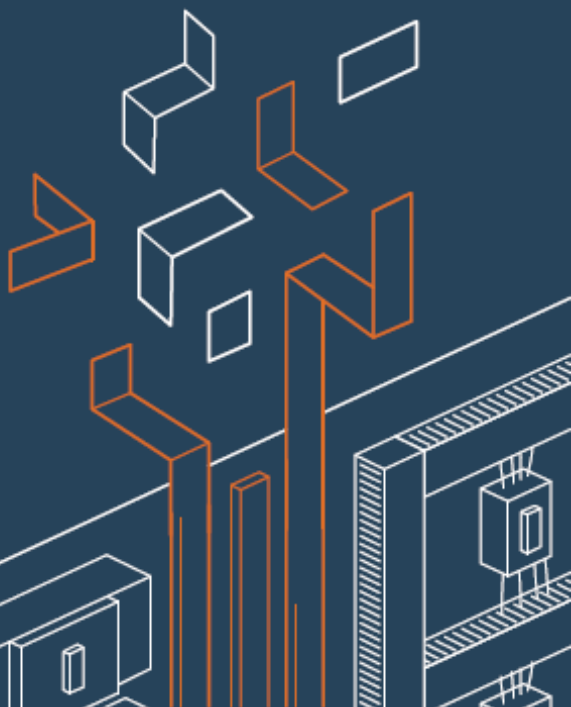




BUSINESS CODE OF CONDUCT





INTRODUCTION

Here at Electris, we believe that we can do business ethically, guided by integrity, honesty, fairness and full compliance with all the applicable laws. We understand that the way we and our suppliers do business affects people and the environment, in particular their working conditions as well as environmental protection, both locally and globally.

In line with our continuing commitment to delivering the best possible quality of services, we hold ourselves to the highest ethical and professional standards. Our guiding principles relate to environmental, social and working conditions. We can achieve our future growth with those who share our vision.

This Code of Conduct outlines the standards and practices which we at Electris comply with and requires our suppliers to do the same.





BUSINESS ETHICS

Both us and our suppliers leverage our strengths in teamwork, going beyond organisational and geographical barriers to deliver the highest possible quality services and products.

Wherever we operate, **we comply with the laws related to the protection of fair competition, fair trading and preventing monopolistic trade practices.** We adhere to all the applicable import and export laws and regulations.

Together with our suppliers, **we protect privacy by complying with data protection legislation** and safeguarding customer data against unauthorised access or use.



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ENVIRONMENT

Both we and our suppliers are aware of our environmental impact, which is why we continue to **minimise our carbon footprint and other impacts** to preserve the natural resources for generations to come.

We comply with all applicable environmental laws and regulations, such as the proper handling of waste and recycling, that apply at our business sites.





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OCCUPATIONAL HEALTH AND SAFETY

Both we and our suppliers understand **the importance of the health and safety of all our employees**. Since our employees are key contributors to the company's growth, we are committed to ensuring the best working conditions possible, so that they can perform their duties in a safe way.

The absolute minimum requirements for ensuring such conditions are:

- Preparing a workplace risk assessment
- Providing periodic OHS training
- Providing personal protective equipment to our employees
- Ensuring the safety of all machines and other equipment
- Providing first aid equipment in the working area
- Providing trained first responders
- Monitoring the working conditions, including measuring noise levels, temperature, light and air quality
- Ensuring tidiness and hygiene
- Providing space to rest
- Ensuring compliance with the applicable laws



NO DISCRIMINATION

Since we and our suppliers operate across a variety of territories, we respect diversity, providing an engaging and tolerant working environment for everyone. **We respect people's dignity and protect their rights**, as outlined in the Universal Declaration of Human Rights.

Neither we nor our suppliers tolerate physical violence, threats, psychological pressure, insults or sexual harassment.

During recruitment and employment, **we do not discriminate against our employees** on grounds of race, religion, gender, marital and family status, age, political affiliation, national origin, disability, sexual orientation or for any other reason.

We **do not charge candidates any fees for the recruitment process** or for the costs associated with taking up employment, such as medical examinations or training.



EMPLOYMENT POLICY

Electris pursues an employment policy in accordance with the Polish Labour Code and applicable laws. Our priority is to provide our employees with safe and comfortable working conditions, including appropriate protective clothing, job training and the right to breaks. **Every employee has the right to terminate their contract at any time, subject to a specified notice period.** We do not impose financial penalties or apply any restrictions on freedom of movement. The employment process includes verification of identity documents, which guarantees full formal compliance and transparency. Our practices are based on respect for employee rights and building partnership relations between the employer and employees.



RESPONSIBLE RECRUITMENT

Our organization is committed to conducting recruitment processes in a responsible, transparent, and ethical manner, in accordance with the principle that the costs of employment are borne by the employer, not the employee. We do not charge—directly or indirectly—any fees related to the recruitment, hiring, or retention process from candidates or employees, regardless of their form of employment (permanent or temporary) or origin (local or foreign). All costs associated with recruitment, including agency fees, administrative costs, testing, visas, work permits, recruitment travel, or accommodation organized for the purpose of commencing work, are borne by the employer.



RENUMERATION POLICY

In both our company and at our suppliers, **equal work is rewarded with equal pay, without discrimination** on grounds of gender, ethnicity, age, skin colour, religion, political views, nationality, social background or other.

The terms of work remuneration agreed between the employer and the employee are always laid down in written employment contracts. Salaries are paid to employees regularly, in accordance with the terms of their employment contracts. Additionally, our employees and our suppliers have to be familiarised with the internal remuneration regulations etc. before they are allowed to start work. We comply with the applicable legislation governing the rules for determining employees' remuneration and the minimum wage.



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PROTECTING PREGNANT AND BREASTFEEDING EMPLOYEES

Both us and our suppliers **care about the health of pregnant and breastfeeding employee.** Female employees are entitled to a paid maternity leave and a parental leave at the end of which, or if interrupted, they have the option to return to the job they held before the leave, under the same conditions and without discrimination, without detriment to seniority or reduction in salary.

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FORCED LABOUR

Neither us nor our suppliers allow forced labour, slavery, human trafficking or exploitation. In particular, we make sure that no misconduct, such as physical and psychological violence, occurs in the workplace.



CHILD AND UNDERAGE LABOUR

Our company Electris, and our Suppliers, adhere to the country's regulations regarding the minimum age for entering into an employment relationship. According to the regulations in Poland, a juvenile is a person who has reached the age of 15 and is under the age of 18. Accordingly, **Electris does not employ individuals who are under 15 years of age or juveniles under 18 years of age.**

In our operations, we always precisely verify the age of job applicants to ensure full compliance with the law.

Electris **only participates in legitimate apprenticeship programs that meet the requirements of the applicable law.** In addition, juvenile apprentices are protected from working in conditions that may endanger their health, safety or violate moral standards.



FREEDOM OF ASSOCIATION

Employees have the right to form and join trade unions or labor organizations of their own choosing, and to participate in such organizations without prior authorization from the employer.

Furthermore, employees have the right to collective bargaining aimed at resolving issues, particularly those concerning the workplace and compensation. We declare our active participation in dialogue with freely chosen employee representatives to improve existing working and employment conditions. Employees shall not be subject to discrimination or retaliation due to their past or present membership in a labor or trade union organization.

We respect the independence and rights of labor organizations and/or trade unions.





PREVENTING CORRUPTION

Neither us nor our suppliers offer gifts to any of our employees or customers to gain or maintain a business advantage or to influence their decisions. In certain specific situations, we allow small gifts whose value does not exceed PLN 50.

In connection with our business, we do not offer, promise, give, demand or accept any gifts, loans, fees, rewards or any other benefits (like sexual propositions, sex acts during the course of the contract) as an incentive to take any unfair, illegal or confidence-undermining action, to obtain or secure a business offer, to steer a business to a certain course or to obtain any other undue advantage.



AVOIDING CONFLICT OF INTEREST

Electris employees are required to avoid conflicts of interest, which occurs when an employee's personal interests conflict with those of Electris.

This means that **employees should not enter into business cooperation with other companies if such contacts may directly benefit the employee or his family members and are in conflict with Electris' interests.** To avoid conflicts of interest, any proposal to enter into such cooperation between Electris and a company with family ties to the employee must be reported to and agreed upon with the employee's immediate supervisor. In addition, cooperation with external companies must be based on contract transparency, and the selection of business partners should be based on an objective evaluation of the best offers that guarantee Electris' interests.



COUNTERING FRAUD

Electris **enforces a zero-tolerance policy against all forms of fraud, abuse, and deceptive practices.** Every employee, associate, and business partner is required to act honestly, integrity-driven, and in full compliance with the law and internal regulations.

Fraud is defined in particular as: falsifying documents or data, misappropriating property, deliberately misleading stakeholders, and abusing one's position for personal or financial gain.

Every Electris employee is obligated to immediately report any suspected irregularities through dedicated, secure channels. Electris ensures full protection against retaliation for individuals who report concerns in good faith.



OUR VALUES AND BEHAVIOURS AT WORK

For us and our suppliers, in addition to the skills and qualifications of our employees, **it is important to promote the right attitudes among our employees, such as cooperation, dedication, responsibility, tolerance and respect.**

We understand cooperation to mean that our employees support and help each other with their tasks, not only within their own department, but also with other departments. By cooperation we also **mean joint efforts to achieve common goals and, importantly, being able to rely on each other.**



REPORTING VIOLATIONS OF OUR BUSINESS CODE OF CONDUCT

In situations where there is any doubt as to how to behave appropriately, in relation to the provisions of the ***Code of Business Conduct***, the action plan described in document I-11-05 should be followed.

Our managers are responsible for ensuring that each of our employees is made aware of the principles and values enshrined in this code, as well as promoting and enforcing them.

All employees are required to report any discovered violations of ***the Business Code of Conduct***.

Agnieszka Nosal

Member of the Management Board

05/02/2025





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