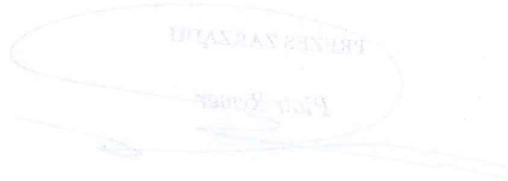


SUPPLIER CODE OF CONDUCT OF ZAKŁADY METALOWE POSTĘP S.A.



Dear Business Partner!

Zakłady Metalowe POSTĘP S.A., as a business partner, has continuous improvement and an ongoing commitment to applying the highest standards supporting sustainable development and responsible business embedded in its DNA.

As our Supplier, you are an important partner in achieving our goal of building a sustainable future. We care about the trust of our stakeholders, in particular our employees, co-workers, customers, investors, and the local community. Therefore, we require our Suppliers to act in accordance with our values and the highest standards of business ethics.

Our activities are based on a commitment to transparency, professionalism, and compliance with the highest standards of ethical business conduct.

This Supplier Code of Conduct of Zakłady Metalowe POSTĘP S.A. constitutes a set of principles based on international standards and regulations governing ethical and sustainable business practices, compliance with which we expect from our business partners. This Code supplements the Code of Ethics, which provides guidance to our employees on how to act properly and upholds our commitments in the area of ethical conduct and respect for human rights.

We apply the principle that where the Supplier Code of Conduct of Zakłady Metalowe POSTĘP S.A. sets a higher standard than local, regional, or national laws, we expect our Suppliers to comply with this Code. However, if the laws or regulations applicable to the Supplier are more restrictive than our Code, we expect the Supplier to comply with such laws or regulations.

The Code is an integral part of our terms of cooperation. All employees, partners, and suppliers are expected to take responsibility for their actions, cooperate in promoting an ethical culture, and promptly report any potential violations.

Thank you for choosing to cooperate with Zakłady Metalowe POSTĘP S.A. and for your valuable contribution to our operations and customer service.

Yours sincerely,

President of the Management Board Zakłady Metalowe POSTĘP S.A.

PREZES ZARZĄDU
Piotr Rymer

SUPPLIER CODE OF CONDUCT OF ZAKŁADY METALOWE POSTĘP S.A.

Purpose of the Code

The Supplier Code of Conduct of Zakłady Metalowe POSTĘP S.A. defines the minimum standards and requirements applicable to the Suppliers with whom we cooperate, in accordance with national and European law as well as the UN guidelines on human rights, environmental protection, and business ethics. The purpose of the Code is to promote responsible management and sustainable development in the supply chain. Suppliers cooperating with us undertake to comply with these principles in order to support our efforts to minimize environmental impact and create a fair and safe working environment.

Compliance with Law

Suppliers are obliged to comply with all applicable national and international laws, including in particular:

- Regulations and European Union Directives implemented into national law concerning environmental protection, labor, health, and safety.
- The UN Guiding Principles on Business and Human Rights.
- Regulations concerning export and import control, as well as all applicable sanctions and embargoes.

Suppliers are obliged to maintain appropriate processes, procedures, and internal supervision ensuring that their business activities comply with legal requirements and this Code.

1. Environmental Responsibility and Cooperation for Sustainable Development

1.1 Reduction of Carbon Footprint

Suppliers are obliged to take actions aimed at reducing greenhouse gas emissions, converted into CO₂ equivalent, by applying energy-efficient solutions and striving to reduce energy consumption in production processes.

1.2 Minimization of Natural Resource Consumption

Suppliers are obliged to optimize processes that minimize the consumption of resources such as water, raw materials, and energy, as well as to promote a circular economy in the area of production waste management.

1.3 Waste Management

Production waste should be reduced, segregated, and processed in accordance with local regulations and in line with best environmental practices. Suppliers should apply recycling and material processing at every possible stage. Production waste should be reduced, segregated, and processed in accordance with local regulations and best environmental practices. Suppliers are obliged to apply recycling and material processing at every possible stage.

1.4 Environmental Management System

It is recommended that Suppliers have and maintain an operating standard compliant with ISO 14001, concerning environmental management. Zakłady Metalowe POSTĘP S.A. may prefer cooperation with Suppliers that have implemented an environmental management system or equivalent organizational solutions supporting the identification, monitoring, and reduction of environmental impact.

1.5 Minimization of Negative Environmental

It is recommended that Suppliers have and implement a strategy for reducing environmental impact, under which they take actions to measure and subsequently reduce greenhouse gas emissions, energy and water consumption, and the amount of waste generated.

1.6 Transparency and Reporting

Suppliers are obliged to monitor and, at the request of Zakłady Metalowe POSTĘP S.A., provide information on their activities in the field of environmental protection and sustainable development. Such information may be provided in particular in the form of questionnaires, forms, summaries, reports, certificates, or other source documents. Zakłady Metalowe POSTĘP S.A. may require the Supplier to provide environmental data concerning, among others, emissions, energy consumption, water consumption, waste management, environmental management systems used, and improvement activities carried out.

By entering into cooperation with Zakłady Metalowe POSTĘP S.A., the Supplier consents to an on-site or remote audit of the Supplier and undertakes to support such audit processes. Compliance monitoring may

also take the form of questionnaire assessment, review of declarations, forms, reports, and documentation provided by the Supplier.

1.7 Adaptation to Sustainable Development Standards

Suppliers are obliged to cooperate with our Company in implementing and maintaining sustainable development standards. This includes adapting production processes and operational procedures to generally applicable standards in the field of sustainable development policy. Suppliers are also obliged to cooperate in achieving environmental and ESG objectives in the supply chain, to the extent appropriate to the nature of the cooperation and the level of risk.

2. Materials and Substances

2.1 Use of Materials with Low Environmental Impact

Suppliers are obliged to optimize processes that minimize the consumption of resources such as water, raw materials, and energy, as well as to promote a circular economy in the area of production waste management. In addition, Suppliers are obliged to use materials from responsible sources, including recycled materials and alternative raw materials with low environmental impact.

2.2 Hazardous Substances

Supplier must avoid the use of chemical substances harmful to human health and the environment and strive to use substitutes that are safe for users and the environment.

2.3 Compliance with REACH, SVHC, and RoHS Requirements:

Suppliers are obliged to ensure that the supplied products, materials, and components comply with the applicable requirements of Regulation (EC) No. 1907/2006 REACH and the RoHS Directive, where applicable. At the request of Zakłady Metalowe POSTĘP S.A., the Supplier is obliged to provide current declarations, statements, or other documents confirming compliance with REACH and/or RoHS, as well as other source documents required by Zakłady Metalowe POSTĘP S.A. in order to confirm material compliance.

The Supplier is obliged to inform whether the supplied products contain SVHC substances included on the current ECHA Candidate List in a concentration equal to or greater than 0.1% by weight (w/w), and to identify such substances if they are present. The Supplier undertakes to immediately inform Zakłady Metalowe POSTĘP S.A. of any changes in material composition, changes affecting compliance with REACH and/or RoHS, as well as changes resulting from updates to the SVHC Candidate List. Zakłady Metalowe POSTĘP S.A. reserve the right to periodically assess Suppliers' compliance with REACH, SVHC, and RoHS on the basis of statements, forms, declarations, safety data sheets, reports, certificates, and other source documents.

Suppliers are obliged to identify SVHC substances in supplied products and to provide complete and up-to-date information if such substances are present in a concentration equal to or greater than 0.1% by weight (w/w), in accordance with applicable legal requirements. Where the requirements apply to a given product, material, or component, the Supplier is obliged to ensure that the levels of restricted substances do not exceed the permissible limits specified in applicable regulations.

2.4 Sustainable Sourcing of Raw Materials

Suppliers are obliged to conduct due diligence in their supply chain with regard to raw materials and materials, in particular tin, tantalum, tungsten, and gold (3TG), in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

The Supplier undertakes to identify whether the supplied products, materials, or components contain tin, tantalum, tungsten, or gold (3TG).

At the request of Zakłady Metalowe POSTĘP S.A., the Supplier shall provide a current CMRT form, Conflict Minerals Reporting Template, or an equivalent declaration confirming the origin of 3TG and the due diligence measures applied.

The Supplier undertakes to cooperate in identifying smelters, refiners, the country of origin, and assessing the risk related to sourcing raw materials from conflict-affected and high-risk areas.

The Supplier is obliged to provide, at the request of Zakłady Metalowe POSTĘP S.A., reliable, up-to-date, and complete information confirming the application of due diligence in the supply chain of risk-related raw materials.

3. Work Ethics and Respect for Employee Rights

3.1 Respect for Human Rights and Decent Working Conditions

Suppliers are obliged to respect human rights and provide employees with decent, safe, and hygienic working conditions. The Supplier should also ensure appropriate remuneration, working hours compliant with regulations, and a safe working environment. The Supplier is also obliged to prevent harassment, violence, intimidation, humiliation, and all forms of retaliation against employees and co-workers.

3.2 Prohibition of Discrimination

Suppliers are obliged to avoid all forms of discrimination and violations of the rights of employees and job candidates. In addition, the Supplier should ensure equal opportunities and equal treatment for both candidates and employees, regardless of gender, race, religion, sexual orientation, social status, disability, or any other personal characteristics, and should create a working environment that supports diversity and inclusion.

3.3 Prohibition of Forced Labor and Child Labor

Child labor and forced labor are absolutely prohibited.

3.4 Ensuring Occupational Health and Safety

Suppliers must provide appropriate health and safety measures, including appropriate personal protective equipment and procedures protecting human life and the natural environment in emergency situations.

3.5 Ensuring the Possibility of Employee Association

The Supplier should respect employees' right to organize and engage in collective bargaining.

3.6 Fair Remuneration and Working Time

The remuneration of the Supplier's employees should be fair and compliant with local regulations and industry standards. Working time must not exceed the limits specified in the relevant regulations.

3.7 Employee Development and Training

Suppliers should support the development of their employees by organizing training in the field of safety, environmental protection, and sustainable practices. To the extent appropriate to the nature of the Supplier's activities, Suppliers should also provide training in ethics, compliance, human rights, and prevention of violations.

4. Business Ethics

4.1 Anti-Corruption

Suppliers are obliged to counteract corruption and prevent all forms of bribery and illegal practices.

4.2 Transparency

Suppliers are obliged to act transparently and conduct business fairly, as well as to provide reliable information about their processes.

4.3 Integrity

Suppliers are obliged to act in accordance with the principles of fair competition and antitrust regulations.

4.4 Protection of Intellectual Property

Suppliers are obliged to ensure the protection of intellectual property, including intellectual property rights, trade secrets, and other confidential information.

4.5 Ensuring Standards in the Area of Financial Documentation

Suppliers are obliged to maintain transparent and reliable accounting and financial documentation, compliant with national or, where applicable, international accounting standards.

4.6 Data Protection and Privacy

Suppliers undertake to protect the personal data of their employees and customers in accordance with the General Data Protection Regulation (GDPR) and other applicable privacy protection regulations.

4.7 Cybersecurity

Suppliers are obliged to have up-to-date and effective cybersecurity rules and procedures, as well as a response plan in the event of breaches of the security of resources or data stored in IT systems, enabling business continuity and restoration of operational efficiency in the event of an extraordinary failure of the Supplier's IT systems.

4.8 Reporting Violations

Suppliers should promptly report any cases of violation of this Code, applicable laws, ethical principles, human rights, or environmental requirements. Reports may be made in accordance with the applicable whistleblowing procedure, through the available communication channels.

5. Innovation and Continuous Improvement

5.1 Implementation of Innovative Technologies

Suppliers should strive to implement modern technologies and innovative solutions that contribute to sustainable development, increased energy efficiency, and waste reduction.

5.2 Continuous Process Improvement

Suppliers are obliged to regularly review and improve processes in order to support sustainable development objectives and minimize environmental impact as much as possible. This also includes readiness to implement corrective and improvement actions in environmental, social, ethical, and material areas if gaps or non-compliances are identified.

6. Audits and Compliance Control

6.1 Right of Zakłady Metalowe POSTEP S.A. to Conduct an Audit

Suppliers are obliged to allow audits of compliance with this Code. Such audits may include on-site visits, document verification, as well as interviews with employees and stakeholders.

Audits and compliance assessments may include, in particular, verification of documentation concerning environmental, social, ethical, and material requirements, including REACH declarations, information on SVHC, RoHS declarations, CMRT forms, certificates, reports, safety data sheets, and other source documents.

Zakłady Metalowe POSTEP S.A. may conduct periodic assessment of Suppliers in the form of questionnaires, forms, document reviews, remote and on-site audits, and other verification activities appropriate to the level of risk, the importance of the Supplier, and the nature of the cooperation.

The Supplier undertakes to provide, in a timely manner, the required information, documents, statements, and explanations necessary to conduct a compliance assessment or audit.

6.2 Supplier's Obligation to Implement Corrective Actions

If non-compliance with this Code is identified, the Supplier is obliged to submit a corrective action plan, undertake corrective actions within the agreed deadline, and consequently remove all identified non-compliances. Corrective actions may also concern deficiencies in documentation, failure to provide required declarations, failure to meet requirements in the area of REACH, SVHC, RoHS, 3TG, CMRT, environment, human rights, ethics, or other requirements arising from this Code.

6.3 Consequences of Violations

In the event of repeated or serious violations, cooperation with the Supplier may be suspended or terminated. Refusal to cooperate during an audit, failure to provide required documents, failure to implement corrective actions, or providing unreliable information may be considered a violation of this Code.

Supplier's Commitment

By entering into cooperation with Zakłady Metalowe POSTEP S.A., I declare that I will comply with the above Code and support the mission of sustainable development of Zakłady Metalowe POSTEP S.A. Any violations shall result in appropriate actions, including the possibility of terminating cooperation.

By signing the Code, the Supplier undertakes to comply with the principles contained herein and to promote these values in its supply chain.

The Supplier also confirms its readiness to provide, at the request of Zakłady Metalowe POSTEP S.A., documents, declarations, forms, and other information confirming compliance with the requirements of this Code.

Supplier's Name: _____

Date: _____

Signature: _____