

**SUSTAINABILITY POLICY**  
**of Zakłady Metalowe “POSTĘP” S.A.**



Gliwice, 29.01.2026

Zakłady Metalowe "POSTĘP" S.A. conducts its business responsibly, respecting the principles of sustainable development, environmental protection, human rights, occupational safety, business ethics, and stakeholder expectations.

The purpose of this Sustainability Policy is to define the main principles, commitments, and directions of the Company's activities in the area of responsible business conduct, reducing negative environmental impact, supporting employees, and building lasting and transparent relationships with customers, suppliers, the local community, and other stakeholders.

The Sustainability Policy is an integral part of the Company's management system and applies at all levels of the organization.

## **1. General Principles**

Zakłady Metalowe "POSTĘP" S.A. undertakes to conduct its business in accordance with applicable legal regulations, customer requirements, internal regulations, and adopted ethical and environmental standards.

As part of the implementation of this Policy, the Company undertakes to:

- a) reduce the negative impact of its business activities on the environment,
- b) use raw materials, materials, energy, and other resources rationally,
- c) comply with legal and other requirements related to environmental protection, occupational safety, human rights, and business ethics,
- d) continuously improve processes, management methods, and actions undertaken for sustainable development,
- e) promote responsible attitudes among employees, suppliers, business partners, and the local community,
- f) ensure safe and decent working conditions,
- g) counteract discrimination, mobbing, forced labour, child labour, and all forms of human rights violations,
- h) conduct business in an honest, transparent manner and in accordance with ethical principles,
- i) counteract corruption, conflicts of interest, fraud, and other abuses,
- j) support activities aligned with the United Nations Sustainable Development Goals, in particular in the areas of the environment, decent work, responsible production, innovation, and climate action.

## **2. Environmental Protection**

Zakłady Metalowe "POSTĘP" S.A. recognizes environmental protection as one of the key elements of responsible business conduct. The Company strives to reduce the impact of its processes, products, and services on the natural environment.

The Company's main environmental objectives include:

- a) reducing the negative impact of the Company's activities on the environment,
- b) continuously improving environmental management methods,
- c) preventing pollution and reducing emissions and waste,
- d) managing energy, water, materials, and raw materials rationally,
- e) handling waste in accordance with waste management principles, environmental protection requirements, and applicable legal regulations,
- f) monitoring the environmental impact of technological processes, particularly with regard to aspects that have a significant environmental impact,

- g) promoting a circular economy, including maximizing the use of recycled raw materials and waste recovery,
- h) shaping pro-environmental attitudes among employees and the local community.

The Company undertakes to take actions aimed at reducing resource consumption and improving production processes in a manner that supports the reduction of environmental impact.

### **3. Employees, Human Rights, and Occupational Safety**

Zakłady Metalowe "POSTĘP" S.A. recognizes employees as a key resource of the organization. The Company strives to ensure a safe, stable, and friendly working environment based on respect, cooperation, and responsibility.

The Company undertakes to:

- a) respect human rights and employee rights,
- b) ensure safe and hygienic working conditions,
- c) prevent accidents at work and occupational diseases,
- d) build a safety culture among employees,
- e) counteract discrimination, mobbing, harassment, and unequal treatment,
- f) ensure equal access to professional development, training, and promotion,
- g) respect the dignity, privacy, and diversity of employees,
- h) counteract child labour, forced labour, and all forms of psychological and physical coercion.

The Company supports the development of employee competencies through training, qualification improvement, and activities increasing awareness in the areas of safety, ethics, environmental protection, and sustainable development.

### **4. Business Ethics and Legal Compliance**

Zakłady Metalowe "POSTĘP" S.A. conducts its business in an honest, transparent manner and in accordance with applicable legal regulations and ethical principles.

The Company undertakes to:

- a) comply with the Code of Ethics and applicable internal regulations,
- b) counteract corruption, fraud, abuse, and conflicts of interest,
- c) prevent the offering, accepting, or requesting of prohibited material and non-material benefits,
- d) ensure fair relations with customers, suppliers, and business partners,
- e) protect confidential information, personal data, business secrets, and information entrusted by customers and contractors,
- f) conduct business in accordance with the principles of fair competition,
- g) enable the reporting of violations of law, ethical principles, and internal procedures in accordance with the applicable Whistleblower Procedure.

The Company does not tolerate actions that are contrary to the law, ethical principles, the Company's interests, or good business practices.

The Company ensures protection for persons making reports in good faith and does not tolerate any retaliatory actions against persons reporting violations of law, ethical principles, human rights, occupational safety, environmental protection, or internal procedures.

### **5. Responsible Relations with Customers, Suppliers, and Business Partners**

Zakłady Metalowe "POSTĘP" S.A. builds business relationships based on quality, responsibility, reliability, transparency, and mutual respect.

The Company strives to cooperate with suppliers and partners who comply with applicable legal regulations, ethical principles, human rights, occupational safety rules, and environmental standards.

In relations with customers, suppliers, and business partners, the Company undertakes to:

- a) treat business partners fairly and impartially,
- b) fulfil obligations in a timely and reliable manner,
- c) ensure the quality of products and services,
- d) protect confidential information and data entrusted by business partners,
- e) promote responsible practices in the supply chain,
- f) counteract corruption, conflicts of interest, and other abuses in business relations.

Detailed principles concerning responsible purchasing, supplier assessment, and environmental, social, ethical, and occupational safety requirements for suppliers are defined in a separate Sustainable Purchasing Policy and in the relevant procedures and documents applicable within the Company.

## **6. Local Community and Social Responsibility**

Zakłady Metalowe "POSTĘP" S.A. is aware of the impact of its activities on the social and local environment. The Company strives to build positive relationships with the local community and support initiatives that contribute to social development, education, safety, and environmental protection.

The Company undertakes to:

- a) maintain dialogue with stakeholders,
- b) take into account the impact of its activities on the local community,
- c) support social and pro-environmental initiatives, within its organizational and financial capabilities,
- d) promote responsible attitudes among employees and the Company's surroundings,
- e) conduct business with respect for the local environment, traditions, and social needs.

## **7. United Nations Sustainable Development Goals**

Zakłady Metalowe "POSTĘP" S.A. supports the assumptions of the United Nations Sustainable Development Goals and undertakes actions aligned with selected goals that are most closely related to the nature of the Company's activities.

In particular, the Company's activities support the following goals:

### **SDG 3 – Good Health and Well-being**

through occupational health and safety activities, accident prevention, building a safety culture, and caring for employees' health.

### **SDG 5 – Gender Equality**

through counteracting discrimination, ensuring equal treatment, and creating a working environment based on respect and equal opportunities.

### **SDG 8 – Decent Work and Economic Growth**

through ensuring decent and safe working conditions, developing employee competencies, respecting employee rights, and responsible human resources management.

**SDG 9 – Industry, Innovation and Infrastructure**

through improving production processes, optimizing activities, increasing quality, and developing solutions that support efficiency and responsible production.

**SDG 12 – Responsible Consumption and Production**

through rational resource management, waste management, recycling, promoting a circular economy, and reducing the negative impact of production processes on the environment.

**SDG 13 – Climate Action**

through undertaking actions aimed at reducing the Company's impact on the climate, including improving process efficiency, reducing energy and raw material consumption, and monitoring environmental aspects.

**SDG 16 – Ethics, Legal Compliance and Responsible Governance**

through compliance with ethical principles, counteracting corruption, protecting whistleblowers, ensuring transparency of actions, and complying with legal regulations and internal rules.

**8. Objectives, Indicators, and Documentation of Activities**

Zakłady Metalowe "POSTĘP" S.A. sets and monitors objectives and indicators in the areas of sustainable development, appropriate to the nature of its business activities, significant environmental, social, employee-related, and ethical aspects, as well as stakeholder expectations.

Qualitative objectives include, in particular, reducing the negative impact of the Company's activities on the environment, building a safe and responsible working environment, respecting human rights and employee rights, strengthening an ethical culture, promoting responsible relations with suppliers, and improving processes in accordance with the principles of sustainable development.

Quantitative objectives and indicators may include, in particular, the consumption of energy, water, materials, and raw materials, the amount of waste generated, the level of recovery or recycling, emissions, training completion, occupational safety indicators, the number of reports and corrective actions, ethics-related activities, and supplier assessment in terms of environmental, social, and ethical requirements.

Detailed objectives, indicators, monitoring results, records, reports, action plans, and corrective and improvement actions are documented in separate policies, procedures, reports, plans, registers, or statements appropriate to a given area.

**9. Monitoring and Improvement of Activities**

Zakłady Metalowe "POSTĘP" S.A. monitors the implementation of activities related to sustainable development and undertakes improvement actions in the event of identified needs, risks, or non-compliances.

Monitoring activities may include, in particular:

- a) assessment of the achievement of environmental objectives,
- b) analysis of the consumption of resources, energy, materials, and raw materials,
- c) analysis of waste management,
- d) analysis of occupational health and safety activities,
- e) analysis of training and awareness-raising activities,
- f) analysis of reports concerning violations of ethical principles,
- g) analysis of activities undertaken for employees, the local community, and business partners.

The results of activities related to sustainable development may be discussed during management reviews, meetings, or other appropriate forms of assessing the functioning of the organization.

The Company undertakes to continuously improve its activities in the area of sustainable development, in accordance with the nature of its business, legal requirements, stakeholder expectations, and organizational and technological capabilities.

#### **10. Communication and Awareness**

Zakłady Metalowe "POSTĘP" S.A. communicates its activities and progress in the implementation of selected United Nations Sustainable Development Goals through internal communication, information materials, presentations, the Company's website, reports, and ongoing communication with customers, suppliers, and other stakeholders.

Communication concerning sustainable development should be reliable, transparent, and based on actual activities undertaken by the Company.

#### **11. Responsibility for the Implementation of the Policy**

The Management Board, together with the Quality Management System Representative of Zakłady Metalowe "POSTĘP" S.A., is responsible for establishing, approving, and supervising the implementation of this Sustainability Policy.

Management staff are responsible for implementing the principles arising from the Policy in their respective areas and for promoting responsible attitudes among employees.

Employees are obliged to comply with the principles set out in this Policy, apply them in their daily work, and report any identified irregularities in accordance with applicable procedures.

#### **12. Final Provisions**

This Sustainability Policy applies to all employees of Zakłady Metalowe "POSTĘP" S.A. and, to the appropriate extent, to persons cooperating with the Company.

The Policy is reviewed at least once a year and whenever there are significant changes in legal regulations, organizational changes, customer requirements, stakeholder expectations, results of management reviews, or the need to improve activities in the area of sustainable development.

The Management Board of Zakłady Metalowe "POSTĘP" S.A. declares its full commitment to the implementation of this Policy and ensures that it is understood, implemented, communicated, and applied at all appropriate levels of the organization.

29.01.2026

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*Wojciech Szorek*  
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