



Kodeks postępowania

Code of conduct



NARZĘDZIOWNIA
PSZENICA



HEAVY
WEIGHT PRECISION

Stron values

**= the lodestar of Family
company of Narzędziownia
Pszenica**

The Code of Conduct of Narzędziownia Pszenica sets out key principles, rules and methods of work for all employees and business partners. We treat this Code of Conduct as guidelines in our everyday work and as a guide for the Board of Directors, managers, employees and business partners. This code reflects the company's business position and culture, which have been developed for years. It is based on our key values:

1. Care of people and the natural environment;
2. Ethic and honest operation;
3. Together we can do more: the use of employees' potential and talents;
4. Care of customers and customer satisfaction: customer needs are a drive of our continuous development.

The Code of Conduct obliges all (full-time and part-time employees and employees employed on the basis of civil-law agreements) to comply with principles set out herein. It imposes special liability on the Management, whose way of conduct should set an example on a daily basis. All subcontractors, suppliers, advisors must respect the principles of this code during their cooperation with our company.

Let's act separately and for the benefit of the company: we create the company's image together and we are responsible for the company's success or failure.

1.

WE ESTABLISH A SAFE WORKPLACE. WE TAKE CARE OF THE ENVIRONMENT

Occupational safety and health consist in taking all types of actions aimed at preventing accidents and promoting a healthy and safe working environment. We are all responsible for the protection of human life and the natural environment. We obey the following principles:

1. We take care of the well-ordered and safe workstation
2. We promote actions aimed at improving safety and preventing accidents; we look for improvements all the time
3. We provide our employees and business partners with relevant OSH training and training on first aid in case of emergency
4. We verify employees of our subcontractors who stay within our facilities in terms of their training and equipment with devices guaranteeing their safe work
5. We take care of our business partners' health; we report all accidents and all dangerous incidents to our superiors
6. We take care of economic and reasonable use of resources and minimise damages to the environment. We believe that we have a significant impact on the sustainable development in the world.

2.

WE ESTABLISH GOOD WORKING CONDITIONS

Tolerant and fair working conditions constitute the basis of good reputation and positive perception of the company both in its nearest and further environment. It is our obligation to respect international human rights.

We obey the following principles:

1. We establish a positive working environment
2. We respect human rights and solve all problems in this respect
3. We do not accept child work (child = a person below 15) or any form of forced work
4. We accept special needs and take special care of young employees (below 15)
5. All forms of persecution, discrimination, lack of respect, harassment, involvement in illegal acts or sexual harassing are absolutely forbidden.
6. We respect rights related to working hours, daily rest and minimum pay.
7. We do not tolerate discrimination against gender, age, race, skin colour, nationality, religion, disability, sexual orientation, education or political views. We treat everyone in the same way and guarantee the same development opportunities to everyone.
8. We maintain good relations with representatives of our employees. All key decisions are consulted with staff representatives.
9. We support our employees in their professional and personal development. We provide an access to training and other forms of knowledge and skills gaining.

10. We respect our employees' involvement in political life and social activity outside their working hours. The company does not take part in any actions of political parties.

3.

DATA PROTECTION AND CONFIDENTIALITY

Data protection means the protection of privacy of employees, business partners and customers. We ensure that any work connected with personal data (data collecting, recording, storing, erasing) is performed in accordance with the applicable regulations of the GDPR. We warrant that personal data are accessible solely to those persons that need them to perform their business duties.

The confidentiality of information is an important aspect of maintaining the company's market position. Such information include: trade secrets, know-how, business plans, financial documents, information about customers, as well as terms and conditions of agreements and prices. The information is necessary to achieve the company's long-lasting success. Therefore, employees must keep it confidential and must not disclose it to third parties. This obligation remains in force even upon the termination of employment. Employees must use confidential information with due diligence.

4.

DOCUMENTATION

Precise, complete financial documentation that complies with applicable legal regulations must present the actual status of the company. Thanks to the transparency of financial statements, the company's standing can be assessed correctly and relevant business decisions can be made. The company's financial transactions should be made by bank transfers. If possible, cash transactions must be avoided. The obligation of precise information also applies to all types of documentation prepared by the company's employees (documentation on quality, safety, environment, health, HR, working time).

5.

THE COMPANY'S ASSETS

Assets of the company include both tangible assets (machinery, vehicles, computers, buildings, real properties, office equipment, money, production materials and tools, etc.), as well as intangible assets (know-how, technologies, trade secrets, software and copyrights). The company's assets are used in responsible way. They are protected against damage, theft or wrong use. Devices may only be used for private purposes with a prior

consent. We treat assets of our customers and business partners as our own: in a responsible and safe way.

6.

QUALITY

Market success of our company is strictly connected with the quality of our products and services. Our major goal is to ensure top quality in each segment of our operation. During our cooperation with many customers and business partners, we always work on improving the quality of our processes. We do not tolerate deliberate conduct or negligence that results in the deterioration of the quality of our products/services. We acknowledge our liability for all types of defects caused through our fault. Such defects are removed by us immediately and if such a repair is not possible, a new element is produced.

7.

BUSINESS RELATIONS, FAIR COMPETITION, CORRUPTION, CONFLICT OF INTERESTS, COMMUNITY INVOLVEMENT

We aim at establishing positive and long-term business relations with our customers, suppliers, advisors and other organisations.

1. Such cooperation is based on mutual respect for values and mutual trust.
2. Customer needs and expectations constitute the basis of the company's development. We try to support our customers in problem solving.
3. We choose our suppliers in a fair and indifferent way.
4. We comply with fair competition principles. We do not tolerate any violation of antitrust law or competition protection law. We do not take part in price fixing, agreements with representatives of our competitors or other actions that limit competition.
5. We do not accept bribery or any other type of abuse.
6. We do not expect, accept or suggest any gifts or other hospitalities which could influence our or our partners' business decisions.
7. Invitations to conferences/fairs/other events sponsored by our suppliers will be only accepted if their business goal is precisely defined. The cost of travel and accommodation of the company's employees must be

- paid by Narzędziownia. Participation in such events must not contribute to a supplier being favoured.
8. We do our business in an honest way. We do not tolerate any forms of corruption or bribery.
 9. It is absolutely forbidden to offer and give any benefits (favours, gifts, payments and other benefits) to public officers.
 10. We establish our business relations solely and exclusively with customers and business partners with good reputation that perform legal activity on the basis of legal sources of finance.
 11. Employees must not make any transactions that are non-compliant with Polish and foreign money laundering regulations on their own or with others.
 12. Private interests must be strictly separated from the company's interests. All employees should avoid situations where there is a possible conflict between their personal interests and the company's interest.
 13. As a socially responsible company, we provide financial and tangible support to social care, educational, sports, cultural institutions, as well as health support activities and environmental protection.



COMPLIANCE WITH THE CODE OF CONDUCT

This Code of Conduct sets forth the basis of the family culture of Narzędziownia Pszenica. We expect that all of our employees will comply with legal requirements and guidelines set out herein. We believe that all of our employees make proper decisions every day. Each employee may and has the right to reports any violation of this Code of Conduct. The violation may be reported not only by employees, but by third parties, as well. The violation must be reported to the following persons (at the employee's discretion):

1. Line manager
2. Management of a higher rank
3. HR Department
4. Legal Department.

A contact person for third parties is: Paula Pszenica, Vice-chairwoman of the Board of Directors, tel. 696 781 503, e-mail: paula.pszenica@narzedziownia.net .

Employees that report any irregularities in good faith and on the basis of tangible evidence must not be discriminated anyhow. If it is possible and permitted by law, the company will keep the identity of an employee that reported or suspects the violation confidential.

Strojec, 26th of October 2020

Mateusz Pszenica

Chairman of the Board

Paula Pszenica

Deputy Chairwoman of the Board

Ewa Pszenica

Deputy Chairwoman of the Board