

# THE CODE OF CONDUCT FOR BUSINESS PARTNERS



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## INTRODUCTION

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

Being part of the Mangata Holding, the ZETKAMA company contributes to the constant increase in value for the entire Capital Group and its shareholders. In its business activities, the company operates in accordance with applicable law, internal regulations and accepted ethical standards contained in the Code of Ethics. These regulations constitute the foundation on which the principles of the Code of Conduct for Business Partners (hereinafter referred to as the Code for Partners) are based.

Our values:



Our Business Partners are all stakeholders with whom ZETKAMA has business relations. In particular, they are contractors, subcontractors, suppliers, customers, financial institutions, industry organizations and other entities.

In cooperation with its Business Partners, ZETKAMA expects recognition of similar values and acting in accordance with the law. ZETKAMA cares about the transparency of business relations and maintaining their formal character. The Company expects its Business Partners to apply the ethical standards set out in the Code for Partners in the course of their activities.

## **RULES**

### **1. HUMAN RIGHTS AND WORK STANDARDS**



ZETKAMA expects its Business Partners to respect human rights, both in the context of the working conditions of their employees and in business activities. All employees of the Business Partner and other persons performing work for it and on its behalf are treated fairly, with respect and dignity.

#### **A. Employee health and safety**

Business Partners provide safe workplaces, comply with all applicable occupational health and safety standards and regulations. In particular, they comply with the law in the field of on-the-job training, taking into account the information on the health and safety conditions and requirements, ensuring appropriate protection measures and carrying out health and safety training.

#### **B. Prohibition of mobbing and discrimination**

ZETKAMA expects its Business Partners to be intolerant of any form of mobbing and discrimination, in particular due to sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnicity, religion or sexual orientation. In terms of recruitment, employment of employees, the course of the employment relationship and its termination, the principles of operation should result from objective and substantive criteria.

#### **C. Remuneration and working conditions**

ZETKAMA's Business Partners remunerate their employees in a timely manner and comply with the provisions on employment conditions.

#### **D. Forced labour**

ZETKAMA's Business Partners do not use any form of forced labour. Work performed at/for a Business Partner or its subcontractors and suppliers is undertaken voluntarily and may not violate basic employee rights, this also applies to overtime work or on public holidays.

#### **E. Work of adolescents**

ZETKAMA's Business Partners do not use any form of child labour. If minors are legally employed, they perform only light work. Light work may not pose a threat to the life, health and development of the adolescent, and may not hinder the adolescent's fulfilment of the compulsory education.

#### **F. Freedom of association**

ZETKAMA's Business Partners recognize and respect the right to freedom of association.

## 2. SUSTAINABLE DEVELOPMENT



ZETKAMA expects its Business Partners to conduct their business in a responsible manner by: preventing environmental risks, limiting the negative impact of activities on the environment, complying with the provisions of generally applicable law in the field of environmental protection.

ZETKAMA expects that its Business Partners will, as part of their business activities, minimize the amount of waste generated and reduce emissions of harmful factors. They should also be guided by the principle of selecting effective technologies, thus striving to reduce the carbon footprint and negative impact on the natural environment.

## 3. COUNTERACTING UNETHICAL BEHAVIOUR AND ABUSE



ZETKAMA expects that its Business Partners conduct their activities in accordance with generally applicable law, including in the field of counteracting unethical behaviour and in accordance with tax law, in particular, do not use unlawful tax optimization and operate in accordance with the law.

### A. Fair competition

ZETKAMA expects that its Business Partners operate in accordance with the principles of fair competition, including, for example, they do not conclude agreements restricting competition or abuse their dominant position on the market.

### B. Anti-money laundering and terrorist financing prevention

ZETKAMA expects that its Business Partners comply with the generally applicable provisions of law in the field of counteracting money laundering and financing of terrorism and take measures to reduce the risk in this regard.

### C. Information protection

ZETKAMA expects that its Business Partners care for the security of data, in particular those made available to them as part of business relations with ZETKAMA, and the information obtained is processed in accordance with the law.

### D. No tolerance for unethical activities and abuses

ZETKAMA expects its Business Partners not to tolerate unethical behaviour, bribery, corruption, paid protection, unlawful influence, causing damage in trade or other abuse. Business Partners may not directly or indirectly offer or accept any undue benefits or promise thereof, including material or personal benefits, in exchange for any specific act or omission.

### E. Conflict of interest

ZETKAMA expects a conflict of interest to be avoided, and in the event of its occurrence, immediately informing if its employees or associates remain in such a conflict.

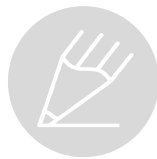
A Business Partner should refrain from any activities that may result in a potential conflict of interest.

#### **F. Business gifts, including hospitality**

In connection with cooperation and in order to build relations between ZETKAMA and Business Partners, it is permissible to accept and give business gifts, including invitations, in accordance with the rules in force at ZETKAMA regarding the exchange of business gifts, i.e.:

- a. a business gift is given for a legal purpose,
- b. its acceptance or handing over does not affect the tasks performed, decisions made, gaining unfair advantage, preferential treatment,
- c. it does not oblige to reciprocity, and can only be a courtesy expression of thanks,
- d. its value does not exceed PLN 200 at a time (including VAT).

## **4. ZETKAMA BUSINESS PARTNERS' COMPLIANCE WITH THE CODE OF CONDUCT**



ZETKAMA expects that its Business Partners are committed to complying with ethical standards at least to the extent specified in the Code for Partners. ZETKAMA also expects its Business Partners to exercise due diligence to ensure that such standards are observed by their contractors, subcontractors and suppliers in the scope covering the implementation of contracts and services provided to ZETKAMA.

ZETKAMA provides the possibility of reporting and signalling irregularities. 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. Notifications may concern, in particular, criminal or unethical activities, violation of employee rights and a conflict of interest.

Notifications should be sent to the e-mail [etyka@zetskama.com.pl](mailto:etyka@zetskama.com.pl) or by a letter to the address of the company's registered office. 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.

## CONSEQUENCES OF NON-COMPLIANCE WITH THE CODE



ZETKAMA attaches importance to good cooperation with Business Partners. Therefore, in the event of a breach of the Code for Partners, it allows the possibility of implementing appropriate remedial actions.

Business Partners should take immediate investigation and remedial action in the event of becoming aware or suspicion of non-compliance with the principles set out in this Code.

In the event of significant violations of this Code for Partners - adequately to the type and scale of the violation and the resulting risks - ZETKAMA reserves the right to take appropriate action against the Business Partner, including termination of cooperation with the Business Partner who has committed unacceptable practices.