

RADPOL PIPES SP. Z O.O. CODE OF ETHICS

PURPOSE

The purpose of the Code of Ethics of RADPOL PIPES sp. z o.o. (hereinafter the "Company") is to promote and foster appropriate conduct, a responsible organisational and workplace culture, and principles of cooperation based on generally accepted standards of social conduct, applicable law, internal regulations and shared values.

SCOPE

What the Code Covers

The Code of Ethics sets out the key standards of conduct expected of the Company's employees in their day-to-day work. It governs relationships within the Company and between the Company and its stakeholders in matters of workplace conduct, business relationships and professional ethics. It also supports the Company in pursuing its mission in line with its values and adopted development strategy.

In conducting its business, RADPOL PIPES sp. z o.o. is committed to complying with applicable laws, internal regulations and adopted ethical standards, and to acting in line with shared values and generally accepted standards of social conduct. The Company seeks to have a positive impact on its stakeholders and operating environment, including customers, business partners, local communities and the natural environment.

Who the Code Applies To

This Code of Ethics sets out the principles and standards of conduct that directors, managers, representatives, employees and associates of RADPOL PIPES sp. z o.o. are expected to follow whenever acting on behalf of the Company. It provides guidance on expected conduct but cannot address every situation that may arise.

This Code of Ethics has been approved by the Management Board of RADPOL PIPES sp. z o.o., which is committed to regularly reviewing compliance with its principles and updating the Code where necessary.

DEFINITIONS

For the purposes of this document and to ensure consistent interpretation of the terms used, the following definitions apply:

Managers at RADPOL PIPES sp. z o.o.	A manager is any person whose job responsibilities include supervising another employee.
Diversity Management	A people-management strategy based on the principle that workplace diversity is one of an organisation's key assets, contributing to organisational development and the achievement of business objectives.
CSR (corporate social responsibility)	A concept whereby companies, when developing their strategies, take into account social and environmental considerations, as well as their relationships with different stakeholder groups.
Stakeholders	Individuals, groups, institutions or organisations - including communities and public authorities - that may affect the Company or be affected by its activities, and whose interests or actions may influence the success of the Company or its undertakings. Stakeholders include shareholders, employees, customers, suppliers and local communities, among others.
Corporate Governance	A framework of principles and practices governing how a company is directed and managed, including the roles and conduct of its governing bodies, members of the Supervisory Board and Management Board, and shareholders.

STANDARDS OF CONDUCT

Core Values

Employees of RADPOL PIPES sp. z o.o. are guided by core values and demonstrate integrity, diligence, conscientiousness and commitment in carrying out their responsibilities. They pursue quality, innovation and professionalism in their work, and promote open communication and cooperation in pursuit of shared objectives. They build and maintain trust with colleagues and business partners and demonstrate respect, understanding and a willingness to help, regardless of position or differences of opinion.

Accountability

Every employee is personally accountable for their actions, regardless of function or position, and is responsible for ensuring that their conduct complies with the Code of Ethics, the Company's internal regulations and applicable laws. If an employee is unsure how to interpret the Code of Ethics, internal regulations or applicable laws, they have both the right and the responsibility to seek guidance from their manager.

Managers at RADPOL PIPES sp. z o.o. seek to build engaged teams and foster an ethical work environment. They are expected to lead by example, treat employees with respect, maintain open, honest and constructive communication, and make every reasonable effort to prevent breaches of the

Code of Ethics, internal rules and other regulations applicable within the Company. If a manager receives a report of a potential breach, they must take appropriate corrective action promptly.

Employment and Working Standards

RADPOL PIPES sp. z o.o. is committed to providing its employees with fair and regularly paid remuneration, opportunities for professional development and advancement, training and appropriate working conditions.

The Company protects its employees' copyrights and respects intellectual property rights.

The Company complies with applicable human rights and labour standards. In particular, it prohibits child labour involving children under the age of 15, forced labour, corporal punishment, psychological or physical coercion, verbal abuse and sexual harassment, and is committed to maintaining a workplace free from such practices.

Diversity and Equal Opportunity

As an organisation, RADPOL PIPES sp. z o.o. promotes cooperation and teamwork free from prejudice and discrimination. The Company prohibits discrimination on the grounds of sex, age, disability, health status, race, ethnic origin, nationality, religion, belief or lack of religious belief, political opinion, trade union membership, sexual orientation, gender identity, family status, lifestyle, the form, scope or legal basis of employment, other forms of engagement, or any other characteristic that may give rise to discriminatory treatment. The Company respects freedom of opinion, conscience and religion, as well as freedom of belief and expression. It recognises the value that employee diversity brings to the organisation. Each employee is personally responsible for upholding RADPOL PIPES sp. z o.o.'s principles of diversity and equal employment opportunity. Employees are required to treat others with respect and dignity and to contribute to an inclusive working environment in which everyone has the opportunity to realise their full potential. RADPOL PIPES sp. z o.o. is committed to implementing its diversity management principles and equal treatment policy and to promoting them among all Company stakeholders.

Workplace Health and Safety

RADPOL PIPES sp. z o.o. is committed to providing all employees with a safe and healthy working environment. Every employee is required to comply with applicable labour law and occupational health and safety requirements. For safety reasons, employees are strictly prohibited from using, possessing or distributing alcohol or illegal drugs, or from being under the influence of either, in RADPOL PIPES sp. z o.o. offices and production facilities. Employees are also prohibited from entering Company workplaces or offices after consuming alcohol, medicines, preparations containing ethyl alcohol, psychotropic substances, intoxicating substances, substitute substances or narcotic drugs. This prohibition applies whether entering Company premises for the purpose of performing work, during periods of leave or other absence from work, or outside working hours.

Every employee must perform their duties with due care for their own safety and the safety of their colleagues.

Fair Competition and Zero Tolerance for Corruption

RADPOL PIPES sp. z o.o. is committed to fair competition and takes steps to prevent bribery, illegal payments and corruption in accordance with the Company's Anti-Corruption Procedure.

Employees must perform their duties transparently and avoid any activity that could give rise to a conflict of interest. Offering or accepting financial or other material benefits in connection with professional duties is prohibited. In particular, employees must not offer bribes or unlawful benefits to suppliers, business partners, public officials or representatives of political parties in order to secure any transaction.

Employees must not use Company information or their position within the Company to obtain a personal benefit or to help others obtain one from opportunities arising through the Company.

Customer and Business Relationships

RADPOL PIPES sp. z o.o. is committed to customer satisfaction and responds to customer needs with openness and respect. Company employees continually develop their skills, competencies and qualifications and make every effort to ensure that the Company's products meet the highest standards and customer expectations. The Company is committed to continuous improvement in order to provide customers with innovative, high-quality products.

Environmental Responsibility

In conducting its business, RADPOL PIPES sp. z o.o. complies with applicable environmental laws and works to reduce the environmental impact of its operations by minimising the use of natural resources and the generation of waste from day-to-day activities. The Company promotes environmentally responsible practices among its employees through initiatives that encourage active participation in environmental protection.

Corporate Social Responsibility

The Company supports social initiatives through participation in volunteering and corporate social responsibility (CSR) activities.

Corporate Governance

The Management Board of RADPOL PIPES sp. z o.o. is committed to maintaining the highest standards of corporate governance throughout the Company. It takes particular care to ensure that material information is disclosed to the market accurately and in a timely manner. This is intended to foster constructive relationships with stakeholders, from investors to employees. The key objectives of the Company's corporate governance framework are:

- Transparency - presenting an accurate and reliable picture of the Company, its strategy and financial position;
- Building trust in relationships with stakeholders;
- Consistently building shareholder value;
- Ensuring access to information and equal treatment of all investors.

Questions, Compliance Monitoring and Review of the Code of Ethics

Employees may submit comments on the Code of Ethics or questions about the interpretation of its provisions directly to the Company's Office of the Management Board.

The Management Board of the Company is responsible for interpreting the Code of Ethics, monitoring compliance with it and overseeing its ongoing review.

The Management Board is responsible for approving and implementing any amendments to the Code.

Approved by the Company's Management Board on 26 February 2018; updated on 14 December 2022

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