

## **CODE OF ETHICS OF SCHILSNER INDUSTRY GROUP SP. Z O.O.**

### **I. GENERAL OPERATING FRAMEWORK**

Schilsner complies with all applicable standards of common law and generally accepted ethical principles in the Republic of Poland, as well as international human rights, including conventions on fundamental human rights. We recognize and strive to fully implement the 10 principles of the UN Global Compact.

### **II. WORKING AND EMPLOYMENT CONDITIONS**

We do not apply forced, slave or prison labour or unpaid labour in any form. The work is voluntary, that is, the employee can decide at any time to terminate the employment relationship on lawful basis. As an employer, we apply fair terms and conditions of employment, and do not obligate employees to pay employment-related expenses. We do not require employees to bring any deposits and we do not retain or keep their documents. We also do not require information from employees other than that which is necessary for employment and required by law. We place particular emphasis on adherence to the principle of equal opportunity, particularly with regard to pay, access to training, promotion, termination or retirement. At Schilsner, we respect employees' right to rest. Employees are entitled to additional pay or time off for overtime work, in accordance with applicable national laws. We follow transparent hiring policies, and all contracts with employees are confirmed in writing. We follow transparent and easy-to-understand internal procedures that define the rules of our company, the protection of employees' rights and employment conditions.

### **III. FAIR PAYMENT**

Employees receive remuneration appropriate to their position, competence and experience. Schilsner does not offer payment below the minimum set by separate acts. Remuneration shall be paid in accordance with the provisions of the contract and generally applicable laws, regularly on time and at least once a month.

Schilsner uses transparent remuneration policies, known to the employee before the contract is signed. The Employee always has the opportunity to receive information about the remuneration received in a given month and its individual components.

### **IV. SAFE WORKING CONDITIONS**

We take care of safe, clean and comfortable working conditions. The health of employees is a priority for us. Schilsner complies with relevant national and international legal norms setting standards and obligations to ensure safe and hygienic working conditions for employees. Schilsner also has appropriate internal procedures in place and employs qualified professionals responsible for their compliance and implementation.

We inform employees and people on our premises, in a clear and easy-to-understand manner, about the requirements of the law, internal regulations related to safety and hygiene, as well as related responsibilities. We allow employees to report any irregularities or other requests related to improving their safety and comfort at work.

We organize work in such a way as to prevent accidents at work or other injuries and harm, and provide medical assistance if necessary. To this end, we organize occupational health and safety trainings for employees and managers.

If employees must be provided with work clothes, Schilsner provides them without charging the employee any additional costs.

Schilsner keeps the premises clean, and provides adequate lighting, heating and ventilation. Employees have access to free drinking water, and are provided with a comfortable place to eat and rest.

Schilsner does not tolerate working under the influence of alcohol or other intoxicants or bringing them onto the premises.

#### **V. CHILD LABOUR AND NON-DISCRIMINATION**

We do not employ children. Adolescent employees, of legal working age, do not perform hazardous work and do not work at night. Adolescent employees do not perform work that may harm their proper development. We comply with national legislation related to the employment of juveniles.

The terms and conditions of an employee's employment and promotion depend primarily on his or her personal abilities and potential, not beliefs. We are against any discrimination in terms of, *inter alia*, employment, promotion, access to training, assignment of duties, remuneration, in particular on the grounds of gender, age, disability, race, religion, nationality, political opinion, union membership, ethnic origin, religion, sexual orientation or form of employment. We care about physical and mental health of our employees, so we do not tolerate any form of physical or mental violence, harassment or intimidation.

We provide our employees with safe and friendly working atmosphere.

We enable employees to report any irregularities. For any suspected or reported difficult or abnormal situations, we strive to clarify and resolve them as quickly as possible.

#### **VI. HONESTY AND RESPECT**

Internal relations are based on mutual respect and trust. In dealing with suppliers and customers, employees are honest, open and professional. Information provided to Customers is comprehensive, clear and truthful, and is intended to provide comprehensive data about Schilsner offerings and products. Suppliers work with Schilsner on a transparent and legitimate basis.

#### **VII. CORRUPTION**

Schilsner objects to all corrupt activities. Employee, in connection with his or her work, is prohibited from offering, giving or promising goods that constitute a pecuniary or non-pecuniary benefit in the form of, for example, presents or gifts of great value, as well as from accepting such goods. Other manifestations of unfair business practices are also prohibited. This includes, in particular, falsifying documents or providing false information.

#### **VIII. FAIR COMPETITION**

We base our activities on the principles of fair competition and respect for good conduct, as well as the legitimate interests of consumers. We support and work for free and unrestricted access to the market. We do not accept or enter into arrangements that could restrict free trade or limit competition. We do not provide false or misleading statements. We apply fair advertising. Employees are obliged to comply with national and international standards for the protection of competition, in particular the Act on Combating Unfair Competition of 16 April 1993.

## **IX. CONFLICT OF INTEREST**

Schilsner ensures that employees are objective and impartial when performing their work. Employees are required to avoid any situation in which even potentially personal interests, family and other types of relationships could conflict with the interests of Schilsner.

## **X. CONFIDENTIAL INFORMATION AND DATA PROTECTION**

Employees are required to keep confidential any information about Schilsner business activity obtained in connection with their employment with Schilsner, the disclosure of which could expose Schilsner even potentially to harm. The ban also applies to information about the activities of Schilsner contractors and customers.

Schilsner takes special care to protect personal data. We collect personal data, and process it in compliance with all applicable laws, including the General Data Protection Regulation (GDPR). Employees must not share or transfer any data and information to unauthorized persons and are required to take all necessary and lawful measures to protect personal data. Furthermore, employees follow internal policies and procedures on how personal data is collected and used to ensure its security.

## **XI. ENVIRONMENTAL PROTECTION**

In its operations, Schilsner endeavours to minimise its negative impact on the environment. In particular, we comply with national and international environmental laws and regulations, and identify and prevent emerging environmental risks, such as by keeping technical infrastructure in proper condition and minimizing waste. We also place special emphasis on the continuous improvement of ourselves and our employees in this area.

Employees are required to comply with all legal norms and Schilsner policies. Employees are also encouraged to engage in open dialogue with management to develop new environmental activities at Schilsner.

## **XII. INTRODUCTION AND APPLICATION OF THE CODE**

This Code is made available on the Schilsner website and is generally available to any employee in both paper and electronic form. Each employee will be notified of the possibility and method of obtaining a copy of the Code. In addition, the contents of the Code will be made available in a publicly accessible place on the Schilsner premises.

Compliance with the Code will be overseen by an ethics officer at Schilsner. This function is performed by the HR Manager in each case. Employees should report any violations of this Code and concerns about correct behaviour in a given situation. This can be done in the form of an email sent to [etyka@schilsner.pl](mailto:etyka@schilsner.pl), by placing the letter in the dedicated box located by the bulletin board at the entrance to the Warehouse, or in the form of a letter sent to Schilsner registered office with the notation "Ethics". Reporting can also be done anonymously. Employee will not suffer any negative consequences as a result of the reporting.

Once a year, we will conduct an audit on the application of the Code and the need for any amendments to the Code.

We retain the unlimited right to amend the provisions of this Code, of which we will inform employees in advance.