SUSTAINABLE PROCUREMENT POLICY

Zakłady Metalowe POSTĘP S.A.

Gliwice, 29.01.2026

POSTĘP
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1. Purpose of the Policy

Zakłady Metalowe POSTĘP S.A. is committed to building fair, transparent and responsible relationships throughout its supply chain. The Sustainable Procurement Policy sets out the principles for conducting procurement activities in a manner that takes into account environmental, social, ethical and economic aspects supporting the sustainable development of the Company and its business partners.

The purpose of this Policy is to ensure that procurement decisions made by Zakłady Metalowe POSTĘP S.A. take into account not only quality, safety, delivery performance and cost, but also compliance with environmental, social and ethical requirements.

This Policy is implemented in conjunction with the Supplier Code of Conduct, General Terms and Conditions of Purchase, required declarations of compliance, and the supplier qualification, evaluation and monitoring processes applicable at Zakłady Metalowe POSTĘP S.A.

2. Scope

This Policy applies to the procurement activities of Zakłady Metalowe POSTĘP S.A., employees involved in the procurement process, as well as suppliers, subcontractors and other business partners participating in the Company's supply chain.

The Policy applies to all suppliers cooperating with the Company. The scope and intensity of qualification, evaluation, monitoring or verification activities may be adjusted depending on the supplier's importance, level of risk, purchasing value, type of materials or services supplied, impact on the Company's operations and customer requirements.

For the purposes of this Policy, key suppliers are suppliers that are of significant importance to production continuity, product quality, purchasing value, environmental, social, ethical or regulatory risk, as well as suppliers identified as significant due to customer requirements or the nature of the materials and services supplied.

3. General Principles

Zakłady Metalowe POSTĘP S.A. conducts its procurement process in a fair, transparent and responsible manner, aiming to cooperate with suppliers that meet quality, environmental, social and ethical requirements.

The Company ensures transparent, fair and non-discriminatory access for suppliers to the procurement process, regardless of their size, origin, ownership structure or other characteristics unrelated to quality, safety, compliance or their ability to fulfil the order.

The Company expects suppliers to comply with the requirements specified in procurement and compliance documents, in particular the Supplier Code of Conduct, General Terms and Conditions of Purchase, and documents confirming material and regulatory compliance.

4. Sustainable Procurement Objectives and Commitments

4.1 Communication of Requirements

Zakłady Metalowe POSTĘP S.A. communicates sustainability requirements, responsible procurement practices and expected standards of cooperation to suppliers and internal stakeholders.

Such communication may take place in particular through policies, codes of conduct, general terms and conditions of purchase, forms, declarations, procurement correspondence, training activities and other tools used by the Company.

4.2 Environmental Criteria

Zakłady Metalowe POSTĘP S.A. takes environmental criteria into account in the procurement process, in particular those relating to efficient use of resources, reduction of environmental impact, waste management, emissions, improvement activities and the use of environmental management systems.

The Company may promote cooperation with suppliers that have implemented environmental management systems, including systems compliant with ISO 14001, or equivalent organisational solutions.

4.3 Social and Ethical Criteria

Zakłady Metalowe POSTĘP S.A. also takes social and ethical factors into account in the procurement process, in particular compliance with human rights, labour law, occupational health and safety requirements, the prohibition of child labour and forced labour, non-discrimination, prevention of violence and harassment, and requirements related to business ethics and compliance.

4.4 Material and Regulatory Compliance

Zakłady Metalowe POSTĘP S.A. takes into account compliance with environmental and material requirements in the supplier qualification, evaluation and monitoring process, in particular requirements relating to REACH, SVHC, RoHS and, where applicable, 3TG and CMRT.

The Company may require suppliers to provide relevant declarations, forms, statements, safety data sheets, certificates, reports or other documents confirming compliance, such as SDS, MSDS, material declarations, test reports and management system certificates.

4.5 Supplier Support and Development

The Company aims to support supplier development in the area of sustainability by communicating requirements, providing guidelines, collecting declarations and forms, conducting assessments and supporting corrective and improvement actions.

4.6 Corrective and Improvement Actions

Where deficiencies, non-conformities or gaps are identified in relation to environmental, social, ethical or material requirements, the Company may require the supplier to provide additional explanations, supplement documentation, implement corrective actions or undertake other measures appropriate to the nature of the non-conformity and the level of risk.

5. Supplier Qualification, Evaluation and Monitoring

Zakłady Metalowe POSTĘP S.A. conducts supplier qualification, evaluation and monitoring taking into account environmental, social, ethical, quality, operational and regulatory criteria.

Supplier evaluation may include the review of questionnaires, forms, declarations, source documents, remote or on-site audits, and other information relevant to environmental, social and ethical compliance. The results of such evaluations are taken into account in supplier qualification, retention and development processes.

Where non-conformities are identified, the Company may require corrective actions, additional explanations, updates to submitted documents or apply other measures provided for in the applicable procurement documents.

6. Documents Supporting the Implementation of the Policy

The principles set out in this Policy are supported by applicable procurement documents, in particular:

- Supplier Code of Conduct,
- General Terms and Conditions of Purchase,
- forms and declarations relating to material and regulatory compliance,
- supplier qualification, evaluation and monitoring procedures,
- supplier evaluation scorecard,
- other documents used in the procurement process and supplier supervision.

7. Roles and Responsibilities

The Procurement Department Leader is responsible for the implementation and monitoring of this Policy.

Depending on the scope of the requirements being assessed, implementation of the Policy may also be supported by legal, quality, environmental, audit, logistics or other relevant organisational functions.

8. Monitoring Progress and KPI Indicators

Zakłady Metalowe POSTĘP S.A. monitors the implementation of this Policy using periodically reviewed indicators relating to selected areas of the procurement process and supplier supervision.

The indicators may relate in particular to:

- communication of the Policy and requirements to suppliers,
- acceptance of the Supplier Code of Conduct,
- completeness of REACH / SVHC / RoHS / CMRT declarations,
- supplier ESG / CSR evaluation,
- supplier audits,
- corrective and improvement actions,
- the level of training of employees involved in sustainable procurement.

KPI Table

Area	KPI	Annual Target
Supplier Code of Conduct	% of key suppliers with a signed Supplier Code of Conduct	80%
Material Compliance	% of suppliers with required REACH / SVHC / RoHS / CMRT declarations	90%
ESG / CSR Assessment	% of key suppliers assessed in terms of ESG / CSR	70%
Audits	Number of audits of high-risk suppliers	minimum 5 per year
Corrective Actions	% of actions closed within the agreed deadline	85%
Training	% of procurement employees trained in sustainable procurement	100%

KPI performance is monitored at least quarterly and documented in the relevant summaries, registers, reports, supplier evaluation scorecards, audit documentation, corrective action registers or training records.

The monitoring results form the basis for planning improvement activities in the area of sustainable procurement.

9. Communication and Review

This Policy is communicated to employees involved in the procurement process and, where appropriate, to suppliers and other stakeholders.

The conclusions of the review may result in updates to the Policy, KPI indicators, supporting documents or supplier-related practices.

The Sustainable Procurement Policy is communicated to suppliers through the Company's website, procurement correspondence, procurement documents and the supplier qualification process. The Policy is also communicated to procurement employees as part of internal onboarding and ongoing internal communication.

10. Final Provisions

This Policy is subject to review at least once a year. The Policy is updated whenever necessary, in particular in the event of significant changes affecting the Company's procurement process or supply chain, changes in customer requirements, regulatory requirements, stakeholder expectations, KPI monitoring results or the level of supply chain risk.

Approval date: 29 January 2026
Document Owner: Procurement and Supply Department Leader

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Approved by: Management Board of Zakłady Metalowe POSTĘP S.A.