

**CODE OF ETHICAL CONDUCT  
FOR SUPPLIERS  
28/10/2021**

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The Transsystem Supplier Code of Conduct describes the minimum standards of ethics and sustainable development for suppliers. It aims to promote and implement ethical values in the supply chain, especially in the case of the purchase of raw materials, but also materials or services.

It helps to implement the assumptions of international standards and guidelines, which include:

- The United Nations 2030 Agenda for Sustainable Development
- Universal Declaration of Human Rights
- Conventions of the International Labor Organization (ILO)

Transsystem is oriented towards conscious compliance with social, ecological and ethical standards. Its mission in this respect is to promote these standards not only among its employees. The Company expects its stakeholders to respect the values set out in this Code. Respecting the rules set out in it is an important criterion for the selection and qualification of Suppliers.

Transsystem requires Suppliers to operate in an ethical, honest and transparent manner.


### **Compliance with the law**

Transsystem makes every effort to conduct its operations with respect for human rights and international labor standards, treating them as fundamental and universal. It respects and implements the provisions of labor law and health and safety, and also ensures that all employees are treated in accordance with the applicable requirements. It prefers cooperation with Suppliers who maintain equally high ethical standards.

The Company pursues a sustainable procurement policy, in particular through:

- supporting and encouraging all customers and suppliers to be guided in their activities by the rules of ethics, social responsibility and environmental protection,
- building good partnerships with Suppliers, based on mutual cooperation, honesty and trust,
- conducting activities related to procurement in accordance with the provisions of national and international laws,
- selecting suppliers with the belief that only responsible practices in the supply chain can ensure the highest quality of the final product, while taking care of the environment, business ethics and appropriate work standards.

Transsystem requires suppliers to respect ethical laws and operate in accordance with the rules of fair competition. The Company does not tolerate any signs and symptoms of aggression, corruption, extortion or embezzlement. The cooperation of the Supplier with Transsystem must occur in accordance with applicable law.



### **Human rights**

The supplier provides its employees with an open and supportive working environment. Every employee has the right to equal treatment, respect for diversity.

The Company does not discriminate on grounds of: race, sex, origin, nationality, religious beliefs or lack thereof, age, disability, sexual orientation, gender or belonging to another legally protected category, worldview, external appearance, marital status. The Company expects its suppliers to respect human rights and treat employees with dignity and respect. This area covers the following topics:

- Non-discrimination - no employee may be discriminated against, harmed or excluded from the community,
- Child and youth work - it is forbidden to use children for work. It is allowed only on the basis of the provisions of the labor law in the field of apprenticeship,
- Fair treatment - manifestations of physical, mental, sexual violence, insulting employees, attempts to intimidate them and any other manifestations of inhuman treatment of employees are not tolerated,
- Remunerations and Allowances - Working hours shall not exceed the maximum level stipulated by applicable national law applicable to the Supplier's place of business. The remuneration is paid in accordance with the applicable national legislation on remuneration,
- Freedom of association - Supplier complies with applicable laws regarding the freedom of association or non-association of employees and the activities of trade unions. Suppliers do not take any negative actions or decisions in relation to people who belong to or are representatives of trade unions,
- Modern Slavery - Suppliers do not benefit from forced labor and do not tolerate slavery, servitude or human trafficking.

The same rights should be extended to all suppliers.

### **Conduct in business relations**

The Company expects all suppliers to act in accordance with the highest standards of honesty, integrity and impartiality in order to eliminate any conflict between their personal interests and the interests of the Company. Transsystem requirements in the area of compliance with the rules of business ethics cover the following areas.

**Conflict of interest** - We always act in such a way as to put the interests of the Company first and avoid even the appearance of a conflict of interest. For example, a conflict of interest exists if a management board member, employee, or close relative of an employee has a share in a competitor, customer or supplier's company.

**Corruption, extortion, bribery** - suppliers do not practice or tolerate any form of corruption,



extortion or embezzlement. Suppliers' cooperation with the Company must be in accordance with applicable law. Use of funds, property and resources of the Company for inappropriate or illegal purposes is prohibited.

**Fair Competition, Antitrust** - Suppliers conduct their business in accordance with the rules of fair competition and all applicable antitrust laws. In terms of competition, it is forbidden in particular to:

- divide territories or customers;
- conclude contracts and exchange information on: prices, cooperation regarding deliveries and their terms;
- exchange strategy on market strategy;
- conclude not only written but also verbal agreements;
- conclude contracts and exchange information on research and development plans.

**Privacy and Data Protection** - Suppliers keep confidential information safe and only use it appropriately. They ensure protection of privacy and intellectual property of both employees and their contractors. They guarantee the protection of personal data of employees and all their stakeholders.

**Whistleblowing and protection against retaliation** - Suppliers, to the extent possible, provide their employees and others with the opportunity to report any irregularities or violations through appropriate channels, while maintaining the confidentiality of reporting. Any retaliation against anyone who reports violations is unacceptable.

Suppliers should have resources to monitor risk in their organization on an ongoing basis and to undertake appropriate reactions and remedial plans.

### **Occupational Health and Safety**

Suppliers are required to provide their employees and associates with safe working conditions that meet the relevant standards and comply with all industry-specific standards. To this end, suppliers should comply with all applicable occupational health and safety regulations. Suppliers ensure that the rules on the storage and warehousing of hazardous materials are followed.

### **Waste and emissions**

Suppliers ensure that all obtained waste is transported and stored in such a way that soil, air and groundwater are not contaminated, and that they do not cause harm to people and animals, in accordance with applicable regulations.

Suppliers are expected to comply with current laws and regulations regarding the use, emission, storage, transportation and disposal of potentially hazardous materials, and try to take measures to reduce the risk of personal injury and environmental damage. Suppliers ensure that by conducting their business they meet all environmental standards in the field of generated emissions. Waste and emissions are continuously measured and controlled.



### **Air quality, water quality and consumption**

Transsystem expects its suppliers to comply with all applicable regulations and standards ensuring safe handling of air emissions, sewage and any other waste. Suppliers shall have systems in place to prevent or minimize accidental spills and emissions to the environment.

### **Climate protection, natural resources**

Suppliers use the natural resources of our planet in a rational and economical manner and conduct activities aimed at reducing energy consumption and reducing greenhouse gas emissions.

### **Responsible chemicals management**

We always consciously strive to minimize environmental impacts and to conserve resources. Suppliers ensure that they do not use materials that are generally recognized as harmful to the environment.

**Transsystem makes every effort to ensure that its suppliers act in accordance with the rules set out herein.**

Wola Dalsza 28/10/2021 .....

The rules of ethical conduct shall enter into force on 28/10/2021

Prezes Zarządu  
*Arkadiusz Grabski*

Członek Zarządu  
*Tomasz Duda*

