

Code of Business Conduct

1 February 2021

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Introduction

Since the beginning of its existence, the company Chemar Rurociągi Sp. z o.o. has been conducting its business in accordance with the principles of fairness, honesty, justice and full respect for all applicable laws. Employees of Chemar Rurociągi Sp. z o.o. have always proved their faithfulness to these principles in their everyday activities, and the reputation gained by Chemar Rurociągi Sp. z o.o. thanks to their attitude is today one of the most valuable resources of our company.

"Guidelines for conducting a business activity by Chemar Rurociągi Sp. z o.o." are a set of documents (including internal procedures) which define the values and principles adopted by Chemar Rurociągi Sp. z o.o. The purpose of the presented "Code of Business Conduct" is to specify and facilitate compliance with the "Principles of conducting business activity" by presenting a minimum of strictly obligatory standards of behaviour in the most important areas of activity.

The Code cannot cover all theoretically possible situations. It is rather intended as a point of reference according to which each action can be judged. When in doubt as to the proper behaviour in a given situation, the employees should seek advice. Each employee is responsible for "doing the right thing" and cannot delegate this responsibility to someone else.

Employees should always be guided by the following basic principles:

- Avoid any actions that may harm company Chemar Rurociągi Sp. z o.o. or negatively affect its reputation
- Be honest and obey the law,
- Put the interest of the Company ahead of their own or anybody else's.

In this document, the term "employee" refers to employees, associates, managerial staff and directors of Chemar Rurociągi Sp. z o.o.

Compliance with laws, rules and regulations

Chemar Rurociqgi Sp. z o.o. and its employees are bound by law. It is forbidden to ever fail to comply with any applicable laws and regulations. Employees are additionally obliged to comply with internal rules and regulations relating to given situations. These internal regulations apply to our Company only and may go beyond existing legal requirements.

We always obey the law

Forced labour and child labour

We respect fundamental human rights. Any form of forcing to work by limiting freedom or threats of physical violence as a way to discipline or control is prohibited. In the hiring process, we respect the minimum age in accordance with national regulations. It is strictly forbidden to employ children under any circumstances, with the exception of apprentices on work placements in cooperation with schools and universities. In this case, these persons are treated in a special way in accordance with the legal requirements. Under no circumstances do we accept the use of child labour, human trafficking, slave labour or any other forms of forced labor (i.e. any form of forcing to work) by third parties cooperating and acting on behalf of Chemar Rurociqgi Sp. z o.o.

We do not accept the use of child labour, human trafficking, slave labour or any other forms of forced labour

Freedom of association

We recognize the right of all workers to form trade unions and elect their representatives. We declare our willingness for honest and trusting cooperation with the representatives of employees and to aim for achieving a balance of interests. We recognize the freedom of employees to associate and organize themselves and to negotiate collectively or individually in accordance with the applicable laws and regulations.

We ensure freedom of association and recognize the right to collective bargaining agreements

Discrimination and mobbing

Chemar Rurociqgi Sp. z o.o. respects the personal dignity, privacy and personal rights of all employees and is committed to fighting all forms of discrimination and harassment in the workplace. Therefore, employees are not allowed to discriminate against others due to, inter alia, their origin, nationality, religion, race, gender, age or sexual orientation. They are also prohibited from engaging in any form of verbal or physical harassment due to the above or any other circumstances.

We are supporters of diversity and respect the personal dignity of our employees

Employees who believe that their workplace does not comply with the above prohibitions are encouraged to notify their immediate supervisor or the Management Board of the Company.

More detailed information on the types and forms of mobbing and discriminatory behaviour, rules and mode of conduct as well as responsibilities of employees and associates of Chemar Rurociqgi Sp. z o.o. can be found in the procedure PB-01.00.00 concerning "Mobbing and discrimination prevention", which is an integral part of the "Code of Business Conduct" of Chemar Rurociqgi Sp. z o.o.

Rules of remuneration and working time

Chemar Rurociagi Sp. z o.o. complies with the applicable provisions of labour and civil law and common practice in the field of employment, i.e. concluding employment contracts and civil law contracts. Chemar Rurociagi Sp. z o.o. meets statutory standards regarding remuneration of employees, respects legal requirements concerning, among others, the minimum wage. Salary payments are regular and meet the requirements of labour law. Each employee is informed about the rules of remuneration. We place emphasis on the work-life balance of our employees. We guarantee and respect employees' time for rest and nonoccupational activity. We comply with applicable law and standards concerning working time norms, the right to rest or public holidays.

We apply clear and transparent rules of employment and remuneration

Occupational Health and Safety

Chemar Rurociagi Sp. z o.o. complies with the standards and regulations concerning occupational health and safety. We are responsible for the safety and health of our employees and we guarantee protection and safety at work in accordance with applicable regulations. Each of our employees, regardless of their position, is obliged to know and follow the health and safety and fire protection rules as well as comply with the law and internal procedures concerning safety and health protection at work. We do not accept situations in which our employees or employees of cooperating companies work/enter workplace under the influence of alcohol or intoxicants, including drugs. By constantly improving the working environment, we strive towards improving the quality, efficiency and satisfaction of employees with the work performed and we avoid putting our employees at unnecessary risk. We achieve it, among others, by maintaining and improving the Integrated Quality, Environment and Health and Safety Management System (IMS) which meets the requirements of PN-EN ISO 9001: 2015, PN-EN ISO 14001: 2015, ISO 45001: 2018.

Health and safety of employees are key values in our business

Environmental protection

Our most important goals include conducting business activities with consideration of the natural environment. We want to develop in a sustainable way, while respecting the needs of future generations. We use raw materials and energy media rationally. We also try to develop appropriate ecological attitudes among our employees. We operate in accordance with applicable laws, regulations and permits relating to environmental protection

We see the environment as our common good

Conflict of interest

*We always act in accordance
with the best interests of
Chemar Rurociqgi Sp. z o.o.*

A conflict of interest takes place when the personal interests of the employee or the interests of third parties are in conflict with the interests of Chemar Rurociqgi Sp. z o.o. In such situations it may be difficult for the employee to act fully in compliance with the best interests of Chemar Rurociqgi Sp. z o.o.

Employees should avoid conflicts of interest as much as possible.

If, however, a conflict of interest occurs, or if an employee finds himself in a situation where such a conflict may arise, the employee should inform his/her supervisor and/or the Management Board about this fact in order to resolve the situation in a fair and transparent manner.

Proper resolution of conflicts of interest is part of the Company's culture for which we are all responsible - regardless of the functions and positions held within the Company. It is particularly important that members of governing bodies and managers are involved in identifying conflicts of interest and indicating appropriate ways to prevent them and deal with them in case of their occurrence.

Management positions and other functions outside the Company

Employees are not allowed to undertake, outside of Chemar Rurociqgi Sp. z o.o., any activity that may negatively affect the performance of their duties towards Chemar Rurociqgi Sp. z o.o. and which could harm the reputation of Chemar Rurociqgi Sp. z o.o. or in any other way collide with the interests of Chemar Rurociqgi Sp. z o.o.

If an employee is not sure whether any activity is permissible, he/she should consult his/her supervisor or the Management Board of the Company.

Taking any of the following positions or functions outside the structures of the Company requires the prior consent of the Member of the Management Board of Chemar Rurociqgi Sp. z o.o.:

- Member of the Management Board / Director / Manager
- Employee / Partner / Consultant

Consent is not granted in the case of positions or functions that may lead to a conflict with the interests of Chemar Rurociqgi Sp. z o.o. or negatively affect the performance of the employee's duties.

Membership in the supervisory boards of capital companies or performing the functions of management board members requires the prior consent of the Supervisory Board of Chemar Rurociqgi Sp. z o.o.

Employees should act and take functions outside the Company at their own risk and expense and only in their spare time, except for situations when the order to take the subject position or function is given by the Company.

*We are proud of the
reputation of Chemar
Rurociqgi Sp. z o.o. and we
are guided by its best interests
also in our activities outside
the company*

Family members and relatives

Immediate family members and life partners of employees may be hired as employees or consultants only if they have appropriate qualifications, achievements, skills and experience, and under condition that there will be no direct or indirect reporting lines between the employees and their immediate family members or life partners.

The above principles of fair employment extend to all aspects of employment, including the level of remuneration, promotions and transfers, also in situations when the family or partnership relations referred to here appear after the employment of the person in the Company.

Children of employees of Chemar Rurociqgi Sp. z o.o. may be given priority in access to internships, training periods, holiday employment and other similar forms of temporary employment, provided that they are not inferior to other applicants in terms of their qualifications.

Our decisions on hiring and development of employees are made in a fair and objective manner

Antitrust regulations and good commercial practices

Chemar Rurociqgi Sp. z o.o. can successfully compete in today's business world and will always comply with applicable antitrust and competition laws and good commercial practices. Consequently, employees should observe the following principles at all times:

- The commercial policy and level of prices are determined independently and will never constitute the subject of a contract (formal or informal) with competitors on the market or with other entities not directly or indirectly related to the Company;
- Customers, territories and product markets cannot be shared between Chemar Rurociqgi Sp. z o.o. and its competitors, and only gained under conditions of fair competition
- Customers and suppliers must be treated fairly.

All employees, and in particular those operating in the areas of marketing, sales and purchasing, as well as those being in constant contact with competing companies, should familiarize themselves with the applicable legal regulations on competition.

In case of doubt, they should contact the Management Board of the Company for advice and training on this matter.

We recognize the importance of free competition

We value and protect our confidential information and respect confidentiality obligations of others

Confidential information

Confidential information consists of any information that is not intended to be made public or that cannot yet be made public. It includes trade secrets, business, marketing and service plans, consumer information, technical and manufacturing ideas, technologies, product designs and databases, records, payroll data and all kinds of unpublished financial and other data.

The condition for the success of Chemar Rurociqgi Sp. z o.o. is the appropriate use of the Company's confidential information and not to disclose it to third parties. Employees must not disclose confidential information or allow its disclosure, except when required by law or when the employee has received the appropriate consent from his/her supervisors. The obligation of confidentiality also applies after the end of the employment period. Employees are also required to make every effort to prevent unintentional disclosure of confidential information, ensuring it is properly stored and handed over in a safe manner.

Chemar Rurociqgi Sp. z o.o. respects the right of third parties to similarly protect their confidential data. In the event that third parties, such as business partners, suppliers or customers, share with Chemar Rurociqgi Sp. z o.o. their confidential information, this information is treated by Chemar Rurociqgi Sp. z o.o. with the same care as its own confidential information. In the same way, employees protect confidential information obtained at their previous workplaces.

Chemar Rurociqgi complies with the regulations concerning the protection of personal data. It secures documentation containing the personal data which is entrusted and made available only in situations required by law. It informs the person concerned by the data about the processing of personal data.

New business opportunities

Our task is to take care of the economic development of Chemar Rurociqgi Sp. z o.o.

Employees are not allowed to compete with Chemar Rurociqgi Sp. z o.o. Nor are they permitted to take personal advantage of a business opportunity discovered in the exercise of their duties, unless the Company expressly waives to seize the opportunity.

Employees who want to start a business activity that may be of interest to Chemar Rurociqgi Sp. z o.o. should inform their supervisor about this fact, who in turn will determine whether the management of the Company intends to take advantage of the opportunity. However, even in the absence of such interest on the part of the Company, an employee may take up a given activity on his/her own account only if he/she is certain that he/she will not therefore be in direct or indirect competition with the Company.

Bribery and corruption

Employees may under no circumstances offer or promise, in person or through intermediaries, any undue financial or other benefits in order to obtain or maintain business opportunities or other benefits from third parties of the public or private sector. Employees are also prohibited from accepting such benefits in exchange for preferential treatment from third parties. Employees should also refrain from any actions or behavior that might suggest or raise suspicion of such attempts.

Employees must be aware that offering or giving undue benefits in order to influence the recipient's decision - even if the recipient is not a government official - may result not only in disciplinary sanctions but also in criminal liability. The undue benefit may be anything that has any value for its recipient, including employment of close relatives or outsourcing consultancy services to such persons.

Employees must also be aware that electoral law in many countries generally prohibits corporations from supporting political parties or candidates in elections. Chemar Rurociqgi Sp. z o.o. has adopted a policy of not providing any subsidies to entities engaged in political activity. Any such subsidies or deviations from the adopted policy must be approved by the Management Board of the Company.

More detailed information on the types and forms of corruption, rules and mode of conduct as well as responsibilities of employees of Chemar Rurociqgi Sp. z o.o. can be found in the procedure PB-02.00.00 concerning "Corruption prevention", which is an integral part of the "Code of Business Conduct" of Chemar Rurociqgi Sp. z o.o.

*We denounce all forms of
bribery and corruption*

Gifts, meals, representation

Employees must not allow benefits offered to them to influence their decisions and must not attempt to improperly influence others through such benefits. Employees may only offer and accept reasonable meal invitations and symbolic gifts appropriate to the circumstances, but may not accept or offer gifts, meals or entertainment if these could be associated with activities intended to improperly affect a particular business arrangement.

When assessing the above-described situations, employees should consider the policy adopted on a given market. In the absence of such policy, the most restrictive local practices should be followed to avoid even the suspicion of improper activity.

When in doubt, employee should seek advice from the supervisor or the Company's Management Board.

Employees are not allowed to offer or accept gifts from third parties in the form of:

- money,
- loans,
- percentages on transactions,
- any other kinds of financial benefit regardless of the value of the benefit

*We compete and conduct
business solely on the basis of
quality and competence*

Abuses, protection of the Company's resources, settlements

We stand for honesty, we respect the resources and property of the Company

Employees may not, under any circumstances, be abusive or dishonest in relation to the Company's property or resources, financial reporting or accounting of Chemar Rurociqgi Sp. z o.o. or third parties. Any such offenses may result not only in disciplinary sanctions but also in criminal liability.

Financial records of Chemar Rurociqgi Sp. z o.o. constitutes the basis for the management of the Company and the condition for the fulfillment of the Company's obligations towards its stakeholders. Therefore, this documentation must be kept accurately and in accordance with the accounting standards adopted at Chemar Rurociqgi Sp. z o.o.

Employees should take care of the property of Chemar Rurociqgi Sp. z o.o. and use it properly and efficiently. All employees should make efforts to protect the assets of Chemar Rurociqgi Sp. z o.o. against loss, damage, misuse, theft, abuse, embezzlement or destruction. This applies to both material and nonmaterial resources, including trademarks, know-how, confidential or proprietary information, as well as information systems.

The Company reserves the right to supervise and control the use of its resources by employees under applicable law, including access to all e-mail files, data and folders stored on the terminals of the Company's computer network.

Breaches of Code

We will read the Code, follow its provisions, and seek advice if needed

It is the responsibility of each employee to fully comply with all provisions of this Code and seek advice from their supervisor when necessary. Complying with the rules and upholding the highest standards of integrity is the personal responsibility of each employee and it cannot be delegated to someone else.

When in doubt, employees should always follow the principles set out in the introduction to the Code.

All breaches of the provisions of the Code may entail disciplinary liability, including termination of the employment contract and, in justified cases, also legal liability.

Reporting and clarifying abuses

Employees should inform their supervisor of any practices or actions which, in their opinion, do not comply with this Code or applicable law.

In justified cases, information on such irregularities may be provided directly to a higher management level, i.e. to the Management Board members.

Also in justified cases, complaints can be submitted anonymously as follows:

- by sending an e-mail to the following address: liniaetyki@chemar-piping.pl
- in paper form to the address of Chemar Rurociągi Sp. z o.o., ul. Olszewskiego 6, 25-953 Kielce
- by putting a letter into the anonymous mailbox located at the main entrance

The procedure of dealing with reported unethical behaviour, corruption or other abuses is described in detail in the "Mobbing and discrimination prevention" and "Corruption prevention" procedures, which are an integral part of the "Code of Business Conduct" of Chemar Rurociągi Sp. z o.o.

All complaints should be thoroughly investigated. Chemar Rurociągi Sp. z o.o. prohibits any repression against employees who make such reports in good faith, while protecting the rights of accused persons.

*We feel responsible for the
righteous behaviour of all of
us in every situation*
