

CODE OF CONDUCT FOR GRUPA KĘTY S.A. CAPITAL GROUP

SUPPLIERS

WE ARE AWARE THAT OUR OPERATIONS SHOULD BE SUBJECT TO AN ONGOING PROCESS OF DEVELOPMENT AND IMPROVEMENT. WE ARE THERFORE OPEN TO THE EXCHANGE OF EXPERIENCES AND THE INSPIRATION OF THE GOOD PRACTICES IN THE BUSINESS ENVIRONMENT AROUND US. AT THE SAME TIME, WE STRIVE TO SET AN EXAMPLE TO OTHER PLAYERS ON THE MARKET THROUGH OUR CONDUCT AND MANAGEMENT METHODS

From the Grupa Kety S.A. Capital Group's Code of Ethics





The Code of Conduct for GRUPA KETY S.A. Capital Group Suppliers was written while the Grupa Kety S.A. Capital Group* was formulating its CSR policy, including its sustainable approach to the supply chain.

The code of conduct sets out the most important points for the group's suppliers** and covers running an ethical and honest business, providing safe and healthy working conditions, respecting human rights and responsibility both for product quality and the natural environment.

^{*}Grupa Kęty S.A. Capital Group: Grupa Kęty S.A. and all its subsidiaries.

^{**} Supplier: any entity engaged in a business relationship with the Grupa Kety S.A. Capital Group.







— OUR MISSION —

For the future...

"(...) to ensure employee development, the efficient use of natural resources, safety, environmental protection and long-term economic value"

- VISION -

"A world-class company in its fields of operation"

- VALUES

Our values are our moral standards, ethics and corporate culture, the innovativeness of our solutions and our social responsibility, all of which reflect the way **Grupa Kęty S.A. Capital Group** functions.

INTRODUCTION

Grupa Kety S.A. Capital Group operates in accordance with the highest of ethical standards, following a system of values it has developed on the basis of **professionalism**, **ethics and mutual respect**.

As to its suppliers, no matter what their country of origin, Grupa Kety expects them to apply the cohesive principles of conduct which have been accepted by the Group and are set out in this document.



OUR OBLIGATIONS TO OUR SUPPLIERS

_ Grupa Kęty S.A. Capital Group constantly strives to attain the highest possible standards for running a business and unceasingly demands of itself the implementation of the best solutions. This is also expected of us by regulators, shareholders, our clients and our employees. We want to build a culture of shared responsibility in business practices, covering occupational health and safety, human rights, business ethics, concern for employees and the local community and care for the environment at every stage of our operations. The same applies to our supply chain and our relationship with our suppliers.

_ This is the reason that our purchasing processes include our principles for responsible business and sustainable development. It is also why the Code of Conduct for GRUPA KETY S.A. Capital Group Suppliers is an integral part of our working relationship with our suppliers, including the process for their qualification and assessment. We believe that this approach benefits not only them and us alike, but also our social and business environment. We also believe that applying the standards set out in this code will intensify our collaboration and partnership with our suppliers and reinforce the growth of their businesses and our own.





WHAT WE EXPECT OF OUR SUPPLIERS

_ We want to work with suppliers who understand and share our approach to responsible business and sustainable growth and who strive to improve and develop their best practices in the spheres where we set ourselves ambitious goals. Those spheres are crucial to us and they are set out here and on the following pages.

CONCERN FOR EMPLOYEES' HEALTH AND SAFETY IN THE WORKPLACE

_ One of the Grupa Kety Capital Group's ambitions is to work its way towards zero incidences of serious and fatal accidents and to create a safe working environment.

WHAT WE REQUIRE OF OUR SUPPLIERS

- 1. The supplier complies with the occupational health and safety laws applicable to the country in which it operates.
- 2. The supplier provides safe, healthy working conditions by implementing procedures, certified OHS management systems and/or its own safety programmes, best practices and solutions which aim for the complete elimination of work-generated accidents, injuries and diseases among employees.
- 3. The supplier is committed to setting safety goals intended to minimise hazards. It monitors, analyses and documents the achievement of those goals and of its activities aimed at the continual improvement of safety in the workplace.

COMPLIANCE WITH HUMAN RIGHTS

_ For the Grupa Kety Capital Group, compliance with the human rights set out in documents such as the European Convention on Human Rights is a fundamental and binding principle.

WHAT WE REQUIRE OF OUR SUPPLIERS

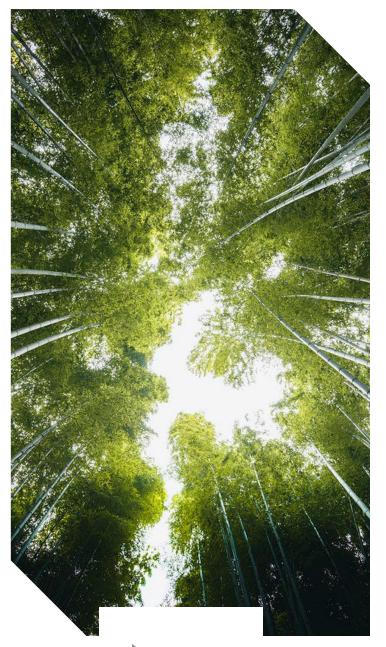
- 1. The supplier ensures that human rights are respected in its operations.
- 2. The supplier ensures that there is equal treatment in the workplace and that its operations involve no discrimination whatsoever against employees or other stakeholders in terms of age, sex, disability, race, religious belief or any other criterion.
- 3. The supplier complies with the employment laws applicable in its country of origin and in the country or countries in which it operates.



CREATING
A SAFE
WORK
ENVIRONMENT

THE ONGOING IMPROVEMENT OF OUR ENVIRONMENTAL IMPACT MANAGEMENT AND CLIMATE CHANGE MITIGATION.

_ At Grupa Kęty S.A. Capital Group, we take full responsibility for the impact our activities have on the environment and climate change.



WHAT WE REQUIRE OF OUR SUPPLIERS

- 1. The supplier complies with the law in terms of the environmental impact of its operations.
- 2. The supplier evaluates its operations for risks of negative environmental impact and makes every effort to avoid those risks.
- 3. The supplier is committed to setting goals for reducing the negative impact its operations have on the environment and climate change.
- 4. The supplier makes every effort to ensure the environmentally responsible sourcing of raw materials and/or to include environmental criteria in its purchasing decisions.
- 5. The supplier makes every effort to reduce its consumption of raw materials and natural resources, including water, and to manage them rationally.
- 6. The supplier makes every effort to minimise the greenhouse gas emissions, including carbon dioxide, which are the direct and indirect result of the supplier's operations. The reduction in emissions aimed for should be appropriate to the scale and nature of the supplier's business.
- 7. The supplier complies with the laws on waste management, makes every effort to minimise the waste it generates in respect of its operations and to ensure the proper management of the waste it generates. This includes working together with the authorised recipients of that waste in order to minimise the risk of having a negative impact on the environment



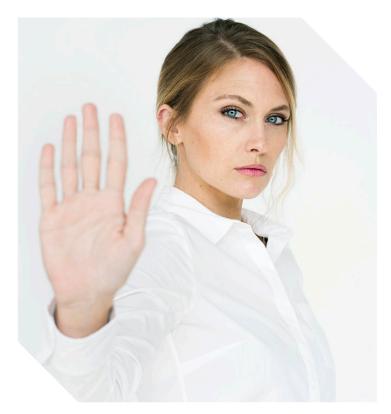


COMBATING CORRUPTION

_ Via the provisions of our Anti-Corruption Policy, we categorically oppose any and all activities bearing the hallmarks of corruption and actively work to prevent it from occurring.

WHAT WE REQUIRE OF OUR SUPPLIERS

- 1. The supplier combats any and all forms of corruption in its operations and implements preventative practices.
- 2. Should any form of corruption whatsoever be identified, the supplier undertakes firm measures to remedy the situation and prevent any further incidents of the kind.
- 3. The supplier has internal regulations in place as regards the giving and receiving of gifts.



FINAL PROVISIONS

_ The Code of Conduct is addressed to all Grupa Kęty S.A. Capital Group's suppliers, which are obliged to comply with its principles. Confirmation of familiarity and compliance with the Code of Conduct is a requirement for collaboration with GRUPA KĘTY S.A. Capital Group.

If the matters addressed in this Code are subject to more restrictive laws or internal regulations in a country where the supplier operates, then we expect the supplier to comply with the more restrictive provisions. Although this Code of Conduct for Suppliers applies primarily to our direct suppliers, Grupa Kęty S.A. Capital Group encourages those suppliers to draw up their own principles and promote them along their own supply chains.

_ Grupa Kety S.A. Capital Group undertakes to support its suppliers in building awareness of best responsible business practices and promoting them and in developing their operations in accordance with the standards for responsible business and sustainable development.

_ This Code of Conduct for Suppliers must be interpreted without detriment to other, additional requirements established by contract or law and affecting business relationships between Grupa Kęty S.A. Capital Group and its suppliers.

_ Grupa Kęty S.A. Capital Group reserves the right to verify that its direct suppliers are complying with this Code of Conduct. The verification can be carried out in various ways, such as self-assessment surveys or audits conducted at the supplier's facilities. An audit of this kind will be announced and agreed upon by Grupa Kęty S.A. Capital Group and the supplier in advance.

_ The Code of Conduct for Suppliers applies both in Poland and abroad and takes into account the cultural, linguistic, social and economic differences in particular countries where Grupa Kęty S.A. Capital Group operates.

Every occurrence of irregularity or breaches of the Code should be reported to the Business Ethics Ombudsman supervising the application of ethical principles at Grupa Kęty S.A. Capital Group. All reports of this kind should be sent by e-mail to etyka@grupakety.com.

www.grupakety.com







