

# CODE OF ETHICS

## Contents

### INTRODUCTION

1. *Business ethics*
  - 1.1. *Anti-corruption measures*
  - 1.2. *Prohibition of unfair competition*
  - 1.3. *Intellectual property protection*
  - 1.4. *Respect for companies and people*
  - 1.5. *Data sharing/disclosure control*
  - 1.6. *Conflict of interests*
2. *Forced labour, child and adolescent labour*
3. *Freedom of association*
4. *Freedom of movement*
5. *Harassment, mobbing and discrimination – equal opportunities and mutual respect*
6. *Health and safety*
7. *Remunerations and benefits*
8. *Working time*
9. *Responsibility for the environment*
10. *Responsible mineral supply*
11. *Reporting complaints*
12. *Awareness and availability of the Code*

### INTRODUCTION

---

The Code of Ethics was created to describe the rules of conduct functioning in AK Spółka z o.o., and to increase the awareness of all employees and business partners. Its provisions are based on the need to respect ethical standards and clearly defined norms of conduct in both social and professional relations. Compliance with the ethics rules is a source of values that have positive influence on our relations with those around us in and outside the workplace.

The aim of the Code is to help us make the right choices by identifying the key ethical models and standards in our professional activities. Its purpose is to help eliminate negative phenomena and behaviours that most often are a result of lack of awareness.

All employees and business partners are expected to respect these values and rules in everyday work.

#### 1. BUSINESS ETHICS

---

##### 1.1. Anti-corruption measures

- 1.1.1. We operate in an open, direct and fair manner while complying with antitrust law and fair competition standards.
- 1.1.2. Employees of AK Spółka z o.o. are not allowed to offer their current or prospect business partners any economic benefits. It is also forbidden to provoke customers and suppliers to offer gifts or favours to employees.
- 1.1.3. AK Spółka z o.o. does not accept any corrupt activities that may give the appearance of an attempted bribery.
- 1.1.4. Employees of AK Spółka z o.o. are obliged to prevent corruption and are responsible for actively communicating the objectives of the following anti-corruption policy in the performance of their duties:
  - 1.1.4.1. All employees are obliged to inform about any circumstances that may affect the impartial performance of their duties.

- 1.1.4.2. In the event of obtaining information about corrupt activities, the employees are obliged to secure any evidence and notify the employer through a managers, and if the above concerns the manager, to notify the employer directly.
- 1.1.4.3. In the course of providing information about corruption it is necessary to maintain the confidentiality of the information, both with regard to the persons informing about the corruption and to the persons concerned.
- 1.1.4.4. To confirm the information concerning a justified suspicion of corruption and possibly secure material evidence, the employer shall carry out an inspection in person or by an authorised employee.
- 1.1.4.5. If the information concerning a justified suspicion of corruption is confirmed, the employer shall take action to apply official consequences to the employee(s) against whom the allegations of their corrupt activities are confirmed.

## **1.2. Prohibition of unfair competition**

- 1.2.1. All our employees are obliged to comply with the competition law and antitrust law. This implies that we do not discuss prices or commercial terms and company's know-how with our competitors.
- 1.2.2. It is not acceptable to give favourable treatment to or exclude business partners.
- 1.2.3. Moreover, we expect from our business partners full responsibility for their actions in order to guarantee fair competition.

## **1.3. Intellectual property protection**

- 1.3.1. We do not infringe intellectual property rights of others by unauthorised use, copying, distribution or modification.
- 1.3.2. Intellectual property and confidential information must not leave the company without prior employer permission or consent.

## **1.4. Respect for companies and people**

- 1.4.1. We treat all employees with dignity and respect. Verbal abuse of employees and mental and physical coercion are not tolerated. AK Spółka z o.o. expects similar attitude from all its partners, both during cooperation and in relations with other entities or persons.

## **1.5. Data sharing/disclosure control**

- 1.5.1. Employees of AK Spółka z o.o. guarantee fast and smooth information flow. In order to foster cooperation, knowledge and information should be provided promptly, comprehensively and without falsification.
- 1.5.2. All our employees use only fair and legal measures to communicate and pursue the company's interests.
- 1.5.3. All our employees are obliged to comply with requirements concerning data protection as well as legal provisions concerning protection of information and to protect confidential, secret and personal data against unauthorised use.
- 1.5.4. All employees are obliged to keep trade and business secrets by virtue of their role in the company.
- 1.5.5. We ensure that internal information is accessible only to those authorised to receive it.

## **1.6. Conflict of interests**

- 1.6.1. AK Spółka z o.o. makes decisions concerning cooperation with business partners only on the basis of objective criteria which are not influenced by personal interests and relationships.
- 1.6.2. We are committed to ensuring that our employees, in the course of performing their professional duties, do not enter into relationships with clients and external suppliers that may result in biased choices and a lack of objectivity.
- 1.6.3. Every employee who works for or provides services to other companies cooperating with AK Spółka z o.o. should report this fact in writing to HR department. In case of conflict of interest such activity should be terminated.

## **2. FORCED LABOUR, CHILD AND ADOLESCENT LABOUR**

---

- 2.1. We respect basic human rights.
- 2.2. Any form of forced labour by restraint of freedom or threat of physical violence as discipline or control measure is prohibited.

- 2.3. In the recruitment process, we respect the minimum age allowed by country regulations.
- 2.4. In all circumstances, the employment of children and adolescents is strictly forbidden.

### **3. FREEDOM OF ASSOCIATION**

---

- 3.1. We respect the basic right of all employees to establish trade unions and elect their representatives.
- 3.2. We declare our willingness to cooperate sincerely and trustfully with employee representatives and to strive for a balance of interests.
- 3.3. If trade unions are established, we shall not apply a policy of retaliation against representatives of trade unions.

### **4. FREEDOM OF MOVEMENT**

---

- 4.1. We respect basic employee rights to freedom of movement.
- 4.2. Any form of restriction on freedom of movement is prohibited.

### **5. HARASSMENT, MOBBING AND DISCRIMINATION – equal opportunities and mutual respect**

---

- 5.1. We promote the policy of equal opportunities and equal treatment. All decisions are made based on questions of substance, regardless of colour, religion, gender, sexual orientation, status, background or level of ability.
- 5.2. We comply with the applicable law on employment and we expect all our employees to treat each other with dignity and respect.
- 5.3. We do not discriminate against anyone on the basis of their nationality, race, gender, religion, political affiliation, disability, sexual orientation or for any other reason.
- 5.4. We do not discriminate against anyone on the basis of their religion. If such need should arise, the employer will provide an appropriate room for religious practices.
- 5.5. Our rule is to look for, employ and support employees based on their qualifications and skills.
- 5.6. Our employees are not allowed to show any signs of discrimination (e.g. through causing harm, harassment, mobbing, sexual harassment/abuse) and we foster partnership based on mutual respect.
- 5.7. Organisational culture of AK Spółka z o.o. is based on values and individual needs of employees. We give our employees opportunities to develop, we organise trainings without discriminating against anyone.

### **6. HEALTH AND SAFETY**

---

- 6.1. We comply with safety standards and regulations.
- 6.2. We take responsibility for our employees safety and health. We ensure protection and safety in the workplace in accordance with applicable regulations.
- 6.3. Through constant improvement of work environment, we strive to improve the quality as well as the efficiency and satisfaction of our employees with their work. All our employees take care of their health and comply with workplace health and safety regulations.
- 6.4. Health and safety are the key value at AK Spółka z o.o. We always follow applicable workplace health and safety rules and regulations. Moreover we consistently promote safe practices and avoid unnecessary risks to our employees.
- 6.5. We respond to our employees health and safety needs and adjust measures in order to improve the existing level of employees health and safety protection by considering the changing work conditions. If such need arises, the employer will provide a suitable rest room for pregnant employees and breastfeeding mothers.

### **7. REMUNERATIONS AND BENEFITS**

---

- 7.1. AK Spółka z o.o. respects legal requirements concerning the minimum remuneration.
- 7.2. AK Spółka z o.o. shares detailed information on remuneration with employees.
- 7.3. Remuneration and benefits are calculated and paid in accordance with applicable law.

## **8. WORKING TIME**

---

- 8.1. AK Spółka z o.o. respects at least the minimum legal requirements for maximum permitted working time.
- 8.2. The number of working hours, including overtime work, is in accordance with the applicable laws on permissible hours of work.
- 8.3. AK Spółka z o.o. complies with applicable law and standards concerning public holidays.
- 8.4. AK Spółka z o.o. keeps a transparent and reliable system for recording working time and remuneration.

## **9. RESPONSIBILITY FOR THE ENVIRONMENT**

---

- 9.1. We operate in line with the applicable environmental law, regulations and permits.
- 9.2. We are committed to constantly improving our products to make them more environmentally friendly. We employ advanced and environmentally friendly technologies. All our employees ensure that natural resources are used sensibly and economically and that their activities cause as little harm to the environment as possible.
- 9.3. The objective of AK Spółka z o.o. is to maintain the lowest possible impact of our operations on the environment by making maximum use of our capacities and modern technologies, while taking economic aspects into account.
- 9.4. The production process is planned in such a way as to limit the amount of generated waste and waste segregation at the place of its generation makes us the co-authors of its reuse.
- 9.5. Environmental issues are dealt with in a responsible manner. The objective is to develop and promote environmentally friendly technologies.

## **10. RESPONSIBLE MINERAL SUPPLY**

---

- 10.1 AK Spółka z o.o. does not source 3TG minerals (tin, tantalum, tungsten and gold) from conflict zones – Democratic Republic of Congo or neighbouring countries. Thus, we promote the Responsible Minerals Initiative (RMI) program.

## **11. REPORTING COMPLAINTS**

---

- 11.1. Every employee can report suspected violations of the law and the Code of Ethics. Violations should be reported via one of the available channels:
  1. talking to your supervisor,
  2. talking to HR department employee,
  3. anonymously by leaving reports in the box located in the WP3 department, which is opened by a commission at the end of each month.
- 11.2. The name of the whistleblower is disclosed only with their consent. For this reason contact is made in a confidential manner.
- 11.3. Every reported issue is forwarded to the President of the Board who decides on the manner of handling it within 14 days.
- 11.4. A list of reported complaints and requests in a given month and decisions taken in this respect is posted on the notice boards by the end of the following month.
- 11.5. AK Spółka z o.o. completely prohibits retaliation against an employee who reports a suspected violation of the law or the above code.
- 11.6. In case of any retaliation, it should be reported via channels listed in point 9.1.

## **12. AWARENESS AND AVAILABILITY OF THE CODE**

---

- 12.1. All employees, regardless of their position in the organisational structure, have the possibility to familiarise themselves with the values and principles set out in the Code of Ethics.
- 12.2. Every supervisor shall ensure that employees from their area know and apply the Code of Ethics.
- 12.3. If questions or ambiguities arise regarding the application of the Code of Ethics, the first person to contact is the supervisor. An employee may also refer the matter to the HR department.
- 12.4. The Code of Ethics is available on the website [www.ak.com.pl](http://www.ak.com.pl), from your line manager and the HR department.