

### Code of Business Conduct of AMK Group Rękawek, Kondraciuk Sp. J.

## (ETI Base Code, Protection of Human Rights)

Wola Ducka 2019

#### Code of Business Conduct of AMK Group Rekawek, Kondraciuk Sp. J.

The basis for the operation of AMK Group Rękawek, Kondraciuk Sp, J. (AMK Group) in the field of business conduct is to conduct business in an ethical and lawful manner in all aspects of business. It is the policy of AMK Group that every employee of the company acts in accordance with the law and the Code of Business Conduct of AMK Group.

The rules of conduct in business are passed on to employees through training and internal communication.

#### 1. Principles of ethics and respect for the law

AMK Group is committed to strict adherence to high standards of ethical conduct, in full compliance with applicable national and international laws. These include, inter alia, regulations in the field of labor law and policy, human rights, environmental protection, counteracting unfair competition, management rules and protection of copyright and other forms of intellectual property.

Company employees have a duty to respect and support the company's values, adhering to the principles of teamwork and individual responsibility.

The company will provide employees with a fair salary and safe and healthy working conditions.

In meeting the relevant requirements for a given job, no employee of the company should suffer discrimination on the basis of race, religion, color, nationality, origin, age, religion, sex, sexual orientation, disability, membership or non-membership of a trade union.

#### 2. Environment

The company's production activity will be carried out with respect and care for the natural environment, minimizing the negative impact on it through proper waste management, reducing exhaust emissions and energy consumption.

#### **3.** Human rights

The company develops an organizational culture based on respect for human rights. The Company's human rights policy is based on generally applicable laws, international standards and norms, including, m.in, the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The company, guided by the principles of ethics and respect for the law and regulations in the field of human rights, labor law and employee rights, at the same time expects ethical conduct on the part of employees. The company recognizes the fact that counteracting discrimination in the area of its business is its fundamental duty.

The Company does not and will not use child labor and forced labor.

#### 4. Corrupt practices and conflicts of interest. Competition

AMK Group strongly opposes any corrupt practices. Employees of the company must avoid actions that lead to conflicts of interest.

The company competes with the competition in a fair and ethical manner, assuming success in competition based on a competitive offer and the highest quality services.

#### 5. Third-party providers

AMK Group strives to work with subcontractors or suppliers who comply with applicable human rights and environmental practices and laws. All suppliers have the right to fair treatment and equal opportunities in establishing cooperation. According to the company's policy, all suppliers are paid on time, in accordance with the terms of the contracts concluded.

#### 6. Liabilities to employees

In relations with employees, the company acts in accordance with the requirements of national regulations, and the obligations of the Employer towards employees under labor law and social security regulations will be respected. All employees have equal opportunities for promotion, taking into account only performance and competence.

The company attaches the utmost importance to ensuring and promoting occupational health and safety. Employees can expect the company to give due attention to constructive suggestions, as well as concerns and complaints. Possible problems will be investigated and solved in an impartial manner.

#### 7. Obligations of employees

Workers must avoid situations which may be inappropriate from the point of view of professional ethics. Employees may not use confidential information or other information obtained in the workplace for their own benefit, or disclose it to third parties, during the period of employment, as well as after its termination. The term inside information refers to all information in the technical, commercial and administrative activities of the company, the disclosure of which could expose the company to losses.

#### 8. Implementation and application of the Code of Business Conduct

The Code of Business Conduct of AMK Group Rękawek, Kondraciuk Sp. J. has been adopted and issued by the Owners of AMK Group. Coordination of activities related to the Code is the competence of the Commissioner for Corporate Social Responsibility Management, who provides guidance to the company's employees on issues related to the implementation and application of the Code.

All employees should be informed about the validity of the Code and familiarize themselves with its content. Each employee is responsible for the application of the Code in his or her area of activity.

In all matters not covered by the Code of Business Conduct, AMK Group Rekawek, Kondraciuk Sp. J. is guided by the ETI (Ethical Trade Initiatives Base Code). The content of the ETI Basic Code has been annexed to the Code of Business Conduct and is fully respected.

#### **Ethical Trade Initiatives Base Code (ETI)**

#### 1. Voluntary employment

- 1.1. No slave labour or forced labour, including forced prison labor, shall be used.
- **1.2.** Employees are not required to make "deposits" or deposit identity documents with the employer; Employees have the right to terminate their employment after an appropriate period of notice.

# **2.** Freedom of association and the right to collective bargaining on terms and conditions of employment.

- **2.1.** Workers have the right to form and join any trade unions and to bargain collectively with their employers.
- **2.2.** The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- **2.3.** Workers' representatives shall not be discriminated against and shall be free to exercise representative functions in the workplace.
- 2.4. In cases where freedom of association and the right to collective bargaining are restricted by law, the employer shall not hinder the development of alternative means of independent association and negotiation, but shall facilitate such development.

#### 3. Safe and hygienic working conditions.

- **3.1.** Employees will be provided with a safe and healthy working environment, corresponding to the current state of the art in the industry and taking into account possible risks. Appropriate measures shall be taken to prevent accidents and injuries to health as a result of, in connection with or during work by reducing as far as possible the causes of hazards in the working environment.
- **3.2.** Workers will receive regular documented training in occupational health and safety; Such training will be carried out again for new and transferred employees.
- **3.3.** Access to clean toilets and drinking water and, where necessary, hygienic food storage facilities will be provided.
- **3.4.** The accommodation, if provided, shall be clean and safe and meet the basic needs of the workers.
- **3.5.** A company adhering to the Code will make a senior management representative responsible for occupational health and safety.

#### 4. The company will not use child labor.

- 4.1. There will be no new recruitment of children.
- **4.2.** Companies will develop guidelines and programs to ensure that each identified working child is transferred to an appropriate school and allows them to continue their education until they cease to be a child, or participate in such programs and contribute to their development.
- **4.3.** Children and young people under the age of 18 will not be employed to work at night or in hazardous conditions.
- 4.4. These guidelines and procedures shall be consistent with the provisions of the relevant International Labor Organisation standards.

#### 5. A Living Wage

- **5.1.** Wages and benefits for the standard working week shall at least comply with the requirements of national laundered standards or comparative industry standards, whichever is higher. Regardless, the wage should always be sufficient to meet basic needs and provide some surplus.
- 5.2. All employees shall be communicated, in writing and in an intelligible form, their terms and conditions of employment regarding pay before the commencement of employment and, with regard to details of pay for the period in question, at each paycheck.
- **5.3.** Deductions from payment as a disciplinary measure will not be permitted; Nor shall any deductions from wages not provided for by national law be permitted without the express consent of the worker concerned. Any disciplinary measures should be documented.

#### 6. Prohibition of excessive working time

- 6.1. Working hours must comply with national laws, collective agreements and the following provisions 6.2 to 6.6, whichever is the better protection for workers. Sections 6.2 to 6.6 are based on international labour standards.
- 6.2. Working time, excluding overtime, must be contractually agreed upon and must not exceed 48 hours per week.\*
- 6.3. All overtime is voluntary. Overtime will be used responsibly and taking into account all of the following issues: the scope, frequency and hours of work of individual employees and all employees together. Overtime will not be used to replace the normal employment relationship. Overtime will always be subject to a higher rate of pay and it is recommended that it should not be less than 125% of the normal rate.
- 6.4. The total number of hours worked in any seven-day period may not exceed 60 hours, except as set out in paragraph 6.5 below.
- 6.5. The working time may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following conditions are met:
  - national law so permits,
  - this is permitted by a collective agreement voluntarily negotiated with a workers' organisation representing a significant proportion of the workforce,
  - appropriate safeguards are taken to protect the health and safety of workers, and,
  - The employer is able to demonstrate that there are exceptional circumstances, such as unexpected increases in production, accidents or emergencies.
- 6.6. Workers shall be entitled to at least one day off in any seven-day period or, if national law so permits, two days off in any 14-day period.

\*International standards recommend a gradual reduction in normal working hours, as appropriate, to 40 hours per week without reducing workers' wages due to reduced working hours.

#### 7. Prohibition of discrimination

7.1. There shall be no discrimination in recruitment, pay, access to training, promotion, dismissal and pensions on the basis of race, caste, nationality, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political opinions.

#### 8. Regulated employment relationship

- 8.1. As far as possible, any work carried out must be carried out on the basis of a recognised employment relationship as provided for by national law and practice.
- 8.2. The employer shall not evade its obligations to employees under labour law or social legislation related to a regulated employment relationship by using contracts of mandate/specific work, subcontracting contracts or cottage industry, or apprenticeship/training programmes without the real intention of transferring skills or providing permanent employment, or by excessive use of fixed-term contracts.

#### 9. Prohibition of inhumane treatment

**9.1.** Violence and corporal punishment, threats of violence, sexual or other harassment, offensive language or other forms of intimidation are prohibited.

The provisions of this Code set minimum standards, not maximum ones, and the Code should not be used to stop companies from exceeding these standards. Companies applying the Code are expected to act in accordance with applicable national law, other relevant laws, and where the law and this Basic Code deal with the same subject, firms are expected to apply a measure providing better protection.