



CODE OF CONDUCT

CENTRO-CHEM

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We at Centro-chem act by principles of conduct based on respect for all suppliers, customers, employees, partners, the local community, and the environment that we live in.

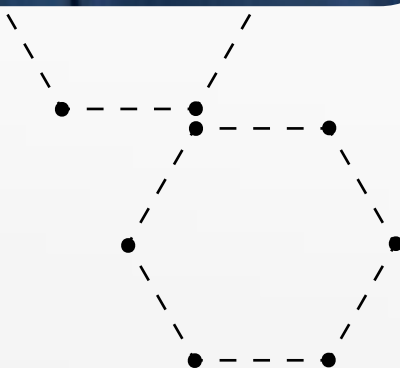
We see sustainability as a holistic concept concerning human and environmental needs for growth and balance.

Code of Conduct anchors our compliance program and reflects our core operating principles. It is supplemented by our policies and procedures, which together form a guide for everyone in the Centro-chem community.

Applying the high standards set out in our Code. Upholding them makes sustainability a goal to achieve not just a popular catchword.

Sincerely,

Piotr Mandziuk, CEO

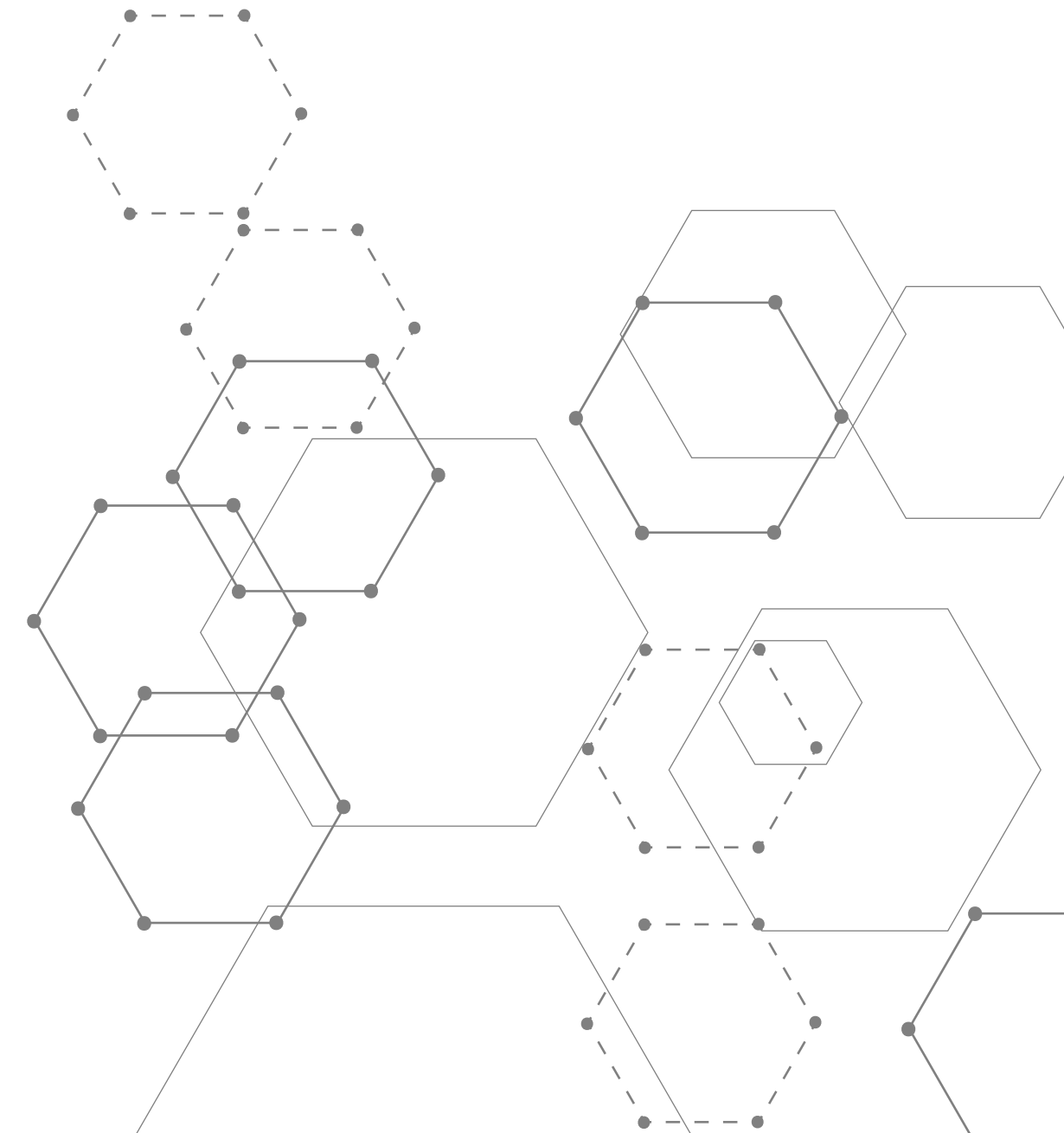


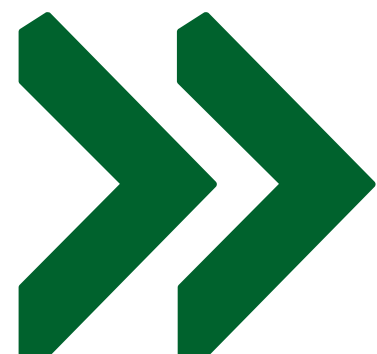


Human rights and labor standards

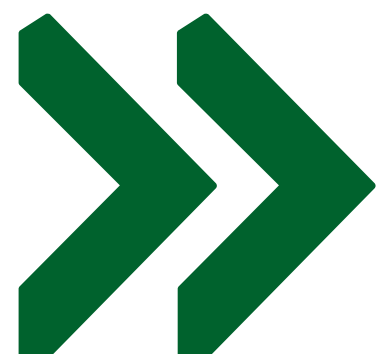
We observe and protect the globally applicable provisions on the protection of human rights as fundamental and universal guidelines.

- ✓ No child labor
- ✓ No human trafficking
- ✓ No forced or illegal labor
- ✓ Compliance with minimum-age provisions

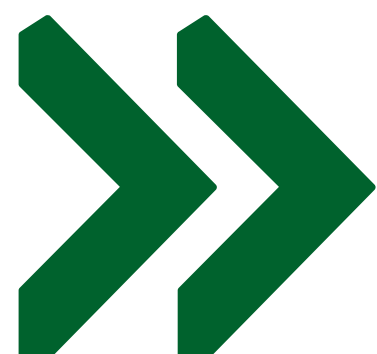




We comply with the applicable law and sector-specific labor regulations concerning **working time, including overtime laws.**

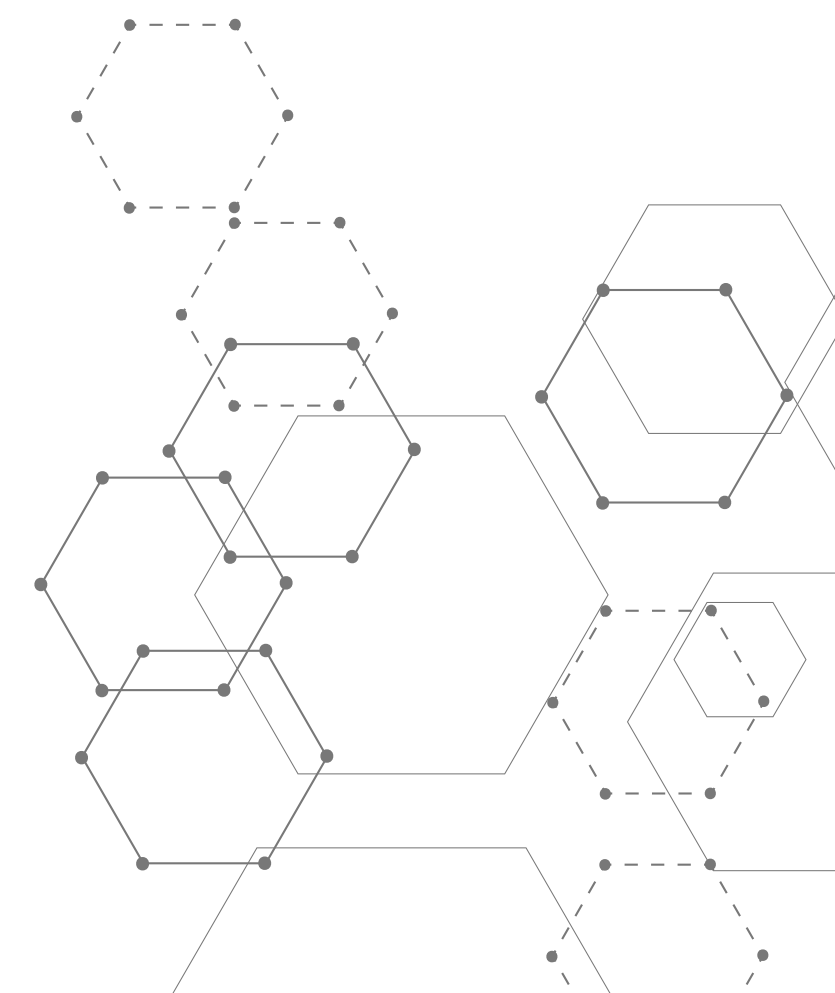


We **ensure that physical, verbal, sexual, or psychological harassment, abuse, or threats, is prohibited in the workplace**, including when determining and implementing disciplinary measures which may never be collectively imposed.



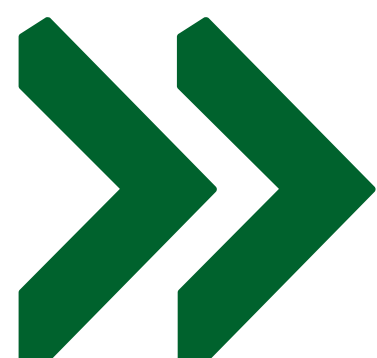
We ensure **respect for privacy and protection of family life, home, and correspondence of workers.**

This includes respecting free settlement, protecting family life and home, as well as ensuring an adequate standard of living and housing.

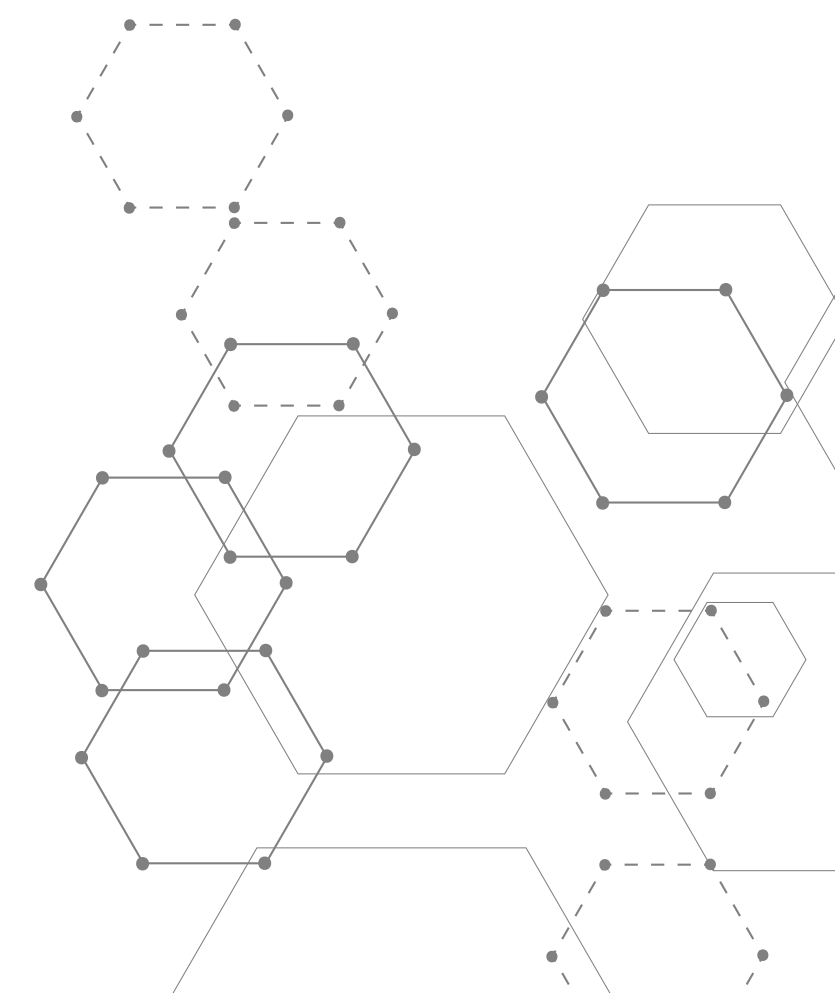




We **eliminate discrimination**, including any distinction, exclusion, or preference made with reference to race, color, sex, language, religion, political opinion, caste, national or social origin, property, union affiliation, sexual orientation, health status, age, disability or other distinguishing characteristics. Any employment-related decision are based on relevant and objective criteria.

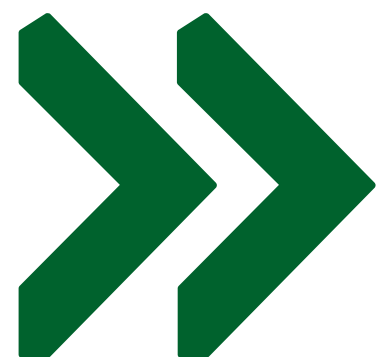


We ensure that workers have **the right to join or form trade unions** of their own choice and recognize the right to collective bargaining.

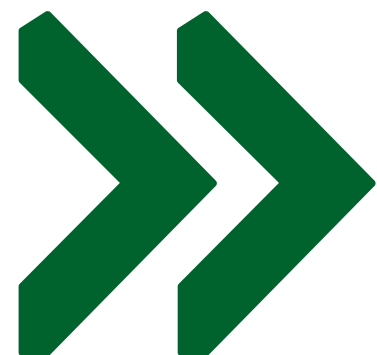




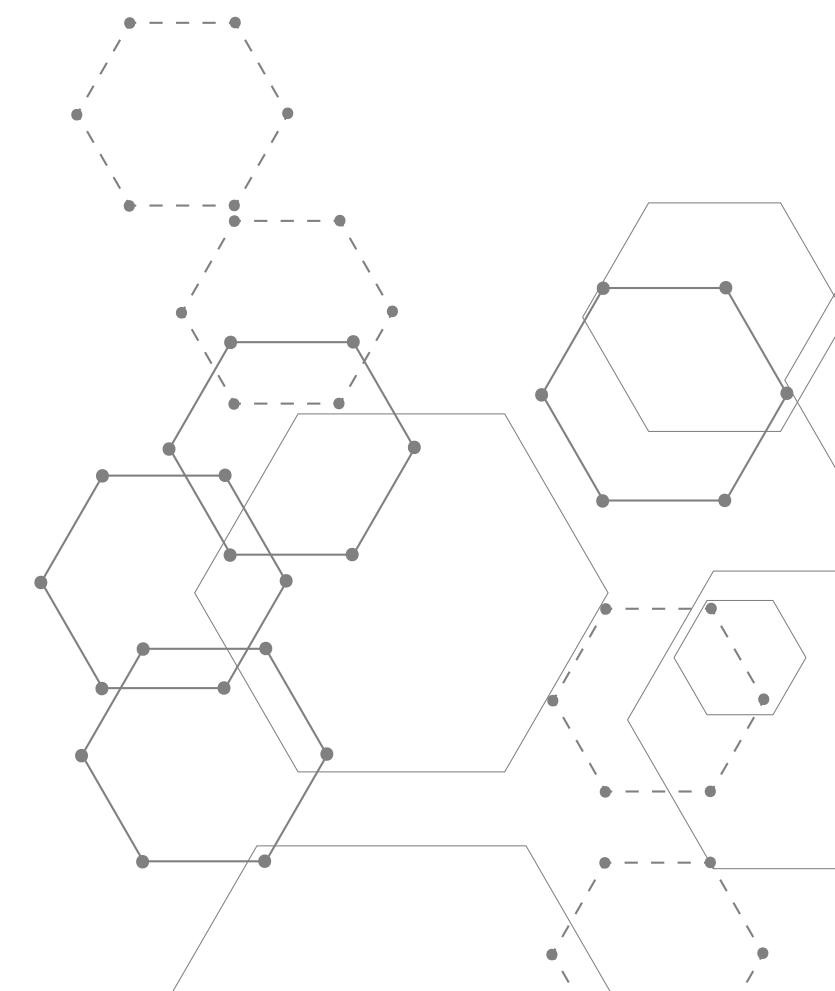
II. Health and safety



We provide our employees with a **safe, healthy work environment** and take proactive measures to **prevent accidents and health risks**. To achieve this, we work to eliminate potential workplace hazards at their source.



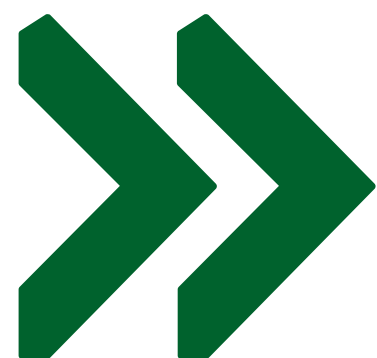
All employees are provided with the **equipment necessary to perform their duties safely**. They are also expected to complete **regular health and safety training**.





Legal compliance

sanctions,
law regulation,
corruption

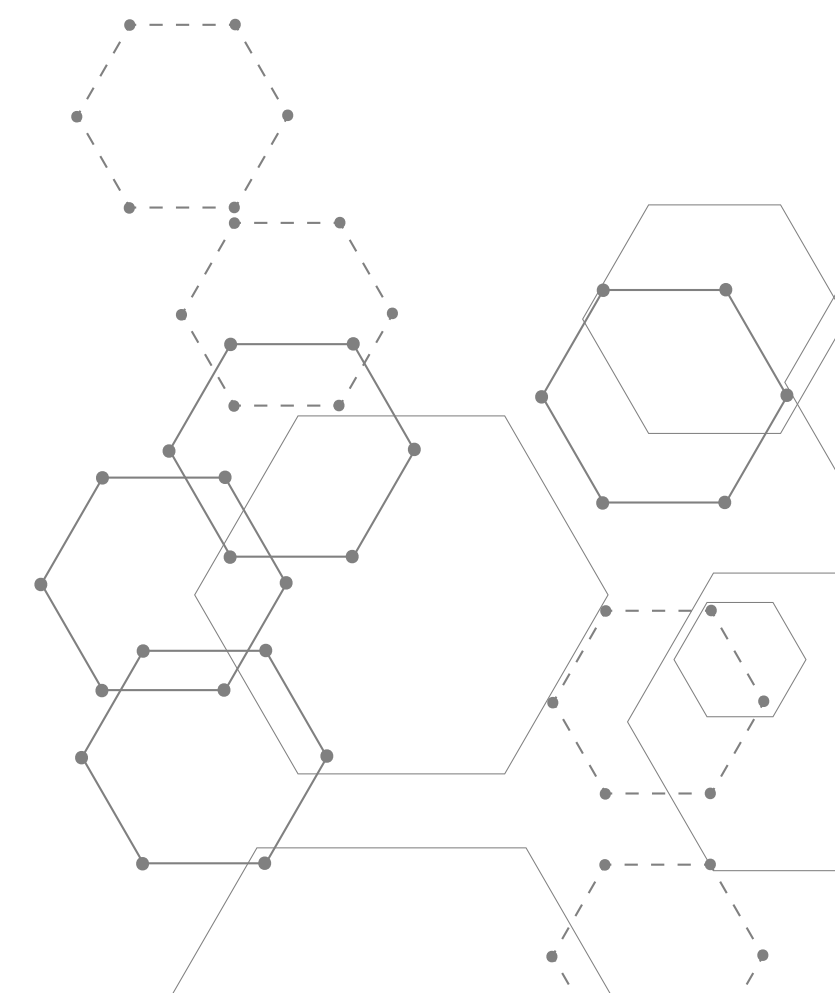


Anti-Corruption Laws

We comply with all applicable laws.

Centro-chem is committed to complying with applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and the anti-corruption laws of all other countries where we do business.

Offering, giving, requesting, or accepting bribes - or any other improper advantage - from public officials, politicians, business partners, or employees is never acceptable.





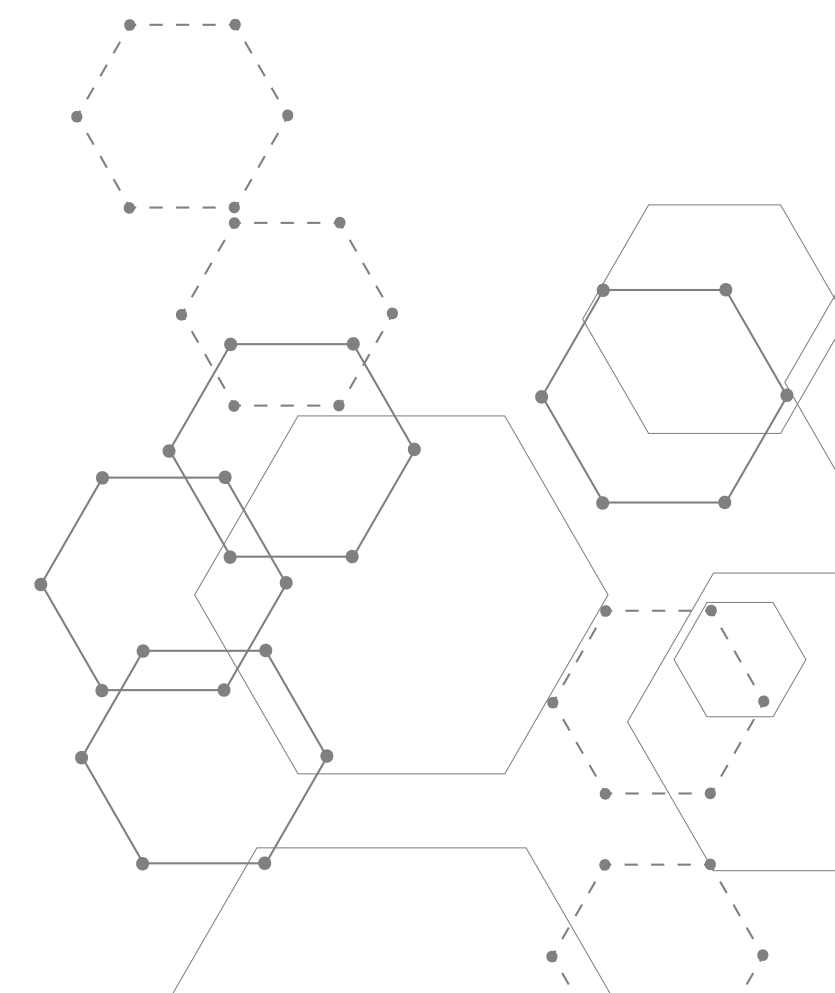
Import-Export & Trade Laws



Every day we transport goods across countries worldwide, and we must **follow the laws and regulations that govern these operations.**

These include export controls, trade regulations, as well as rules aimed at anti-boycott measures and the prevention of money laundering.

Responsibility for the company's sustainable development, responsible business practices, and ESG initiatives has been assigned to a member of Centro-chem's Management Board.





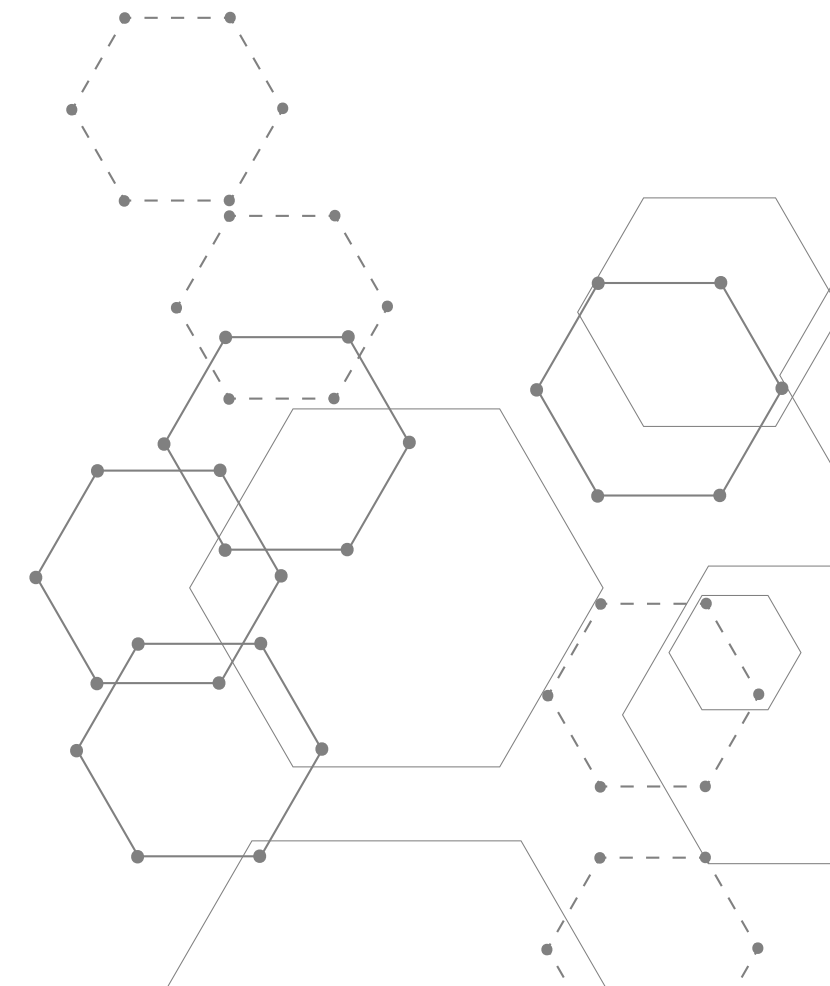
IV • Environmental protection



In Centro-chem we comply with all applicable laws and regulations and international standards relating to the protection and preservation of the environment.

We protect the human and natural environment by taking measures to prevent environmental pollution, by promoting recycling, and by using natural resources a sustainable way.

In our long-term policy, we strive to minimize our negative impact on biodiversity (including deforestation), climate change, and water scarcity.



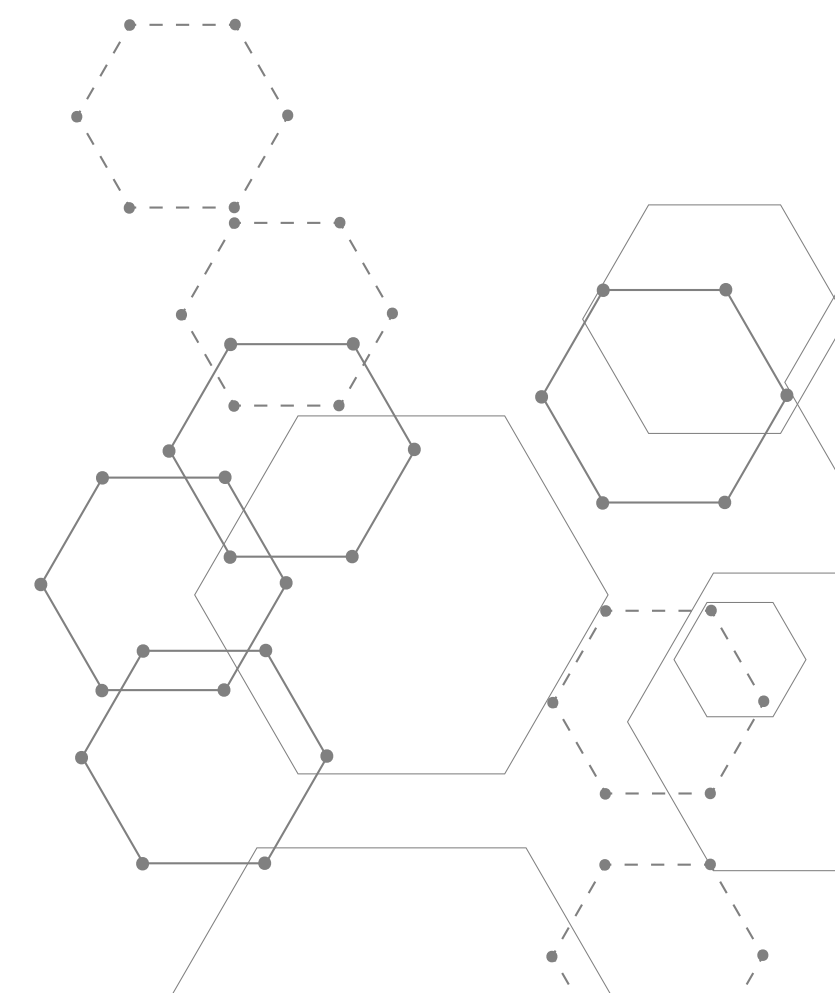
We plan to reduce use of fossive fuel by **replacing our fleet with electric cars and fork-lift truck.**

All new investments concerning warehouses and offices are planned as a building with **zero net energy consumption and zero carbon emissions per year.**

The company has introduced a **policy of reducing paper consumption** by implementing a system of electronic signing of contracts and all external documents.

We are an **active member of the local community.**

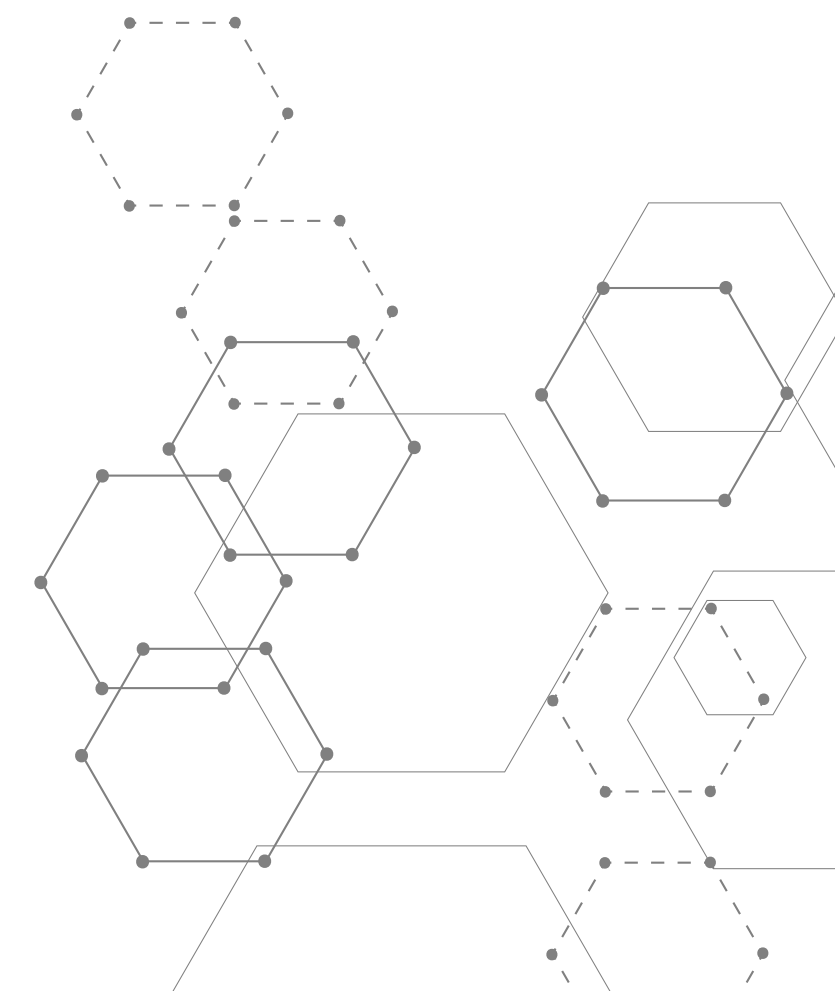
Actions for education, social integration and support for local charity campaigns are permanently included in our sustainable development policy. Each year, we allocate a part of the generated profit to the above-mentioned activities.





We take steps and implement measures aimed at:

- ✓ reducing waste
- ✓ reducing emissions in the air, ground, and water
- ✓ reducing energy consumption
- ✓ handling chemicals in an environmentally compatible way
- ✓ eco-friendly handling, storage, and disposal of hazardous waste
- ✓ contributing to the recycling and reuse of materials and products





V. Whistleblower policy



Violation of any law or this Code is a serious matter. This means that every employee or Centro-chem contractor who knows about disobeying above-mentioned rules must speak up and share any concerns about inappropriate, unethical or illegal conduct with the appropriate company resource.

You may report a concern via our confidential ethics reporting e-mail **compliance@centro-chem.pl**, which is available 24 hours a day, seven days a week, in 3 languages – English, Polish and Russian.

