

CODE OF ETHICS



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INTRODUCTION

One of the main pillars of our development, apart from the strategy and organizational structure, is culture.

Organizational culture is a set of basic assumptions, a set of dominant values and norms of behaviour characteristic for an organization, which define its identity and distinguish it from other organizations. Culture is the way you get things done without thinking how.

In order to organize and gather our principles and values in one place, we have created the Code of Ethics, which helps us in our daily work and achieving strategic goals.

We want all of our employees to identify with the values and principles of this Code.

For our business partners we have prepared: The Code of Conduct for Business Partners.

VISION



We want to be a reliable and profitable company, a brand with a global reach.

We will develop based on the collective intelligence of our employees, investing in their knowledge.

MISSION



We produce high-quality industrial valves that allow to regulate the flow of medium in installations.

INTRODUCTION TO THE CODE

Our Code of Ethics (hereinafter the Code) contains a set of values and principles applicable in the company. These are the basic ethical values and standards expected from our employees.

The Code of Ethics is more than just a set of principles and values. The Code is a signpost that helps us meet our commitments.

Every employee and entity acting for ZETKAMA is obliged to know the Code and to comply with the values and principles indicated in the document. The Code of Ethics indicates the method of reporting irregularities in the event of violations and non-compliance with the applicable values and principles. Any issues not specified or vague in this code are governed by other internal procedures of the company and generally applicable provisions of law.

OUR VALUES



COOPERATION

which we understand as joint action with others based on respect and understanding in order to achieve optimal results.



INNOVATION

i.e. a creative approach to improving existing processes and products.



CREDIBILITY

for us, it is the fulfilment of the provisions contained in contracts with stakeholders and the observance of mutual obligations in cooperation within the organization.



QUALITY

it is the performance of products and services in accordance with the concluded contracts, standards and applicable law.



INVOLVEMENT

it is showing initiative, performing work with dedication, setting ambitious goals and caring for the constant development of our company.

OUR RULES



The culture of our work is based on the observance of the adopted rules by all employees in the organization and carrying out tasks for its benefit. Our most important principles are related to the attitude towards ZETKAMA and its employees, the natural environment, as well as towards the conducted business activities and maintained relations with the environment.

1. WE CARE ABOUT OUR CUSTOMERS



- A. We design our products so that everyone can rely on them.
- B. Our products meet the expectations of customers in terms of quality, safety and care for the natural environment.
- C. We treat our customers with respect, we act ethically and in accordance with the law.
- D. We attach great importance to building long-term, positive and trust-based relationships with our customers.
- E. We acquire new customers thanks to high quality products, competitive prices and professional service.
- F. We do not use unfair or misleading business practices.

2. WE CARE ABOUT SUSTAINABLE DEVELOPMENT



- A. Social responsibility and environmental protection are important elements in our business. We plan and run our business in such a way as to ensure long-term, sustainable development.
- B. We regularly monitor and reduce the negative impact of our activities on the natural environment.
- C. When deciding on modernization and new investments, the environmental effect is an important criterion for us.
- D. We care about a positive impact on the surroundings, the environment and the planet - we take responsibility for what we do and how we do. We are convinced that by acting in a sustainable manner, we care for the benefit of all stakeholders.

3. WE ARE A RESPONSIBLE EMPLOYER



- A. In our organization, we respect each other and the individuality of each employee.
- B. We care about friendly and safe workplaces, we provide conditions for development and freedom of contact. We apply the principles of cooperation that we expect others to respect.
- C. By our behaviour, we build a positive image of employees and the organization as a whole. We apply objective and non-discriminatory criteria for hiring and promoting employees.
- D. We conduct internal recruitment, thanks to which we retain people with extensive experience and qualifications in our organization, while ensuring their professional and personal development.
- E. We employ employees in accordance with the highest standards in terms of the organization of a safe work environment, and the basic form of employment is an employment contract.
- F. New employees are offered a package of necessary information about our organization - Employee Guide.
- G. We provide a clear system of remuneration and non-wage benefits.
- H. We create development opportunities for our employees, we train and co-finance their individual development.
- I. We encourage everyone to share their ideas - the "KNOWLEDGE IN THE COMPANY" program and we promote work in our company among the local community - the "RECOMMEND WORK IN ZETKAMA" program.
- J. We care for mutual relations and respect for the employee's rights, we do not tolerate any behaviour that violates the rights and dignity of the employee.
- K. We provide employees with equal access to information - we publish the company's basic results and the most important news about its activities (infoZETKA).
- L. We encourage our employees to care for the natural environment (waste segregation, energy saving).
- M. We protect the personal data of our employees and associates as well as business secrets.

4. WE CARE ABOUT THE SAFETY OF EMPLOYEES AND PROCESSES



- A. We care about the safety at work and health of employees. Health and safety rules are a priority, each employee is obliged to comply with the health and safety rules and report any observed irregularities.
- B. We constantly monitor, maintain and improve work safety, the safety of our facilities, technical devices and processes.
- C. We provide employees with access to information on occupational risk and methods of safe work performance, as well as resources for its safe performance.

5. WE CREATE A FRIENDLY WORKPLACE



- A. We care for the well-being of our employees, we provide them with conditions and tools to perform their work effectively.
- B. We adapt to new situations and respond to the needs of employees, we provide flexible working hours, and in justified cases we use remote work.
- C. We use new technologies and constantly develop new forms of cooperation and communication (videoconferences).

6. WE WORK BASED ON SPECIFIC STANDARDS OF BEHAVIOUR



- A. We use a company dress code - clothing appropriate to the occasion.
 - a. Formal business attire - we use it when we plan business meetings. Business class attire for women is a dress, skirt, elegant pants and a jacket, and for men - a suit. Men's plain shirts with long sleeves. Footwear covering toes and heels. A corporate shirt is recommended for official meetings.
 - b. Business casual attire - loose business attire - we use when we plan a working day in the office/at home with no meetings. Simple trousers or uniform jeans and a less formal blazer or jacket and full footwear will be appropriate.
- B. We follow a certain hierarchy
 - a. A person occupying a lower position bows first. The handshake gesture, on the other hand, is the boss's decision and s/he should reach out first.
 - b. We remember, however, that outside the company, e.g. during a meeting with a customer, this arrangement will change and the customer will be the "boss". In the relations of people holding comparable positions, we apply rules similar to those relating to social gatherings: a woman offers her hand to a man and an older person to a younger one.
- C. We work with a calendar
 - a. When planning work and cooperation, we use a calendar, we invite to meetings at least one day in advance - so that everyone can prepare for it.
 - b. When we are unable to attend the meeting, we inform about the reason for the absence and appoint a replacement.

7. WE CARE ABOUT COMMUNICATION, WE FOLLOW ITS STANDARDS



- A. Communication is a natural part of our business activities. How our organization is perceived depends on what we do and what we say. The same standards apply to internal and external communication.
- B. We provide equal access to information.
- C. We are in dialogue with trade unions.
- D. We take care of proper, good relations with the local community and with the media.
- E. In our communication, we make sure that the time, place and method of communication are adapted to the recipient. We inform about both positive and negative events. We make sure that the information provided is true, complete and legible.
- F. We take care of good relations with customers. We put emphasis on the development of modern solutions that facilitate communication between the customer and ZETKAMA.
- G. We care about the image, because through our behaviour we build the company's value.
- H. We use specific communication standards and various forms of communication, as specified in detail in the Communication Behaviour Standards Manual.

8. WE DO NOT TOLERATE UNETHICAL BEHAVIOUR AND AVOID A CONFLICT OF INTERESTS



- A. We deal responsibly with gifts and other benefits at work. We do not accept money or cash equivalents or other benefits of significant value (more than PLN 200) in connection with the performance of official duties.
- B. It is allowed to accept gifts of symbolic value. These are gifts with a permanent company logo or promotional products such as calendars or mugs, etc.
- C. We are honest in our business dealings, and we abide by the law. We treat all stakeholders equally. Under no circumstances should a gift received influence our decisions regarding the performance of our official duties. Any situations that may have the hallmarks of unethical behaviour are immediately reported to an immediate supervisor.
- D. We use the company's property only for business purposes related to official tasks. We make expenses at the expense of the company in business-justified cases. We use equipment (e-mail, Internet, telephone, computer, printer, company cars) only on the terms specified in internal regulations.
- E. We avoid conflicts of interest, including: investing, engaging in and providing additional services in companies that are customers, suppliers or other business partners, and above all, competitors, so as not to lead to a conflict of interest with ZETKAMA or Mangata Holding.
- F. We make every effort to create the necessary procedures and provide protection to all employees who report any irregularities. We provide anonymity and problem solving by implementing measures to correct and prevent violations.

9. WE CARE FOR RELATIONS WITH STAKEHOLDERS



- A. Our relationships with stakeholders are based on mutual trust, respect and professionalism.
- B. Purchases and orders are carried out on the basis of transparent and objective principles consistent with applicable law and clearly defined internal procedures. We oblige entities we work with to adhere to the same standards of integrity as those we adhere to ourselves.
- C. When selecting a new contractor or when re-assessing an existing contractor, we pay attention to anything that could violate our standards.
- D. When selecting suppliers, we base our decisions on the merits and supplier's reputation. We avoid potential or actual conflicts of interest with suppliers.
- E. We apply the Code of Conduct for Business Partners.

10. WE CARE FOR DIALOGUE WITH LOCAL COMMUNITY



Our motto is:

WE OPERATE GLOBALLY, WE HELP LOCALLY

- A. We care about the development of the region in which we conduct business. We participate in the life of the local community by supporting local events and providing work. We are aware that our activities affect our environment.
- B. We actively support the needs and initiatives of local communities, including employees and their family members, as well as local institutions and communities in areas such as: health, science and education, culture and sport.
- C. We support the initiatives of the MANGATA Capital Group.

PROCEEDING IN THE EVENT OF VIOLATION OF LAWS, OUR VALUES AND PRINCIPLES



Anyone who has information on irregularities resulting in a breach of the law or the ZETKAMA Code of Ethics by an employee or a person acting for the organization should report it. We provide the opportunity to report irregularities anonymously.

A person reporting information about activities, the effects of which may be harmful to ZETKAMA, its employees or contractors, receives the status of the Whistleblower. Anyone can be a Whistleblower, in particular an employee, associate, business partner or customer.

To ask a question, report a problem or violation of the applicable regulations or the ZETKAMA Code of Ethics, please contact: your immediate supervisor, by letter to the company's address, *with the note "Do not open – deliver personally"* or to the e-mail address: etyka@zetskama.com.pl

Persons reporting irregularities are protected. In the event of being granted the status of a Whistleblower, this person acquires the rights to:

- a. provide information in a confidential manner,
- b. expect to ensure the confidentiality of personal data, function or position held, and to conduct explanatory proceedings in such a way that it is not possible to unequivocally determine who reported the information - at the request expressed by the notifier,
- c. protection against unfair treatment in connection with the notification,
- d. anonymity.

Personal data and other information provided via the above-mentioned path will remain confidential until the notifier agrees to disclose all or part of this information.