

IGLOTEX

Code of Ethical Conduct

Iglotex Capital Group

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CODE OF ETHICAL CONDUCT IGLOTEX SA

We are aware that our activities affect people's lives and the environment both locally and globally. Based on our vision, we feel responsible not only for our products but for each and every employee who takes part in the company's activities. We firmly believe in close cooperation with our business partners, which should include clear responsibility for the environment and society, as well as respect for human rights throughout the supply chain.

Awareness, trust and continuous development are the basis for our cooperation with business partners who share our values and ambitions.

The purpose of the IGLOTEX Code of Conduct is to define general principles and values that we are guided by on a daily basis.

This Code of Conduct applies to all employees of our company and companies cooperating with us.

The adopted requirements shall comply with:

- UN Global Compact programme based on the United Nations Universal Declaration of Human Rights (1948),
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998),
- Rio Declaration on Sustainable Development for the Environment (1992),
- UN Convention against Corruption (2000)
- Paris Agreement on Reducing CO2 emissions into the atmosphere (2016),
- Montreal Protocol on Substances that Deplete the Ozone Layer (1987).

FAIR COMPETITION AND ANTI-CORRUPTION PRINCIPLE

Relations with our business partners are based on the principle of transparency. We do not accept the direct and indirect suggestion, encouragement or acceptance of inappropriate material and personal benefits – whatever the circumstances. Cooperation with counterparties must be based only on balanced business decisions and fair conduct. We

do not accept the following behaviours amongst our staff members:

- accepting material or personal benefits which are illegal or lead to an infringement of the law,
- accepting a material benefit in the form of cash or cash equivalent,
- accepting or requiring anything in return or execution of something under the agreement, as well as in return for a material or personal benefit,
- participation in forms of entertainment that are inappropriate ethically or otherwise violate our commitment to show respect and observe good practices.

Our principle is ZERO TOLERANCE for corruption.

CONFIDENTIALITY OF INFORMATION

Protecting our internal resources (ideas, concepts, processes, procedures, technologies and business information) is important for our competitiveness in the market. Therefore, certain information is owned by the company and is considered confidential, inter alia:

- Documentation and financial and accounting data,
- Customer information,
- Employee data,
- Details of implemented projects,
- Business, organisational and development plans,
- Production technology.

IT resources, as a tool for recording the above data constituting a trade secret, are available to Employees who are obliged to comply with the provisions of the Rules of Confidentiality and to maintain integrity and data in order to properly perform their official duties.

Each and every employee of the Iglotex Capital Group is obliged to protect professional secrets and confidential information on the basis of the confidentiality agreement concluded.

Iglotex Capital Group respects physical property rights, as well as intellectual property rights of other persons and parties.

CONFLICT OF INTERESTS

A conflict of interest exists when the employee's private interests are or appear to be contrary to the interests of the company. Business decisions should be based on the needs of the company, not its employees, their families

and friends, or willingness to grow rich by employees.

Business activity should not be conducted with organisations in which the employee or his/her family has a significant share.

POLITICAL NEUTRALITY

Iglotex Capital Group shall be neutral with respect to political parties and candidates. Company names or assets related to Iglotex Capital Group should not be used to promote or discredit the interests of political parties or candidates.

ENSURING PROPER EMPLOYEE RELATIONS

In the Iglotex Capital Group, we appreciate the contribution of each and every employee to joint work and assume that the well-being of staff members and the Group requires a working atmosphere based on mutual respect. We oblige our employees to take care of a friendly working environment, as well as to prevent mobbing or discrimination. In the work environment of GK Iglotex, there is no place for harassment or bullying - regardless of its form. Violence is understood as exerting verbal or physical influence aimed at intimidating, offending or creating an unfriendly environment. There is no discrimination as regards the recruitment of workers, remunerations, access to trainings, promotion, dismissal from work and retirement on grounds of race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political convictions.

In no circumstances shall recourse to corporal punishment, violence, threats or any and all other forms of intimidation be permitted.

SAFE WORKING ENVIRONMENT

Safety and health protection of employees is for the Capital Group of IGLOTEX an overriding value. This is a priority commitment to create, maintain and improve safe and hygienic working conditions for each staff member employed. The Capital Group continually aims to improve the level of safety and health protection of employees, in accordance with the applicable provisions and standards of law, achieved by:

- improvement of the hazard identification process and occupational risk management,
- actions aimed at reducing as much as possible the risk of accidents at work and occupational diseases,
- implementation of technical and organisational solutions improving work ergonomics,
- building employees' awareness through the training system,
- enforcement of compliance by employees of OHS regulations and principles,
- use of high quality personal protective equipment,
- observance of the law on transport, storage and use of chemicals,
- development and improvement of internal safety procedures and instructions.

PROHIBITION OF CHILDREN'S WORK

Our company does not employ children. The term 'child' means a person who is under the age of 15 or older if the locally applicable minimum age of employment is higher. Minors, that is, those who are under 18 years of age, cannot carry out work that may be dangerous. Juvenile workers cannot be employed at night. Juvenile workers shall be provided with special protection in accordance with the requirements of the applicable law.

NO FORCED LABOUR – VOLUNTARY EMPLOYMENT

IGLOTEX Capital Group does not use forced labour, including

semi-slave, slave labour or labour related to human trafficking. IGLOTEX Capital Group allows employees to leave the premises upon completion of the shift and does not retain their identity cards or does not require deposits.

WORKING HOURS AND REMUNERATION

The Company undertakes to comply with working time consistent with the requirements of national law. Maximum number of working hours per week is specified by national law but in general it should not exceed 48 hours. Any overtime work performed by employees to the company will be voluntary, used in a reliable manner and taking into account any and all aspects related to the frequency, scope and time of individual work of all employees.

Each and every staff member shall have the right to a full day of rest after 6 consecutive working days.

At least the legally required minimum salary should be paid to employees and all staff members will receive additional remuneration for overtime work in accordance with the provisions in force. The right to remuneration for overtime also applies to piecework.

Remuneration shall be paid regularly and in a timely manner to all employees. All employees will be presented in writing with clear and comprehensible terms of employment and remuneration before starting employment.

RIGHT TO ASSOCIATE AND CONDUCT COLLECTIVE NEGOTIATIONS

The IGLOTEX Capital Group recognises freedom of association and organising by employees and conducting collective or individual negotiations by staff members in accordance with legal provisions and regulations. To this end, IGLOTEX Capital Group shall engage in a dialogue with employees' representatives. Staff members shall have the right of association at their own discretion to support or protect the interests of employees or to join such an association. IGLOTEX Capital Group does not accept any discrimination and any disciplinary measures against employed persons who peacefully

and lawfully exercise the right of association and negotiation.

LEGALITY OF EMPLOYMENT

The company employs staff members legally. Any work performed must be carried out in accordance with the principles of a recognised employment relationship provided for by law and market practice.

ENVIRONMENTAL PROTECTION

In the interests of the environment, Iglotex Capital Group seeks to minimise the environmental impact of economic activities. We pay attention to building awareness of the company's activities related to its environmental aspects and introduce activities aimed at detecting, monitoring and minimising factors harmful to the environment, including:

AIR PROTECTION

- we focus on greener transport and run a passenger fleet with LPG installation,
- we modernise the fleet by choosing vehicles with lower fuel combustion standards EURO 5 and EURO 6,
- we use low-emission energy fuels for heating purposes in our own buildings,
- we carry out activities that minimise the risk of leakage of refrigerants from our cold stores,
- we plan to replace refrigerants with mixtures with a lower GWP (Global Warming Potential) as an ecological alternative,
- we apply energy-efficient solutions to technical infrastructure, including warehouses, offices, parking areas, etc.,

WASTE

- we reduce the quantities of waste generated in our company,
- we segregate the resulting waste,

- secondary raw materials are sent for recycling and recovery,
- we pay particular attention to the management of hazardous waste by transferring it to specialised companies for disposal,
- we implement any and all legislation on the rational management of waste in the structures of the activities and we emphasise compliance with waste production standards.

PROTECTION OF SOIL AND WATER

- we minimise the risk of leakage of chemical substances from our installations,
- we use crude oil-derived substance separators, which reduces the release of petroleum substances from car parks to groundwater,
- we conduct a rational raw material management based on respect for the value of natural raw materials, including water,
- the value of the built-up area is strictly controlled in order to ensure that the area of biologically active land around our buildings is as large as possible.

ACTIONS FOR LOCAL COMMUNITIES

The company's market success depends to a large extent on the society from which its customers come but also on suppliers and potential employees. We really contribute to the development of the market in which we operate. We subsidise non-governmental organisations and regional institutions working for education, sport, social welfare, culture and environmental protection. We lend our logo for good-cause initiatives promoting volunteering and developing local communities.

ENSURING COMPLIANCE OF THE PROCEDURE

The principles and examples presented in the Iglotex Code of Ethical Conduct of the Capital Group reflect the standards and values that we are guided by. In keeping with ethical principles, we do not forget the law. It should be remembered that it does not replace more detailed procedures, instructions and rules of procedure of the company.

If any doubts arise as to compliance with the Code of Ethical Procedure, you can always report to:

Representative for the Code of Ethical Conduct and Human Rights

Ms Maryla Noste-Jeglińska

Mail: m.noste@iglotex.com.pl

Tel. 609880297

or send information using **communication boxes available on the premises of Iglotex Capital Group plants.**

On behalf of Iglotex Capital Group

Skórcz, 04.05.2021

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Any and all irregularities and violations against the adopted ethical principles discussed in this document may be reported anonymously via the contact form at www.iglotex.com.pl.