



Stalowa Wola 11.01.2024

Code of Ethics **THONI ALUTEC SP. Z O.O.**

DECLARATION OF THE MANAGEMENT BOARD

Dear Colleagues,

Since its establishment, THONI ALUTEC Sp. z o.o. has built its position on the principles of integrity, responsibility, professionalism and respect for the law. We believe that sustainable business success can only be achieved when strong business performance goes hand in hand with the highest ethical standards, occupational health and safety, respect for human rights and corporate social responsibility.

This Code of Ethics sets out the values and principles that guide our daily activities. It forms the foundation of the corporate culture of THONI ALUTEC Sp. z o.o. and establishes the standards of conduct applicable to all members of the Management Board, managers, employees, contractors and, where appropriate, our business partners, suppliers and subcontractors.

As the Management Board, we are committed to conducting our business in compliance with applicable laws and regulations, the principles of fair competition and recognised standards of good business practice. We have zero tolerance for any form of corruption, discrimination, forced labour, child labour, harassment, retaliation or any other conduct that violates human dignity or applicable law.

We are committed to fostering a working environment based on mutual respect, openness, accountability and cooperation. Every employee has the right to work in safe and fair working conditions and the responsibility to report any actual or suspected violations of the law, ethical principles or the provisions of this Code.

The Management Board of THONI ALUTEC Sp. z o.o. is committed to ensuring that all reports of potential misconduct are handled fairly, objectively and with due regard for confidentiality. Any person who reports a concern in good faith will be protected against retaliation.

Responsibility for complying with this Code rests with each and every one of us. Managers have a particular responsibility to promote an ethical culture, lead by example and support employees in making responsible and ethical decisions.

We are committed to regularly reviewing and continuously improving this Code to ensure that it remains aligned with changing legal requirements, the expectations of our customers and business partners, and recognised best practices in compliance, corporate social responsibility and sustainable development.

Every one of us contributes to the reputation of THONI ALUTEC Sp. z o.o. Compliance with the principles set out in this Code reflects our shared responsibility towards our colleagues, customers, suppliers, local communities and all other stakeholders.

We would like to thank all our employees and business partners for their commitment to building an organisation founded on trust, integrity and mutual respect.

Management Board
THONI ALUTEC Sp. z o.o.



1. Purpose and Scope of the Code

1.1. Purpose of the Code

1. The THONI ALUTEC Sp. z o.o. Code of Ethics (the "Code") defines the values, principles and standards of conduct applicable throughout the Company and constitutes a fundamental element of the Company's Compliance Management System and corporate culture.
2. The purpose of this Code is to:
 1. promote lawful, ethical and responsible business conduct;
 2. foster a corporate culture based on mutual respect, trust, accountability and transparency;
 3. ensure respect for human rights, labour rights and the dignity of every individual;
 4. prevent corruption, discrimination, conflicts of interest, fraud, misconduct and other unethical behaviour;
 5. ensure safe and healthy working conditions;
 6. promote responsible environmental and social management;
 7. protect the reputation, credibility and integrity of THONI ALUTEC Sp. z o.o.; and
 8. strengthen the trust of customers, employees, business partners, suppliers and other stakeholders.
3. This Code provides practical guidance for making decisions and acting in professional situations where it is necessary to assess whether a particular course of action complies with applicable laws, ethical principles and the Company's values.

1.2. Scope of Application

1. The provisions of this Code apply to:
 1. members of the Management Board;
 2. managers and supervisors;
 3. all employees, regardless of the type of employment, position held or place of work;
 4. individuals providing work or services to the Company under civil law contracts;
 5. trainees, interns and individuals undertaking vocational training; and
 6. any other persons acting on behalf of or for THONI ALUTEC Sp. z o.o., to the extent appropriate to the nature of their relationship with the Company.
2. THONI ALUTEC Sp. z o.o. also expects its suppliers, subcontractors, agents, commercial representatives and other business partners to comply with the principles set out in this



Code. Where appropriate, the Company may require confirmation of such compliance by means of a separate declaration or contractual commitment.

1.3. Nature of the Code

1. This Code forms an integral part of the **Compliance Management System** implemented by THONI ALUTEC Sp. z o.o.
2. The Code shall be applied in conjunction with applicable laws and regulations, internal rules, procedures, policies and other governing documents in force within the Company.
3. In the event of any inconsistency between this Code and mandatory provisions of applicable law, the applicable law shall prevail.
4. Every person subject to this Code is required to familiarise themselves with its provisions, comply with its requirements and promptly report any known or suspected violations of the law, ethical principles or this Code in accordance with the Company's applicable Reporting Procedure.

1.4. Responsibility for Compliance with the Code

1. The Management Board of THONI ALUTEC Sp. z o.o. is responsible for the implementation, application, periodic review and continuous improvement of this Code.
2. Managers and supervisors are responsible for:
 1. promoting a culture of ethical conduct;
 2. leading by example;
 3. supporting employees in making appropriate and responsible decisions; and
 4. responding appropriately to any breaches of this Code.
3. Every employee is responsible for complying with this Code and for contributing to a corporate culture based on integrity, accountability and mutual respect.

1.5. Review and Updates

This Code shall be reviewed on a regular basis, and in any event no less than once every two years. It shall also be reviewed whenever significant changes occur in applicable legislation, the Company's organisational structure, or the requirements of customers or other stakeholders.

Any amendments or updates to this Code shall be approved by the Management Board or by a person duly authorised by the Management Board.

2. Definitions

For the purposes of this Code, the following terms shall have the meanings set out below:

Company – THONI ALUTEC Sp. z o.o., with its registered office in Stalowa Wola, Poland.



Code – this Code of Ethics of THONI ALUTEC Sp. z o.o.

Employee – any individual performing work for or on behalf of the Company, regardless of the type of employment, position held, place of work or working time arrangement.

Management – members of the management team responsible for organisational units within the Company, as well as all individuals supervising or managing employees.

Business Partner – any natural or legal person cooperating with the Company, including, but not limited to, suppliers, customers, subcontractors, agents, consultants, intermediaries and service providers.

Stakeholder – any individual or organisation whose rights or legitimate interests may be affected by the Company's activities, including employees, customers, suppliers, shareholders, public authorities, local communities and non-governmental organisations.

Conflict of Interest – any situation in which an individual's personal, family, financial or other interests may influence, or appear to influence, the impartial performance of their professional duties.

Benefit – any financial or personal advantage, regardless of its form, value or method of provision.

Retaliation – any direct or indirect act or omission taken against a person who has reported a concern in good faith or assisted in the investigation of a reported concern, where such act or omission has the purpose or effect of placing that person at a disadvantage.

Misconduct – any act or omission that is inconsistent with applicable laws, this Code, internal procedures or accepted ethical standards.

Compliance – the system designed to ensure that the Company's activities are conducted in accordance with applicable laws and regulations, internal rules, contractual obligations, ethical principles and responsible business practices.

3. Values and Ethical Principles

3.1. Our Values

At THONI ALUTEC Sp. z o.o., we believe that long-term business success can only be achieved by conducting our activities in accordance with the highest ethical standards. All business decisions are made with due regard for the law, respect for human dignity and responsibility towards our stakeholders. Our corporate culture is built upon the following core values:

1. Integrity

We conduct our business honestly, fairly and transparently. We have zero tolerance for fraud, corruption, deliberate misrepresentation or any conduct that undermines the trust of our customers, business partners and colleagues.

2. Respect for the Law

We comply with all applicable national and international laws and regulations, as well as the Company's internal rules and policies. Whenever uncertainty arises, we choose the course of action that is lawful and ethically responsible.

3. Respect for People

We treat every individual with dignity, fairness and respect. We do not tolerate discrimination, harassment, violence, bullying or any violation of human rights.

4. Accountability

Each of us is accountable for our decisions, our work and the impact our actions have on safety, the environment, our colleagues and the reputation of the Company.

5. Professionalism

We strive for excellence by continuously developing our competencies, sharing knowledge, encouraging innovation and improving our processes.

6. Safety

The safety and well-being of people always take precedence over economic results. Every

4/27



employee has a responsibility to identify and report hazards and to actively contribute to maintaining a safe and healthy workplace.

7. Social and Environmental Responsibility

We conduct our business with respect for the environment and in accordance with the principles of sustainable development. We are committed to reducing the environmental impact of our operations and supporting initiatives that create value for local communities

3.2. Principles of Ethical Conduct

Every person covered by this Code is expected to:

1. comply with applicable laws and the provisions of this Code;
2. act honestly and loyally towards the Company;
3. make decisions objectively and free from conflicts of interest;
4. protect confidential information and personal data;
5. prevent corruption, fraud and all other forms of misconduct;
6. respect the dignity, diversity and rights of every individual;
7. safeguard their own health and safety, as well as that of others;
8. protect the Company's assets and use entrusted resources responsibly and efficiently;
9. promptly report any suspected or actual violations of the law, this Code or ethical principles in accordance with the applicable reporting procedures; and
10. cooperate fully in the investigation of reported concerns.

3.3. Speak Up Principle

THONI ALUTEC Sp. z o.o. promotes a culture of openness, accountability and transparent communication.

Every person acting on behalf of the Company has both the right and the responsibility to report, in good faith, any actual or suspected violation of applicable law, ethical principles or the provisions of this Code. The Company is committed to ensuring the confidentiality of all reports, conducting fair and impartial investigations, and protecting individuals who raise concerns in good faith from any form of retaliation. No person who reports a concern in good faith shall suffer any adverse consequences as a result of making such a report, even if the reported concern is not substantiated following an investigation.

4. Human Rights

4.1. Company Commitment

THONI ALUTEC Sp. z o.o. conducts its business with respect for the dignity, freedom and fundamental rights of every individual. We recognise that responsible business conduct requires respect for

5/27



human rights across all areas of our operations and throughout our supply chain.

The Company is committed to conducting its business in compliance with applicable laws and internationally recognised human rights standards.

All employees, contractors and business partners are expected to comply with the principles set out in this Code.

4.2. Equal Treatment and Diversity

The Company is committed to providing equal treatment and equal opportunities for employment and professional development to all individuals.

Decisions relating to recruitment, remuneration, promotion, training, performance evaluation and termination of employment are based solely on qualifications, competence, experience and legitimate business needs.

The Company has zero tolerance for discrimination on the grounds of, including but not limited to:

- sex;
- age;
- nationality;
- ethnic origin;
- race;
- colour;
- religion or belief;
- disability;
- health status;
- sexual orientation;
- gender identity;
- trade union membership;
- political opinion;
- type of employment; or
- any other characteristic protected under applicable law.

The Company promotes a culture of diversity, mutual respect and collaboration.

4.3. Respect for Human Dignity

Every individual employed by or cooperating with the Company has the right to work in an environment based on mutual respect.



The Company does not tolerate:

- workplace bullying;
- harassment;
- sexual harassment;
- physical or psychological violence;
- intimidation;
- humiliation;
- threats;
- retaliation; or
- any other behaviour that violates human dignity.

Every employee has a responsibility to respond appropriately to conduct that breaches the principles set out in this Code.

4.4. Prohibition of Forced Labour and Human Trafficking

The Company strictly prohibits all forms of forced or compulsory labour, labour performed under the threat of penalty, slavery, debt bondage and human trafficking.

Employment with the Company is entered into voluntarily, and employees have the right to terminate their employment in accordance with applicable law and the terms of their employment contract.

The Company does not retain employees' identity documents and does not require employees or job applicants to pay recruitment, hiring or placement fees.

4.5. Ethical Recruitment

The Company's recruitment processes are conducted in a fair, transparent and non-discriminatory manner.

The Company does not tolerate practices such as:

- charging candidates recruitment or hiring fees;
- misleading candidates regarding the terms and conditions of employment;
- restricting employees' freedom to change employment; or
- using coercive or forced recruitment practices.

Where recruitment agencies are engaged, the Company expects them to comply with the same ethical standards.

4.6. Prohibition of Child Labour and Protection of Young Workers

The Company does not employ children or any person whose employment would violate applicable laws relating to minimum working age.



Where young workers are employed, the Company provides them with appropriate protection, suitable working conditions and ensures full compliance with all applicable legal requirements. Young workers shall not be assigned work that could endanger their health, safety or development.

4.7. Freedom of Association and Social Dialogue

The Company respects employees' rights to establish and join workers' organisations and to participate in social dialogue in accordance with applicable law. No employee shall be disadvantaged or discriminated against for exercising these rights.

4.8. Reporting Human Rights Concerns

Any person who becomes aware of a potential human rights violation is encouraged to report the matter in accordance with the Company's applicable Reporting Procedure. The Company ensures the confidentiality of all reports, conducts impartial and thorough reviews, and protects individuals who report concerns in good faith against any form of retaliation. All reported concerns are assessed with due care and diligence. Where a violation is confirmed, the Company will implement appropriate corrective and preventive measures.

4.9. Human Rights Due Diligence

The Company is committed to identifying, assessing and mitigating risks related to human rights within its own operations and, where appropriate, throughout its relationships with business partners. Where human rights violations are identified, the Company will take appropriate measures to remedy the situation and implement actions designed to prevent similar incidents from occurring in the future.

5. Employment Standards

5.1. Fair and Lawful Employment

THONI ALUTEC Sp. z o.o. pursues an employment policy based on fairness, transparency and full compliance with applicable labour laws. Every individual commencing work for the Company is provided with clear information regarding the terms and conditions of employment, scope of responsibilities, remuneration principles, and their rights and obligations. The Company does not tolerate illegal employment practices or any actions intended to circumvent applicable labour legislation.

5.2. Remuneration and Benefits

The Company provides remuneration in accordance with applicable laws and ensures the timely payment of wages and all employment-related benefits. Remuneration is determined in a fair and transparent manner, taking into account the employee's responsibilities, qualifications, experience and level of accountability. The Company is committed to providing equal pay for work of equal value and does not apply any unlawful or unjustified deductions from employees' remuneration. Every employee receives sufficient information to verify the accuracy of their remuneration and the benefits to which they are entitled.

5.3. Working Hours

Working time is organised in accordance with applicable laws and regulations. The Company ensures that employees are provided with:



- compliance with applicable working time limits;
- statutory daily and weekly rest periods;
- entitlement to annual leave and other employment-related rights;
- proper recording and remuneration of overtime work.

Overtime shall be kept to the minimum necessary and planned with due regard for the health, safety and well-being of employees.

5.4. Professional Development and Equal Opportunities

The Company supports the professional development of its employees through:

- internal and external training programmes;
- continuous development of professional competencies;
- knowledge sharing;
- opportunities to acquire new skills and qualifications;
- objective performance and competency evaluations; and
- equal opportunities for career advancement.

Decisions relating to professional development are made without regard to sex, age, nationality, disability or any other characteristic protected under applicable law.

5.5. Respect for Privacy

The Company respects the privacy of its employees and is committed to protecting their personal data. Personal data are processed solely to the extent necessary for the fulfilment of legal obligations or contractual requirements and in accordance with applicable data protection legislation.

Every employee is required to maintain the confidentiality of information relating to other employees that they obtain in the course of performing their duties.

5.6. Dialogue and Cooperation

The Company promotes a culture of open dialogue, mutual respect and cooperation.

Every employee has the right to:

- submit suggestions for improvements;
- express opinions and provide feedback;
- raise concerns relating to work organisation; and
- report concerns without fear of retaliation.

Managers are responsible for maintaining constructive dialogue with employees and fostering a



culture of open and transparent communication.

5.7. Work-Life Balance

The Company recognises the importance of maintaining a healthy balance between employees' professional and personal lives.

Where reasonably practicable and consistent with business needs, the Company supports solutions that promote effective work organisation, respect employees' personal time and contribute to a healthy and supportive working environment.

5.8. Employee Responsibilities

Every employee is responsible for:

- complying with applicable laws, internal regulations and Company policies;
- performing assigned duties with due care, professionalism and diligence;
- safeguarding the reputation and good name of the Company;
- treating colleagues and business partners with respect; and
- reporting any actual or suspected violations of applicable laws, ethical principles or this Code in accordance with the Company's applicable Reporting Procedure.

6. Occupational Health, Safety and Environmental Protection

6.1. Our Commitment

The health and safety of our employees, contractors, business partners and all individuals present on the premises of THONI ALUTEC Sp. z o.o. are among the Company's highest priorities.

The Company conducts its operations in a manner that ensures safe and healthy working conditions and is committed to the continuous improvement of its Occupational Health and Safety (OHS) and Environmental Management System.

No production, operational or commercial objective shall ever justify actions that endanger human life, health or the natural environment.

6.2. Company Responsibilities

The Company is committed to:

- providing safe and healthy working conditions in compliance with applicable laws and regulations;
- identifying workplace hazards and carrying out regular occupational risk assessments;
- eliminating hazards at their source or reducing risks to an acceptable level;



-
- providing appropriate personal protective equipment (PPE) and collective protective measures;
 - ensuring that machinery, equipment and installations are maintained in a safe operating condition;
 - providing mandatory occupational health and safety training;
 - establishing and maintaining appropriate emergency preparedness and response procedures;
 - monitoring working conditions and implementing measures to prevent occupational accidents and work-related illnesses; and
 - investigating workplace accidents and near misses and implementing appropriate corrective and preventive actions.

6.3. Employee Responsibilities

Every employee is responsible for:

- complying with occupational health and safety laws, regulations and internal instructions;
- performing work in accordance with established procedures;
- correctly using the required personal protective equipment;
- maintaining a safe, clean and orderly workplace;
- promptly reporting any hazards, equipment failures or unsafe acts or conditions;
- participating in mandatory health and safety training and emergency drills; and
- cooperating in the investigation of workplace accidents and near-miss incidents.

Every employee has the right to refrain from performing work where there is an imminent and serious risk to life or health, in accordance with applicable law.

6.4. Safety Culture

Safety is a shared responsibility of everyone working for or on behalf of the Company.

THONI ALUTEC Sp. z o.o. promotes a safety culture based on:

- shared responsibility;
- open communication;
- reporting hazards and near-miss incidents;
- learning from experience; and
- continuous improvement.

Employees are encouraged to submit suggestions for improving workplace safety and eliminating potential hazards.



6.5. Contractors and Third Parties

Subcontractors, suppliers and all other persons performing work on the Company's premises are required to comply with applicable occupational health and safety regulations and the internal safety rules of THONI ALUTEC Sp. z o.o.

Before commencing work, such persons shall be informed of the applicable safety requirements and shall comply with the instructions of individuals responsible for supervision.

6.6. Environmental Protection

The Company conducts its business with respect for the environment and in accordance with the principles of sustainable development.

In particular, THONI ALUTEC Sp. z o.o. is committed to:

- complying with all applicable environmental laws and regulations;
- reducing the consumption of energy, water and natural resources;
- minimising waste generation and promoting waste segregation, reuse and recycling;
- preventing environmental pollution;
- reducing emissions to air, water and soil;
- ensuring the safe and responsible management of chemicals; and
- taking environmental considerations into account when planning operations, projects and investments.

6.7. Responsibility of Every Employee

Every employee is responsible for:

- using the Company's resources responsibly and efficiently;
- reducing the unnecessary consumption of materials and energy;
- handling and disposing of waste in accordance with applicable procedures;
- promptly reporting any environmental incidents, pollution or failures that may adversely affect the environment; and
- supporting initiatives aimed at improving occupational health and safety and environmental performance.

The actions of every employee have a direct impact on the safety of colleagues, the protection of the environment and the reputation of THONI ALUTEC Sp. z o.o.

7. Business Ethics

7.1. General Principles



THONI ALUTEC Sp. z o.o. conducts its business in compliance with applicable laws and regulations, the highest ethical standards and the principles of fair business practice.

All employees, managers and individuals acting on behalf of the Company are expected to act with integrity, accountability and transparency, while respecting the interests of customers, business partners, suppliers and other stakeholders.

In making business decisions, we are guided by the principles of legality, integrity, impartiality and responsibility for protecting the Company's reputation.

7.2. Anti-Corruption and Prevention of Fraud

THONI ALUTEC Sp. z o.o. maintains a **zero-tolerance approach** to all forms of corruption, bribery and fraud.

The following activities are strictly prohibited:

- offering, promising, giving, requesting or accepting any financial or personal benefit for the purpose of influencing a business decision;
- using one's position within the Company for personal gain;
- making unauthorised payments, commissions or gratuities;
- falsifying documents or information;
- misappropriating Company assets;
- knowingly concealing irregularities, fraud or other misconduct.

Every employee is required to report any suspected corruption, fraud or other misconduct without undue delay in accordance with the Company's applicable Reporting Procedure.

7.3. Gifts, Hospitality and Other Benefits

The exchange of gifts or hospitality may be an accepted part of building legitimate business relationships; however, it must never influence, or appear to influence, the objectivity or independence of business decisions.

Employees may only offer or accept gifts or hospitality that:

- comply with applicable laws and regulations;
- are reasonable, customary and occasional;
- are not intended to obtain an improper advantage;
- do not create a conflict of interest; and
- cannot reasonably be perceived as an attempt to influence a business decision.

Where any doubt exists, employees should consult their immediate supervisor before accepting or offering any gift or hospitality.



7.4. Conflict of Interest

Every employee is required to avoid situations in which personal interests may conflict, or appear to conflict, with the interests of THONI ALUTEC Sp. z o.o. or impair the objectivity of business decisions. Conflicts of interest may arise, in particular, in connection with:

- family or personal relationships with business partners;
- engaging in competing business activities;
- secondary employment that may interfere with the proper performance of professional duties; or
- holding financial interests or ownership stakes in entities cooperating with the Company.

Any actual, potential or perceived conflict of interest must be disclosed to the employee's immediate supervisor without undue delay.

7.5. Fair Competition

The Company conducts its business in accordance with the principles of fair competition and applicable competition laws.

In particular, the following practices are prohibited:

- agreeing prices or other commercial terms with competitors;
- allocating markets or customers;
- exchanging confidential commercial information with competitors;
- abusing a dominant market position; and
- making false or misleading statements regarding competitors.

7.6. Anti-Money Laundering

The Company does not engage in any activities that could facilitate money laundering, terrorist financing or the concealment of the origin of financial assets.

Employees are required to exercise particular care when dealing with transactions that may raise reasonable concerns regarding their legality or legitimate business purpose and to report such concerns in accordance with applicable internal procedures.

7.7. Export Controls and Sanctions

The Company complies with all applicable export control laws, economic sanctions and regulations governing trade in restricted goods, technologies and services.

Employees involved in sales, procurement, logistics or international business activities are required to exercise due care and ensure compliance with all applicable legal and regulatory requirements.

7.8. Accuracy of Records and Information

All documents, records, reports and information prepared or maintained in connection with the



Company's activities must be complete, accurate, truthful and maintained in accordance with applicable laws and the Company's internal procedures.

The intentional submission of false information, concealment of relevant information or falsification of records is strictly prohibited.

7.9. Responsibility of Every Employee

Every person acting on behalf of THONI ALUTEC Sp. z o.o. is responsible for making decisions that are consistent with applicable law, this Code and the Company's values.

Whenever uncertainty arises regarding the appropriate course of action, employees should:

- verify whether the intended action complies with applicable laws and this Code;
- seek guidance from their immediate supervisor; and
- refrain from taking action until any doubts have been resolved.

Every employee is responsible for safeguarding the good name and reputation of THONI ALUTEC Sp. z o.o. in both internal and external business relationships.

8. Protection of Information and Data

8.1. General Principles

Information is one of the Company's most valuable assets. Its proper protection is essential to safeguarding the Company's operations, as well as the interests of its customers, business partners and employees.

Every person acting on behalf of THONI ALUTEC Sp. z o.o. is responsible for using information appropriately and protecting its confidentiality, integrity and availability.

8.2. Confidential Information

Confidential Information includes any information the unauthorised disclosure of which could expose the Company or its business partners to harm, result in the loss of competitive advantage or violate applicable laws and regulations.

The obligation to maintain confidentiality applies in particular to:

- technical and technological information;
- financial data;
- commercial information;
- customer and supplier data;
- trade secrets;
- design and engineering documentation;
- information relating to manufacturing processes; and
- any other information designated as confidential or which, by its nature or the circumstances,



should reasonably be regarded as confidential.

The duty of confidentiality applies both during employment or cooperation with the Company and after such employment or cooperation has ended.

8.3. Protection of Personal Data

The Company processes personal data in accordance with applicable data protection laws and its internal procedures.

Every employee is required to:

- process personal data only to the extent necessary for the performance of their duties;
- ensure an appropriate level of data security;
- maintain the confidentiality of information; and
- promptly report any personal data protection incidents in accordance with the applicable procedures.

8.4. Cybersecurity

Every user of the Company's information systems is required to exercise due care when using IT systems, networks and electronic devices.

In particular, employees are required to:

- use strong, unique passwords and protect authentication credentials;
- use only authorised software and devices;
- protect computers and mobile devices against unauthorised access;
- avoid opening suspicious emails, attachments or links; and
- promptly report any suspected information security incidents.

8.5. Use of Information Technology Resources

The Company's information technology resources are provided primarily for business purposes and the performance of professional duties.

Every user is required to:

- use such resources in accordance with applicable procedures;
- protect equipment entrusted to them;
- refrain from installing unauthorised software;
- prevent unauthorised persons from accessing Company devices; and
- comply with applicable security requirements when working remotely or outside the Company's premises.



8.6. Artificial Intelligence and Emerging Technologies

Artificial intelligence tools and other emerging technologies shall be used responsibly and in compliance with applicable laws and the Company's internal policies.

Without the Company's prior authorisation, employees must not upload confidential information, personal data, technical documentation or any other trade secrets to publicly available artificial intelligence platforms or similar external tools.

8.7. External Communications and Social Media

Employees are expected to use social media and other external communication channels responsibly and in a manner that protects the reputation and good name of THONI ALUTEC Sp. z o.o.

Employees must not disclose confidential information, customer data, business partner information or any other information whose disclosure could adversely affect the Company.

Only individuals specifically authorised by the Company may make public statements or communicate externally on behalf of the Company.

8.8. Employee Responsibility

Every employee is responsible for the proper use of information and the protection of the data to which they have access in the course of performing their duties.

Any loss of data, information security breach or other security incident must be reported without undue delay in accordance with the Company's applicable procedures.

9. Intellectual Property

9.1. General Principles

Intellectual property and know-how constitute valuable assets of THONI ALUTEC Sp. z o.o. and form a key element of the Company's competitive advantage.

Every person acting on behalf of the Company is responsible for protecting the intellectual property rights of THONI ALUTEC Sp. z o.o., as well as those of its customers, suppliers and other business partners.

9.2. Protection of the Company's Intellectual Property

Employees are required to properly safeguard all intellectual property rights owned by the Company, including in particular:

- technical and technological documentation;
- engineering designs;
- production documentation;
- software;
- databases;
- trademarks;



- marketing materials;
- know-how;
- trade secrets; and
- research and development results.

Such information may be used solely for purposes directly related to the performance of professional duties.

9.3. Respect for Third-Party Intellectual Property Rights

The Company respects the intellectual property rights of third parties.

Employees must not:

- copy or use third-party materials without the required authorisation;
- infringe copyrights, patents, trademarks or trade secrets;
- use unlicensed or illegal software; or
- disclose documentation belonging to customers or business partners to unauthorised persons.

9.4. Innovation and Continuous Improvement

The Company encourages innovation and supports employees in developing new ideas, improvements and technical solutions that contribute to enhanced quality, safety, operational efficiency and environmental protection.

Any inventions, improvements or other solutions developed in connection with the performance of professional duties should be reported in accordance with the Company's applicable internal procedures.

9.5. Use of Information and Materials

Employees are responsible for ensuring the proper storage and protection of documents and other media containing protected information.

Without the Company's prior authorisation, employees must not:

- copy documentation beyond the extent necessary for the performance of their duties;
- disclose information to unauthorised persons;
- use the Company's information or materials for personal purposes; or
- remove or destroy documents in violation of applicable procedures.

9.6. Employee Responsibility

Every employee is responsible for safeguarding entrusted information and protecting intellectual property rights.

Any actual or suspected infringement of intellectual property rights must be reported to the employee's immediate supervisor without undue delay.



Any breach of the principles set out in this Chapter may result in disciplinary measures or other legal consequences in accordance with applicable laws and the Company's internal regulations.

10. Responsible Supply Chain

10.1. Principles of Cooperation with Business Partners

THONI ALUTEC Sp. z o.o. is committed to building long-term relationships with suppliers, subcontractors and other business partners based on mutual trust, integrity, transparency and accountability.

When selecting and evaluating business partners, the Company considers not only commercial, quality and technical criteria, but also compliance with applicable laws and adherence to recognised standards of business ethics.

10.2. Expectations Towards Business Partners

The Company expects its business partners to conduct their activities in compliance with applicable laws and the principles set out in this Code and the **Supplier Code of Conduct**.

In particular, business partners are expected to:

- respect internationally recognised human rights;
- provide lawful and fair working conditions;
- prohibit forced labour and child labour;
- ensure safe and healthy working conditions;
- conduct business in accordance with the principles of fair competition;
- prevent corruption, fraud and other forms of misconduct;
- protect confidential information and personal data;
- conduct their activities in an environmentally responsible manner; and
- comply with applicable export control laws, international sanctions and all other legal requirements relevant to their business activities.

10.3. Responsible Sourcing

The Company supports responsible sourcing practices and expects its business partners to exercise due diligence in identifying and mitigating risks associated with the origin of raw materials and other resources used in their operations.

Where justified, the Company may require business partners to provide information or documentation demonstrating compliance with applicable legal, contractual or customer requirements.

10.4. Supplier Evaluation and Monitoring

The Company may periodically evaluate its business partners, taking into account the quality of supplied products or services, timely fulfilment of contractual obligations, compliance with legal requirements and adherence to ethical standards.

Such evaluations may include documentation reviews, questionnaires, meetings, supplier visits or audits conducted in accordance with applicable procedures and contractual arrangements.



10.5. Cooperation During Audits and Corrective Actions

Business partners are expected to cooperate with the Company in investigating identified non-conformities and implementing appropriate corrective and preventive actions.

Where breaches of this Code or other agreed requirements are identified, the Company may require the preparation and implementation of a corrective action plan within an agreed timeframe.

10.6. Responsibilities of Business Partners

Business partners are responsible for ensuring that individuals acting on their behalf, including subcontractors and lower-tier suppliers, comply with applicable laws and ethical standards equivalent to those required by THONI ALUTEC Sp. z o.o.

The Company encourages its business partners to promote an ethical culture and continuously improve their compliance management practices.

10.7. Consequences of Non-Compliance

Serious or repeated violations of applicable laws, ethical principles or the requirements established by THONI ALUTEC Sp. z o.o. may result in appropriate measures being taken, including requiring corrective actions, restricting further cooperation or, where justified, terminating the business relationship in accordance with applicable laws and contractual provisions.

11. Reporting Misconduct

11.1. A Culture of Openness and Accountability

THONI ALUTEC Sp. z o.o. promotes a corporate culture founded on integrity, accountability, mutual trust and open communication.

Every person acting on behalf of the Company has both the right and the responsibility to respond to conduct that may violate applicable laws, this Code or other internal regulations.

The purpose of the Company's reporting system is to facilitate the early identification of misconduct, reduce risks and support the continuous improvement of the organisation.

11.2. Scope of Reportable Concerns

Reports may relate, in particular, to information concerning:

- violations of applicable laws and regulations;
- breaches of this Code;
- corruption or other forms of misconduct;
- fraud or falsification of records;
- conflicts of interest;
- human rights violations;
- discrimination, workplace bullying or harassment;
- occupational health and safety violations;



- environmental risks or incidents;
- personal data protection breaches;
- information security breaches;
- misuse of Company assets; or
- any other conduct that may expose the Company to legal, financial, operational or reputational risk.

11.3. Persons Entitled to Report Concerns

Reports may be submitted by any person who becomes aware of a potential violation in connection with their work or cooperation with the Company, including:

- employees;
- members of the Management Board;
- individuals engaged under civil law contracts;
- trainees and interns;
- suppliers and subcontractors; and
- any other persons cooperating with the Company.

11.4. Reporting Channels

The Company provides several reporting channels for submitting concerns, including:

- by post addressed to the Company's registered office;
- by submitting a sealed envelope at the Company's reception; or
- by email to zgloszenia@thoni-alutec.pl.

Individuals submitting reports should use the reporting channel that best ensures the confidentiality and security of the information provided.

11.5. Good Faith

Any person submitting a report is expected to act in good faith and have reasonable grounds to believe that the information reported is accurate at the time the report is made.

A report made in good faith will not result in any adverse consequences for the reporting person, even if the reported concern is not substantiated following an investigation.

Knowingly making false reports or acting in bad faith may result in legal consequences and disciplinary measures in accordance with applicable laws and the Company's internal regulations.

11.6. Confidentiality

The Company is committed to protecting the identity of reporting persons and maintaining the



confidentiality of all information obtained during the reporting and investigation process, except where disclosure is required by applicable law.

Access to information relating to a report shall be restricted solely to persons authorised to conduct or support the investigation.

Every individual involved in handling or investigating a report is required to maintain strict confidentiality.

11.7. Investigation Process

Every report shall be subject to an initial assessment and, where appropriate, a further investigation conducted in a manner that is:

- impartial;
- objective;
- timely;
- confidential; and
- respectful of the rights of all persons concerned.

Where justified by the outcome of the investigation, the Company shall implement appropriate follow-up actions, including investigative, corrective and preventive measures.

11.8. Cooperation During Investigations

Every person participating in an investigation is required to cooperate fully, provide accurate and truthful information and make available any documents necessary for clarifying the matter.

Obstructing an investigation or intentionally concealing relevant information is strictly prohibited.

11.9. Responsibility

Every employee is responsible for complying with the principles set out in this Code and for responding appropriately to known or suspected violations.

An effective reporting system is a fundamental element of the ethical culture of THONI ALUTEC Sp. z o.o. and serves to protect employees, business partners and the legitimate interests of the Company.

12. Protection Against Retaliation

12.1. Protection of Reporting Persons

THONI ALUTEC Sp. z o.o. provides protection to individuals who, in good faith, report or assist in the investigation of violations of applicable laws, this Code or other internal regulations.

The Company has zero tolerance for retaliation against reporting persons, individuals participating in investigations or those supporting reporting persons.

12.2. Scope of Protection

Protection against retaliation applies, in particular, to:

- reporting persons;



- individuals providing information or evidence;
- witnesses participating in investigations;
- persons supporting a reporting person; and
- any other individuals who, due to the circumstances of the case, may be exposed to retaliatory actions.

Such protection applies to individuals acting in good faith who had reasonable grounds to believe that the reported information was true at the time the report was submitted.

12.3. Prohibited Retaliatory Actions

Retaliation means any act or omission resulting from the submission of a report that has the purpose or effect of placing a protected person at a disadvantage.

Prohibited retaliatory actions include, without limitation:

- termination or non-renewal of employment without legitimate justification;
- reduction of remuneration or withdrawal of employment-related benefits;
- denial of promotion or training opportunities;
- unjustified changes to position, workplace or working hours;
- intimidation, coercion or threats;
- workplace bullying, harassment or social isolation;
- unjustified negative performance evaluations;
- discrimination in any form;
- hindering the performance of professional duties;
- actions damaging the reputation or good name of the reporting person; and
- any other actions that may result in unjustified adverse consequences for a protected individual.

12.4. Responsibilities of Management

Managers are responsible for:

- promoting a culture of openness and mutual trust;
- providing a safe environment for reporting concerns;
- responding promptly to information regarding potential retaliation;
- cooperating in the investigation of reports; and
- protecting the confidentiality of individuals involved in the reporting process.



12.5. Responding to Retaliation

Any person who believes they have been subjected to retaliation should report the matter without undue delay in accordance with the Company's Reporting Procedure.

Reports concerning suspected retaliation shall be treated with due care and be subject to a separate assessment.

Where retaliation is confirmed, the Company shall take appropriate measures, including:

- immediately ending the retaliatory conduct;
- mitigating its consequences, where possible; and
- taking appropriate organisational, disciplinary or legal action against those responsible.

12.6. Responsibility for Retaliation

Any act of retaliation constitutes a breach of this Code and may result in disciplinary measures or other legal consequences in accordance with applicable laws and the Company's internal regulations.

The Company treats all acts of retaliation as serious violations of the ethical principles and values upon which its business is founded.

13. Audits and Continuous Improvement

13.1. Purpose of Compliance Monitoring

THONI ALUTEC Sp. z o.o. carries out systematic activities to monitor compliance with this Code and to continuously strengthen its ethical culture and Compliance Management System.

The objectives of these activities are to:

- ensure compliance with applicable laws and regulations;
- monitor adherence to the principles and requirements of this Code;
- identify areas requiring improvement;
- reduce legal, operational and reputational risks; and
- promote a culture of accountability and continuous improvement.

13.2. Audits and Compliance Assessments

Compliance with this Code may be periodically verified through:

- internal audits;
- customer audits;
- audits conducted by independent external organisations;
- compliance reviews; and
- assessments of the effectiveness of the Company's Compliance Management System.

The scope of each audit shall be determined based on the nature of the Company's activities, identified risks and applicable legal, contractual and organisational requirements.



13.3. Cooperation During Audits

All persons subject to this Code are required to cooperate fully during audits, inspections and compliance reviews.

In particular, they are expected to:

- provide complete and accurate information;
- make available all documents required during the audit process;
- refrain from obstructing audit or inspection activities; and
- cooperate in investigating and resolving identified non-conformities.

13.4. Corrective and Preventive Actions

Where violations or non-conformities are identified, the Company shall take appropriate measures to eliminate their root causes and minimise the risk of recurrence.

Such measures may include, in particular:

- developing and implementing corrective action plans;
- updating internal procedures and policies;
- providing additional training;
- implementing organisational improvements;
- monitoring the effectiveness of implemented measures; and
- reassessing identified risks.

13.5. Training and Awareness

The Company provides employees with access to training programmes and awareness initiatives relating to:

- business ethics;
- legal compliance;
- anti-corruption;
- personal data protection;
- information security;
- human rights;
- occupational health and safety; and
- environmental protection.

Training programmes are tailored to employees' responsibilities and the nature of their work.



13.6. Review and Update of the Code

This Code shall be reviewed periodically to ensure that it remains effective, relevant and up to date. Reviews shall be conducted, in particular, in the event of:

- changes in applicable laws or regulations;
- organisational changes within the Company;
- audit or inspection findings;
- significant violations or incidents;
- changes in customer or business partner requirements; or
- the need to align the Code with recognised best practices in compliance.

13.7. Responsibilities of the Management Board

The Management Board of THONI ALUTEC Sp. z o.o. is responsible for:

- approving this Code;
- ensuring its effective implementation and maintenance;
- promoting a culture of ethical conduct;
- supporting initiatives that strengthen employee awareness;
- providing adequate resources for the effective operation of the Compliance Management System; and
- promoting the continuous improvement of the Company's compliance framework.

13.8. Shared Responsibility

The effectiveness of this Code depends on the commitment of everyone acting on behalf of THONI ALUTEC Sp. z o.o.

Every employee, manager and person cooperating with the Company is responsible for complying with the principles set out in this Code, reporting observed or suspected misconduct and actively contributing to a corporate culture based on integrity, accountability and mutual respect.

14. Final Provisions

1. This Code shall enter into force on the date of its approval by the Management Board of THONI ALUTEC Sp. z o.o.
2. The Management Board is responsible for the implementation, maintenance and periodic review of this Code.
3. All employees are required to familiarise themselves with the contents of this Code and to comply with its provisions.



-
4. Any breach of this Code may result in measures provided for under applicable laws, the Company's internal regulations or relevant contractual arrangements.
 5. This Code shall be made available to all employees and, where appropriate, to the Company's business partners.
 6. This Code shall be reviewed at least once every two years, or whenever significant changes occur in applicable laws, the Company's organisational structure or customer requirements.
 7. Matters not regulated by this Code shall be governed by applicable laws and the internal regulations of THONI ALUTEC Sp. z o.o.
 8. Any questions regarding the interpretation or application of this Code should be addressed to the employee's immediate supervisor or another person designated by the Management Board.

Elaborated by: Katarzyna Kaszuba

Approved by Company Board:

Member of Board

Dariusz Furtak

Member of Board

Marek Ślepecki

Stalowa Wola

11.01.2024