

THE CODE OF ETHICS OF JOTKEL SP. Z O.O. SP.K.

A. PREAMBLE

In highly competitive market conditions, a company is unable to operate without being favourably perceived by its environment and without complying with ethical standards.

Jotkel Sp. z o.o. Sp.k. recognizes that activities aimed at ensuring high-quality products and services, reliability in relation to contractors, employees of the State Treasury and the environment prove a responsible approach to managing the **Company**, and contribute to its success. In all departments of the **Company**, it is necessary to uphold the basic ethical values and recognize the obligations to all stakeholders in the **Company**. Integrity is a prerequisite for the **Company's** stability and success. The **Company's** greatest values include its reputation and the customers' trust. Acceptance of the Code means the recognition of these values and commitment to regular monitoring of the compliance with the adopted standards.

The Code of Ethics of Jotkel Sp. z o.o. Sp.k. was created on the basis of well-known and generally accepted rules of social coexistence, universal ethical rules and the UN Global Compact rules.

B. Stakeholders:

In its activities, **Jotkel Sp. z o.o. Sp.k.** takes into account the needs and values of the stakeholders, including in particular:

- Employees,
- Company's customers,
- Business partners,
- Local communities.

With a view to the stakeholders interested in the effects and methods of **Jotkel's** activities, the **Company** declares that it recognizes the generally accepted rules of social coexistence and is driven by the following values in its daily operations:

- responsibility,
- reliability,
- credibility,
- professionalism,
- fair competition,
- respect,
- commitment,
- team work.

C. KEY VALUES IN THE COMPANY:

- The **Company's** objective is to provide high-quality products and services that meet the needs of customers and guarantee the best satisfaction.

- The customer satisfaction and trust are the overriding values. In relations with customers, **Jotkel** operates in accordance with agreements concluded with them which are worded in a way that is clear and understandable for both parties. It precisely defines the terms and conditions, avoids misunderstandings in relations with customers, and operates in accordance with the Integrated Management System and International ISO Standards: 9001:2015, 14001:2015 and 45001:2018.
- It is an obligation to respect and support the protection of internationally recognized human rights and to eliminate any violation of human rights.

D. RELATIONS WITH CUSTOMERS, COUNTERPARTIES AND COMPETITORS

Jotkel Sp. z o.o. Sp.k. adheres to the principle that each customer is equally important, and the information provided by the customer is confidential. The **Company** is impartial towards its stakeholders and does not treat anyone preferentially. Each of the stakeholders has equal access to information about the **Company** in line with their rights.

- **Jotkel** selects the counterparties in accordance with the law and based on the **Company's** rules and procedures, specifying the manner of conducting tender proceedings and selecting the best tender.
- Relations between the **Company** and the counterparties are based on mutual trust.
- **Jotkel** keeps all information received from the customer confidential.
- To ensure full customer satisfaction, the **Company** guarantees a high standard of services, and strives to provide products and services that are valuable, good quality, solidly made, safe to use and environment friendly.
- **Jotkel** does not knowingly provide incomplete information or misleading descriptions of the products and services offered. In advertising and other forms of communication, the **Company** avoids providing untrue, exaggerated or incomplete information. The **Company** does not engage in any practices aimed at increasing sales by unlawful marketing campaigns.
- When dealing with competitors, employees are required to avoid situations that allow disclosure of confidential information regarding the **Company**.
- **Jotkel** does not attempt to obtain information regarding its competitors by illegal means (industrial espionage, employing competitors' employees to obtain secret information from them, persuading competitors' personnel or customers to disclose information, etc.).
- **Jotkel Sp. z o.o. Sp.k.** competes fairly with its competitors and does not undermine their reputation.
- The **Company** uses knowledge about the competitors to improve its own operations. It does not make any disparaging comments about competing companies.

- **Jotkel** strongly opposes all forms of slavery, forced labour, child labour, discrimination in the field of employment and expects the same attitude from its counterparties.
- **Jotkel Sp. z o.o. Sp.k.** does not accept and combats corruption in all its forms, including bribery and extortion.

E. RELATIONS WITH EMPLOYEES

Employees of **Jotkel Sp. z o.o. Sp.k.** are required to actively participate in creating a positive image of the **Company**, represent it with dignity and diligently perform their duties, relying on the best used knowledge and experience, and maintain good relations with the **Company's** customers and partners.

- Employees are loyal to the **Company**, do not undertake any activities that could lead to a conflict of interest between them and the **Company**, and in particular do not undertake any competitive activities against the **Company**.
- Employees are encouraged to constantly improve their professional qualifications. They use the knowledge and skills acquired during training courses to improve work efficiency.
- Employees follow changes in the law and apply them when performing their duties.
- Employees are required to comply with the law, good manners and the **Company's** procedures and regulations, and react immediately to any attempts to break the law.
- In relations with the **Company's** customers and partners, and in relations with other employees of the **Company**, the responsibility for his or her own word, attitude, decisions and actions is the overriding principle for an employee of **Jotkel**.
- The employees of **Jotkel** are required to meet the deadlines and promises made to customers and associates.
- Employees must not exceed the rights resulting from their job position or obtain any unauthorized personal benefits as a result of their decisions, actions or omissions. They are required to react to all attempts at corruption and fraud.
- Employees are bound by the rules of politeness and friendliness towards customers, associates and partners of the **Company**. They are required to make every effort to avoid any conflict situations.
- Employees should help each other and provide support in accordance with the rules of equality and reciprocity. In mutual relations, the employees should be guided by the rules of professionalism and loyalty, share ideas and observations, being aware that they act for the common good.
- The employees are required to speak with respect about each other, their managers and the Management Board of the **Company**.
- The employees should speak with respect about competitors of the **Company**.
- The employees of the **Company** are required to take proper care of the property entrusted to them, use such property rationally and use the work equipment economically.

- Accepting gifts or other benefits by employees of cooperating companies may create awkward situations and may be perceived as an attempt to persuade them to offer some benefits to the donor in return. In any situations related to accepting or giving gifts, the employees of **Jotkel** are required to comply with the following rules:
 - forcing anyone to accept a gift is unacceptable,
 - cash gifts are unacceptable,
 - small gifts and hospitality are allowed if they do not impose any obligation on the recipient and may be reciprocated to the same extent,
 - one should immediately notify one's manager of any situation of a corrupt nature, e.g. an attempt to give money, an expensive gift, etc. in return for a favour.
- Managers are required to support the professional development of employees and improvement of work efficiency.
- When assessing the performance of employees reporting to them, managers follow the rule of justice and concentrate on substantive matters.
- Managers organise work in such a way as to make the most of the employees' abilities, knowledge and experience, and to support their development.
- Managers are open to the opinions of employees and create conditions to support the development of innovation and entrepreneurship.
- The employees of **Jotkel Sp. z o.o. Sp.k.** are treated with respect and dignity at all times.
- **Jotkel** supports freedom of association and recognizes the right of workers to collective bargaining.
- The **Company** does not accept or use any form of slavery, forced or child labour.
- The **Company** aims to ensure stable jobs and informs employees about employment prospects.
- **Jotkel** provides a clean, healthy and safe work environment in accordance with the standards and regulations. Employees are required to follow the rules and regulations introduced to avoid accidents.
- **Jotkel** guarantees confidentiality of medical data provided by employees. The results of periodic medical check-ups are not made available to other employees or third parties.
- As the Personal Data Controller, **Jotkel** collects, stores and processes personal data only insofar as necessary to achieve the objectives of the enterprise and meet the requirements of the currently applicable law. The **Company** is required to make every effort to ensure that activities related to the collection, storage and processing of personal data always comply with the principles of the GDPR.
- The **Company** informs employees about social security contributions being paid.
- When taking out additional insurance, the **Company** is guided solely by the benefits of the employees. It makes every effort to select the safest offer of the insurance company.

- The **Company** makes every effort to ensure equal opportunities for professional development for all employees. **Jotkel** does not use non-substantive preferences in personnel processes and decisions affecting employees and job candidates.
- Discrimination on any ground is prohibited. The **Company** is required to support the professional development of employees and to provide full information and equal opportunities in access to training courses and other forms of development, promotion opportunities and recruitment.
- Every employee has the right to be proud of their knowledge, creativity and achievements.
- It is unacceptable for someone to claim the authorship of another person's idea or achievements.
- The **Company** does not accept and combats any cases of bullying, discrimination and harassment. It considers such behaviour to be contrary not only to the law but also to the culture and tradition of **Jotkel**.
- All employees, regardless of their gender, beliefs, sexual orientation, opinions or nationality, are treated in the same way. Everyone has the right to remuneration that is adequate to their job position and the work performed. They are given the same responsibilities and job descriptions. The **Company** expects all employees to be equally engaged in work based on their skills and experience, and to be responsible for all activities undertaken by them as part of their professional duties.
- All data and information obtained or produced by an employee while performing their official duties are the property of **Jotkel Sp. z o.o. Sp.k.** and may be used only in accordance with the law, respecting the entity they relate to, and in accordance with the interests of the **Company**.

F. THE SURROUNDINGS

- **Jotkel** is open to the needs of local communities and supports them through active or financial participation in local social and economic initiatives.
- The **Company** is committed to protect the environment. It cares about the aesthetic qualities of the **Company's** surroundings.
- **Jotkel** strives to integrate the business and industry environment in which it operates through active participation in business organisations, associations and other institutions that act as integrators or represent the interests of the industry.
- The **Company** makes every effort to be a socially sensitive business entity and provides favourable employment opportunities and good working conditions.
- **Jotkel** takes into account the interests of the entire environment, including both national and local interests.
- The **Company** supports the local community as far as possible. Charitable donations are granted in accordance with the rules established by the Management Board of **Jotkel Sp. z o.o. Sp.k.**

G. THE ENVIRONMENT

In its activities, **Jotkel Sp. z o.o. Sp.k.** is guided by a high degree of responsibility for the environment.

The **Company** is committed to protecting the environment and using natural resources responsibly. Therefore, it:

- supports the development and promotion of environmentally friendly technologies,
- takes initiatives to promote greater environmental responsibility,
- ensures that the production cycle, sewage management, waste disposal, exhaust and noise emissions meet the standards,
- analyses the environmental effects of each new venture,
- conducts regular reviews of the **Company's** environmental impact,
- informs the community in which it operates about its environmental programme.

H. OCCUPATIONAL HEALTH AND SAFETY

- **Jotkel Sp. z o.o. Sp.k.** creates safe workplaces, organises safe work and manufactures safe products.
- Employees are trained in the field of occupational health and safety. They know the rules of conduct when carrying out their duties and use the indicated protective equipment.
- The **Company** promotes a culture of work safety in the organisation.

I. THE LINKS BETWEEN BUSINESS AND POLITICS

The activities of **Jotkel Sp. z o.o. Sp.k.** are characterised by full respect for the law, implemented by democratically appointed local, regional and national authorities.

- The **Company** does not support any political activity based on the promotion of hatred, prejudice or discrimination against specific groups or individuals.
- The **Company's** policy to support social and political activities is public.
- The **Company** does not treat politicians and representatives of power in a particularly privileged manner.

J. PUBLIC PROCUREMENT

Jotkel Sp. z o.o. Sp.k. complies with the Public Procurement Act, and in particular:

- it does not try to influence decision-makers by giving them gifts, promising benefits and paying financial rewards,
- it provides in its offer substantive conditions that it is actually able to meet,
- it presents actual achievements and experience in its offer,
- it does not take actions that discredit competitors.

K. INTERNATIONAL BUSINESS ISSUES

- **Jotkel Sp. z o.o. Sp.k.** complies with the law of other countries and customs of the communities living in these countries.
- The **Company** respects the tradition and culture of each country with which it cooperates.
- The **Company** acts responsibly in the field of international trade, in accordance with treaties recognized by Poland.
- **Jotkel** does not cooperate with companies that profit from child labour, forced or slave labour.

L. MEDIA RELATIONS

The **Company** pursues an open information policy towards the media and authorised offices. Provides reliable information on its activities. It complies with the rules of representation in relations with the media and authorised regulatory bodies, as part of a coordinated communication and information policy.

Persons authorised to provide information to the media and offices are members of the Management Board and persons authorised by the Management Board.

M. THE IMAGE

Employees are required to take care of the **Company's** image as it affects its perception by the stakeholders. Therefore, they should:

- look neat, and their clothing should be appropriate to the circumstances,
- demonstrate good manners,
- behave with dignity outside the workplace in situations where they can be identified with the **Company**.

N. COMPLIANCE WITH THE CODE OF ETHICS

All employees of **Jotkel Sp. z o.o. Sp.k.** are required to comply with the provisions of the Code of Ethics. Each employee should, in accordance with the freedom of conscience and freedom of speech, report any conduct that is inconsistent with the rules of the Code of Ethics to their managers. Any breach of the Code requires a response from both employees and managers. Breach of the above rules may result in the application of disciplinary measures.

O. RESOLVING DOUBTS, MONITORING COMPLIANCE AND DEVELOPING THE CODE OF ETHICS

The employees of **Jotkel** may submit comments to the Code of Ethics or doubts as to the interpretation of its provisions directly to the **Management Board** of the **Company**.

The **Management Board** of the **Company** has the authority to interpret, monitor compliance with and develop the Code of Ethics.

The decision to approve and amend the Code is made by the **Management Board**.