

CODE OF CONDUCT FOR THE BUSINESS PARTNERS

NPA
SKAWINA



**BORYSZEW
GROUP**

CODE OF CONDUCT FOR THE BUSINESS PARTNERS

of the Boryszew S.A. Oddział Nowoczesne Produkty Aluminiowe Skawina

This Code of Conduct for Business Partners of the Boryszew S.A. Nowoczesne Produkty Aluminiowe Branch in Skawina (hereinafter referred to as: „Code” and „NPA Skawina”) sets forth the rules of conduct applied by the NPA Skawina and the NPA Skawina expects that this Code of Conduct shall be applied by its Business Partners. For the purpose of application of this Code of Conduct the term Business Partners shall mean all natural and legal persons, unincorporated associations and other operational units that are or may be in any legal or business relation with the NPA Skawina, in particular: suppliers, service providers, contractors, advisors, agents, financial institutions etc. As a part of the BORYSZEW S.A. Group, the principal values that the NPA Skawina applies to its conduct are: trust – competence – development. We combine the delivery of economic objectives with the implementation of the social and environmental objectives. We expect that the cooperation with our Business Partners shall be based on responsibility, integrity, compliance with applicable laws and human rights, as well as ethics and environmental protection requirements.

I. HUMAN RIGHTS AND LABOR STANDARDS

The NPA Skawina expects the Business Partners to respect the universally recognized human rights and to respect the rights and dignity of their employees, in particular by applying the following principles: Employee Health and Safety: to assure healthy and safe conditions of work, to protect the employees’ health and life and to make every reasonable effort to prevent threats to life and health of the employees. Prohibition of Discrimination and Providing Equal Opportunities: to provide equal employment opportunities for the employees and to ensure the workplace free from any discrimination based in particular on sex, race, nationality, religion, belief, disability, age, health or political beliefs. Prohibition of Employment of Children and the Use of Forced Labor: refrain from using any form of forced labor or children labor, as well as violence or intimidation in any form. Freedom of Association: to respect employees’ right of association.

II. ANTI-CORRUPTION AND ANTI FRAUD POLICY

NPA Skawina expects its Business Partners to conduct business in accordance with all applicable laws as well as to act in a responsible and honest manner, in particular by applying the following principles: Fair Competition: not to apply any trading practices, actions and schemes that may restrict or distort competition in an unfair manner (e.g. price fixing) as well as to apply honest and transparent business practices. Anti-money Laundering:

not to engage in money laundering and terrorist financing activities. Prohibition of Corruption: to refrain from any types of corruption activities (bribery, trading influence etc.), including offering, accepting directly or indirectly any undue benefits in exchange for specific behavior or mediating in such activities. Legality of Supply Sources: to only use supplies from legal sources, in particular not to acquire any goods or services that may be used to finance armed conflicts or from service providers that have committed or are suspected of having committed any human rights violations.

III. ENVIRONMENTAL PROTECTION

Protection of the natural environment is one of the priorities of the NPA Skawina. We expect our Business Partners to be aware and act responsibly in the area of the environmental protection, in particular by applying the following principles: Supporting Environmental Protection: to comply with applicable environmental standards, as well as to effectively and efficiently manage the natural resources and energy, and if conducting operations with significant impact on the environment – to adapt and apply adequate environmental management system. Waste Management: to conduct safe and efficient waste management and to undertake actions in effort to reduce the amount of waste, to prevent and to minimize pollution.