

## Code of Ethics and Corporate Social Responsibility STALMA S.A.



### Introduction

Building a market economy is related to the need to comply with the principles of ethics and entrepreneurial culture. STALMA S.A. bases its business activities on compliance with ethical standards and commonly accepted norms of behavior. Actions aimed at ensuring high-quality products, services, and reliability towards customers, employees, or stakeholders demonstrate a responsible approach to managing the organization and constitute a fundamental contributor to our overall success. We aim to establish a reputation as an honest organization that cares about its immediate and distant surroundings.

We regard maintaining ethical values and recognizing obligations towards all interested parties as a condition for achieving success and stability. An impeccable opinion and trust are our primary values, which we undertake to respect and monitor on a regular basis.

Our activities are characterized by a full respect for the law established and implemented by democratically appointed local and national authorities. Policy of STALMA S.A. in terms of supporting social and political activities is public. We treat every individual and organization equally, and we do not endorse any activities that involve spreading hatred, prejudice, or discrimination against specific groups or individuals.

Our goal is to establish a positive working environment and opportunities for employees by thoroughly clarifying all issues concerning behavior and decisions deemed unethical. We associate the strict application of the Code of Conduct with educating employees in the scope of the adopted principles. The regulations specified here are constantly monitored and improved.

The main principles applied in all interactions by STALMA S.A. employees, customers, and suppliers are:

- Respect for human rights
- No use of forced or compulsory labor

- Prohibition of human trafficking
- No employment of underage workers or children
- compliance with laws and current legislation regarding working conditions, including mandatory days off from work and payment of basic remuneration along with overtime
- Non-acceptance of discrimination based on age, gender, race, religious affiliation, and other factors
- Respect for freedom of association
- Counteraction against corruption and bribery
- Respect for intellectual property
- Respecting the health and safety of employees and collaborating individuals
- Minimizing adverse effects on the environment

### Cooperation with customers and suppliers

STALMA S.A. ensures that the delivered products are of appropriate quality, safe for use, and compliant with Polish and international standards and regulations, as evidenced by the certificates we have acquired. The information and product descriptions we provide are accurate and up to date. To ensure complete customer satisfaction, we guarantee high quality in both the products and the actions carried out in response to any complaints. Our advertising is based on reliable information, is conducted legally, and does not involve comparing competitors in a way that would discredit their products, services, or activities.

We further guarantee that all customer information will be used in accordance with their intent and with complete confidentiality. In the case of foreign customers, we agree to follow the laws of their respective countries. Our activities in the field of international trade are conducted responsibly, in accordance with the agreements concluded by Poland.

Cooperation with STALMA S.A. with each supplier is based on mutual trust and respect for common interests, payments are provided on time, in accordance with the concluded contract or order. In the case of foreign suppliers, we comply with the legal order in force in their countries, as informed by the supplier and the client, our activities in the field of international trade are always carried out taking into account the international agreements signed by Poland.

STALMA S.A. ensures constant monitoring of issues related to export control and respect for economic sanctions imposed by countries and international organizations.

### Internal relations

Internal relations at STALMA S.A. are based on respect for the personal dignity of each employee, regardless of nationality, age, length of service, position, education, religion, gender, marital status, health condition, skin color, sexual preferences, etc. Employees are recruited and promoted depending on the required qualifications in a given position. Any expressions of

discrimination against employees within STALMA S.A., including those by customers, suppliers, and other parties, will be interpreted as attempts to discriminate against the organization, and top management will respond accordingly. Tolerating sexual harassment and other forms of mental or physical distress of employees is not acceptable on the grounds of STALMA S.A. or among its personnel. The organization's principal purpose for its employees is to provide stable positions and to create new ones, as well as to provide employees with accurate information about job opportunities and the company's current and future status.

STALMA S.A. ensures a clean and safe working environment by standards and legal regulations, and through training and preventive activities, tries to ensure that employees understand the need and make efforts to avoid accidents, and injury to themselves, their colleagues, and third parties.

STALMA S.A. ensures the confidentiality of all data provided by employees based on the current rules described in the relevant regulations (GDPR).

STALMA S.A. assists employees in enhancing their qualifications and advancing their careers within the company, offers training, and encourages each employee's desire to further their education. It seeks to ensure complete communication with each employee in its activities and acknowledges the need to inform and consult on employee issues in the teams in which they work. It has procedures in place for addressing disagreements, and if they emerge, it does everything possible to resolve them without escalating the conflict.

STALMA S.A. informs employees accurately about the nature of contracts concluded with them, social security contributions paid and guarantees that it does not use the conclusion of contracts to the extent and in cases prohibited by law. If it is necessary to dismiss employees, every effort is made to assist them in finding other employment. In order to appreciate the efforts of individual people who contribute to the company's success, the organization applies the rules of a transparent and clear remuneration policy. The organization's objective is to consider the specific efforts of each employee.

STALMA S.A. ensures ongoing information to employees about the goals of its activities and tasks at individual job positions. It also ensures that information obtained from employees during work will not be used for any purpose other than the one for which it was made available. We undertake to fulfill our special obligations towards employees who will soon retire or are forced to retire. We try to support friendships and bonds with retirees and pensioners from among our employees.

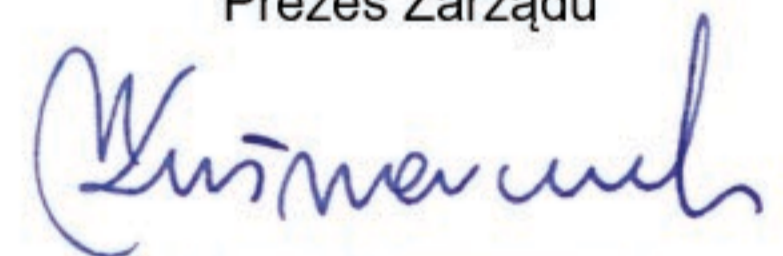
### **Coexistence with competitors**

Our business relationship with competitors is based on fair competition. All actions taken are consistent with the law and good practices and do not threaten or violate the interests of other entrepreneurs. At the same time, products manufactured by STALMA S.A. do not constitute any the intellectual property of other entrepreneurs. Professional secrecy applies to all employees. We undertake to obtain and use only publicly disclosed technical, technological, and organizational information of competing enterprises. STALMA S.A. respects the principles of fair competition and antitrust.

### **Coexistence with the surroundings and the natural environment**

STALMA S.A. aspires to be a socially responsible business entity, to serve the local community, to provide good working conditions, and to create new jobs. STALMA S.A. is governed by a high degree of responsibility for the natural environment, cares about environmental protection, and uses natural resources in a responsible manner. We have a standardized production cycle, sewage management, waste disposal, exhaust emissions, and we protect employees against the effects of noise at work stations. In line with the proper management of natural resources and limiting the exploitation of the natural environment, STALMA S.A. is concerned about waste reduction, reducing electricity consumption, greenhouse gas emissions, and water consumption. We analyze the impact of each new venture on the environment.

Prezes Zarządu



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