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## **Pro-Flex S.A. Ethical Code of Conduct**

A responsible business is a management strategy directed at social interests, environmental aspects and safety of employees. Sustainability is a way of thinking and acting which will allow future generations to survive, because we all need suitable work environment and living space.

### **WHAT IS THE CODE AND WHOM IT APPLIES TO:**

Pro-Flex S.A. Ethical Code of Conduct constitutes a collection of principles and values which guide all employees of the company at their daily work. Superiors at all levels of the company structure, acting for the company, take responsibility for adhering to the principles as well as creating a working environment in which they are respected. In our business activities we are guided by high ethical standards, basing our relations with clients, employees and suppliers as well as our surroundings on partnership. We support the development of our employees, and we provide them with safe and decent working conditions. Each employee can be sure we will respect their rights and dignity. Discrimination on grounds of place of origin, gender, convictions, preferences and membership in legally operating organisations is inadmissible. This Code applies to all employees and third parties cooperating with our companies. Ethical conduct entails following both existing social and legal norms and principles outlined in this document.

### **OUR VALUES:**

**Responsibility** - we approach our work with passion, we are not afraid of challenges and responsibility that goes with them. Each stage of our activity is given due attention, as we spend a lot of time looking for the most satisfactory solution and then its execution. We take responsibility for the best final effect of the product and for company's impact on the environment, we are also ready to accept consequences of bad decisions and we are open to change.

**Quality and continual improvement** —ensuring professional services, as supported by years of experience, and the use of modern technologies, as well as qualified team of experts to reach a high-quality final product, by continual improvement of processes and their optimisation for sustainable growth.

**Commitment**—we are ambitious, and we aim at being better still. We aim high and set ambitious targets. We would like our company to be defined by: highest quality of services on offer, product safety, as well as high expertise of our employees.

**Professionalism**—we all aim at continued improvement of standards and quality of our work in order to reach our goals. We have the knowledge and expertise to do our tasks. We are consistent in what we do. We ensure our employees have information they need to carry out their duties. We respect time of our clients, suppliers and co-workers. We only make promises to clients that are consistent with our present capabilities and accepted standards.



We are fully aware of the advantages of our commercial offer, and we understand clients' expectations, which, in turn, allows us to rightly adjust our offer to a particular client. We treat the knowledge we have of competition as an impulse to improve our services. We do not voice negative opinions of the competition in contacts with clients.

We are aware that our actions influence the image of our company on the market.

#### **COOPERATION WITH OUR BUSINESS PARTNERS-- SUPPLIERS AND CLIENTS AS WELL AS OTHER INTERESTED PARTIES**

Our relations with clients are based on honesty, transparency, professionalism and mutual respect. We fulfil our commitments and contracts made with interested parties. In our work, we believe that both parties should be satisfied and should benefit. We build long-lasting relationships with our clients, which are based on trust and clear principles of cooperation. This allows us to provide highest standards of offered products and services. We treat all tasks entrusted to us seriously, trying to discharge our obligations on time and in accordance with agreed conditions. Relevant interesting parties are given reliable access to any necessary information.

We adhere to the letter of the law and commonly accepted standards in our business relations and we expect the same from our suppliers, therefore we qualify them in view of the principles of sustainable development. We value honesty and we take responsibility for our actions. We expect fair and just competition on the market.

We spread patterns of good conduct by giving the requirements outlined in this Code of Ethical Conduct to our business partners and we react to reprehensible behaviour of others. We will always treat our business partners, including clients, fairly, justly, and with respect for human rights.

#### **DATA CONFIDENTIALITY**

Pro-Flex places great emphasis on data security of their in-house and external co-workers, as well as company's secrets by securing them against misuse or use by unauthorized persons. Each employee is under an obligation of confidentiality and to keep professional secrets, which is confirmed by his signature in a relevant document.

Any data or information obtained or produced during the execution of an order is treated as confidential and cannot be made available to third parties under any circumstances, as regulated by relevant instructions.

Personal data of our employees is protected against unauthorized access. It is used only in justified circumstances. When we collect, use and process personal data, we do so in accordance with applicable law, asking employees about it in a declaration of consent to processing personal data.

#### **CONFLICT OF INTERESTS**

Pro-Flex S.A. is convinced that honest and ethical conduct should underline all our actions. We follow the principle of transparency in our business dealings. All persons working for the company are under an obligation to avoid relations and circumstances which might create ethically questionable situations. Any invitations must fit within standard business hospitality. We will oppose all forms of corruption. All persons working for the company are trained in the above principles. None of the employees or



authorized representatives of the company can supply prohibited benefits to contractors, their employees and representatives or other third parties, or demand such benefits or allow themselves to promise or receive them. As we value honest conduct and transparency in action, all ethically dubious situations should be reported in order to avoid any suspicion of unfair practices. Potential social relations between our employee and the employees of our client or competitor shall not influence work conditions or performed work obligations. Accepting forms of hospitality or gifts from our clients is acceptable solely when it is legal and does not seem like an attempt of influencing business decisions.

## **HUMAN RIGHTS**

Human rights are basic and indisputable principles to which every man is entitled. We respect human rights and liberties we are granted regardless of factors such as nationality, race, or gender. We also expect everyone we work with to adhere to the high standards of respecting human rights and protecting employees from discrimination.

As an employer we make sure our actions are conducted according to provisions of the Polish labour law and we adhere to the Convention of Human Rights.

We guarantee our employees a good and safe working environment.

We do not accept the use both in personal policy and everyday work any discriminatory practices based on race, skin colour, age, gender, civil status, religion or disability.

Recruitment processes, career paths, employee evaluation, promotions and remuneration of employees are conducted on the basis of clear principles and criteria, which are put in place to guarantee equal treatment of all employees and candidates for positions.

We observe the prohibition on labour of minors under 16, we regard the use of children as completely unacceptable and deeply unethical since it deprives them of childhood, potential, and dignity. All of our actions adhere to the current Labour Code, we observe the prohibition on forced labour, use of corporal punishment, psychological and physical coercion as well as abuse, including the prohibition of sexual harassment.

## **HEALTH AND SAFETY AT A WORKPLACE**

Health and safety of our employees is our priority. Our company follows the principle of joined care for safety, adhering strictly to OSH regulations and procedures. Official norms and provisions of law on occupational safety and health apply.

We identify hazards at workstations, we define means of monitoring them, in order to prevent potential accidents. European regulations on the safety of employees sets out a hierarchy of measures taken by an employer in order to safeguard employees from dangerous substances. We apply a hierarchy of prevention to handling chemicals and chemical agents. Elimination and replacement are at the top of the control measures hierarchy. We maintain the quality of the physical (lighting, noise, microclimate), chemical (e.g. paints, chemical solvents), and biological (viruses, bacteria) factors both at the workstations and around the workplace. This is accomplished through proper control tools and processes. We continuously increase work conditions quality and identify risks and danger sources.



We ensure that our employees get development courses on any hazards at their workstations as well as requirements adapted to the kind of work they do and any means of personal protection.

Buildings as well as all installations meet the requirements of the provisions of Polish law and undergo regular maintenance, as they have to be kept clean and constitute a healthy working environment. Employees are obliged to report any incident that constitutes a hazard to people, the environment and the hygienic safety of manufactured goods. We safeguard health and safety of the employees, clients, subcontractors, and other guests.

## **EMPLOYEES**

Our policies and HR procedures are documented and in accordance with applicable provisions of law.

Our employees are always engaged on a voluntary basis, and they work in decent and ethical conditions.

The dignity of each employee is respected, and discrimination and harassment are never acceptable. As a company, we follow EU Charter of Fundamental Rights—a set of fundamental human rights and civil obligations.

We ensure equal opportunities to all employees. We appreciate diversity and do our best to promote culture of equality and diversity, always taking into account that people come from different backgrounds and their different experiences are a precious contribution to our company.

### **Work hours:**

Pro-Flex has a three-month accounting period.

Depending on the specifics of work, the following working time schedules are used:

- basic:
  - office and administration personnel have flexible working time, i.e. they start work between 6.00 a.m. and 9.00 a.m., and they finish work after they have worked 8 hours, Monday through Friday
  - warehouse personnel—variable times for starting work , Monday through Friday, 8 hours a day - balanced working time:
  - employees in production process working in a production hall and in a laboratory (shift work: 6.00 a.m.—6:00 p.m. and 6.00 p.m.—6.00 a.m.)
- task-oriented

The Employer places great emphasis on working time norms as outlined in the Code, as well as daily and weekly breaks at work.

### **Overtime:**

In times of specific need, the Employer commissions overtime work, which is voluntary.

Daily overtime is calculated jointly with remuneration for a month when it occurred, while average weekly overtime is calculated with remuneration for the last month of the given accounting period.



Overtime rates are calculated according to the provisions of law, i.e. basic hourly rate plus a bonus i.e. 50% of a basic rate for daily overtime, 100% of the basic rate for average weekly overtime.

**Remuneration:**

Remuneration is payable monthly in arrears, until 10<sup>th</sup> of the following month, and if this should be a public holiday, a day before. Remuneration consists of basic wages, overtime payment, bonus for work at night, discretionary bonus. The Employer also pays remuneration for times when an employee was not at work, according to national law.

If an employee agrees to it, remuneration is paid on employee's bank account. If an employee does not agree to it, it is paid at the Employer's cash desk at Employer's headquarters.

**Penalties (deductions from the remuneration)**

In case of a breach of employee's duties, as listed in provisions of Polish law, the Employer imposes a penalty of a written warning or a reprimand.

According to the provisions of law, after a year of irreproachable work, the document is deleted from employee's files.

The employer does not apply financial penalties.

**Applications and complaints**

Employees can submit both applications and complaints to an Employer, both orally and in writing. A relevant procedure has been introduced.

**NATURAL ENVIRONMENT AND SUSTAINABLE DEVELOPMENT**

Care and responsibility for natural environment have been important to us since the foundation of Pro-Flex S.A. Already at the building stage appropriate elements of building fixtures were selected in view of meeting important ecological standards. In our daily work we have energy-efficient lighting, appropriate waste sorting, rational use of water, electrical energy and heating, as well as raw materials used in production.

According to "Assessment of environmental impact" we place special importance on environmental impact when planning investments and modernizations, implementing solutions minimizing their negative environmental impact. In our line of work our neighbours' expectations are also very important and we aim at conducting business in a way that facilitates harmonious cohabitation with them. Our products are created in accordance with the ideology of sustainable development and taking responsibility for the natural environment. The packages adhering to the principles of the sustainable development reach the increasingly aware recipients, who look for functional and unique packages. Given the above, we have placed particular emphasis on the reduction of noise and volatile organic compounds by the right execution of production processes and dealing with hazardous substances.

Our business is operated in accordance with the provisions of law on the protection of the environment, we have all required permissions, and we cooperate with specialised, qualified suppliers of waste utilisation services.