

Code of Ethical Conduct of IGLOTEX Group Companies

IGLOTEX S.A.

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CODE OF ETHICAL CONDUCT of IGLOTEX Group Companies

IGLOTEX Group companies, as economic participants, are aware that their activities have an impact - in various spheres - on human life and the environment, both locally and globally. In pursuing their vision of sustainable development, they feel responsible not only for the products they manufacture, but for every employee and business partner involved in the Companies' operations.

As part of close cooperation with business partners, the Companies will strive to ensure that this cooperation also includes environmental and social responsibility, throughout the production and supply chain. Therefore, special attention is paid to food quality and safety, consumer health and facilitating good food choices, and an openness to social dialogue is declared.

The purpose of this Code of Ethical Conduct of IGLOTEX Group Companies is to identify and promote the principles and values that guide the daily activities of the Companies.

This Code of Conduct applies to all employees and business partners of the Companies, with whom they are connected by long-term cooperation, as well as by single business projects.

The principles adopted were formulated based on, among other things:

- UN Universal Declaration of Human Rights (1948),
- UN Global Compact (2000),
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998),
- Earth Charter i.e. Rio de Janeiro Declaration on Environment and Development (1992),
- Montreal Protocol on Substances that Deplete the Ozone Layer (1987).

FAIR COMPETITION PRINCIPLE

IGLOTEX Group companies make every effort to build relationships with employees and business partners based on the principle of transparency.

It is not acceptable to directly or indirectly offer any material or personal benefit, to solicit or accept it. Cooperation with business partners must be based solely on balanced business decisions and loyal conduct.

It is the principle of the IGLOTEX Group Companies to have ZERO TOLERANCE for corruption.

CONFIDENTIALITY OF INFORMATION

The activities of the IGLOTEX Group Companies also involve the use of property rights to intangible assets (including ideas, concepts, processes, procedures, technologies, and business information), which are confidential in nature because they determine the Companies' competitiveness in the market. For this reason, IGLOTEX Group Companies protect intangible assets that are owned by the Companies and have adopted internal regulations in the form of bylaws and relevant contractual provisions that safeguard their interests in this regard.

IGLOTEX Group companies also respect the property rights to intangible assets held by others, including business partners and their employees, fulfilling the obligations they have assumed to protect them.

AVOIDING CONFLICT OF INTERESTS

IGLOTEX Group companies exercise the utmost care in their operations to ensure that their business decisions conform to market principles, including minimising the potential for conflicts of interest.

To this end, IGLOTEX Group companies strictly adhere to the standards of law, particularly civil and commercial law, which prevent the emergence of conflicts of interest on any level. The mutual powers of the bodies of the Companies were formed in such a way as to eliminate, to the fullest extent possible, the sources of potential conflicts of interest, and the market principles were realistically applied.

COMMUNITY SERVICE

IGLOTEX Group companies participate in social life by supporting foundations and associations, especially those with the status of public benefit organisations. However, they avoid getting involved in political activities on any side of the political scene, including not supporting such initiatives by committing their resources, remaining neutral.

COUNTERPARTY RELATIONS

The expectations that IGLOTEX Group companies set for themselves are also translated to business partners. Issues of arm's length conduct and sustainability are part of the supplier selection process, which are governed by the Companies' internal policies, including the adopted Animal Welfare Policy and Sustainable Purchasing Policy of particular importance. Given the close cooperation with business partners, which also includes responsibility for the environment and social life, as well as respect for Human Rights, business relationships are formed in a sustainable manner, guided by good practices, including adherence to the principles of honesty and merchant loyalty.

ENSURING PROPER PERSONNEL RELATIONS

IGLOTEX Group companies value the role and contribution of each business partner and employee in working together, hence the assumption that the common good requires an appropriate working atmosphere and cooperation based on mutual respect, so respect for the dignity and other personal property of employees and business partners is emphasised. In carrying out the above principle, the Companies obligate all parties, in particular their employees, to foster a friendly working atmosphere, partnership relations with contractors, as well as to counteract mobbing and discrimination, in accordance with applicable regulations.

SAFE WORKING ENVIRONMENT

Occupational health and safety, as well as the protection of the health and life of employees, is a paramount value for the IGLOTEX Group Companies. This priority commitment obliges the creation, maintenance and improvement of safe and hygienic working conditions and their provision to every employee. IGLOTEX Group companies, though, among other things, responsible occupational risk management, training that builds employee awareness, and planning and incurring appropriate financial expenditures, continually strive to improve the level of health and safety of working conditions and protect the health and lives of employees in accordance with applicable legal standards. In the current activities, special attention is paid to taking measures to reduce the possibility of

accidents at work and occupational diseases as much as possible, technical and organisational solutions are implemented to improve ergonomics at work, employees' compliance with OSH regulations and rules is enforced, certified personal protective equipment is used, standards for transport, storage and use of chemical substances are observed, and internal safety procedures and instructions are created and improved.

EMPLOYMENT OF MINORS

IGLOTEX Group companies, adhere to all rules and standards regarding the employment of minors. Such persons are not allowed to perform work that may be dangerous, and they are not allowed to work at night. Young workers are provided with the care and assistance necessary to adapt them to the proper performance of their work.

VOLUNTARY EMPLOYMENT

IGLOTEX Group companies respect the right of each employee to perform the work of his or her choice freely, and that any restrictions on this right can only result from mandatory legal norms.

WORKING HOURS AND REMUNERATION

IGLOTEX Group companies comply with regulations on working time, rest periods, as well as overtime rules.

Employees working at IGLOTEX Group Companies have the right to fair remuneration for their work, and this right is realised by creating a balanced remuneration system based on objective criteria. IGLOTEX Group companies meet the livelihood, social and cultural needs of employees according to their capabilities and conditions.

ASSOCIATION AND COLLECTIVE BARGAINING

IGLOTEX Group companies actively participate in social dialogue between employer and employee representatives. In order to represent and defend their rights and interests, employees, as well as employers, have the right to form and join organisations.

Employees participate in the management of the workplace through their representations formed in accordance with labour laws.

LEGALITY OF EMPLOYMENT

IGLOTEX Group companies hire employees in accordance with the rules of law. All successful job candidates are presented - in writing - with clear and understandable terms

of employment and compensation for their work.

IGLOTEX Group companies do not engage in unfair or coercive recruitment practices aimed at abusing the rights of the employer at the expense of the employee.

ENVIRONMENTAL PROTECTION

Out of concern for the environment, IGLOTEX Group companies strive to minimise the negative impact of their business activities on the environment. Special attention is paid to building awareness of the Companies' activities related to environmental aspects, and measures are being introduced to detect, monitor, and minimise factors harmful to the environment in terms of air protection, waste generation, and soil and water conservation, among others.

AIR PROTECTION

- counting the carbon footprint and building a decarbonization strategy at IGLOTEX Group Companies is being successively implemented,
- more environmentally friendly transportation solutions are preferred,
- the fleet is being upgraded with vehicles with lower fuel-burning standards,
- low-emission energy fuels for heating purposes in our own buildings are increasingly used,
- activities to minimise the risk of leakage of refrigerants from our cold stores are being implemented,
- plans to replace refrigerants with lower GWP (Global Warming Potential) mixtures that are environmentally friendly alternatives are being developed,
- energy-efficient solutions to technical infrastructure, including warehouses, offices, parking areas, etc. are being implemented,

WASTE

- waste generated at the Companies is being reduced,
- an effective system of segregation of generated waste has been implemented,
- appropriate materials are sent for recycling and recovery,
- particular attention is being paid to the management of hazardous waste by transferring it to specialised companies for disposal,
- any and all legislation on the rational management of waste in the structures of the activities is being implemented and emphasis is put on compliance with waste generation standards.

PROTECTION OF SOIL AND WATER

- risk of leakage of chemical substances from used installations is being minimised,
- oil separators are used to reduce the entry of oil substances into groundwater,
- rational management of raw materials based on the elimination of unnecessary use of natural resources, among others, water, is carried out,
- area of biologically active areas located near the companies' facilities is increased.

ACTIONS FOR LOCAL COMMUNITIES

IGLOTEX Group companies are aware that market success is largely dependent on the local communities from which customers, but also suppliers and potential employees, originate. The positive reception by local communities of the Companies contributes to a positive corporate image. Hence, the Companies make a real contribution to the development of the market in which their business is conducted. Funding is provided to non-governmental organisations and regional institutions working in the fields of education, sports, social welfare, culture and environmental protection. The Companies' patronage is extended to worthy initiatives that promote volunteerism and activities for the development of local communities.

ENSURING COMPLIANCE OF PROCEDURE

The principles outlined in the Code of Ethical Conduct of IGLOTEX Group Companies reflect the standards and values that guide the Companies in their operations, but in no way replace legal regulations, including intra-company regulations.

In order to properly implement and ensure compliance with the provisions of this Code, an Ethics Team was established, which includes designated representatives of management bodies and employees.

REPORTING VIOLATIONS OF THE CODE OF ETHICS

In situations that raise any doubts about how to behave appropriately in connection with the provisions of the Code of Ethics, please contact: mailbox or directly to the Chair of the ethics team, i.e. Hanna Kotlewska.

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