

RAWLPLUG'S SUPPLIER
CODE OF CONDUCT
HEREINAFTER REFERRED TO AS
THE "CODE"

1. BACKGROUND

A key element of Rawlplug's strategy is building lasting relationships that take into account the needs and expectations of all our stakeholders. We communicate in a transparent manner about the ideas that inspire us, the values we uphold, and the actions we intend to undertake, expecting our business partners to show a commensurate commitment to building a global, sustainable supply chain.

Purchasing is one of Rawlplug's strategic areas of activity, so all the principles gathered and described in this Code are fully consistent with Rawlplug's strategy, mission and vision, which are reflected in Rawlplug's other internal documents: the Sustainable Management Systems Policy, Code of Ethics, Sustainable Procurement Policy, and other regulations and guidelines (including those related to fair competition, anti-corruption or conflict of interest).

All activities carried out within the scope of the Code's subject regulation, conducted in cooperation with Suppliers, are fully compliant with the recommendations and guidelines of the following ISO standards:

- ISO 20400 Sustainable Procurement,
- ISO 26000 Guidelines on Social Responsibility.

All practices resulting from the provisions of the Code are elements of the Rawlplug's Integrated Management Systems certified in accordance with the standards:

- ISO 9001 Quality Management System,
- ISO 14001 Environmental Management System,
- ISO 27001 Information Security Management System,
- ISO 45001 Occupational Health and Safety Management System.

2. GENERAL PROVISIONS

The rules gathered in the Code are intended to serve as signposts, indicating the directions for our continuous improvement. We intend to implement them together with our Suppliers, striving to ensure that business ethics and corporate social responsibility (CSR), alongside innovation, quality and safety, are an integral part of our relations.

The Rawlplug Supplier Code of Conduct applies to all entities within the Rawlplug supply chain: that is, suppliers of goods, materials, services and their subcontractors and intermediaries.

Whenever references to the "Supplier" are found in the Code, this should be understood as the entire catalogue of entities listed above.

Rawlplug is committed to fulfilling all the requirements outlined in the Code. We expect simultaneously that suppliers will share our desire to deliver products and services of the highest quality, treat all employees with respect and dignity, ensure safe working conditions and conduct their business ethically and with care for the environment.

3. RAWLPLUG'S SUPPLIER REQUIREMENTS

3.1. Obligations Towards Employees and Rights.

The Supplier should respect the applicable national and international legal regulations, principles and rules.

The Supplier is obliged, in every aspect of their operations, to respect the inalienable and universal human rights and freedoms as expressed in the Universal Declaration of Human Rights of the UN, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, the International Labour Organisation standards, as well as all other sources of law applicable within the territory of the Republic of Poland and the European Union.

The Supplier shall:

- ensure a safe, hygienic and discrimination-free work environment,
- ensure equal employment opportunities based on an individual's qualifications and experience, regardless of their race, skin colour, gender, age, religion, nationality, disability or sexual orientation,
- fairly compensate their employees in relation to the labour markets in which it operates and ensure working hours comply with the applicable national labour law regulations,

The Supplier shall not engage in the use of forced or slave labour, nor should they employ children.

The Supplier and their employees shall adhere to principles of honesty, openness and transparency in business dealings, as well as avoid any behaviours that could damage or negatively impact the reputation or image of Rawlplug.

3.2. Climate and Environment.

We expect the Rawlplug's Suppliers to strive to develop processes that ensure renewability and minimise the negative effects of their activities on communities, the environment and natural resources, while simultaneously protecting the health and safety of third parties.

In addition, the Suppliers:

- shall obtain and regularly update all legally required permits and registrations related to environmental protection and shall comply with the relevant requirements associated with reporting on environmental aspects,
- in their operations, the Suppliers shall strive to reduce the consumption of resources, including raw materials, energy and water,
- shall monitor, document and endeavour to reduce energy consumption and greenhouse gas emissions, as well as seek ways to increase energy efficiency and the use of eco-friendly energy sources,
- shall identify and monitor chemical substances and other materials that pose a threat to the environment, ensuring their safe handling, utilisation, storage and disposal,
- shall strive to reduce or eliminate all kinds of waste.

3.3 Confidentiality and Personal Data Protection.

The Supplier shall ensure confidentiality with respect to all sensitive and business-critical information pertaining to Rawlplug to which they have access.

Rawlplug respects everyone's right to the protection of personal data and the right to integrity in relation to the processing of personal data. The Supplier shall ensure that any activities involving personal data, such as collecting, recording, comparing, storing or deleting, are conducted in accordance with applicable laws and regulations.

3.4. Fair Competition

We believe that fair competition drives us to action. It serves us, our stakeholders and the entire society, as it influences efficiency and innovation, which are the foundations of a well-functioning market economy. In connection with this, the Supplier shall be obligated to act in accordance with the applicable legal regulations on competition protection, and in particular, it shall not engage in price-fixing/cartel agreements, rigging of tender offers, customer or market allocation, or in exchanging information about current, historical or future pricing conditions with competitors' representatives.

3.5. Conflict of Interest and Anti-Corruption

Conflicts of interest may arise from forms of hospitality and entertainment, gifts, contributions to charitable and political causes, sponsorships and close personal relationships. Rawlplug strives to conduct its business activities while actively avoiding conflicts of interest. We demand the same from our supply chain. The Supplier shall avoid contacts or behaviours that could lead to or be perceived as leading to a conflict between their own interests and the interests of Rawlplug.

We do not demand, accept, propose or provide any form of hospitality or gifts that might improperly influence or appear to influence our business decisions or those made by our partners or other persons we work with. We also do not give consent to such action. The Supplier shall possess or implement appropriate internal procedures to ensure compliance with the applicable legal regulations regarding anti-corruption measures.

3.6. Protection of Assets and Equipment

We protect our assets, especially our capital, from damage, theft, loss and improper use, as they are crucial to our operations. The Supplier undertakes to respect the assets of Rawlplug and our stakeholders, and to use Rawlplug's assets only when authorised to do so.

3.7. Sanctions

Sanctions are legal instruments used by governments and international bodies to influence foreign policy by prohibiting transactions with specified countries, individuals, entities or sectors. Sanctions lists are developed, among others, by the United Nations, the European Union and the United States. Rawlplug needs to know its external partners; therefore, the Supplier is obligated to disclose the actual owners with whom Rawlplug conducts business.

The Suppliers are obliged to conduct a policy that ensures the presence of tantalum, tin, tungsten and gold in their products does not indirectly or directly support armed groups that violate human rights in the Democratic Republic of Congo or in its vicinity. The Suppliers shall exercise due diligence when analysing the origin and supply chain of these minerals and, upon request, provide Rawlplug with relevant information in this regard.

4. VERIFICATION PROCEDURES

To ensure that the Suppliers meet the above issues at the level we expect, we use a variety of verification methods, such as:

- a direct communication and Supplier qualification,
- a Supplier's assessment (remote questionnaire),
- an audit conducted by Rawlplug or a third party (agreed between the parties before commencement),
- action recovery plans.

The Supplier has at any time the opportunity to contact Rawlplug in order to obtain additional information, present materials and provide further explanations regarding issues described in this Code and actions taken in accordance with the aspects described here.

5. FINAL PROVISIONS

The Rawlplug's Supplier Code of Conduct describes the minimum requirements for Suppliers regarding conduct that is consistent with values and principles of social responsibility and sustainable development.

Its goals include:

- establishment of transparent standards and good procedural practices,
- creation of frameworks for conducting constructive dialogue and activities in the interest of all stakeholders,
- enhancing the quality of delivered products and provided services,
- reducing the likelihood of ethical, social and environmental risks occurring, related to business activity,
- implementing principles of corporate social responsibility in global supply chains.

Rawlplug reserves the right to terminate the contract on the terms and in the manner specified in the agreement if the Supplier finds that compliance with the provisions of the Code is impossible and does not intend to take steps towards their implementation.

A large, faint watermark of the Rawlplug logo is visible in the bottom left corner of the page, consisting of the stylized 'R' and the word 'RAWLPLUG' in a light blue color.

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