



**ORDINANCE No. 4**

**Of 07.03.2025**

**On the introduction of the Code of Conduct in Solvera Gawel Technology S.A.**

**SOLVERA GAWEL TECHNOLOGY S.A.**

**CODE OF CONDUCT**

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## **I. Introduction**

The basis of SOLVERA Gawel Technology S.A. activity is to build responsible business based on respect for fundamental rights and freedoms, as well as active participation in the Company's activities for sustainable development.

### **Purpose of the Code**

With the goal of creating a transparent, ethical and responsible organizational culture, we have created this Code of Conduct, which is the foundation of our values, standards and standards of conduct. This document is intended to be a clear set of basic principles that should be a guide for every employee, co-worker, business partner and stakeholder in decision-making, taking into account our ethical obligations and applicable laws. The Code defines standards of conduct regarding responsibility for lawful actions, rules for hiring employees, appropriate behavior in the workplace by employees at all levels of the organizational structure, business activity and business relations. At the same time, it provides conditions that allow employees to freely express their opinions on the issues that have arisen and to take specific actions to prevent violations of applicable standards and regulations.

This code not only indicates what behaviors we expect in our daily work, but also emphasizes the principles that are extremely important to us, i.e. honesty, respect for others, social responsibility and care for the environment. We want each member of our organization to understand their obligations, actively contribute to creating an atmosphere based on trust, open communication and mutual support, and point out possible problems and participated in creating a friendly work environment.

We are convinced that adherence to the principles expressed in this Code will allow us to jointly achieve our business goals in a sustainable manner and with respect for the highest ethical standards. We encourage everyone to familiarize themselves with the following principles and implement them in their daily functioning.

We take actions together that will allow us to build an organizational culture that will allow us to build our success, act with pride and responsibility towards ourselves, our customers and the local community, which is so important to us.

We believe that people are the basis for success and effective development, which is why it is so important for us to treat both employees and our business partners with respect and dignity, taking into account the principles of fairness, equality, transparency, and respect for diversity and justice.

**Our values:**

The primary goal of our business is to build a strong and stable position in our industry by offering products and services of the highest quality. This is possible thanks to continuous development, the use of modern technologies and innovations, as well as research and development activities that the Company undertakes on its own, guided by the principles of sustainable development. We create a business that is based on ethics, responsibility and respect for people and the environment. The basic principles that guide us in our daily work are:

- **Honesty and Responsibility** – should be the basis of every relationship, both social and business. We take all measures to act in accordance with the law, with generally accepted principles, respecting both our employees and stakeholders. We set clear communication paths for everyone. We take responsibility for our actions, both towards each other and towards customers, partners and the environment.

- **Respect and Equality** – we believe that every person should be treated with dignity and care. We want to build our company based on an inclusive culture, promoting diversity and harmonious cooperation between employees – regardless of their age, gender, status, nationality, origin, religion, health, physical condition or sexual preferences. Thanks to this, we want to create conditions for everyone to develop and fully use their potential. We believe that diversity can be a fundamental driver of growth and innovation.

- **Cooperation and Partnership** – the basis of our success is cooperation with others. We believe that trust and partnership allow you to build stable and long-lasting relationships with our customers, business partners and communities, bringing mutual benefits.

- **Innovation and Quality** – we are constantly looking for new solutions that will allow us to improve our products, services and processes, while taking into account both the needs of our customers, but also respecting the natural environment.

- **Sustainable Development** – while developing our business, we do not forget about the environment in which we operate. We are committed to protecting the environment and improving the quality of life. We manage resources responsibly, strive to minimize the impact of our activities on the natural environment and engage in activities for the benefit of the local community by participating in a number of social initiatives.

**Compliance with laws and other regulations**

Compliance with all laws and regulations, both local and national, international activities in the course of business activities is one of the most important fundamental pillars of our Company's operation. We monitor changes in the law on an ongoing basis, Especially those that have a direct impact on our business. We expect all employees and associates, as well as business partners, to comply with the law and to take actions and

perform their duties based on a generally applicable legal standards, as well as internal regulations and regulations.

We believe that building a company's organizational culture starts with each of us. That is why it is so important to us that every person who makes up our community is aware of the need to follow the basic principles of honesty, reliability and respect.

To this end, we have created internal regulations to enable employees to respond to inappropriate and prohibited behaviours or practices:

- **Anti-Corruption Policy**, which defines the concept of corruption and clearly defines how to respond to all its manifestations. As part of our commitment to ethics, we do not tolerate any form of bribery or corruption and require all our employees, suppliers and external entities to comply with anti-corruption laws. We do not tolerate and prohibit any form of corrupt behaviour, in particular direct or indirect offering or accepting tangible and intangible benefits, in order to obtain any favourable decisions or resolutions, whether on business or employee grounds, as well as in relations with third parties, offices or state authorities. We do not agree to take actions aimed at impermissibly influencing the formation of business relationships and transactions, maintaining or obtaining orders, as well as taking actions that promise benefits or such actions that may at least give such impressions.

- **Personal Data Protection Policy** – we pay special attention to ensuring the protection of personal data by implementing appropriate solutions. In our opinion, a sense of security in this area is a guarantee of reliable cooperation.

We believe that a competitive market is the basis for building a reliable position of the company. That is why our actions are taken with respect for the principles of fair competition.

At the same time, we place particular emphasis on the protection of trade secrets, obliging both employees and our business partners to maintain confidentiality.

## II. Operating environment

A particularly important aspect of our activity is the creation of a good atmosphere in work based on mutual trust and respect. These are fundamental pillars of our organizational culture. We believe that every workplace should be safe and free from any undesirable phenomena. Therefore, all members of our organization have a duty to act in a way that fosters positive interpersonal relationships and fosters mutual respect.

Employees:

The functioning of our company is in accordance with the provisions of the labor law, in particular those specifying the procedure and rules for the employment of workers, as well as their rights and obligations, such as:

- 1) a total ban on child labour, while allowing the possibility of employing children juveniles only in accordance with and on the basis of the relevant provisions of law specifying the conditions that must be met for such a person to be employed, as well as ensuring the possibility of internships by students – for this purpose we have prepared the Standards for the Protection of Minors,
- 2) voluntary conclusion of the employment relationship and its termination by the employee according to his or her own discretion,
- 3) compliance with all applicable labour law regulations, in particular the adopted standards in the field of working and rest time, holidays, employee safety and other benefits provided for by the relevant labour law,
- 4) ensure that all employees perform their duties and perform work in the safe and hygienic conditions, taking care of the health of employees, fire protection and equipping employees with the necessary equipment, tools and personal protective equipment adapted to the nature of work,
- 5) preventing, combating and enabling workers to report any incorrect behaviours in the workplace, in particular such as: discrimination, harassment, sexual harassment, mobbing, violation of personal rights, while guaranteeing that no retaliation is taken against persons who reacted or took action to report or eliminate irregularities,
- 6) enabling the exercise of the right to freedom of association and collective bargaining, as well as participation in peaceful assemblies, in accordance with applicable law, while respecting the rights of employees to refrain from such activities.

#### **Equality and anti-discrimination**

We make all decisions regarding recruitment, terms of employment, application of disciplinary measures or promotions, taking into account the principle of equality and fairness transparency. We do not agree to any behavior that would discriminate against employees in any way, directly or indirectly, in terms of establishing and terminating an employment relationship, terms of employment, promotion and access to training for the purpose of improving professional qualifications, in particular on the grounds of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination, sexual

orientation, employment for a definite or indefinite period, full-time or part-time employment. All decisions regarding the work are made on the basis of substantive and objective criteria.

We do not agree to any unlawful unequal treatment, persecution or humiliation of another human being.

We also do not tolerate any activity that may be considered to encourage discrimination.

#### **Counteracting harassment and mobbing**

Everyone has the right to work in an environment where they feel safe and respected. We do not accept any inappropriate behavior that could humiliate, ridicule or violate the personal dignity of the employee. This applies to both physical behaviours and actions as well as verbal or written that violate personal dignity. To this end, we have implemented the Anti-Mobbing and Anti-Discrimination Procedure in our organization, which sets out in detail both the rules of conduct in everyday work, mutual rights and obligations of employees and employers, but also allows reporting any manifestations of the above-mentioned phenomena, while guaranteeing confidentiality to the reporting person. The Company undertakes to promptly fair handling of reports, ensuring the confidentiality and protection of whistleblowers.

Respect in the workplace is a shared responsibility. Each of us, regardless of our position, has a responsibility to build a work environment that promotes dignity, empathy and cooperation, which we remind of by organizing training in this area.

#### **Health and safety at work**

We take all possible measures to ensure safe, healthy and hygienic working conditions. Our goal is to create a workplace where the risk of threats to the health and life of employees will be constantly minimized. We comply with relevant regulations, including fire regulations and health and safety standards and regulations, while taking preventive measures to eliminate any potential hazards. All employees have an absolute duty to avoid inappropriate and inappropriate behaviour that poses a risk in the workplace and may result in a threat to the life or health of other people.

Each of us is aware of the need to inform our direct superiors, the Human Resources Department or persons responsible for ensuring safe and hygienic working conditions about accidents, injuries or occupational diseases, but also to point out dangerous behaviours or working conditions.

### **III. Social and Environmental Responsibility**

We treat sustainable development and environmental protection as an important element in shaping both our business strategy and the needs of the local community. We understand that our operations have an impact on natural resources and we are committed to minimizing the negative impacts of our operations.

### Sustainability and environmental protection

In our business, we adhere to the principles of sustainable development and environmental protection. We are constantly taking steps to create conditions for the responsible use of natural resources. We focus on ensuring a balance between the ecosystem and the natural economy and conducting business activity through careful, economical and rational use of energy, water, materials and space. We are looking for solutions that will allow us to increase the efficiency and quality of our production while striving to implement techniques, processes and materials that allow us to reduce waste generation and constantly care for the natural environment. We strive to use renewable energy sources in their daily operations, to take measures to improve energy efficiency, and to use other forms of real care about the environment, such as providing our employees with organized transport to and from work. As a responsible organization:

- we implement a circular economy policy that is based on recycling, reusing materials and reducing waste production,
- we monitor and report our carbon footprint to measure progress and set reduction targets,
- we verify innovations that can have a significant impact on the achievement of sustainable development goals,
- We raise awareness among employees, partners and the community about the importance of protecting the environment.

We are committed to continuously undertaking and improving activities in the field of environmental protection, compliance with regulations in this area, as well as caring for the natural environment with a view to the future of future generations. Such activities are part of a well-functioning and modern organization that we want to create.

### Activities for local communities

Our goal is to support the local community by creating and providing jobs, as well as building relationships with local businesses. We undertake a number of activities to support the local community. We organize and participate in cultural events that are an opportunity to integrate and get to know each other, and at the same time are a unique opportunity to learn about the principles of our company. We support local social organizations, especially those that support the most needy. We also actively participate activities aimed at promoting physical activity and sports development of children and young people.

#### IV. Relationships

Building relationships with stakeholders is based on trust, responsibility and mutual respect for each other's vision in the field of business.

##### Customers:

Our goal is to offer the highest quality products, which is why we have implemented an effective quality control system. At the same time, we respond to noticed irregularities and take actions that.

They will eliminate them. The basis of our cooperation is mutual trust and acting in accordance with ethical principles.

Messages, suggestions and opinions that we receive from customers and contractors are extremely valuable to us, we always treat them seriously as an important source of knowledge about our products and our business. They are also often an inspiration for further improvement and development, as well as modification of the procedures we already use.

##### Suppliers:

When making decisions in the field of cooperation with suppliers, we rely on honest and transparent criteria relating to quality, price, timeliness of task completion, compliance with ethical principles, human rights and care for the environment. Our goal is to ensure transparency in building relationships with suppliers, ensuring open communication, but also the possibility for suppliers to express their opinions on the way we work together. We know how important it is to support the development of local entrepreneurs – we treat it not only as a social duty, but above all as an opportunity to build a strong and sustainable local society. Supporting local companies contributes to economic growth, job creation and strengthening social bonds.

##### Raw materials:

We conduct our business in an ethical and legal manner, also committing ourselves to responsible sourcing of raw materials. We are aware that the current political and economic situation in the world has a significant impact on issues related to the extraction of the so-called conflict minerals, such as tin, tantalum, tungsten and gold (3TG), which can be imported from areas where armed conflicts are ongoing, violence is used, and human rights, including children's rights, are violated.

We take all measures to verify our suppliers in terms of compliance with international standards of responsible sourcing of minerals by requiring them to submit appropriate statements in which they indicate the source of the minerals, as well as self-checking and evaluating your own supply chain. In order to ensure the implementation of the above-mentioned obligations at the highest level, and in particular to guarantee the possibility of a quick response in the event of detecting irregularities in this respect, we have created the possibility for our contractors to inform us about any cases of non-compliance with the above-mentioned

rules. We believe that this will allow us to react at the right time and to draw consequences against dishonest contractors, in particular the termination of cooperation.

We believe that such actions can have a real impact on the sourcing of raw materials in a way that guarantees respect for fundamental rights and freedoms.

#### V. Whistleblowing

In order to ensure transparency of activities, but also the active participation of our employees and contractors in preventing and responding to irregularities, we have created mechanisms that enable us to provide us with information in this regard:

- 1) Internal Reporting Procedure – issued pursuant to the provisions of the Act of 14 June 2024 on the protection of whistleblowers, under which whistleblowers may report a breach of the law. An application may be made by an employee, a cooperating person, a supplier, an intern, as well as other persons listed in detail in the Procedure. The report can be made confidentially or anonymously, via a dedicated system.
- 2) Whistleblowing Policy – enables confidential reporting of irregularities that may threaten important interests of the Company or the safety of employees.

We guarantee that whistleblowers who act in good knowledge will not be exposed to retaliation for doing so. Our goal is to build a strong organization, the core of which are employees. Openness is an immanent feature of responsible management, and this is what we care about.

#### VI. Compliance with the Code

This Code is the foundation of the Company's operations. Therefore, all employees of SOLVERA Gawel Technology S.A. are obliged to comply with the provisions of this Code. Members of the Management Board and persons holding managerial positions should promote among employees activities and behaviors consistent with ethics and principles of proper conduct.

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"Ethics is a creative activity of many people"

Albert Schweitzer

PREZES ZARZADU  
*Dariusz Kluz*  
...Dariusz Kluz...  
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Ceo

