



SUPPLIER CODE OF CONDUCT **THONI ALUTEC Sp. z o.o.**

1. Purpose

THONI ALUTEC Sp. z o.o. is committed to conducting its business with integrity, in compliance with applicable laws, and in accordance with the highest standards of ethics, social responsibility, respect for human rights, occupational health and safety, and environmental protection.

This Supplier Code of Conduct ("Code") defines the minimum standards expected from all suppliers, subcontractors, service providers, consultants, agents, and other business partners ("Suppliers").

Compliance with this Code constitutes an essential element of the business relationship with THONI ALUTEC Sp. z o.o. Suppliers are expected to promote these principles throughout their own supply chains.

2. Compliance with Laws

Suppliers shall:

- comply with all applicable national and international laws and regulations;
- obtain and maintain all required licenses, permits and authorizations;
- conduct business honestly and transparently;
- maintain accurate business and financial records;
- cooperate with competent authorities where required by law.

3. Human Rights

Suppliers shall respect internationally recognized human rights and conduct their operations with dignity, fairness and respect for all individuals.

Suppliers shall:

- prohibit all forms of forced, bonded or involuntary labour;
- prohibit child labour;
- prohibit human trafficking;



-
- respect employees' freedom of movement;
 - treat all employees with dignity and respect.

4. Employment Standards

Suppliers shall ensure:

- lawful employment practices;
- written employment conditions where required by law;
- timely payment of wages and benefits;
- compliance with working time regulations;
- legally required rest periods;
- equal employment opportunities;
- protection of employees' privacy.

Any form of discrimination, harassment, intimidation or abuse is strictly prohibited.

5. Occupational Health and Safety

Suppliers shall provide a safe and healthy working environment by:

- identifying workplace hazards;
- assessing occupational risks;
- implementing preventive measures;
- providing appropriate personal protective equipment;
- maintaining machinery and equipment in safe condition;
- ensuring emergency preparedness;
- providing regular health and safety training;
- investigating accidents and implementing corrective actions.

Employees shall have the right to refuse work presenting an imminent danger to life or health without fear of retaliation.



6. Environmental Protection

Suppliers are expected to conduct their operations responsibly and minimize environmental impacts.

Suppliers shall:

- comply with environmental legislation;
- prevent pollution;
- reduce waste generation;
- promote recycling and resource efficiency;
- reduce energy and water consumption;
- manage hazardous substances responsibly;
- continuously improve environmental performance.

7. Business Ethics

Suppliers shall conduct business honestly, fairly and ethically.

They shall:

- comply with all applicable anti-corruption laws;
- avoid conflicts of interest;
- maintain accurate accounting records;
- compete fairly;
- avoid deceptive or fraudulent business practices.

8. Anti-Bribery, Gifts and Conflicts of Interest

Suppliers shall not directly or indirectly:

- offer or accept bribes;
- provide improper payments;
- offer excessive gifts or hospitality;
- seek improper business advantages.

Business courtesies may only be offered if they are lawful, reasonable, transparent and do not influence business decisions.

Actual or potential conflicts of interest shall be disclosed without undue delay.



9. Fair Competition

Suppliers shall comply with all applicable competition and antitrust laws.

They shall not engage in:

- price fixing;
- market allocation;
- bid rigging;
- exchange of competitively sensitive information;
- abuse of market position;
- any other anti-competitive practices.

10. Information Security and Data Protection

Suppliers shall protect confidential information entrusted to them by THONI ALUTEC Sp. z o.o.

Suppliers shall:

- maintain confidentiality;
- implement appropriate cybersecurity measures;
- process personal data only in accordance with applicable data protection laws;
- prevent unauthorized access, disclosure or misuse of information.

Confidential information shall not be used for any purpose other than the agreed business relationship.

11. Intellectual Property

Suppliers shall respect intellectual property rights belonging to THONI ALUTEC Sp. z o.o. and third parties.

Suppliers shall protect:

- patents;
- trademarks;
- copyrights;
- trade secrets;
- confidential know-how;



- proprietary technologies.

Unauthorized copying, reproduction or disclosure of protected information is prohibited.

12. Responsible Supply Chain

Suppliers are expected to promote responsible business conduct throughout their own supply chains.

They shall ensure that their subcontractors and suppliers comply with standards equivalent to those contained in this Code.

Where appropriate, Suppliers shall exercise due diligence regarding:

- human rights;
- environmental impacts;
- ethical business conduct;
- responsible sourcing of raw materials.

13. Conflict Minerals and Responsible Sourcing

Where applicable, Suppliers shall establish due diligence processes concerning the origin of minerals and raw materials and cooperate with THONI ALUTEC Sp. z o.o. in meeting customer and legal requirements relating to responsible sourcing.

14. Export Controls and International Sanctions

Suppliers shall comply with all applicable export control laws, trade restrictions and international sanctions.

Where applicable, Suppliers shall maintain adequate internal controls to ensure compliance with export regulations governing strategic goods and technologies.

15. Reporting Concerns

Suppliers are encouraged to promptly report any actual or suspected violation of this Code or applicable law that may affect the business relationship with THONI ALUTEC Sp. z o.o.

Reports shall be handled confidentially and in accordance with applicable laws and internal procedures.

16. Audits and Compliance Verification

THONI ALUTEC Sp. z o.o. reserves the right to verify Supplier compliance with this Code through:



- supplier assessments;
- documentation reviews;
- questionnaires;
- on-site audits, where contractually agreed;
- corrective action plans.

Suppliers are expected to cooperate fully during such assessments.

17. Non-Compliance

Failure to comply with this Code may result in:

- requests for corrective actions;
- enhanced monitoring;
- suspension of business activities;
- termination of contractual relationships;
- removal from THONI ALUTEC Sp. z o.o.'s approved supplier list.

18. Final Provisions

This Supplier Code of Conduct forms an integral part of THONI ALUTEC Sp. z o.o.'s supplier relationship management framework.

Suppliers are expected to communicate the principles contained herein to their employees, subcontractors and relevant business partners.

THONI ALUTEC Sp. z o.o. reserves the right to amend this Code from time to time. The latest version shall be made available to Suppliers upon request or through appropriate communication channels.

Elaborated by: Katarzyna Kaszuba

Approved by Company Board:

Member of Board

Dariusz Furtak

Member of Board

Marek Ślepecki

Stalowa Wola

11.01.2024