



LUBAWA
GROUP

LUBAWA GROUP OF COMPANIES

Code of Ethics and Business Conduct

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The companies within the LUBAWA Group of Companies have developed their activities while striving to maintain a balance between economics, ethics, and respect for the letter of the law. We have decided to unify and formalise these principles for the entire Group.

This Code of Ethics presents the values and principles that the Group considers particularly important. In pursuing our mission, we intend to be guided by the following values:

Respect: *the disposition to experience oneself and others through the recognition and respect of human dignity.*

Teamwork: *the ability to take collective action in the workplace toward achieving common goals and addressing and resolving arising issues.*

Professionalism: *making full use of one's knowledge and competencies, available technologies, and know-how.*

The Code is intended to contribute to shaping the awareness and social sensitivity of all employees of the Group, our Business Partners, and all other stakeholders. The clear provisions of this document are meant to help all of us make decisions in difficult, conflicting, or unusual situations.

*If we ask ourselves the question "What does it mean to act properly?" or if we suspect that someone is acting contrary to the Code, we have the right and the obligation to **SPEAK UP OPENLY**. We oppose the attitude that says: "It is sight that is dangerous, and safety lies in blindness." We are committed to creating an atmosphere in which we can speak openly, raise concerns, and ask for help in resolving problems.*

Management Board of Lubawa S.A.

Introduction: This Code shall apply to Lubawa S.A. in Ostrów Wielkopolski and to its affiliated companies (hereinafter referred to as the LUBAWA Group of Companies). The companies affiliated with Lubawa SA in Ostrów Wielkopolski are those that, together with Lubawa SA, form the LUBAWA Group of Companies, namely: Lubawa SA, Miranda Sp. Z o.o. , Litex Service Sp. z o.o., Litex Promo Sp. z o.o., Effect System Sp. z o.o. , Effect System SA, Eurobrands Sp. z o.o., MS Energy Sp. z o.o.



LUBAWA SA



miranda
TEXTILES

LITEX
PROMO

LITEX
SERVICE



EFFECT
SYSTEM

EUROBRANDS

MS ENERGY SP. Z O.O.

Table of Contents

I. GENERAL PRINCIPLES

1. Responsibility
2. Guidelines for Conduct
3. Our Values

II. LABOUR STANDARDS

1. Human Rights and Employment Practices
2. Principles of Non-Discrimination, Equality and Diversity
3. Mobbing, Harassment and Molestation
4. Privacy and Data Confidentiality
5. Health and Safety

III. ZERO TOLERANCE FOR CORRUPTION

1. Anti-Corruption Principles and Guidelines

IV. FAIR BUSINESS PRACTICES

1. Relations with Customers
2. Relations with Public Sector Stakeholders
3. Fair Competition and Antitrust Regulations
4. Settlements with Counterparties
5. Relations with Suppliers
6. Other Business Partners

V. COMMITMENTS TO THE ENVIRONMENT

1. Local Community
2. Shareholders/Partners
3. Political Activity
4. Environment
5. External Representation of the Companies

VI. FUNCTIONING OF THE CODE OF ETHICS

1. Familiarity and Accessibility of the Code of Ethics
2. Reporting Violations and Protection Against Retaliation
3. Ethics Committees
4. Implementation and Verification of the Code of Ethics and Business Conduct

I. GENERAL PRINCIPLES

1. Responsibility

The LUBAWA Group of Companies and its employees accept responsibility and commit to complying with applicable laws and regulations, as well as adhering to the ethical standards they have established for themselves.

The company's priority is to conduct its business in a responsible, transparent, and trustworthy manner. This Code of Ethics and Business Conduct, hereinafter referred to as the Code of Ethics, reflects the fundamental ethical and legal standards that guide us in all aspects of our operations. It serves as a model of proper conduct for all employees of the Companies in their relationships with supervisors, customers, partners, suppliers, and the local community.

We expect all our Business Partners and other stakeholders to also comply with the principles of the Code of Ethics. We do not hesitate to respond when someone violates or abuses our principles. Working in a responsible organisation that upholds ethical standards is not only a right but also an obligation. The successful implementation of the Code of Ethics depends on the commitment of each and every one of us.

2. Guidelines for Conduct

We commit to complying with the Code of Ethics, which applies to all employees, management, and members of the Boards of the Companies forming part of the Lubawa Group of Companies. Moreover, we seek to work with business partners who share our values and our commitment to ethics and compliance. We encourage our counterparties, suppliers, and other dependent entities to act in accordance with our Code of Ethics.

For the purposes of this document, the following definitions are introduced:

Stakeholder – means all employees, temporary workers, collaborators employed or providing services under a civil law contract in any of the companies forming part of the Lubawa Group of Companies, as well as suppliers, subcontractors, agents, counterparties, shareholders, or partners;

Internal Stakeholder – means all employees, temporary workers, and collaborators employed or providing services under a civil law contract in any of the companies forming part of the Lubawa Group of Companies.

The responsibility of each Internal Stakeholder includes:

- Complying with laws and acting in accordance with their letter and spirit;
- Being familiar with and understanding the principles of the Code of Ethics, as well as the procedures related to their position;
- Participating in training on the requirements of the Code of Ethics;
- Acting in a safe, ethical, and Company-compliant manner;
- Reporting irregularities and possible violations of the law and the requirements of the Code of Ethics;
- Cooperating in investigations or audits conducted by authorised representatives of the Companies.

The Management Boards of the Companies are also obliged to promote and develop a culture of ethics by:

- Creating a friendly and responsible working environment;
- Preventing all forms of discrimination and exclusion;
- Encouraging Stakeholders to report concerns and violations;
- Ensuring adequate protection for Stakeholders who report irregularities;
- Listening and responding effectively to problems;
- Supporting understanding and implementation of the principles of the Code of Ethics.

International Import and Export

The LUBAWA Group of Companies complies with all applicable legal regulations governing international import and export. Internal Stakeholders involved in international trade activities are required to be familiar with these legal regulations.

If a Stakeholder is uncertain about the ethical course of action in everyday situations, the following questions may help in making the right decision:

Is this situation or behaviour in compliance with the law and the internal regulations of the Companies?

Is it consistent with the values set out in the Code of Ethics and your own personal values?

Does it constitute a breach of the Code of Ethics?

Could it have a negative impact on you or the reputation of the Companies?

Could it expose the Companies, clients, or suppliers to risk?

Is there an alternative course of action?

What would your supervisor or colleagues think about this behaviour?

3. Our Values

In pursuing our mission, we are guided by the following values:

Respect: we recognize and respect human dignity—both our own and that of others.

Teamwork: we are capable of collaborating in the workplace to achieve shared goals, complete assigned tasks, and solve emerging problems.

Professionalism: we make full use of our knowledge and skills, available technologies, and know-how, acting in a way that leads us toward achieving professional excellence in our field and securing a leading position in the industry.

Compliance with laws and principles: we adhere to the law and follow our internal rules and procedures, which set high ethical standards.

II. LABOUR STANDARDS

We care about labour standards and mutual relationships, which represent a key commitment for both the Companies within the Lubawa Group of Companies and all their Stakeholders. Our goal is to ensure a friendly work environment free from discrimination, unequal treatment, intimidation, and harassment. We believe that every person has the right to work in conditions free from any form of persecution. As a company, we respect the privacy of our colleagues and protect all personal data. In terms of health and safety, our goal is to eliminate workplace accidents and avoid any actions that could cause harm to others.

1. Human Rights and Employment Practices

Our human rights protection policy is based on the respect and safeguarding of fundamental human rights as defined by national laws and in accordance with the principles set out in the following international documents:

OECD Guidelines for Multinational Enterprises which provide a set of recommendations for responsible business conduct in a global context, including human rights, employment and labour relations, the environment, combating corruption and bribery, consumer protection, science and technology, competition, and taxation (OECD, OECD Guidelines for Multinational Enterprises, 2011).

UN Guiding Principles on Business and Human Rights, a collection of principles concerning the observance of human rights (UN. UN Guiding Principles on Business and Human Rights. (2011). https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_en.pdf)

Eight Fundamental Conventions of the International Labour Organization (ILO), defining human and labour rights that companies are expected to respect, including the right to freedom of association and collective bargaining, the right to non-discrimination, and the elimination of slavery, forced labour, and child labour.¹

¹ Convention No. 29 on Forced or Compulsory Labour, Convention No. 87 on Freedom of Association and Protection of the Right to Organise, Convention No. 98 on the Right to Organise and Collective Bargaining, Convention No. 100 on Equal Remuneration for Men and Women Workers for Work of Equal Value, Convention No. 105 on the Abolition of Forced Labour, Convention No. 111 on Discrimination (Employment and Occupation), Convention No. 138 on Minimum Age for Admission to Employment, Convention No. 182 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour.

The Ten Principles of the United Nations Global Compact relating to human rights.

The International Bill of Human Rights, comprising five key United Nations documents: the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights together with its Optional Protocols concerning individual communications and the abolition of the death penalty, and the International Covenant on Economic, Social and Cultural Rights (UN, The International Bill of Human Rights. (1948) <https://www.ohchr.org/documents/publications/compilation1.1en.pdf>)

We are guided by respect for human rights and implement best employment practices, including:

- Employing only those workers who are legally authorized to work;
- Committing to maintaining a friendly working atmosphere within our Companies, particularly through promoting teamwork, accountability, and respect for diversity;
- Demonstrating support for the protection of human rights and avoiding participation in business activities that violate them, while engaging—whenever possible—in initiatives that promote business ethics among stakeholders;
- Ensuring equal access to employment regardless of gender, sexual orientation, religion, social background, or race;
- Providing fair and timely remuneration for work performed, sufficient to ensure a standard of living consistent with human dignity for employees and their families;
- Providing working conditions that meet occupational health and safety standards;
- Ensuring equal career development opportunities for all, based on seniority, skills, and experience;
- Creating opportunities for expanding knowledge, acquiring new skills, and personal development;
- Guaranteeing the freedom to express thoughts and opinions;
- Ensuring the freedom to join trade unions;
- Guaranteeing the right to rest.

We respect international norms and standards:

- We do **not** use slave, forced, or compulsory labour;
- We do **not** withhold passports or work permits as a condition of employment;
- We do **not** participate in human trafficking or exploitation;
- We do **not** import products that are in any way connected to slavery or human trafficking;
- We do **not** employ children or minors below the legal minimum working age.

We comply with national and international regulations on the protection of young person labour as set out in the following documents:

- The Constitution of the Republic of Poland;
- The Act of 26 June 1974 – the Labour Code (Polish Journal of Laws No. 24, item 24, item 141, as amended);
- Council Directive 94/33/EC of 22 June 1994 on the protection of young people at work (OJ L 216, 1994, p. 12, as amended);
- The United Nations Convention on the Rights of the Child;
- ILO Convention No. 138 concerning the Minimum Age for Admission to Employment;
- ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour;
- ILO Convention No. 79 concerning the Limitation of Night Work of Children and Young Persons in Non-Industrial Occupations.

An employee may only be a person who is at least 18 years of age, and – under the conditions for the employment of young persons specified in Section Nine of the Labour Code – also a person under the age of 18.

A young person is a person who is at least 15 years old but under 18 years of age. A young person may be employed under a contract for vocational training purposes, and after reaching the age of 16, under an employment contract, but only for the performance of light work.

In the event that a child is found attempting to take up employment, we act in accordance with the following guidelines:

- We verify the age of all employed persons for every form of employment in accordance with the provisions of the work regulations;
- We initiate dialogue with the child and, if necessary, notify the appropriate institutions capable of assisting the child in their difficult situation;
- We collect information on any probable violation of the standards upheld by the Lubawa Group of Companies;
- We record factual evidence — we document the case;
- We determine corrective and preventive measures, taking into account the best interests of the child;
- We conduct inspections throughout the supply chain to ensure that all standards set forth in the Code of Ethics and Business Conduct are applied.

If an employee has doubts:

A child is defined as any person under 16 years of age, unless local law specifies a different age as the age of compulsory education.

2. Principles of Non-Discrimination, Equality and Diversity

We recognize the equality of every employee and act in the only proper way toward all individuals who are part of the Lubawa Group of Companies, respecting the principles of non-discrimination, equality, and diversity:

- We act honestly, in accordance with the principles and values of the Companies;
- We treat employees equally with respect to the establishment and termination of employment, working conditions, promotion, and access to training for professional development;
- We adhere to the principle of equal opportunity policy aimed at effectively eliminating all forms and manifestations of discrimination in the workplace, covering aspects such as racial, religious, sexual, national, ethnic, or gender diversity, disability, health condition, marital status, political beliefs, or trade union membership;



- We have standardised recruitment, employment, promotion, training participation, disciplinary, and dismissal processes according to clearly defined criteria related to work and qualifications, which apply to all employees;
- In our daily relationships, we show mutual respect.

Definition of Discrimination Prohibition

Equal treatment in employment means the absence of any form of discrimination, whether direct or indirect, in particular on the grounds of sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, creed, sexual orientation, or type of employment.

Direct discrimination occurs “where an employee, on one or more discriminatory grounds, is or could be treated less favourably than other employees in a comparable situation.”

Indirect discrimination occurs “where, as a result of an apparently neutral provision, criterion or practice, there are or could be unfavourable disproportions or a particularly disadvantageous situation in relation to the establishment or termination of employment, employment conditions, promotion or access to training aimed at improving professional qualifications for all or a significant number of employees belonging to a group distinguished by one or more discriminatory grounds, unless such provision, criterion or practice is objectively justified by a lawful aim to be achieved and the means of achieving that aim are appropriate and necessary” (*Article 18(3a) §1–4 of the Labour Code of 26 June 1974; Polish Journal of Laws of 2023, item 1465, as amended*).

PERSONAL DEVELOPMENT

Supporting the personal and professional development of employees is very important in order to increase their engagement and job satisfaction, and thereby enhance the company’s productivity and efficiency.



3. Mobbing, Harassment and Molestation

We respect the principles of preventing mobbing, harassment, and molestation:

- We treat everyone with respect and avoid situations that may be perceived as inappropriate;
- We firmly express objections toward anyone engaging in inappropriate behaviour.

Definition of Mobbing

Mobbing refers to actions or behaviours concerning an employee or directed against an employee, consisting of persistent and long-term harassment or intimidation of the employee, resulting in or intended to result in a lowered sense of professional self-worth, humiliation or ridicule, isolation, or elimination from a team of co-workers (*Art. 94[3] of the Labour Code of 26 June 1974; Journal of Laws of 2023, item 1465, as amended*).

We categorically oppose any practices that allow for any form of psychological or physical violence, in particular:

- We do **not** convey feedback about work through shouting or threats;
- We do **not** tolerate verbal, non-verbal, or physical behaviour by any person associated with our operations that aims to or may be perceived as mobbing, degrading, intimidating, harmful, or hostile actions;
- We do **not** tolerate any form of psychological (mobbing) or physical harassment, including behaviour that violates personal dignity through persistent pestering, harassment, continuous criticism, bullying, or intimidation;
- We do **not** criticize someone's work without justified reason and do not discredit others due to the quality of their performance;
- We do **not** ignore internal stakeholders by excluding them, for example, from task assignments;
- We do **not** ridicule, undermine competencies, or disclose private details about internal stakeholders;
- We do **not** isolate internal stakeholders mentally or physically from the rest of the team (e.g., through unjustified job reassignment);

- We do **not** overload internal stakeholders with excessive duties compared to others in equivalent positions;
- We do **not** force anyone to work during illness under threat of dismissal;
- We do **not** practice unannounced, compulsory overtime;
- We do **not** accept offensive remarks, gossiping, insults, or deliberate withholding of important information;
- We do **not** spread false information damaging anyone's reputation;
- We do **not** allow any form of physical or psychological harassment intended to violate the dignity, humiliate, or degrade an internal stakeholder.

4. Confidentiality and Data Protection

Out of concern for the comfort and safety of our Stakeholders, we respect the principles of privacy and data confidentiality. We handle all information related to our Stakeholders with due care.

- We do not disclose information entrusted to us in connection with business transactions, employment relationships, or confidentiality agreements.
- We protect and do not disclose business secrets of our Stakeholders, as well as state secrets and other classified information that may affect national security and defence.
- We do not use, unlawfully disclose, recommend, or induce others to use confidential information of Stakeholders within the meaning of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (Market Abuse Regulation, "MAR") and repealing Directive 2003/6/EC of the European Parliament and of the Council and Commission Directives 2003/124/EC, 2003/125/EC, and 2004/72/EC (OJ L 173, 2014, p. 1, as amended); (hereinafter referred to as: **"the MAR Regulation"**).
- Confidential information as defined in the MAR Regulation is disclosed only in accordance with applicable legal requirements.
- We process information in accordance with the Act of 5 August 2010 on the protection of classified information (consolidated text Polish Journal of Laws of 2024, item 632), the disclosure of which could cause or might cause harm to the Republic of Poland or would otherwise be detrimental to its interests.

- Access to confidential information under the MAR Regulation, classified information, and other non-public data is granted only to trained and authorised internal Stakeholders of the Lubawa Group of Companies.
- We also pay particular attention to the processing of personal data of our Stakeholders. We are committed to respecting and strictly complying with legal regulations, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – GDPR) OJ L 119, 2016, p. 1, as amended) and the Polish Personal Data Protection Act of 10 May 2018 (Polish Journal of Laws of 2019, item 1781).

In particular:

- We process personal data lawfully, fairly, and in a transparent manner for the data subject;
- We collect personal data for specific, explicit, and legitimate purposes and do not process them further in a manner incompatible with those purposes;
- We ensure data accuracy and, where inaccuracies are identified, we delete or correct the data;
- We apply the principle of data minimisation, meaning that personal data collected are adequate, relevant, and limited to what is necessary for the purposes for which they are processed;
- We store personal data in a form that permits identification of the data subject for no longer than necessary for the purposes for which the data are processed;
- We process data in a way that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using suitable technical and organisational measures;
- We do not share data with unauthorised persons;
- Each of our Stakeholders has the right to know what personal data we collect and store and may access their personnel records at any time;
- We do not share any personal data with third parties unless required by law;
- We do not issue instructions to internal Stakeholders that could result in breaches of information security for the Companies, their employees, or associated firms and individuals.



Definition of Personal Data

Personal data means any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person. *[Regulation (EU) No 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), (OJ L 119, 2016, p. 1, as amended)]*;

DETAILED INFORMATION

1. Supplier Code of Ethics – [Annex No. 7](#)
2. Anti-Corruption and Misconduct Procedure – [Annex No. 6](#)
3. Data Security and Protection Policy
4. Instruction for Managing the IT System for Personal Data Protection

5. Health and Safety

We make every effort to ensure that our actions are characterised by responsibility; therefore, we constantly strive to improve safety and enhance existing management systems:

- We report any hazardous situations, defects, or malfunctioning equipment that could cause serious accidents;
- We cease work immediately upon identifying a danger and promptly inform supervisors;
- We do not undertake tasks without the necessary competence or authorisation;
- We participate in safety training relevant to our positions;
- We are familiar with emergency and crisis management procedures applicable in the workplace;

- We encourage Stakeholders to comply with occupational health and safety principles and procedures;
- We promptly report any accidents, injuries, or illnesses;
- We take responsibility for our own health and physical and mental condition at work (e.g., when taking medication or substances that could impair concentration and performance);
- We take responsibility for ensuring safe working conditions;
- We implement management systems that support the creation of a safe working environment;
- We train ourselves and expect mutual awareness of health and safety principles in the workplace;
- We maintain a balance between private and professional life. This balance guarantees good health, well-being, and effective work. We therefore respect the right to digital disconnection outside of working hours.

DETAILED INFORMATION

1st Human Rights Protection Policy – [Annex No. 1](#)
2nd Occupational Safety Policy – [Annex No. 2](#)
3rd Anti-Discrimination and Anti-Mobbing Procedure – [Annex No. 3](#)
4th Recruitment Procedure – [Annex No. 4](#)
5th Internal Reporting Procedure in the Companies of the LUBAWA Group of Companies – [Annex No. 5](#)

III. ZERO TOLERANCE FOR CORRUPTION

We do not accept any form of corruption. We build the strong market position of the LUBAWA Group of Companies through honest and reliable relationships with our clients.

1. Anti-Corruption Principles and Guidelines

We apply and adhere to anti-corruption principles:

- If we become aware of any issues or violations related to alleged bribery, corruption, extortion, or embezzlement, or if we have any suspicions in this regard, we report them to our direct supervisors;
- We conduct our business in accordance with all applicable laws and regulations;



- We do not engage in any actions that could be perceived as corrupt behaviour — in particular, we do not accept or offer material or non-material benefits;
- Upon observing or suspecting any attempt at corrupt activity, we immediately inform our supervisors to verify the situation and take appropriate corrective measures;
- We promote principles of ethics and integrity in all business relations;
- We act in the best interests and needs of the Companies, not based on private interests or relationships;
- We inform our direct supervisors of any potential or actual conflict of interest.

We do not tolerate corrupt behaviour:

- We do **not** permit promising or offering financial or personal benefits to public officials, state-owned entities, political parties, party members, or candidates for public office, or to business partners, in order to obtain or maintain business relationships;
- We do **not** accept personal benefits, gifts, or invitations to entertainment events in exchange for establishing business relations, providing services, or disclosing confidential information, or if the donor's intent is to obtain a biased decision;
- We do **not** offer or accept inappropriate gifts or other financial benefits and avoid any actual or potential conflicts of interest;
- We do **not** tolerate any form of corrupt activity.

We prohibit all forms of corruption, including:

- **bribery** – that is, any act of promising, accepting, offering or soliciting financial or personal benefits in order to achieve a specific personal objective by bypassing standard procedures. Bribery applies to situations occurring both in the public sector, involving a public official, and within a company, in connection with one's position, for the purpose of causing financial damage to the company, committing an act of unfair competition, or engaging in an improper preferential act in favour of a purchaser or recipient of goods or services;
- **Influence peddling** – that is, mediating in the handling of various matters in exchange for a financial or personal benefit, or the promise thereof, while invoking one's real or alleged influence;
- **fraud** – that is, knowingly misleading someone or taking advantage of another person's mistake for personal gain;

- **extortion** – that is, the use of force or threats to compel another person to act in a certain way;
- **embezzlement** – that is, the appropriation of entrusted funds or other assets;
- **money laundering** – that is, accepting, concealing, or introducing into financial circulation funds derived from criminal activity;
- **exploitation of conflicts of interest** – that is, abusing authority or position to obtain personal benefits;
- **nepotism** – that is, favouring family members or friends (also known as cronyism) by granting them employment or positions of power for which they are not qualified;
- **accepting fees or gratuities in exchange for speeding up the handling of matters;**
- **conducting transactions using non-public information;**
- **obstructing or hindering public tenders, including engaging in bid rigging.**

DETAILED INFORMATION

1. Anti-Corruption and Misconduct Procedure – **Annex No. 6**
2. Internal Reporting Procedure in the Companies of the LUBAWA Group of Companies – **Annex No. 5**
3. Anti-Money Laundering and Counter-Terrorism Financing Procedure

2. Sponsorship and Philanthropy

The Companies of the LUBAWA Group of Companies, being sensitive to the needs of individuals or entities in difficult circumstances, support public benefit organisations and public institutions such as hospitals, schools, and kindergartens, as well as others, by addressing their most urgent needs through financial or material assistance. The Companies of the LUBAWA Group of Companies support all initiatives aimed at providing selfless assistance to those in need, as well as those promoting health, intellectual capital development, professional activation, education, and environmental protection.

IV. FAIR BUSINESS PRACTICES

Our goal is to build partnership relations with our Stakeholders based on respect for human rights and legal regulations, responsibility, and mutual trust. In relations with government clients, we adhere to the provisions governing the implementation of specific activities. We act in full

compliance with the letter of the law; therefore, actions constituting acts of unfair competition are not permitted within our company. We require our subcontractors and suppliers to confirm their commitment to socially responsible business practices and to undertake to comply with the principles and values set out in the LUBAWA Group of Companies' Code of Ethics and Business Conduct and the Suppliers' Code of Ethics. We respect and comply with the principles of personal data protection of our Stakeholders.

1. Relations with Customers

We are building the LUBAWA Group of Companies based on our core values, which include respect, professionalism, and teamwork:

- We are guided by the principle of the client's best interest;
- We provide professional, competent, and courteous service;
- We are open to clients' expectations and suggestions;
- We provide complete and truthful information about the products and services offered;
- We communicate transparently about the progress of complaint or complaint handling;
- We ensure the protection of client information and personal data;
- We deliver products and services of the highest quality;
- We strive to establish partnership relations with clients based on respect, responsibility, and trust;
- As a company, we take full responsibility for the products and services we offer, declare adherence to all commitments and deadlines agreed with clients, remove defective goods, and eliminate unprofessional practices;
- We avoid unequal treatment and any form of discrimination against clients.

3. Relations with Public Sector Stakeholders

The LUBAWA Group of Companies, in its interactions with clients from the public sector, applies the provisions of the Public Procurement Law of 11 September 2019 (Polish Journal of Laws of 2024, item 1320, as amended). On the supranational level, it adheres to the Treaty on the Functioning of the European Union together with the group of so-called procurement directives.

3. Fair Competition and Antitrust Regulations

We uphold fair competition and comply with antitrust regulations by:

- Practising ethical conduct in our relationships with competitors;
- Respecting the good reputation of competing entities and adhering to the principles of fair competition;
- Believing that by competing solely through our brand, the quality of our products and services, and our commercial terms, we contribute to the development of a strong free-market economy.

In our relations with competing entities:

- We comply with the principles of fair competition and maintain a professional attitude based on constructive dialogue and cooperation;
- We avoid conflicts of interest;
- We respect competing companies.

We do not tolerate actions considered as acts of unfair competition:

- We do **not** enter into agreements that restrict competition, the purpose or effect of which is to eliminate, limit, or otherwise distort competition in the relevant market;
- We do **not** abuse a dominant market position against weaker competitors, for example by directly or indirectly imposing unfair prices that are either excessively high or unreasonably low;
- We do **not** breach trade secrets;
- We do **not** imitate products;
- We do **not** induce others to terminate or breach contracts;
- We do **not** engage in slander or dishonest praise;
- We do **not** bribe public officials;
- We do **not** obstruct market access;
- We do **not** use unfair or prohibited advertising.

4. Settlements with Counterparties

The LUBAWA Group of Companies follows the principle of timely settlement of all obligations towards its Stakeholders. All payments between the company and its Stakeholders are made in accordance with prior arrangements. Financial records accurately reflect all transactions and comply with accounting standards and applicable law. We oppose document falsification and any dishonest representation of conducted transactions.

5. Relations with Suppliers

In striving to build lasting and transparent relationships with our Stakeholders:

- We conduct the contractor selection process reliably and in accordance with internal procedures;
- In selecting subcontractors and suppliers, we are guided by criteria such as quality, experience, scope of offer, price, and timeliness; It is also important to us that our subcontractors and suppliers meet social, environmental, and ethical business standards;
- We do not engage in business relations, directly or indirectly, with entities or individuals subject to Polish or international economic sanctions;
- We provide information regarding the contractor selection process and procedures;
- We avoid situations that could lead to irregularities (e.g. conflicts of interest, acceptance of material benefits) both during selection and cooperation with subcontractors or suppliers;
- We exercise due diligence in concluding and executing contracts;
- We build mutual relationships based on professionalism and trust;
- We resolve doubts and disputes through constructive dialogue.

6. Other Business Partners

To our sales agents and advisers:

- We define our principles and requirements in business transactions, with particular emphasis on ethical standards, fair conduct, and applicable laws;
- We communicate our expectations to promote the principles set out in the LUBAWA Group of Companies' Code of Ethics and Business Conduct as well as the Supplier Code of Ethics, and require commitment to their observance.

V. COMMITMENTS TOWARDS THE ENVIRONMENT

We shape our relations with the external environment based on professionalism, transparency, and openness, while also respecting the rights and interests of other entities. Our goal is to build long-term and mutually beneficial social relationships founded on trust and respect. We share with our Stakeholders and other external parties information about our values and ethical conduct principles as outlined in the Code of Ethics. At the same time, we respectfully acknowledge the values and ethical principles of our partners.

1. Local Community

In the spirit of social responsibility, we undertake commitments that support local communities. We are aware of the impact we have on local communities in the areas where we conduct our business:

- We employ local residents;
- We cooperate with local subcontractors and suppliers;
- We analyse the impact of our operations on the local environment and initiate actions that support its development;
- We strive to be a “good neighbour” who understands the expectations and needs of local communities;
- We actively participate in community life and engage in addressing key social issues;
- We take actions that contribute to the development of local communities;
- We encourage our internal Stakeholders to propose community initiatives in which the companies of the LUBAWA Group of Companies may become involved.

2. Shareholders/Partners

We are committed to using the company’s resources prudently and responsibly in order to ensure the best possible return for our shareholders/partners and to protect the value of their investments. All related business activities undertaken by us will adhere to the highest ethical and legal standards.

Internal Stakeholders are prohibited from allocating company assets or funds for political purposes without the knowledge and consent of the Management Boards of the companies comprising the LUBAWA Group of Companies. Political support shall be understood as endorsing a candidate for local, national, or international office using company resources — including covering expenses related to campaign activities or assigning employees to political work for a candidate during their working hours.

4. Environment

We are aware of the impact of our operations on the natural environment and the necessity of taking initiatives to ensure sustainable development. In caring for the natural environment:

- We carry out our assigned tasks and responsibilities with due regard for the protection of the natural environment;
- Our environmental commitments are expressed through the implementation of an integrated approach to environmental management, the prevention of pollution, and the undertaking of appropriate actions that support environmental protection, both within our management systems and through social initiatives. As part of the continuous improvement of environmental management processes, we engage our resources — including subcontractors and other interested parties;
- We minimise negative environmental impacts in our daily activities, regardless of the type of work performed;
- We comply with the internal environmental protection regulations of the Companies;
- We participate in training sessions on the standards of the Environmental Management System in accordance with ISO 14001;
- We involve internal Stakeholders in the Companies' environmental protection initiatives.

5. External Representation of the Companies

In safeguarding the good name of the Companies that form part of the LUBAWA Group of Companies, we strive to ensure that our appearance and conduct are appropriate to our professional roles.

In our relations with external entities, we commit to open and active information exchange. We communicate in a professional manner and avoid misleading our audience.

The following persons are authorised to communicate with the media:

- The Management Board of Lubawa S.A.,
- The Management Boards of the Companies within the LUBAWA Group of Companies,
- Persons authorised by the Management Boards of the Companies within the LUBAWA Group of Companies.

DETAILED INFORMATION

Media Procedure – **Annex No. 8**

VI. OPERATION OF THE CODE OF ETHICS AND BUSINESS CONDUCT

1. Familiarity and Accessibility of the Code of Ethics

- 1.1 The standards and principles set out in the Code of Ethics of the Companies within the LUBAWA Group of Companies apply to all internal Stakeholders, regardless of their position, length of service, type of contract, working hours, or scope of duties.
- 1.2 Each internal Stakeholder is obliged to comply with the standards and principles specified in the Code of Ethics and Business Conduct. Failure to comply with the Code may result in disciplinary action.
- 1.3 Each internal Stakeholder is required to participate in training on the principles of the Code of Ethics and Business Conduct and to undergo periodic reviews of their knowledge of it.
- 1.4 Before employment or the commencement of cooperation with a new internal Stakeholder, the Companies ensure that they have the opportunity to familiarise themselves with the contents of the applicable Code of Ethics of the Group.
- 1.5 Each internal Stakeholder has constant access to the Code of Ethics via the internet, and any changes to its content are immediately communicated through internal communication channels (e.g. by email) or through dedicated training sessions.
- 1.6 Internal Stakeholders have the right to submit comments and propose amendments to the principles and provisions of the Code of Ethics.

2. Reporting Violations and Protection Against Retaliation

- 2.1 Each Stakeholder has both the right and the obligation to report, in good faith, any suspected irregularities or violations of the principles set out in the LUBAWA Group Code of Ethics and Business Conduct.
- 2.2 The system for reporting irregularities related to compliance with the standards contained in the Code of Ethics and the procedure for handling such reports is defined in the Internal Reporting Procedure within the Companies of the LUBAWA Group of Companies.
- 2.3 We provide protection against retaliation for individuals who, in good faith, report observed improper conduct or practices.
- 2.4 We require the Supplier to report to the LUBAWA Group of Companies any suspicions or violations of the provisions of the LUBAWA Group of Companies Supplier Code of Ethics.
- 2.5 Reports of violations should be submitted through the following channels:
- in writing, via the GlobalLeaks application (panel available at <https://sygnalista.grupalubawa.pl>);
 - orally, by requesting a direct meeting with the Compliance Officer (contact details for the Compliance Officer are available at <https://lubawagroup.com/grupa/csr/>). Such a meeting will be organised within 14 days of receiving the request. Submitting a request for a meeting does not constitute a formal report of a violation.
- 2.6 In addition to the channel specified above, violations of the Code of Ethics and Business Conduct may also be reported by:
- Speaking directly with or emailing one's supervisor or a member of the Management Board,
 - Speaking with a member of the Ethics Committee.

3. Ethics Committees

Ethics Committees operate within the Companies of the LUBAWA Group of Companies and are composed of individuals distinguished by their knowledge of the respective Company, their authority among colleagues, and their impeccable reputation.

The main responsibilities of the Ethics Committees include:

- Promoting a culture of ethics and conduct in accordance with ethical principles;

- Clarifying issues related to the application or interpretation of the Code of Ethics;
- Supporting the onboarding of new internal Stakeholders, ensuring they understand and follow the Code of Ethics;
- Organising periodic training sessions and workshops on business ethics.

Contact with the Ethics Committee can be made:

- In person, at the company's headquarters or other business locations;
- By phone or email with the designated representative of the Committee. Contact details of Committee members are made available on information boards or other customary locations designated for this purpose.

DETAILED INFORMATION

6th Internal Reporting Procedure in the Companies of the LUBAWA Group of Companies – **Annex No. 5**
7th Supplier Code of Ethics – **Annex No. 7**

4. Implementation and Verification of the Code of Ethics and Business Conduct

To ensure compliance with the Code of Ethics and Business Conduct, the Management Boards of the Companies within the LUBAWA Group of Companies will undertake the following actions:

- 1st Ethics Committees will conduct training sessions on ethical principles applicable within the LUBAWA Group of Companies for all internal Stakeholders. Trainings will be organised at least once every two years.
- 2nd Should any doubts arise regarding the interpretation of the provisions of the Code of Ethics and Business Conduct, internal Stakeholders are required to seek clarification from their supervisor or a representative of the Ethics Committee.
- 3rd The Code of Ethics and Business Conduct is subject to mandatory review and potential updates at least once every two years, conducted by the Ethics Committee established for Lubawa SA in coordination with the Management Boards of the Companies.
- 4th Adherence to the provisions of the Code of Ethics and Business Conduct is monitored in accordance with relevant internal control regulations.

5th The Code of Ethics and Business Conduct enters into force on the date of its adoption and publication.

6th Managers of all organisational units within the Companies of the LUBAWA Group of Companies are responsible for familiarising their internal Stakeholders with the Code of Ethics and Business Conduct.

7th The contents of the Code of Ethics and Business Conduct, as well as any amendments, are communicated in documentary form or via email. Information provided in this manner is binding for internal Stakeholders from the moment they could access it, without the need for written acknowledgement. In certain cases, internal Stakeholders may be required to submit a written statement confirming they have received and understood the Code.

8th The Code, or its summary, will be published on the Company's website.

9th The Code will be delivered to suppliers, clients, and all Stakeholders, along with an obligation to comply with its provisions.

10th Provisions concerning the obligation to comply with the Code of Ethics and Business Conduct by all parties to business relationships constitute an integral part of commercial and civil law agreements.

SIGNED BY THE
MANAGEMENT BOARD
OF LUBAWA

Annexes:

- 1st Human Rights Protection Policy;
- 2nd Workplace Safety Policy;
- 3rd Anti-Discrimination and Anti-Mobbing Procedure;
- 4th Recruitment Procedure;
- 5th Internal Reporting Procedure in the Companies of the LUBAWA Group of Companies;
- 6th Anti-Corruption and Misconduct Procedure;
- 7th Supplier Code of Ethics;
- 8th Media Procedure.