

The Management Board of Italmetal Sp. z o. o. complies with the legal provisions and specific requirements of its clients in the field of social welfare and the rules of conduct in accordance with the ethical guidelines of its employees and all interested parties involved in the implementation of the processes defined in the Italmetal Integrated Management System. In particular, it supports the observance and continuous improvement and development of operating rules through internal Regulations and the rules of conduct contained therein regarding:

- Human rights, which are universally agreed minimum conditions that enable all people to maintain their dignity. Italmetal respects human rights regardless of nationality, place of residence, sex, national or ethnic origin, skin color, religion or any other status.
- Business ethics, ie rules relating to employees, suppliers, independent subcontractors, consultants and other interested parties with whom it cooperates and in accordance with the provisions, helps to conduct business in an ethical, honest manner and in full compliance with all laws and regulations.
- The anti-corruption policy contained in the work regulations obliging all employees to comply with the anti-corruption policy. The company's anti-corruption policy defines the rules of conduct for all interested parties that eliminate corruption-like behavior with zero tolerance for such behavior. Failure to comply with the above anti-corruption policy results in taking the steps provided for in Art. 52 of the Labor Code.
- Confidentiality of information contained in the Company Regulations, obliging all interested parties to observe the principles of confidentiality of information, professional secrecy and not to disseminate information about the employer, supplier or customer that is not intended for public dissemination.
- Wages and salaries and benefits relating to all wages and other additional rights payable directly or indirectly by the employer to the employee and resulting from the employment of the employee. Working time does not exceed the limits established by the Labor Code, and employees have at least one day off every seven days.
- Child and youth labor in Italmetal is completely prohibited from employing children and minors. In addition, in the case of employee traineeships, young trainees under the age of 18 will not work overnight or overtime and are specially protected against working conditions which are detrimental to their health, safety or development.
- Modern slavery in Italmetal, it is forbidden to retain identity documents, as well as trafficking in human beings, any work or services required from any person under the threat of any penalty and for which that person has not volunteered, including additional work, such as forced overtime.
- Freedom of association in Italmetal, the right to freedom of peaceful assembly and freedom of association at all levels is respected, which also means the right of everyone to form and associate in trade unions. It also includes collective bargaining as a negotiation process between employers and a group of workers with the aim of reaching a regulatory agreement to be ensured by voluntarily elected Crew Representatives.
- Harassment is prohibited, including harsh or inhuman treatment or the threat of such treatment, sexual, mental or physical coercion or verbal abuse of employees.
- The prohibition of discrimination in Italmetal applies equal treatment to an individual or group regardless of their specific characteristics, including sex, race, color, ethnic or social origin, genetic features, language, religion or beliefs, political or other views, membership of a national minority property, birth, disability, age or sexual orientation.

Compliance with these key guidelines is guaranteed thanks to the maintenance and continuous improvement of the Integrated Management System that respects the requirements of the Labor Code and other legal provisions in force in the territory of the Republic of Poland.

All employees, in line with their duties, are obliged to acknowledge and comply with the Company Policy, Social Policy, the Company Code, the rules of business responsibility, including ethical anti-corruption and anti-monopoly rules, and the obligation to report any irregularities in this regard.

Chairman of the Board
Jelcz-Laskowice, September 22, 2021. Girardini Attilio