

Document No.: EKO-PRO-004	<h1>Code of Ethics</h1>	Valid for (area / process): <i>Ekoenergetyka</i> - <i>Polska S.A.</i>
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1. Subject, purpose and field of application

The purpose of this procedure is to present the issue of ethical principles to the employees of Ekoenergetyka Polska S.A. The procedure applies to all organizational units of Ekoenergetyka Polska S.A.

2. General principles

The company participates in shaping the right economic, and therefore also social relations, in the spirit of respecting the legal order of the country in which it operates.

It also recognizes the need to respect universally accepted principles of social coexistence in a spirit of responsibility for the whole of collective life.

He respects the cultural values of the communities in which he undertakes his activities, strives to harmoniously pursue individual and social goals in a spirit of respect for human rights and concern for the common good.

The purpose of the Code of Ethical Conduct is to shape the right culture of life, especially the culture of work within the Company and between the Company and its environment.

Key Values Ekoenergetyka Polska S.A. are a signpost of conduct for all employees.

In situations not regulated by the provisions of the Code of Ethical Conduct, they are an indicator for making individual decisions.

3. Observance of the law and good manners

Ekoenergetyka Polska S.A. operates in the territory of the Republic of Poland based on the provisions of the Code of Commercial Companies. All employees acting on behalf of the Company are obliged to respect the legal solutions in force in Poland. The company operates in accordance with the applicable legal regulations. These regulations apply to all bodies of the Company and their relations to external persons and institutions. The company also declares to respect good manners and social practices existing in the country.

4. Relations within the Company

The success of the Company and the conditions of our work depend to a large extent on the attitude of all its employees. They also depend on the sense of responsibility for the Company and its development, as well as on a good atmosphere in which the spirit of diligence, thrift, duty and loyalty to the Company and superiors is combined with the ability and willingness to cooperate with others. A good atmosphere of cooperation makes it possible to fully use the abilities and possibilities of all employees, both for the good of the Company and for the successful personal development of each employee. Responsible care of all employees for the good name of our Company is also necessary. We present the alphabet of relations.

A. To its employees, Ekoenergetyka Polska S.A. declares respect for employee rights, in particular:

- a. ensuring decent and safe working conditions;

b. ensuring equal opportunities for employment, promotion, development and professional improvement with the company's development strategy;

c. protection of personal data in accordance with the guidelines and the RODO (Personal Data Protection Regulation of May 24, 2018).

Detailed information on the above rights and obligations of the Employer and the Employee is regulated by the provisions of the Work Regulations of March 27, 2019 with attachments as well as relevant resolutions and personnel procedures as [EKO-PRO-005 Załącznik nr 1 do Uchwały Zarządu nr 2 z dnia 19 sierpnia 2019 roku Procedura w zakresie odpowiedzialności porządkowej Pracowników.](#)

B. Decent and friendly working conditions

a. We want to achieve decent and friendly working conditions by building transparency of work procedures and maintaining harmonious, everyday interpersonal relations, based on cooperation and involvement of employees in the interests of the organization.

b. Employees and associates of Ekoenergetyka Polska S.A. may not be used in any way by the Company for activities contrary to the provisions of the Code of Ethical Conduct.

c. Giving orders to employees from other organizational units, without notifying their superiors, is a violation of those in force at Ekoenergetyka Polska S.A. ethical principles.

d. It is unacceptable to issue contradictory orders to employees by superiors of various levels.

e. In the event of such a situation, the employee may refuse to carry out the order until it is explained by the superiors.

C. An employee of Ekoenergetyka Polska S.A. has the right to:

a. refuse to carry out an order that exceeds his / her competences and rights related to the position held;

b. demand an explanation of an incomprehensible command;

c. refuse to carry out an instruction that violates the law;

d. may leave his workplace after completing his duties at the agreed time, as well as in other justified and agreed situations;

e. terminate employment with the appropriate notice period.

D. Ekoenergetyka Polska S.A. does not accept any form of harassment, stalking or degrading employees. We strive to create a work environment based on mutual respect and tolerance.

E. It is not allowed to:

a. use any form of mobbing: insult, humiliate, insult, slander and intimidate others;

b. use any form of sexual or other harassment, violence, threats of violence and corporal punishment that affects employment conditions and affects decisions about promotion, working conditions, disciplinary action, training options, wages, etc .;

c. use their position in the Company to gain personal benefits, infringe the personal rights of others;

d. disseminate information that violates the personal rights of others;

e. spread rumors, false information, leading to conflicts and disrupting proper relations within the Company;

f. use forced labor, slave labor or forced labor, including forced labor of prisoners;

- g. Require employees to make “deposits” or to deposit their identity documents with an employer;
- h. charge the employees with deposits in order to limit their freedom.

F. Any behavior that violates in any way the personal dignity of an employee, candidate for employee or any other person should be reported to the supervisor.

G. The managerial staff is obliged to create a proper working atmosphere, in particular to:

- a. subjective, partner-like treatment of employees;
- b. listen carefully to matters that are brought by employees, providing an appropriate place and sufficient time for the interview;
- c. support subordinates in difficult random situations that require special assistance;
- d. help candidates and people starting work in the Company by paying them due attention, providing information about the organization and their potential position, as well as preliminary discussion of employment conditions;
- e. interviewing the employee, if possible, in the event of their departure from the organization, regardless of the manner of such departure;
- f. make every effort to ensure that the manner of carrying out tasks related to the employee's departure ensures ethical behavior towards him.

H. Equal opportunities for employment, advancement, and professional development

Ekoenergetyka Polska S.A. aims to create an atmosphere of mutual trust between management and employees, based on fair and prudent treatment of all regardless of gender, age, position held, length of service in the Company, trade union membership, external appearance and political orientation. We are a responsible employer and we want every employee of Ekoenergetyka-Polska S.A. felt part of our company regardless of the differences between us. We know how important it is to respect other people in everyday work. We want all employees to remember about this attitude in relations with their superiors, subordinates and colleagues, creating a friendly workplace. Although we are different, each of us is important and brings significant value to our company.

Diversity management in Ekoenergetyka-Polska is to ensure respect and tolerance for each person with respect for their uniqueness. As a result, we create conditions for equal treatment of all employees, creating a friendly workplace that allows equal opportunities for development and promotion for all employees of the company. We are convinced that only under such conditions of equal treatment is it possible to discover the potential of each employee, build a career and development path, and build teams that implement the company's innovative goals in the long term.

I. Recruitment, professional selection, appraisal, development, promotion and remuneration of employees are carried out according to clear rules and criteria determining the equality of all persons. Ekoenergetyka Polska S.A. declares:

- a. Equal treatment in the field of employment (entering into and terminating employment, terms of employment, promotion and access to training in order to improve professional qualifications) of all employees and candidates regardless of race, caste, nationality, age, disability, sex, marital status, sexual and political orientation, trade union membership and religion;

- b. Wages and benefits for a standard working week that meet at least national legal standards or comparative industry standards, whichever is higher;
- c. All employees are provided with written and intelligible terms of their employment conditions: prior to commencement of employment and, with regard to wage details for the period, with each payment;
- d. Deductions from wages as a disciplinary measure are not allowed. Any deductions from the wages not provided for by law are also not allowed without the express consent of the employee concerned. All disciplinary measures are documented

We implement the principle of equal opportunities and support and promote diversity through specific actions:

- a. building managerial staff based on diversity - women and men, regardless of age, have equal opportunities in taking up managerial positions, directors, board members and at every managerial level, what counts is competence and an attitude of commitment and openness to development.
- b. creating a diverse work environment (promoting an attitude of sharing experience) - we make sure that our teams are interdisciplinary and diverse, and consist of employees with different levels of experience. It is also important for us to build openness and inclusiveness with regard to new team members.
- c. compliance with the principles of equal opportunities - each employee has equal access to training, promotions, benefits and the level of remuneration adequate to the activities performed, the role (scope of responsibility) and competences (knowledge, skills and attitude). We make sure that internal and external training is tailored to the needs and professional profile of each employee. When applying for training, we ensure a proportional number of places for each gender. In the absence of an appropriate number of female or male applications, free places are taken by applicants, regardless of their gender. Employees are promoted based on their competences, results and commitment to their work,
- d. recruiting with the participation of candidates with various profiles - all interested candidates take part in our recruitment processes. We are open to looking for new talents. The key factor in selecting an employed person is matching competences, experience, knowledge and skills to the job offer profile. We are sensitive and strongly oppose any form of discrimination based on sex, age, race or any other criteria.
- e. supporting the development of employees' private interests - we create conditions for sharing their passions in the professional environment, we support employees in fulfilling their sports, cultural, educational, charity and philanthropic ambitions, etc.
- f. supporting activities ensuring balance between work and private life - we undertake activities to support employees in reconciling work and private life, one of the examples of this type of activities is the launch of the Ekolucky kindergarten and nursery (ekolucky.pl) in the area adjacent to the company's seat, run by the Ekoenergetyki Foundation and dedicated, inter alia, to children of our employees who can reconcile their most important roles and professional ambitions.

J. The employee has the right to:

- a. Know the scope of their duties, expectations and tasks assigned to them by their superiors;
- b. To know a reliable and substantive evaluation of their work;
- c. Count on assistance in professional development;
- d. Maintain an open and constructive dialogue about your own performance and reward for achievement.

K. The management staff involved in making decisions related to the process of evaluation, promotion, recruitment, development and use of training courses is obliged to:

- a. Applying only merit criteria for assessing the skills and achievements of employees;
- b. Applying clear, understandable and equal to all criteria and measures, regardless of gender, age, length of service, external appearance and trade union membership, when assessing the contribution of employees' work;
- c. Communicating expectations and decisions about his or her place in the team and in the Company openly and understandable to the employee;
- d. Supporting the employee's professional development in accordance with the formal and legal procedures in force at Ekoenergetyka Polska S.A. applying the same rules of conduct to all employees.

L. Freedom of association and the right to collective bargaining on employment conditions

- a. Employees have the right, without exception, to form and join any trade union, works council or other body representing their interests towards the employer and to negotiate collectively with employers;
- b. The employer adopts an open attitude towards the activities of trade unions and their organizational activities;
- c. Employee representatives are not discriminated against and are free to perform representative functions in the workplace;
- d. In cases where freedom of association and the right to collective bargaining are restricted by law, the employer does not hinder the development of alternative means of independent free association and negotiation, but facilitates such development.

Detailed information is included in Annex [HRS-PRO-003 Załączniku nr 1 do Uchwały Zarządu nr 4 z dnia 19 sierpnia 2019 roku Procedurze Wyboru i zasad funkcjonowania Rady Pracowników w Ekoenergetyka Polska S.A.](#)

ł. Employment of children and minors

Under no circumstances can you employ children in the plant. Children and adolescents under the age of 18 will not be employed at night or in hazardous conditions. The above guidelines and procedures are in line with the provisions of the relevant International Labor Organization standards.

M. Privacy protection

Ekoenergetyka Polska S.A. complies with the privacy rules of each employee. It collects and stores only such personal information as is necessary for the functioning of the Company.

N. The employee has the right to:

- a. Know the information collected and stored about it;
- b. View your personal file;

c. To keep the information collected about it confidential and to guarantee that the collected information will not be made available to unauthorized persons.

The employee is obliged to ensure the security of personal information about other people, and if it is available for the performed tasks - not to disclose it to unauthorized persons.

O. Permissions

Only authorized employees may make business commitments on behalf of the Company.

When making business decisions on its behalf, employees should use their best knowledge and skills to protect the interests of the Company.

Q. Adequate working hours

a. Working time complies with national law and internal guidelines, whichever provides better protection.

b. Employees are not required to work an average of more than 48 hours a week in the adopted settlement period and are entitled to at least 1 day off for every 7 days on average. The number of overtime hours may not exceed 5 hours a day (according to the currently applicable Annex to the Work Regulations of March 27, 2019 and the Labor Code).

R. Commercial Software

a. Commercial software is used in Ekoenergetyka Polska S.A. as a tool of professional work. Employees will be held liable for using the software in an illegal manner.

b. Employees may use the software provided by the employer, which is treated as a work tool. Violation of this rule may be grounds for bringing employees to justice.

S. Intellectual Property Rights

The company has the rights to works and information related to work at Ekoenergetyka Polska S.A. which are the product of individual and group intellectual activity of employees, unless agreements with employees are concluded stipulating otherwise.

T. Behavior outside the workplace and working time

Behavior after work is a private matter of the employee, as long as it does not have a negative impact on safety at the workplace, the employee's ability to work or the image of Ekoenergetyka Polska S.A.

Each case of inappropriate behavior will be analyzed separately in order to determine its impact on the interests and image of the Company and, if necessary, to make appropriate business decisions.

U. Employee health and safety

Ekoenergetyka Polska S.A. is constantly striving to improve the occupational safety and health protection of employees.

Employees receive regular, documented training in occupational health and safety. Such training will be repeated for new and transferred employees.

There is access to clean toilets, drinking water, sanitary facilities equipped with hot and cold water, soap and paper towels and, if necessary, hygienic places for food storage.

V. Ekoenergetyka Polska S.A. declares:

- a. Continuous improvement of the occupational safety and health protection, in accordance with the applicable laws and standards;
- b. Providing employees with a safe and hygienic working environment, corresponding to the current state of knowledge in a given industry and taking into account possible risks;
- c. Continuing to take appropriate measures to prevent accidents and damage to health and occupational diseases as a result of, in connection with or during work, by reducing the causes of hazards in the work environment as much as possible;
- d. Implementation of solutions reducing the arduousness of work;
- e. Raising the qualifications of employees and promoting attitudes of involvement in activities to improve working conditions;
- f. Informing the staff and the public about the Company's policy in the field of occupational safety and health protection and their effects.

The employee has the right to refuse to comply with the supervisor's order in the absence of adequate health and life protection measures provided for a specific activity and not secured by the employer.

W. Employees and superiors of Ekoenergetyka Polska S.A. are obliged to:

- a. Submit to save your own life or others in emergency;
- b. Comply with the regulations, rules and standards applicable in the position held;
- c. Protect one's own life and health by the appropriate use of personal protective equipment, protective clothing and footwear provided for the position held, as provided for by internal regulations, and, if necessary, also using collective protective measures;
- d. Using appropriate tools, in accordance with their intended use;
- e. Reporting any violation of the provisions and rules of occupational health and safety, accidents, injuries, diseases or uncontrolled release of harmful substances into the environment and warning other people in the area of danger about the danger;
- f. Compliance with the quality standards of products manufactured at the workplace.
- g. It is strictly forbidden to report to work under the influence of alcohol, drugs or other intoxicants.

X. Communication

Efficient interpersonal communication, understanding the company's goals strategy increases employee involvement in the performance of entrusted tasks and improves operational efficiency.

Y. Employees of Ekoenergetyka Polska S.A. they have the right to:

- a. receive current information on the published strategies, plans and goals of the Company;

- b. obtain full information about the workplace, including: anticipated changes that affect its current and future functioning in the Company;
- c. obtain full information about the supervisor's assessment of own work effects;
- d. express your own opinion on the management of the Company, based on substantive premises, and present to superiors proposals for actions to improve the functioning and development of the Company.

Z. The superior is obliged to:

- a. explain to the employee any doubts regarding the functioning of the Company or - if it is impossible - refer them to the appropriate person who can provide a satisfactory answer;
- b. if possible, provide the employee quickly with full information regarding his person and position;
- c. clarify doubts regarding changes in internal regulations relating to the position held by the employee;
- d. initiate cooperation between individual organizational units in the Company.

4.1. Declaration of Human Rights - our approach**A. Respect for and compliance with standards**

As a company, we work every day to best convey and implement our ideas and ideals. Adopting standards and obtaining certifications related to international social and working conditions standards, creating our own policy and implementing it are part of our vision and how we are committed to Creating better quality for the environment and people.

Declaration of Human Rights - in accordance with the provisions of Appendix [EKO-PRO-006 Polityki i Oświadczenia dotyczące Praw Człowieka](#)

4.2. Values**4.2.1. Respect**

Ekoenergetyka Polska S.A. is guided in its activities by the principle of respect and dignity of every human being. The rules of mutual treatment of the Company's employees affect its overall economic effect. The company Ekoenergetyka Polska S.A. in the business sphere, it takes into account, first of all, the competence and professionalism of employees and declares respect for the nationality, race, religion and political orientation of all its employees, associates, customers and business partners.

4.2.2. Honesty

Ekoenergetyka Polska S.A. in all its activities, both business and social, declares respect for the principle of honesty. Its representatives are obliged to keep their word and honesty in all relations with business and social partners.

4.2.3. Transparency

Ekoenergetyka Polska S.A. declares full information transparency, thanks to which all interested parties have the opportunity to accurately assess the condition, functioning and plans of the Company, respecting the principle of confidentiality of information constituting the Company's secret.

The right to information about the Company is enjoyed primarily - due to the capital commitment - by the owners and other stakeholders who have legally guaranteed access to information published about the Company.

4.2.4. Professionalism

In our activities, we are guided by professionalism and reliability. We make sure that the management mechanisms are at the highest level. We follow clear rules of employee evaluation, guided primarily by the results achieved by them.

4.2.5. Open communication

We create conditions for a smooth exchange of views through all available channels so that employees, customers and suppliers can deepen and enrich their contacts. We encourage honest and open communication within the Company and with customers and suppliers, while protecting its confidential information.

4.2.6. Apoliticality

A. Ekoenergetyka Polska S.A. declares being apolitical: refraining from engaging in political life, considering that it is contrary to the long-term interest of the Company.

B. All attempts contrary to the interests of Ekoenergetyka Polska S.A. pressure on its employees by politicians will be reported to superiors and sent for information to the Management Board.

C. Ekoenergetyka Polska S.A. recognizes that the involvement of employees in social and political activities contributes to the building of a civil state and strengthens democracy. Employees can participate in political life within the limits guaranteed by law.

D. Ekoenergetyka Polska S.A.:

- a. Does not contribute financially or materially to any political organization;
- b. does not endorse any politician or party;
- c. not engaging in the election campaigns of political parties or candidates for political office;
- d. conducts its business activities and personnel policy based on substantive premises, with the benefit of the entire Company in mind.

E. Ekoenergetyka Polska S.A. can and should actively participate in discussions conducted by political groups: the government, parliament and local governments, as long as they concern the activities of the Company and its employees.

F. Employees at Ekoenergetyka Polska S.A.

- a. engage in political activity as private persons, not as representatives of Ekoenergetyka Polska S.A. .;
- b. they cannot use for their political activity neither the Company's property (equipment, rooms, company car, telephone, etc.), nor the working time in which they are obliged to perform tasks for Ekoenergetyka Polska S.A.;
- c. may not conduct an election campaign or any political activity on the Company's premises;

d. in connection with their political activity, under no circumstances may they exert any pressure on their subordinates or associates.

G. The employee's political activity covers his private sphere of life, however, due to the possibility of a conflict of interest, it is advisable to inform his immediate superior when taking particularly important decisions (eg standing for election, participating in party governing bodies).

4.2.7. Striving for success

We set ambitious goals for the company and employees, supporting innovation, gaining knowledge, teamwork and the will to win.

4.3. Personnel procedures supporting the Code of Ethics

4.3.1 Procedure for reporting irregularities

A. Ekoenergetyka - Polska S.A. as a participant in economic life, it strives to ensure compliance with generally applicable law and internal regulations in force therein, as well as to ensure the protection of the working environment in which fairness, honesty and mutual respect are the norm.

B. Thanks to Annex [EKO-PRO-007 Procedura zgłaszania nieprawidłowości](#), it is possible to signal unlawful behavior, acts or omissions, which constitute or may constitute:

- a. violation, potential violation or inducement to violate generally applicable law,
- b. breach, potential breach or inducement to breach the provisions, values and principles sanctioned by the internal regulations and policies of the Company
- c. violation of good manners, ethics or the principles of social coexistence - even if it is legal, but may have a negative effect on the work environment, employee relations or the Company's image.

C. In this way, the company wants to prevent any behavior that has a destructive effect on employee and business relations or affects the quality of the technological process.

4.3.2 Procedure against mobbing

Definitions:

Mobbing: hostile, destructive, unethical, verbal, visual or physical, systematic behavior on the part of the Employer, supervisor or group of Employees, directed at an Employee or a group of Employees, consisting in persistent and long-term harassment or intimidation, including psychological harassment or physical, causing or likely to cause the Employee lowered self-assessment of professional suitability, causing or aimed at humiliating or ridiculing the Employee, isolating him or eliminating him from the team of colleagues or fearing the Employee. Mobbing will also be discriminatory behavior, i.e. having the features described above and referring directly or indirectly to the terms of employment, promotion and access to training in order to improve professional qualifications, in particular due to sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, religion, sexual orientation, and also due to employment for a fixed or indefinite period, or full-time or part-time employment;

Employer obligations

A. The Management Board of Ekoenergetyka Polska S.A. is obliged to take all actions permitted by law to prevent mobbing at work or in connection with work performed by employees for the Company.

B. The Management Board of Ekoenergetyka Polska S.A. is obliged to take all actions provided for by law in order to reduce the social effects of mobbing, including in particular interventions and providing assistance to victims of mobbing.

C. The Management Board of Ekoenergetyka Polska S.A. entitled and obliged to take all actions provided for by law, including in particular the provisions of the Labor Code, against persons who are the perpetrators of mobbing.

D. The Management Board of Ekoenergetyka Polska S.A. is obliged to take the actions described in this procedure each time a Notification is made.

E. The Management Board of Ekoenergetyka Polska S.A. is obliged to take the actions indicated in this procedure in each case of obtaining information about the occurrence of the mobbing phenomenon from a source other than the notification.

Employees' rights and obligations

A. Each Employee who is subject to mobbing regarding employment has the right to demand that the Employer undertakes actions aimed at eliminating and removing the effects of mobbing.

B. The Employee's exercise of the above-mentioned entitlement does not in any way exclude the Employee's right to seek legal protection under applicable law. The Employee's use of such legal remedies is also not in any way dependent on the earlier application of the provisions of the Procedure.

C. Each employee who has or learns information about mobbing is entitled to submit a report. Unjustified slander of mobbing is prohibited.

Responsibility for mobbing

A. Mobber, is subject to liability provided for by law, in particular the Labor Code (order to prohibit mobbing, termination or disciplinary termination of a contract for work with a mobber, order liability of a mobber, material liability of a mobber in the event of the need to pay compensation to a mobbing victim).

B. The liability referred to above also applies to persons who unjustifiably claim mobbing.

Counteracting mobbing

A. Ekoenergetyka Polska S.A. conducts active activity against mobbing in the workplace and in connection with work, including:

- a. Undertaking preventive actions described in this point, aimed at counteracting mobbing;
- b. Undertaking interventions aimed at immediate cessation of mobbing, in particular those described in point 23 of this procedure.

B. Ekoenergetyka Polska S.A. takes preventive measures to counteract mobbing consisting in:

- a. Train all employees in the field of mobbing and counteracting these phenomena,
- b. Conducting periodic anti-mobbing training for employees,
- c. Creating information materials on mobbing and making them available to employees.

C. Employees may initiate preventive actions. For this purpose, they have the right to organize a meeting on mobbing and the possibility of eliminating these phenomena in the event of their occurrence in Ekoenergetyka Polska S.A.

Proceedings in the case of mobbing - defined by the procedure of app. [HRS-PRO-004 Procedura przeciwdziałania mobbingowi w Ekoenergetyka-Polska S.A.](#)

5. Business relations

5.1. Accounting and recording of company data

A. Ekoenergetyka Polska S.A. is required to keep books, record invoices and accounts in a clear and transparent manner so that they accurately and accurately reflect transactions and the use of funds.

B. It is strictly forbidden to introduce entries concealing the actual state of the transaction on purpose.

C. You must not create undisclosed or unrecorded funds or financial resources for any purpose, make payments of false or bogus invoices, create false journal entries, or prepare reports.

5.2. Abuse of the company's time, property and equipment

A. The basis of responsibility for the Company, reference to the principle of fairness and honesty, as well as the spirit of economy are the foundation of the proper use of working time, respect for the Company's property and all its devices. Employees are obliged to take care of the Company's assets and use them in such a way as not to expose the Company to unnecessary costs.

B. Employees of Ekoenergetyka Polska S.A. not allowed:

Abuse the Company's property (including telephones, company cars, faxes, copiers, machines, devices, products) for purposes other than those related to the performance of the entrusted duties, but may use these goods on the terms specified in the Company;

- a. Misuse the Internet and e-mail for private purposes;
- b. Perform private obligations while on the job;
- c. Use entertainment funds for non-service purposes;
- d. Sell clothing bearing the trademarks.

5.3. Conflict of interest and competitive activity

A. Employees of Ekoenergetyka Polska S.A. may not conduct competitive activities that harm the interests of the Company or create situations in which there is a conflict of interest. A conflict of interest occurs when a decision may be influenced by an employee's personal interest.

B. It is especially forbidden to cooperate with companies competitive to Ekoenergetyka Polska S.A. including:

- a. Providing them with advisory services;
- b. Performing full-time or commissioned work, performing any functions in the governing bodies of a competing company;
- c. Having significant shares / stocks in a competitor;

d. Making decisions or influencing the decision to establish a business relationship with a supplier in which the employee owns a business interest or is employed or owned by a family member or close person.

5.4. Attitude to competition

A. Collecting information about competitors from legally available sources in order to evaluate the merits of their products, services and marketing methods is permitted under applicable law.

B. Practices such as industrial espionage, theft or concealment of identity in order to obtain confidential information from a competitor are prohibited.

C. Employees must not be offensive about the nature, financial condition, and potential legal problems of competitors for the purpose of obtaining business benefits.

5.5. Accepting and offering material benefits

A. The quality of our products is the only criterion for cooperation with customers and business partners. Ekoenergetyka Polska S.A. does not condone any activities that violate impartial business decision making.

B. The following are considered a material benefit:

a. Financial rewards;

b. Free of charge execution of the order or its execution at a reduced, non-market price;

c. A gift of greater value.

d. A gift may be accepted if:

e. Has a negligible material value and does not exceed the customs adopted on a given market - taking into account tax regulations in this area;

f. Has no influence on the tasks and decisions performed;

g. Does not oblige to reciprocity;

h. It is an advertising or corporate gift, officially and publicly presented during the ceremony.

i. If possible, gift opening should be done in public.

Employees of Ekoenergetyka Polska S.A. it is forbidden to offer material benefits to the Company's business partners, with the exception of customarily accepted gifts, mainly corporate ones, of negligible material value.

C. Entertainment among business partners

a. Employees of Ekoenergetyka Polska S.A. may not participate in entertainment events or informal meetings organized by business partners, if this will have a negative impact on relations and concluded transactions.

b. Participation in common entertainment obliges to represent the Company with dignity and culture.

c. It is important to try to conduct business talks in the presence of another person, make a short note of the meeting, and in the event of a corruption offer being submitted to an employee, you should immediately inform your supervisor about it and make a memorandum.

6. Sustainable Development and Sustainable Development Goals

A. Sustainable development has been defined as one that meets the needs of people today without limiting future generations' ability to meet their needs.

B. Sustainable development requires a concerted effort to build a sustainable and disaster-resistant future for all people in the world and for our planet.

C. To achieve sustainable development, consistency of three key elements is necessary: economic growth, social inclusion and environmental protection. They are interconnected, and they are all vital to the well-being of individuals and societies as a whole.

6.1 The company and its environment

A. Ekoenergetyka Polska S.A. conducts and develops its business activities in harmony with the natural and social environment.

B. We feel responsible for the environment in which we operate, and we consider social activity an integral part of our business.

C. By conducting a partner dialogue, we try to take into account the welfare of all individuals, organizations and communities affected by our activities.

6.2. Local communities

A. We feel part of the society in which we operate. Therefore, in a sense of responsibility, we voluntarily undertake obligations supporting local communities. We strive to build lasting relationships with local communities based on partnership and trust.

B. Ekoenergetyka Polska S.A.:

a. supports local initiatives based on the principle of public-private partnership, aimed at improving the quality of life of the inhabitants;

b. analyze the impact of its activities on the local environment;

c. engages in charity activities, helping the poor and needy;

d. promotes local communities and actively works towards combating unemployment among the local community.

C. Ekoenergetyka Polska S.A. implements a policy of sustainable development, combining economic success with care for the social and natural environment.

D. Every employee has the right:

a. actively participate in the life of the local community;

b. submit your ideas for building a civic state in which the Company can join;

c. encourage other employees to act for the benefit of local communities.

6.3. The natural environment

- A. It is necessary to maintain harmony between the industry and the natural environment. The heritage passed on to us by previous generations should be especially cared for and protected by us.
- B. Ekoenergetyka Polska S.A., aware of the impact of its activities on the environment, adapts to the requirements of sustainable development through the processes of pollution prevention and environmental protection and the removal of damage resulting from its activities.
- C. Employees of Ekoenergetyka Polska S.A. .:
- a. declare care for the natural environment, regardless of the place and type of work;
 - b. comply with the Company's internal environmental protection regulations;
 - c. report any noticed case harmful to the natural environment of the employee from OHS.
- D. As a supervisor, you are obliged to:
- a. popularize, control and enforce internal regulations of Ekoenergetyka Polska S.A. in the field of environmental protection;
 - b. precisely define the responsibility of your own organizational unit and the competences of employees involved in activities for environmental protection;
 - c. shape the environmental awareness and responsibility of employees.
- E. Each disturbing event reported or observed by employees or people living in the vicinity of the Company is thoroughly investigated and the reasons for its occurrence are thoroughly explained.
- F. Ekoenergetyka Polska S.A. provides all interested parties with access to information on the Company's environmental impact.

6.4. Customers

- A. Customer welfare is our priority. Our clients have the right to expect the highest quality products from us.

B. High quality of products

Ekoenergetyka Polska S.A. declares:

- a. compliance with all obligations towards the customer;
- b. continuous application of control, corrective and preventive actions that guarantee detection of organizational or qualitative irregularities and elimination of unprofessional actions;
- c. removal of defective goods;
- d. introduction of new technologies and continuous modernization of existing machines and devices;
- e. conducting an innovation policy among employees;
- f. active cooperation with research centers.

C. Clear rules

Employees at Ekoenergetyka Polska S.A. they are obligated:

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- a. take care of the good name of the Company and represent it with dignity;
- b. be guided in professional activities by the principle of the client's best interests;
- c. make the utmost care to ensure that the products offered to customers meet the quality standards;
- d. provide professional and competent service, friendly, full of openness to the needs and expectations of customers, both in direct contacts and correspondence.

D. Ekoenergetyka Polska S.A.. assumes full responsibility for the offered products. In cases where they do not meet the quality standards, Ekoenergetyka Polska S.A. declares:

- a. quick consideration of comments, warnings and complaints;
- b. informing customers about the progress and examination of complaints and the result of the complaint procedure;
- c. analysis of the reasons for the complaint and implementation of corrective actions.

E. Complaints may be submitted in the following form: in writing, by phone, or electronically to organizational units responsible for product service.

F. The submitted comments on our products are an impulse for continuous improvement, adaptation to the needs and expectations of our customers.

G. Respect for the customer

Employees at Ekoenergetyka Polska S.A.:

- a. serve the customer efficiently and courteously;
- b. maintain an attitude of dialogue and look for opportunities to cooperate with the client;
- c. avoid tactless words and behaviours that are inconsistent with culture and good manners;
- d. treat all clients equally, irrespective of age, gender and race.

H. Reliable information

Employees at Ekoenergetyka Polska S.A. are obliged to:

- a. provide customers with complete information about the products and activities of the Company, except for information constituting technical, technological, commercial or organizational secrets of the Company, the disclosure of which could expose the Company to damage or protected under specific legal provisions;
- b. provide only true information about your activities and products;
- c. not to abuse the trust, not to take advantage of the possible ignorance and inexperience of clients

I. Protection of information

- a. Employees of Ekoenergetyka Polska S.A. are obliged to exercise the utmost diligence in the field of protection of any information they deal with in the course of their official duties and to obtain it only to the extent that is necessary for their implementation.
- b. The subject of particular care is information protected by law and the internal organizational documents of the Company issued on their basis and the applicable clauses of contracts concluded with the Company's business partners.
- c. The superior may not give orders to his subordinates which could result in a breach of the information security of the Company, its employees or companies and persons cooperating with it.

d. At Ekoenergetyka Polska S.A. it is forbidden to copy and use materials owned by others without obtaining the consent of their owner.

e. When cooperating with companies, using Internet technology, the Company is obliged to ensure that other companies use appropriate and trustworthy information security systems that ensure the integrity and confidentiality of transactions and payments. Working with clients, the Company provides them with information on the level of protection of their personal and financial data and the method of securing them in our company.

7. Compliance with the code of ethics

Disseminating the Code of Ethical Conduct, clarifying doubts

A. Each employee of Ekoenergetyka Polska S.A. regardless of their position in the organizational structure, is required to read the provisions of the Code of Ethical Conduct of Ekoenergetyka Polska S.A. and adhere to them.

B. The Code of Ethical Conduct is available in the Human Resources Department, in the HR Department and in the folders of the Management System of Ekoenergetyka Polska S.A., on the "NAS" drive, nextcloud cloud, as well as on the Google drive at: <https://drive.google.com/drive/folders/1Kn3jIQU6e4VIVqfG0ifM4326Nk5n7BYv>

C. An employee of Ekoenergetyka Polska S.A. has the right to receive an explanation of unclear provisions or doubts related to the content of the Code of Ethical Conduct, submit comments and initiate changes and additions to its provisions.

D. The employee has the right and should propose his own solutions to difficult problems, ideas for eliminating ineffective procedures or inappropriate behavior occurring in the company.

E. The superior is obliged to:

- a. undertake activities popularizing the Code of Ethical Conduct and ethical behavior;
- b. promote people and role models, set a good example of diligence and commitment;
- c. provide employees with the Code of Ethical Conduct and explain - at their request - the provisions contained therein;
- d. react decisively to reported information regarding violations of the provisions of the Code of Ethical Conduct;
- e. control the application by employees of all the rules of the Code of Ethical Conduct.

F. Supporting compliance with the provisions of the Code of Ethical Conduct

a. Each employee of Ekoenergetyka Polska S.A. is obliged to immediately inform about the violation or reasonable suspicion of violating the law and the provisions of the Code of Ethical Conduct, so that preventive or intervention measures can be taken.

b. In the event of a breach of the Code of Ethical Conduct, the employee should contact his / her supervisor, who is obliged to listen to the employee and start explaining the reported irregularities.

c. If an employee does not fully trust his / her supervisor, he / she should take one of the following actions:

- send an e-mail to the mailbox guaranteeing the sender's anonymity;
- put the note in an anonymous complaint box;

• an employee of the Company may also use the opportunity to talk to the Vice President of the Management Board of Ekoenergetyka Polska S.A. .;

G. An employee reporting an infringement of the law is guaranteed full anonymity. The process of explaining the matter and considering the complaint is carried out with complete discretion regarding the source of information.

H. Any person from outside the Company, noticing irregularities in the conduct of employees or in the applicable procedures of the Company, may submit their objections in person, by e-mail Etyka@ekoenergetyka.com.pl, by post or by phone.

I. There is the availability of superiors for employees, the possibility of an open, honest conversation, with guaranteed protection of their content and the provision of constructive support. The implementation of these principles is the responsibility of all levels of management.

J. Each supervisor is required to listen to the employee and decide together with him to take action if there are reasonable suspicions that there is a violation of the Code of Ethics.

Failure to comply with the Code of Ethical Conduct

A. Ekoenergetyka Polska S.A. declares:

a. protect employees and business partners who disclose violations of the law or the Code of Ethical Conduct against the harmful effects of a decision to disclose irregularities;
b. apply restrictions to persons violating the personal rights of employees and their business partners, in accordance with applicable law and the Code of Ethical Conduct.

B. Each employee, in accordance with the freedom of conscience, freedom of speech and the Code of Ethical Conduct of Ekoenergetyka Polska S.A. has the right and obligation to disclose non-compliance with the applicable standards to the management of the Company.

C. The superior is obliged to listen to and direct to the relevant services any irregularities reported by the employee in order to explain and work out a solution consistent with the law and the Code of Ethical Conduct.

D. The rules contained in the Code of Ethical Conduct also apply to consultants, associates, contractors and all other persons who act on behalf of Ekoenergetyka Polska S.A., Violation of the Code of Ethical Conduct may result in the cessation of further cooperation or termination of contracts concluded with them.

8. Related documents

- [zał. Regulamin Pracy z dnia 27 marca 2019 roku](#)

- [zał. EKO-PRO-005 Procedura w zakresie odpowiedzialności porządkowej Pracowników;](#)

- [zał. EKO-PRO-006 Deklaracja Praw Człowieka – Polityka i oświadczenie dotyczące praw człowieka](#)

- [zał. EKO-PRO-007 Procedura zgłaszania nieprawidłowości](#)

- [zał. HRS-PRO-004 Procedura przeciwdziałania mobbingowi](#)

- zał. HRS-PRO-003 Procedura Wyboru i zasady funkcjonowania Rady Pracowników w Ekoenergetyka Polska S.A.

9. Changelog

No.	Revision	Date	Change description / Reason for a change	Author
1	1	2019-09-03	Initiation process	Ireneusz Lechniak
2	2	2019-09-06	Supplementing the procedure with provisions on mobbing	Ireneusz Lechniak
3	3	2020-08-14	Company name update	Aneta Łabuz
4	4	28.09.2021	Supplementing the procedure with provisions in points 4. H and 4. I	Aneta Łabuz