



CODE OF ETHICAL CONDUCT

FINOW POLSKA Sp. z o.o.

Ethics • Integrity •
Responsibility

This Code of Ethical Conduct (hereinafter referred to as the "Code") is intended to define the ethical standards and principles of conduct that should be observed by all employees and associates performing work for FINOW POLSKA Sp. z o.o. By acting in accordance with this Code, we build a work environment based on trust, respect and responsibility. The Company conducts its business in accordance with universally applicable laws, the highest ethical standards and best business practices, upholding values and principles in all areas of its operations. An important element of our strategy is the implementation of sustainable development principles in all areas of our business, taking into account environmental, social and responsible governance aspects. Every employee is expected to act with the highest standards of integrity and professionalism and to comply with this Code.

1. COMPLIANCE WITH THE LAW AND BUSINESS ETHICS

- ▶ In conducting our business, we always comply with applicable laws, regulations, required standards, as well as internal rules and procedures.
- ▶ All transactions are accurately and promptly recorded in accordance with applicable regulations, so as to accurately reflect the Company's revenues and expenses.
- ▶ We operate in accordance with the principles of business ethics, guided by honesty, transparency, accountability and respect for the interests of all parties involved in the Company's operations.
- ▶ We ensure full impartiality in decision-making, eliminating any conflicts of interest both in professional contacts and in relations with business partners and other external entities.
- ▶ Personal interests may not conflict with the Company's interests or influence decisions made. Using one's position or influence for private purposes is not permitted.
- ▶ We do not tolerate actions contrary to business ethics, in particular abuse of power, unfair trade practices, manipulation of information or use of market dominance in a manner contrary to law or good practice.
- ▶ Money laundering, theft, fraud, embezzlement and financing of terrorism are absolutely prohibited.
- ▶ We expect all employees and business partners to act in accordance with applicable law and the principles of business ethics, both in internal and external relations.

2. ANTI-CORRUPTION POLICY

- ▶ We do not accept any form of corruption or behaviour bearing the hallmarks of corruption or bribery, either in business activities or in the actions of our employees and associates.
- ▶ We do not offer or accept material benefits in order to gain an advantage, avoid an unfavourable situation or establish or maintain a business relationship.
- ▶ Occasional gift-giving or offering hospitality is considered a manifestation of generally understood courtesy. We do not treat this as an opportunity to exert undue influence on decisions or to obtain undue benefits.

3. FAIR COMPETITION

- ▶ Our activities comply with all applicable antitrust laws relating to both competition and fair trade.
- ▶ We acquire customers solely through fair tendering.
- ▶ We treat all business partners in a fair and equal manner.

4. HUMAN RIGHTS

- ▶ We respect and protect the privacy, personal dignity and other rights of every employee, customer, supplier and other person with whom we cooperate.
- ▶ We expect all employees and associates of the Company to treat each other in a professional manner, with dignity and respect.
- ▶ We treat all employees and associates in accordance with the principle of equal rights – regardless of age, race, gender, nationality, sexual orientation, disability, religion or political beliefs.
- ▶ We oppose and do not tolerate in any form discrimination, mobbing, harassment, bullying or any kind of unacceptable treatment of employees and associates.
- ▶ We are firmly opposed to forced labour, modern slavery and human trafficking in all its forms.

5. EMPLOYEE RELATIONS AND WORKPLACE SAFETY

- ▶ We apply fair rules of employment, remuneration, development and promotion of our employees and associates.
- ▶ Hiring decisions are always made based on an assessment of the candidates' qualifications, skills and/or experience.
- ▶ We guarantee all employees and associates the statutory minimum wage.
- ▶ We provide safe working conditions and care for the health of our employees, associates and third parties.
- ▶ We expect our employees to take responsibility for their own safety and the safety of others on company premises.
- ▶ We conduct regular inspections of workplaces and working conditions, and respond to any irregularities and potentially dangerous situations.
- ▶ We monitor hazards and apply the best possible measures to prevent workplace accidents and occupational diseases.
- ▶ We provide employees and associates with an appropriate level of knowledge on occupational health and safety through the organisation of themed training sessions.
- ▶ We do not tolerate persons under the influence of alcohol, drugs or other intoxicating substances on company premises, nor their introduction or consumption.
- ▶ We operate on the basis of a functioning occupational health and safety management system.

6. PROHIBITION OF CHILD LABOUR

- ▶ We do not employ children or young persons below the minimum age required for employment under the laws in force in Poland.



7. SUPPLIERS AND SUBCONTRACTORS

- ▶ We select suppliers on the basis of transparent criteria and procedures, taking into account the principles of free and fair competition.
- ▶ Our Code of Conduct for Suppliers obliges subcontractors and suppliers to act in accordance with the principles contained therein and with generally accepted standards, as well as to comply with applicable laws.
- ▶ We expect our suppliers to ensure that their own subcontractors and suppliers also act in accordance with these principles.

8. QUALITY OF PRODUCTS AND SERVICES

- ▶ We always strive to ensure the highest quality of products and services that meet all applicable safety and quality standards.
- ▶ The quality of our products and services depends on the continuous adherence by our employees and associates to good manufacturing practices that meet customer and legal requirements.
- ▶ We operate on the basis of a functioning quality management system.

9. PROTECTION OF DATA AND CONFIDENTIAL INFORMATION

- ▶ We protect the Company's assets and intellectual property.
- ▶ All employees and associates are obliged to protect the Company's confidential information to which they have access.
- ▶ Personal data is collected, stored, used and shared in accordance with applicable data protection legislation.
- ▶ All information relating to the Company's business, customers, suppliers and other business partners is adequately protected and may not be misused.

10. COMMUNITY INVOLVEMENT

- ▶ We support and participate in projects related to activities for children and young people, as well as in other significant and needed social initiatives.
- ▶ Sponsorship and donations in support of local initiatives are aimed at building a positive image of the company. This activity is never used to gain any benefit.
- ▶ We do not provide financial support to political parties or politicians.

11. ENVIRONMENTAL PROTECTION

- ▶ We act in accordance with all applicable environmental protection laws.
- ▶ We undertake a variety of activities aimed at protecting the natural environment, including reducing our negative environmental impact and making rational use of natural resources.
- ▶ We implement modern, environmentally friendly technological solutions to maximise reductions in energy consumption and greenhouse gas emissions.
- ▶ In our production processes, we use raw materials produced using renewable energy sources, as well as recycled materials.
- ▶ We continuously strive to minimise waste, ensure safe waste management and send waste for disposal or recycling in accordance with applicable law.
- ▶ We operate on the basis of a functioning environmental management system.

12. INTERNATIONAL TRADE RESTRICTIONS

- ▶ We strive to avoid using in production raw materials originating from conflict-affected regions that are a direct or indirect source of funding for armed groups violating human rights.
- ▶ We do not cooperate with suppliers, subcontractors or business partners subject to economic sanctions, trade restrictions or embargoes arising from national or international law.

13. REPORTING VIOLATIONS

- ▶ All employees and associates are obliged to report any violations of this Code, as well as any other unethical practices.

**Reports should be submitted to the following
e-mail address:
info@finow.pl**

*Reports will be handled confidentially and without exposing
the reporting person to any retaliation.*

This Code is not an exhaustive list of applicable rules, but should be used as a guide for making the right ethical decisions.