# Code of Ethics and Business conduct



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# Clearly defined values enhance a company's credibility

This Code of Ethics and Business Conduct defines how our employees working at Vitrintec do their jobs. It contains a set of ethical principles and practices that we follow and will continue to maintain in the future. We implement it because only by involving employees who are committed to the values listed in this document in their conduct can we be seen as a credible company.

Credibility is a key feature of a company to attract employees and customers. It helps to build trust-based relationships between groups of people influenced by the company. Vitrintec Sp. z o.o. strives for a strong business position, strengthens its own image and builds a company culture, which is reflected in this Code of Business Conduct and Ethics. We want to become a leader in our industry, and this comes with greater responsibility. Fully aware that ethical principles are the foundation of any business, we are implementing this Code of Business Conduct and Ethics. Unethical actions in this area constitute a business risk which, in the worst case, excludes the entity concerned from the market, in the best case, compromises the good name of the organisation. This is why we do not accept any unethical behaviour and take immediate and straightforward measures against such practices.

While our values and this Code of Conduct can point us in the right direction, they are never a substitute for thinking. In the process of making sometimes difficult and complex decisions, some questions may arise, and this Code will not answer every one of them. But I hope that it will provide some guidance on how to choose the right path that does not interfere with our personal principles. We should all keep in mind that based on clearly defined values, we build the credibility of the company.

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Code of Ethics and Business Conduct (hereinafter: Code) is a guide designed to help us understand our values. It provides instructions on how we should behave in our interactions with each other in the office, with clients and with the wider community within which we operate, as well as with other stakeholders. The Code is the primary document we can refer to in case of possible ethical dilemmas. It provides contact references for any questions or concerns that may arise.

We have developed our Code according to our values: a set of beliefs that governs our actions. These values commit us to acting in accordance with ethical standards, in a responsible and sustainable manner. Responsibility and balance should be reflected in everything we do, so:

We care about life. We care about the well-being of people and the health of the environment. We work in a safe manner. We never ignore unsafe behaviour. We support health and well-being initiatives. We prefer green, environmentally friendly solutions and conduct our business in a manner that does not harm the environment. We are aware of our responsibility towards future generations.

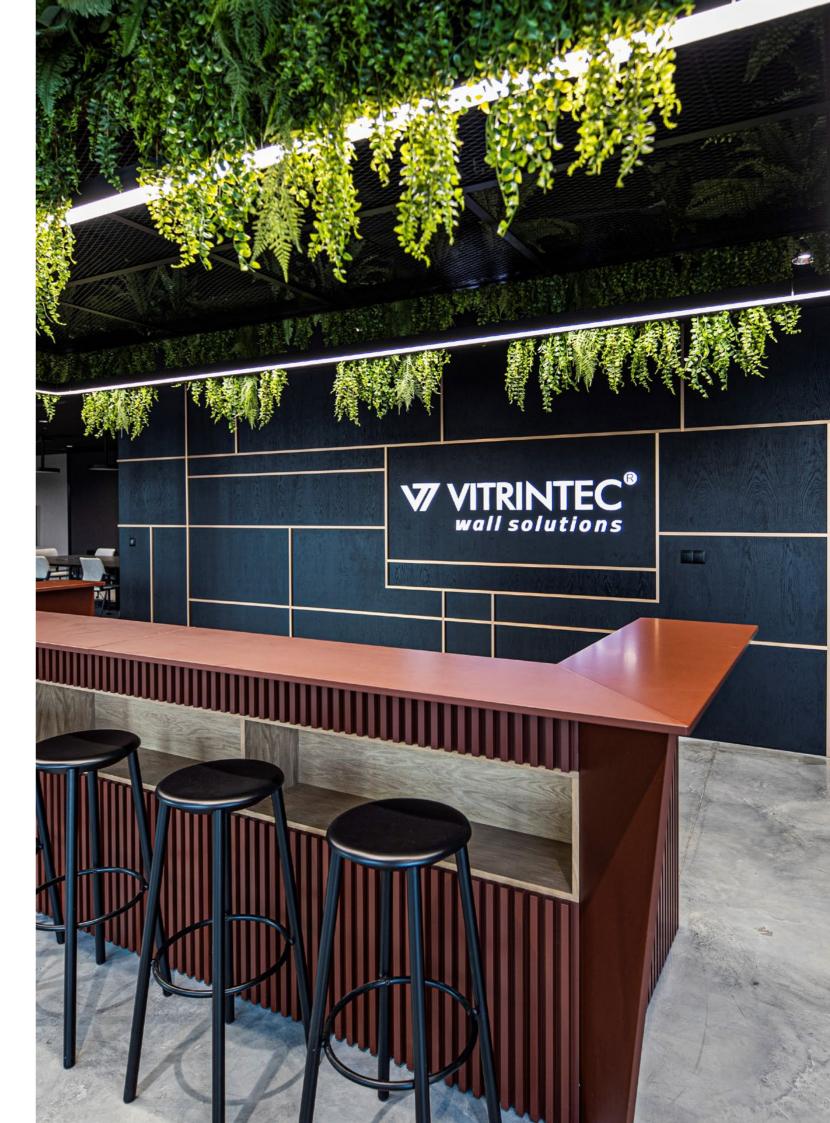
We conduct our business activities in a fair and transparent manner, guided by the principles described in this Code of Conduct, and we do not accept shortcuts. We promote openness in the workplace so that everyone can express their opinion. Acting as individual employees, as teams of employees (departments) and as Vitrintec Sp. z o.o. as a whole, we strive to be better in everything we do. We are an organisation that continuously improves and openly shares our knowledge. We are proud of the quality and innovation that we implement. We use diversity to deliver the best solutions. We foster a culture of inclusion, openness and honesty, showing trust and respect for each other.

We care about our customers, helping them to succeed in their business. We strive to understand their needs and expectations to help them transform their vision into reality through our products.

This Code is based on values derived directly from human rights. We advocate the rights of all people, as codified in the Universal Declaration of Human Rights adopted by the United Nations (UN), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the conventions of the UN affiliate International Labour Organisation. At Vitrintec we take seriously the obligation to protect and improve the quality of life of people, regardless of their position within its structure and organisation. All Vitrintec employees are obliged to comply with the principles described in this Code and to meet the requirements contained therein: this also applies to part-time employees, employees under civil law contracts, employment agency contracts and temporary workers. Managers, supervisors and all supervising the work of others have a particular responsibility. Such individuals lead by example and must therefore act in accordance with this Code. Breaches of the Code or any other document describing company policy will result in corrective or disciplinary action, up to termination of employment.

This Code extends well beyond professional activities at Vitrintec, as external beneficiaries play a key role in our business. These include subcontractors, suppliers, consultants, intermediaries, representatives of research and scientific bodies, state and local authorities and any interest groups also commit to comply with our Code in areas that directly affect them when working with us. We comply with all legal requirements relating to our activities. If you discover that the Code conflicts with applicable laws, please let us know.

The commitment of Vitrintec to conduct business with high integrity and transparency is linked to a work culture in which everyone feels empowered to report noncompliance with the law and this Code, including unethical behaviour. As our, you are responsible for reporting misconduct or any suspected misconduct to your manager/ leader or the manager's supervisor. If you feel uncomfortable about this, you can report the suspicion or violation anonymously. We will investigate any reported issues promptly and confidentially and take appropriate action based on the results of our investigation. Instructions on how to report violations can be found on page 12. If you are a manager, you are responsible for ensuring that any reported violations are dealt with appropriately. Vitrintec Sp. z o.o. management does not tolerate retaliation against an employee who has reported suspected violation in good faith. "Good faith" means that the whistleblower, to the best of his or her knowledge and belief, reported all circumstances they knew about, and everything they submitted was truthful and they did not conceal anything. Any employee engaging in retaliation will be subject to disciplinary measures. If you experience retaliation, report it as an inappropriate behaviour.





#### CHAPTER I

OUR COMMITMENTS IN THE WORKPLACE



Working at Vitrintec Sp. z o.o., in addition to providing the best products and support to customers to help them achieve their goals, also means managing the company's assets in a sustainable manner and creating a fair, healthy and safe working environment in which we can grow as individuals and as employees. Such defined goals can only be achieved through professional conduct and by promoting an inclusive culture in which everyone feels comfortable.

# Health and safety

Occupational health and safety is understood as the prevention of accidents and the promotion of a healthy and safe working environment for all employees, coworkers and anyone else who comes into contact with our company. For Vitrintec Sp. z o.o., this is a priority and our objectives are clearly defined: we create a hazard-free environment. Health and well-being often depend on the working environment. These consist of elements such as supportive employee supervision, a sense of purpose and physical safety at work.



# Working principles at Vitrintec Sp. z o.o.



We are concerned about the well-being of our employees and all people affected by our business.



We strive to create a working environment that promotes the health, safety and well-being of employees.



We implement activities focused on health, safety and wellbeing, based on visible leadership.



We promote best practices on health and safety, prevention of accidents at work. We exchange experiences in this area with actors in the supply chain and among our industry representatives.



We provide employees with appropriate health and safety training.



We make sure that subcontractor employees are properly trained and equipped with the equipment, clothing and tools to work safely.



In terms of healthy and safe working practices, we aim to be industry leaders. We are constantly making improvements to create a hazard-free environment.

### Decent working conditions

All employees should receive adequate remuneration for their work and be treated fairly and with respect for their labour rights. The workplace should provide decent working conditions, in accordance with the legislation governing workers' rights, general human rights and the International Labour Organisation (ILO) standards which we endorse. These principles should apply not only to those employed within our organisation, but also to actors operating in our supply chain.

We do not tolerate any form of child labour, forced or compulsory, at our project sites or in our supply chain. The Children's Ombudsman Act recognises as a child every human being from conception until the age of majority (18 years). Within the meaning of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on 20 November 1989, "child" means every human being below the age of eighteen years, unless, in accordance with the law relating to the child, he or she attains the age of majority earlier (Article 1),. The child, due to his/her physical and mental immaturity, requires special care and attention, including appropriate legal protection, both before and after birth.

We do not accept practices that would restrict workers' freedom of movement, such as making employment conditional on taking identity or other personal documents.

We recognise the special needs of pre-retirement employees and we are obliged to ensure that they receive adequate protection during this period of their lives.

Working hours, wages and allowances in our company comply with national and local laws and relevant ILO conventions.

We recognise and respect collective agreements and the right of our employees to organise and bargain collectively where permitted by law.

We maintain good relations with labour organisations, employee representatives and the employees themselves employed by our company.

We maintain an ongoing dialogue with our employees to ensure that their rights are respected.

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### Diversity and inclusion

We understand diversity in the context of the human person as all the features that make us different as individuals, such as age, gender, sexual orientation, ethnicity, membership of a particular generation, religion, beliefs, language, education, marital status. We understand inclusion as recognising and promoting the wealth of unique ideas, views, perspectives and opinions from the diverse members of our workforce.

We respect all individuals, strive to work as one team and foster forms of open, honest and respectful communication:

We believe that in a diverse and diversity-accepting work environment, we are able to create better products for our customers.

We treat everyone the same, ensuring that everyone has equal opportunities to progress: regardless of appearance, background, religion, beliefs, gender, sexual orientation, gender identity or expression, age, disability, marital or family status or any other characteristic protected by law.

Our employment equality policy covers all aspects of work, including the right to training and qualification enhancement, the right to promotion and any other conditions related.

We do not accept any form of disrespect, harassment, discrimination, bullying, abuse or unwanted sexual proposition.

### Presonal development

With personal development opportunities, employees of Vitrintec Sp. z o.o. can develop their competences and personal potential and apply their newly acquired skills and abilities to continuously improve the performance of our teams.



We believe that the people we employ are our greatest asset



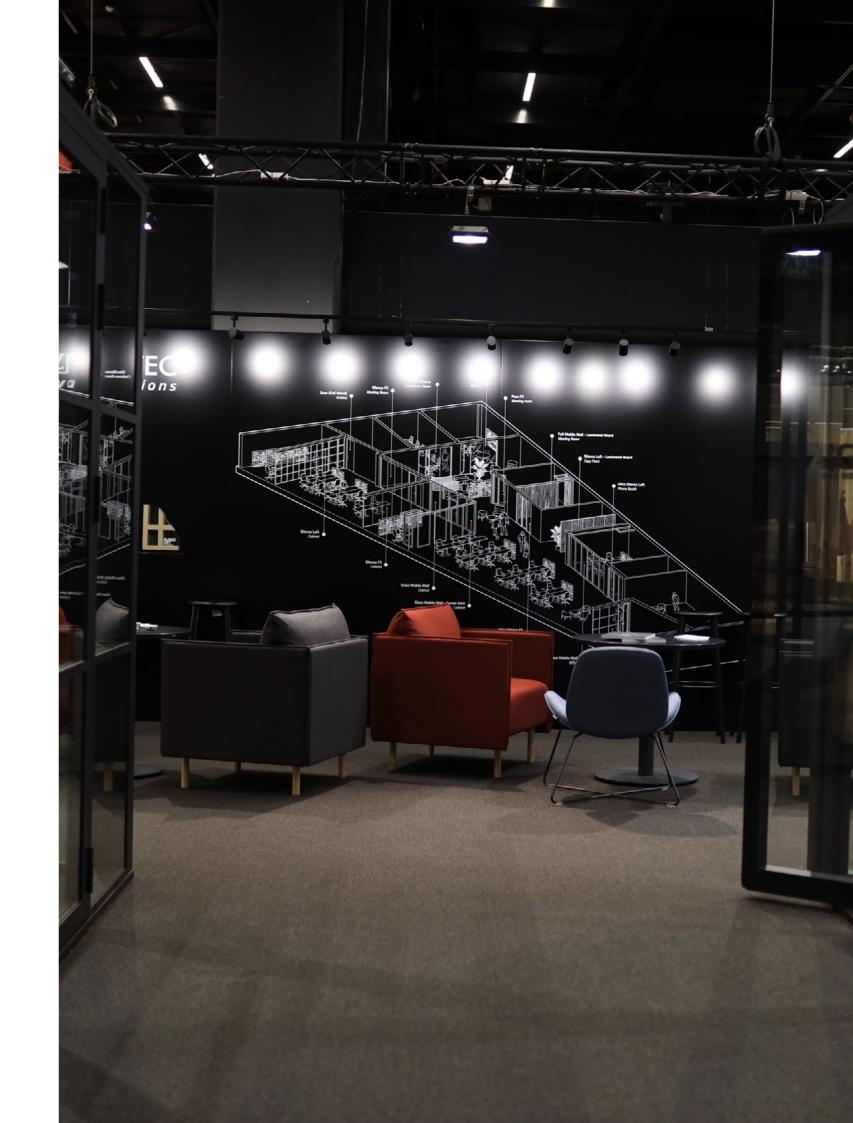
We support employees in both personal and professional development



We offer training and other development opportunities to our employees, which allow them to expand their knowledge and skills



We encourage employees to develop and learn from each other through mutual collaboration and sharing of best practice



#### **Data protection**

The protection of personal data consists in complying with legal regulations concerning the creation and handling of sets of personal data, as well as individual data, concerning a specific natural person. Personal data means information relating to an individual or information that can be used, directly or indirectly, to identify such an individual. Such data may include, for example, date of birth, contact information, names of family members, health information, photographs or identity document number. The protection of personal data is intended to ensure that the right to privacy is protected administratively and legally.

- The Management Board of Vitrintec Sp. z o.o. ensures that it endeavours to perform all activities on personal data, e.g. their collection, recording, comparison, storage and deletion, in accordance with applicable legislation, including in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals 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 GDPR)
- We respect the right of every individual operating within our organisation as well as within its sphere of influence to protect their personal data.
- We safeguard personal information about our employees and stakeholders.
- We ensure that only those who need personal information to perform their jobs have access to it.
- We ensure that all individuals who access personal data are provided with appropriate measures to protect it.
- We do not work with personal data or hold it for longer than required to fulfil the purpose for which it was collected.

# Reporting and record keeping

Vitrintec Sp. z o.o. keeps and presents full and accurate records of its business activities, which means that our financial and non-financial records and reports always represent the true state of our business.

- We believe that proper record-keeping is an essential part of conducting business with integrity and transparency.
- We document the nature of all financial transactions fully and accurately, in accordance with laws and other legal acts relating to accounting activities. In addition, all Vitrintec Sp. z o.o. reporting complies with International Financial Reporting Standards (IFRS), the Global Reporting Initiative (GRI) and the relevant Vitrintec quality policies.
- We maintain accurate non-financial documentation on quality, safety, health, environment, human resources, working time, corporate governance and skills development.

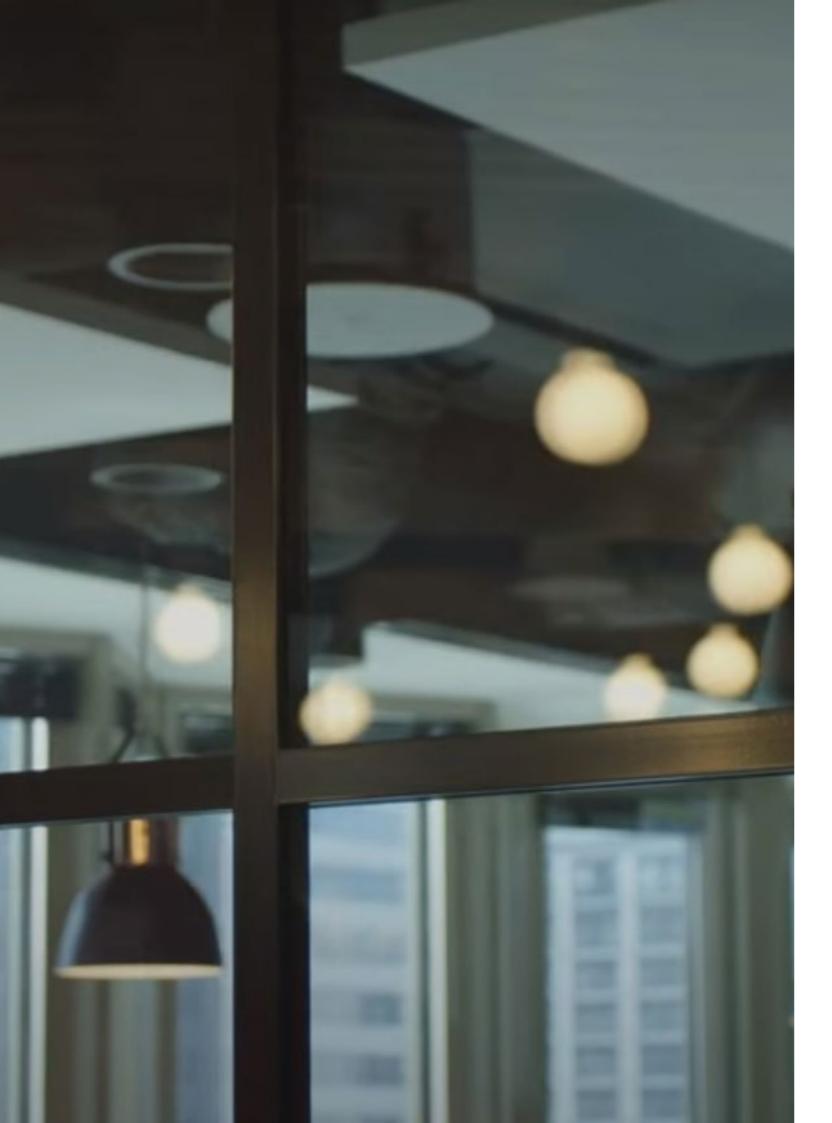
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#### **Company assets**

Vitrintec Sp. z o.o. holds both tangible and intangible assets. Examples of tangible assets are: fixed assets, semi-finished products (raw material), money, products offered, computers, real estate, premises and equipment, machinery, car fleet. Examples of intangible assets are: the Vitrintec brand, owned patents, licences, trademarks, know-how, company secrets or copyrights.

- We use brand assets responsibly and prudently.
- We protect tangible assets from damage, theft, loss and misuse because they are crucial to our business.
- We do not use our computer and electronic communication systems to transmit inappropriate content, including any illegal activity, or to provoke behaviour that could be considered harassment, discrimination, or that could be considered as signs of harassment or bullying.
- We protect the assets entrusted to us by our customers and other stakeholders from damage, theft, loss and misuse.





#### Confidentiality

Protecting ideas, internal processes and business information is very important for our competitiveness and for maintaining trust among our stakeholders. Therefore, certain information is protected company property and is considered confidential. Confidential information includes company secrets, know-how, research reports from the R&D department and other proprietary information. These categories also include patents, trademarks, copyrights, business plans, financial records, customer information, details of projects we are involved in, information related to the pricing of our products, employee files, prosecutions and investigations of reported misconduct, financial and accounting data and other business matters and methods.

- We respect the confidentiality of information relating to Vitrintec Sp. z o.o. and our stakeholders.
- We do not expect new employees to provide confidential information relating to their previous employment.
- We take all reasonable measures to prevent the disclosure of confidential information to people who do not need it or are not entitled to access it in connection with their job responsibilities.



#### Alcohol and drugs

Employees are prohibited from working under the influence of alcohol, drugs or substances with similar effects or from taking such substances while performing their duties. The above also includes chronic dependence on alcohol and drugs affecting the manner and regularity with which work duties are performed.

Working under the influence of alcohol is a serious breach of health and safety regulations as it compromises the safety of the employee and other people at work. Therefore, when an employer suspects that an employee is intoxicated, the employer may order a breathalyser test at work. A subordinate must consent to the test. If he/she does not agree to the test, the employer may call in the authorised services (e.g. the police), and the employee will then be forced to take the test. These issues are regulated in more detail in the Labour Code.

# Harassment in the workplace

With regard to internal and external relations at work, Vitrintec Sp. z o.o. expects all employees to refrain from any behaviour that could be considered as mobbing and from any manifestation of harassment, such as, inter alia, creating a hostile work environment towards individual employees or groups of employees, unreasonably interfering with the work performed by others or impeding the career path of another employee. It is prohibited to sexually harass or to make another person's career development conditional on that person's acceptance of a sexual proposition or an offer to engage in close personal contact expressly against that person's wishes.

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### CHAPTER II OUR MARKET COMMITMENTS



There is no doubt that in business the best relationships are built on respect and a set of mutual benefits. Therefore, we always strive to understand and anticipate the needs of our customers, suppliers, associates and other stakeholders, to act with integrity, responsibly and fairly. As employees of Vitrintec Sp. z o.o., we do our utmost to ensure that our work results in products of the highest quality, is completed on time and within budget. In these areas, we always strive to exceed expectations.

### Stakeholder relations

The way the market perceives us depends on how we conduct our day-to-day relationships with our stakeholders. Stakeholders include employees, customers, external business partners with whom we contract, and the community within which we work. External business partners include joint venture partners, subcontractors, suppliers, intermediaries, advisors and others with whom we enter into relationships to deliver our products. By acting openly, honestly and following ethical principles, we become the company we want to be. All employees are involved in achieving this goal. In our relationship with stakeholders:

- We strive to build positive, constructive and long-term business relationships with partners who share the same values as ours.
- We believe that stakeholders conducting business with us have the right to be treated at the same level as they treat us.
- We will not give up our values for any stakeholder.

In our relationship with customers:

- We foresee their needs and strive to exceed expectations by proactive approach.
- We try to help them achieve their goals by understanding their expectations and meeting them.
- We seek to solve possible problems, from the simplest to the more complex.

# Hospitality and gifts

In order to promote their business, companies often offer hospitality to customers and partners in the form of sponsorship of meals, travel or invitations to events, including gifts. As a rule, a gift is something given voluntarily without expecting anything in return. At Vitrintec Sp. z o.o.:

• We do not demand, accept or offer forms of hospitality or gifts to contractors that could influence - or give the appearance of influencing - our or our partners' business decisions.

The forms of hospitality and gifts offered must be appropriate and:

- Must comply with local laws and customs.
- Cannot create in the recipient a sense of obligation towards the donor.
- Must serve a genuine business purpose.
- Must not be immoral in nature or violate the dignity of others.
- Hospitality offered to other party should be of moderate value.
- Gifts should have a symbolic worth and be appropriate to the occasion. Promotional items are also gifts.

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#### **Quality assurance**

We, at Vitrintec Sp. z o.o., are proud of the quality and innovation of the products we offer. We also understand that offering high quality products serves both our customers and our company. Therefore:

- Our aim is to ensure high quality in every process conducted during our operations. We continuously improve our products, services and company processes.
- We maintain a professional relationship with all stakeholders with the aim of delivering products that meet or exceed their expectations.
- If our products have defects, we accept responsibility for their occurrence and rectify them in accordance with our contractual obligations.

#### **Fraud**

In legal terms, fraud is an offence of deceiving another person into a disadvantageous disposition of one's own or another person's property by means of misrepresentation or exploitation of their error or incapacity to grasp the intended action in order to obtain a material benefit. Fraud occurs when someone knowingly attempts to mislead another person, acts dishonestly or abuses the power associated with their position to gain any material advantage, or involves another person in such actions. Fraud usually aims to obtain money, property or services in a dishonest manner. A type of fraud is an action that consists of knowingly or recklessly misrepresenting or inaccurately documenting the cost of providing materials or services, deliberately concealing defects or fabricating evidence.

• At Vitrintec, we always act with integrity, based on the applicable legal principles and truth.

#### **Sponsoring**

Sponsorship is a form of promotion. At its core are associations, whereby a positive image of the sponsored entity is transferred to the sponsor. The sponsor's mark most often accompanies events or activities of sponsored institutions. Vitrintec Sp. z o.o. allows the possibility of sponsorship. In return for the fee paid, Vitrintec Sp. z o.o. receives benefits such as the opportunity to use the name of the sponsored organisation, promotional activities, use of the facilities concerned or the chance to promote the name of Vitrintec Sp. z o.o. and its products. When selecting sponsorship activities and their subject matter and entity, Vitrintec Sp. z o.o:

• Selects for sponsorship activities and subjects directly related to its business or of interest to the company's potential customers, as well as those related to sustainable development, education, scientific activities and business, e.g. media relations, human resources, etc.

Sometimes, the company is promoted through sponsorship activities, related to projects in which the products offered by the company have been used.

- The company never benefits from sponsorship if it could have any adverse impact on people, the environment or social developments.
- We offer sponsorship activities only on the basis and within the limits of the law.

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# CHAPTER III OUR GLOBAL COMMITMENTS

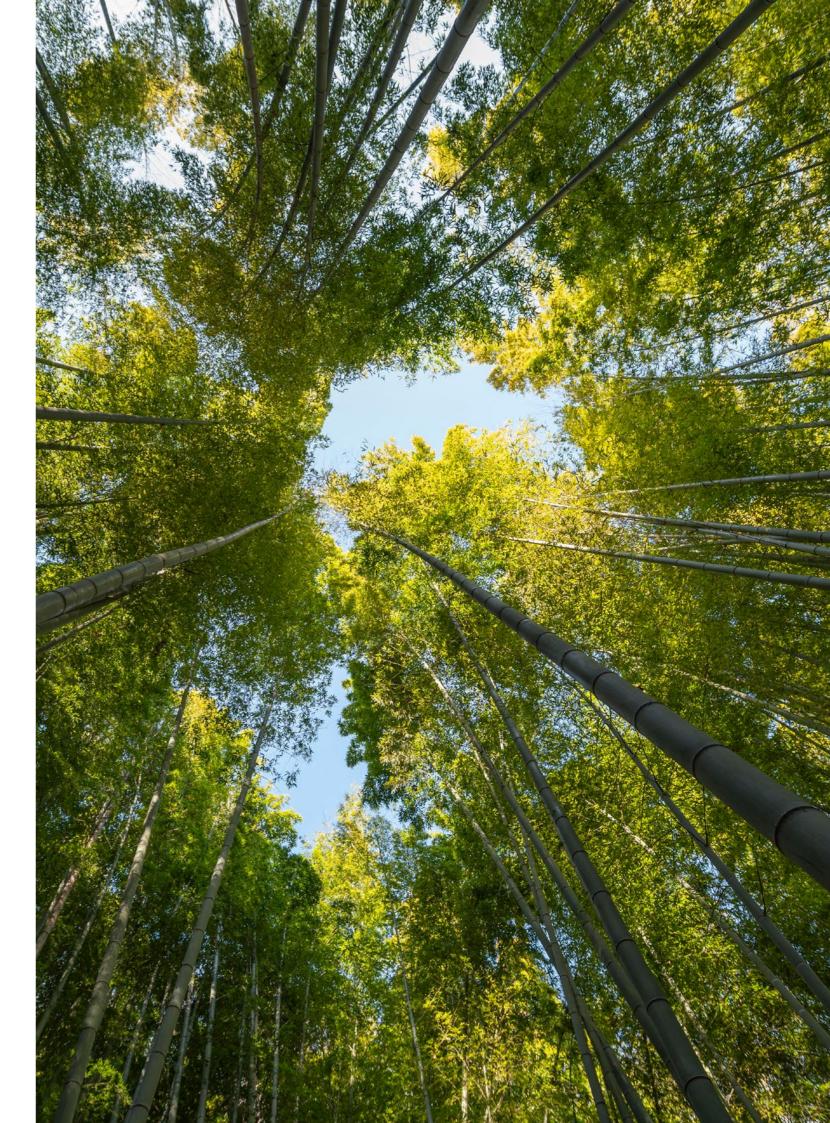


We strive to be a leader in the manufacturing and construction sectors, while at the same time being aware that as employees of a business entity we are an integral part of society and that our operations extend far beyond the products we supply to our customers. For this reason, we believe that our positive contribution to society should also include finding new ways to reduce the environmental impact of our business activities, promoting fair competition and contributing positive values to the communities in which we live and work.

### Climate and environment

When working at Vitrintec Sp. z o.o., we strive to protect the environment and believe that we can make an important contribution to global sustainability.

- We consecutively improve our procedures and activities that may have an impact on the environment. We offer products that minimise losses in this regard during their entire life cycle.
- When considering the implementation of a project, we weigh up the opportunities and risks for the environment.
- We involve our stakeholders in carbon footprint management and environmental protection. This includes employees, customers, suppliers and all those who live and work near our plant.
- Vitrintec Sp. z o.o. and all the companies that work closely with it as part of the group, operate on the basis of an environmental management system registered and certified in accordance with the international standard ISO 14001. This system must cover all activities over which Vitrintec SP. z o.o. has management control or majority ownership. When working with subcontractors, our aim is to maintain comparable environmental management standards.





#### Social commitment

Community commitment is usually defined as all activities during which individuals share their resources with others. Vitrintec Sp. z o.o. expresses its commitment locally.

At Vitrintec Sp. z.o.o., we believe that community investment strengthens our reputation and helps build long-term relationships with potential and actual customers.

We support the local community with our time, expertise and often our resources and monetary contributions. We never use charitable donations unethically: for undue gain, or to influence the recipient.

We focus on educational opportunities that have clear long-term benefits for community members.

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### **External** communication

External communication, as an important part of our marketing and branding efforts at Vitrintec, is conducted by the marketing department. It participates in all communications to customers, potential customers, potential employees, partners, suppliers, investors, local government representatives and other stakeholders. The activities performed by the aforementioned department include all media and promotional activities, information and press activities, publishing content via social media, participation in trade fairs, publications, advertisements and all other public presentations.

When we communicate with external parties, we provide data in a timely, reliable manner, taking care to ensure the reliability of the information. We share information honestly and our announcements are focused on maintaining a high level of trust.

We maintain an open dialogue with the entities we influence.

We respond to enquiries in a professional manner.

We provide information to the media on behalf of Vitrintec Sp. z o.o. only when we are authorised to do so. We direct media requests for information to the marketing department or the department responsible for providing the information in question.

When responding, we make it clear whether we are speaking on behalf of Vitrintec Sp. z o.o. or on our own behalf.

We protect the Vitrintec Sp. z o.o. brand and show respect to our colleagues and others when using social networks.



# Anti-corruption and bribery

Pursuant to art. 1ust. 3of the Act of 9 June 2006 on the Central Anti-Corruption Bureau (Journal of Laws of 2021, item 1671) corruption should be understood as promising, proposing, giving, requesting, accepting by an employee, directly or indirectly, any undue financial, personal or other benefit, for the employee or any other person or accepting an offer or promise of such benefit in exchange for any activity or failure to act in the performance of a public function or in the course of business activity.

Within the meaning of Article 2 of the Civil Law Convention on Corruption drawn up in Strasbourg on 4 November 1999 (OJ 2004 No. 244, item 2443), corruption is the requesting, offering, giving or accepting, directly or indirectly, of a bribe or any other undue advantage or its promise, which distorts the proper performance of any duty or conduct required of the person receiving the bribe, undue advantage or its promise.

Corruption undermines all principles of fair business conduct, distorts competitiveness in the market, harms the brands involved and puts the companies and individuals involved at risk. Therefore, at Vitrintec Sp. z o.o.:

- We act with integrity and do not tolerate any form of bribery or corruption.
- We avoid non-transparent situations that might even give the appearance of bribery, corruption or other forms of improper behaviour.
- We do not demand, accept, give or offer bribes either directly or through external parties acting on our behalf.

#### Sanctions

International sanctions, otherwise known as restrictive measures, are one of the instruments of influence against entities whose activities violate the principles and norms of international law, including international human rights, and pose a threat to global or regional peace and security. Vitrintec Sp. z o.o.:

- Does not engage, either directly or indirectly, in business with any person or entity on the sanctions list.
- Does not do business, either directly or indirectly, with any country or region subject to sanctions.

#### Money laundering

Money laundering is defined as any action aimed at introducing money or other property obtained from illegal sources or used to finance illegal activities into the legal market. Vitrintec Sp. z o.o. does not support such activities and therefore:

• It only does business with customers and business partners of good repute who operate in accordance with the law, based on funds from legitimate sources.

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#### **Political activities**

We operate on the market like most companies and, likewise, our business requires political and government relations. However, if you engage in politics, you may not make statements or (financial) contributions to political organisations, or make political manifestos, on behalf of our company. If you make any political statements on social media or other channels, it is important that you make it clear that these views are your own and not those of the company you work for. Vitrintec Sp. z o.o. is apolitical and does not express any opinion on political parties. The exception may be circumstances that affect our industry or company, but in that case it will be up to the Management Board and colleagues in the Marketing Department to openly present our position. Lobbying, understood as advocacy, may also occur in the course of our work. These are lawful activities aimed at influencing the state's decision-making bodies (legislature, executive or local authorities) in order to obtain a favourable decision. Lobbying activities include both direct communication with officials and providing support to any person who engages in this type of communication. At Vitrintec Sp. z o.o.:

We do not make large-scale contributions to political causes or those that would generate such a large impact that they would be perceived as excessive or inappropriate.

We understand that lobbying is one way to positively influence our industry and/or business opportunities.

We work to ensure that any lobbying activities conducted on our behalf are appropriate and do not reflect negatively on the company.

We have a neutral attitude towards interest from politicians of all parties in our company's projects and initiatives.

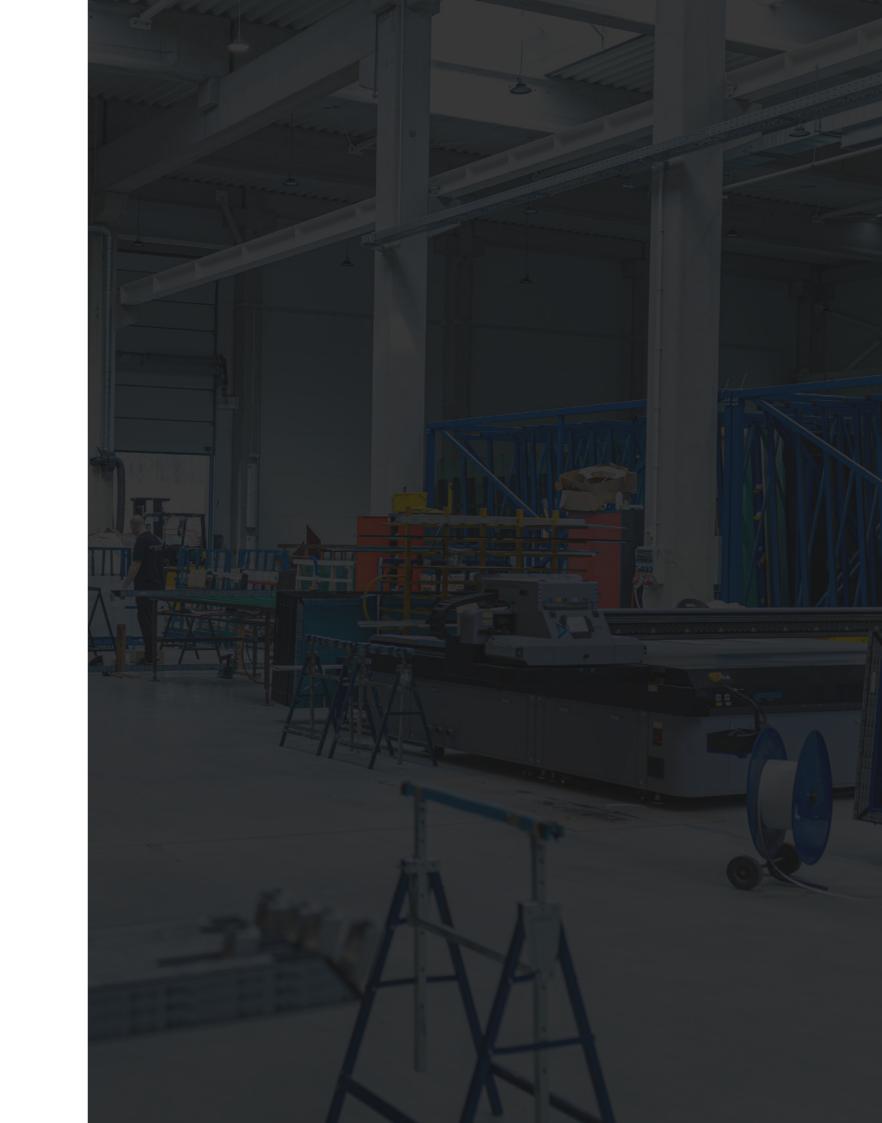
If politicians at any level approach us to obtain relevant information about our industry we will provide it so that they can make informed decisions.

Political contacts should always be in line with the purpose and values of Vitrintec Sp. z o.o.



#### **APPENDIX**

IMPLEMENTATION OF THE
CODE OF ETHICS AND BUSINESS
CONDUCT



Vitrintec Sp. z o.o. bodies and managers at all levels have a duty to serve as an example to the Recipients of the Code of Ethics.

#### Awareness

Employees are obliged to read this Code and the procedures applicable to their duties and tasks. They are also obliged to comply with their provisions. They are specifically committed to refrain from actions that are incompatible with the provisions of the Code of Ethics and Business Conduct.

#### Management Board

The CEO and the Shareholders promote the implementation of this Code, as well as the development of appropriate procedures, and supervise compliance with the principles set out therein. Recipients of the document may contact the CEO directly at any time to ensure proper compliance with the Code or to report violations.

## Reporting violations

Recipients are required to immediately report conduct that is even potentially inconsistent with the provisions of this Code of Ethics to their supervisor or to the CEO. They may report anonymously. Persons reporting suspected violations in good faith will not be subject to retaliation. Whistleblowers will be protected from retaliation of any kind, including any discriminatory or punitive action. The identity of the whistleblower will be kept confidential, subject to any obligations imposed by law.

All data shall be processed and archived by the Management Board in accordance with applicable legal principles.

### Training and information

The Code of Ethics is made available to Recipients within and outside Vitrintec Sp. z o.o. through specific communication channels. Vitrintec Sp. z o.o. establishes a training plan, appropriately adapted to the roles, responsibilities, duties and positions of the various Recipients, to familiarise them with the principles of the Code of Conduct and to emphasise the importance of complying with it.



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