

THE BUSINESS ETHIC CODEX

The business ethic codex of Posiadalo Sp. z o.o. Company incorporates rules of conduct in the field of professional ethics and coexistence, it's also a **foundation for creating an honest and transparent working culture**. The main goal of the Business ethic Codex is to build the right working culture within the company and its surroundings. The Codex results from the mission and vision of Posiadalo Sp. z o.o. and is based on its values. All rules included in the Codex are applied to each worker of Posiadalo Company.

Each violation of the rules and conventions written in the Codex will be met with the most serious disciplinary consequence, including the possibility of being made redundant.



PRINCIPLE 1.

WE FOLLOW THE RULES OF VALUES AND ETHICS IN RELATIONS WITH OUR CONTRACTORS, BUSINESS PARTNERS AND EMPLOYEES

Based on our experience, together as employees of Posiadalo Sp. z o.o. We create Our company and introduce it to new markets. Collaboration is based on deep devotion, professionalism and reacting to newly introduced, innovative solutions, which help Our Clients to achieve success.

- Our work and performance are devoted to high quality and Our Clients' satisfaction;
- We are committed to impeccable, efficient and courteous customer's service, additionally through partnership ways of communicating that is based on our knowledge about the offer, we actively meet client's expectations;
- All Clients are treated likewise. We make promise that within our capabilities, we strictly respect our commitments, along with meetings, document transmission etc.;
- We instantaneously react to mistakes and misunderstanding, to which we admit and we do Our best to make amends;
- We are aware that Our Image and market position are determined by high quality, rapid response and quick decision making;
- We preserve Our clients' good name and provide information security during the process of collaboration. We respect the principles of information confidentiality in the scope of cooperation and information from the client. We protect Our clients' and suppliers' personal data;
- We apply the anti-corruption policy: we don't take any "gifts" from suppliers or any other partners, we don't get any material or financial benefit, we encourage our employees to inform of any conflict of interest, meaning a situation in which a private of one individual can in any way coincide with the company's business, the only exception are small marketing gifts given during a holiday time i.e. calendaries, pens, paper notebooks and things alike;
- All business transactions are transparent and reflected accurately;
- Falsifying or misleading are completely unacceptable in the global supply chain;
- In business collaboration we are guided by the principle of honest business conducting and fair competition - Collusion with other companies on the restriction of competition are entirely unacceptable;
- We are open to suggestions, requests, complaints from the business environment, i.e contractors, neighbors. We are at Your disposal in communication thanks to email: kodeksetykibiznesowej@posiadalo.pl

PRINCIPLE 2.

WE FOLLOW THE RULES OF VALUES AND ETHICS TOWARD EMPLOYEES

Posiadalo Sp. z o.o. Company creates clear working and employment conditions

- We don't use forced labor;
- We don't collect any form of payment from employees in respect of the employment;
- Every employee receives a written agreement in a language which one understands;
- Every employee has the right to terminate the contract legally and to receive compensation for hours worked;
- We don't employ children and minors (the minimum age of our workers is 18 years);
- The basic salary can't be lower than requirements of Polish law;
- We comply with daily and weekly working hours standards regarding Polish law;
- We respect the right of employees to choose their representative free from the pressure and fear, as well as the right of association.

Basic principles setting standards for the employees in the company:

1. Personal and professional ethics

We carry out work in an environment of good relations and respect. We create partnership relations based on openness, kindness and respect of personal dignity towards employees. Together, we care about principles of ethics, impeccable manners, which enhances operational effectiveness. We treat others like we would like to be treated ourselves. We strive for consistent collaboration, and in the event of possible conflicts we always seek professional settlements in a friendly atmosphere, with respect for different views. We never leave any unfinished matters to colleagues from the next shift and always help those who are overwhelmed with work. We react when the work performed by someone is done in a dangerous way.

2. Self-improvement, self and company's development

We strive for self-improvement and achieving, in work, the best possible results on the basis of one's credentials. We have the right to question and seek new solutions without fear of expressing or taking any critics from other parties. We share our experience and knowledge with other employees, we value their knowledge, credentials and views. Every employee has the right to share one's remarks or observations related to the factory functioning and conditions within. Each opinion is important. In the factory, special complaint and request boxes were installed, to which workers can submit them in the written form.

3. Equal opportunities, non-discrimination

All employees are treated equally in every way - everyone has the same chance to be promoted or access to training that increases professional competence, no matter the age, gender, marital status, nationality, race, sexual orientation, practiced religion, disability or political belief. Posiadalo Company doesn't discriminate any employees or applicants due to one's race, skin color, religion, ethnicity, nationality, sex, sexual preference, age, disability or political belief. That rule is applied to all people who have already been employed, as well as those who are applicants, and concerns the recruitment process, hiring training and promotions. All staff measures and company's sponsored programs are conducted without any acts of discrimination. Any forms of humiliation, persecution or harassment are intolerable, and each employee is obliged to condemn and report on any symptoms of discrimination or mobbing. In Posiadalo it is not acceptable to: take advantage of one's position to further own agenda, as well as violate other's personal property, humiliate, harass, use other forms of mobbing, spread false information, use any form of slander, sexual harassment, sexual abuse, corporal punishment, psychological as well as physical coercion.

PRINCIPLE 3.

WE TAKE CARE OF HIGH COMPANY'S ORGANIZATION CULTURE

Organization culture is a system of processes that consists of adopting and applying by employers and employees to social and cultural rules in the company. The organization culture mostly shapes behavior and attitude of the people in the company and influences relationships. In Posiadalo Sp. z o.o. Company, together as a team, we try to create a culture, which stimulates formulating the company's strategy and which is based on giving to the employees a sense of identity, which increases their commitment and strengthens the company's internal stability.

1. In Posiadło Sp. z o.o. Company we promote:

Partnership

In business activity we follow high ethical standards. It is significant that the relations that we have with Our Contractors, Clients, and among workers were based on honesty, coexistence and fair play competition rules. We develop long term relationships with Clients founded on trust, openness and benevolence.

Austerity

Every Worker is obliged to spend company's money in a smart and well-thought way, to optimize costs and take care of the company's finances.

Stability

Due to continuous pursuit of perfection and constant contact with our Clients, we can continuously keep track of customers' needs and meet their expectations, which makes us a stable business partner, as well as a reliable employer.

Innovation

We invest in employees' development, as well as in the most modern technologically-market-oriented research and equipment to create new, satisfactory solutions for the Client. Additionally, we continuously collaborate with scientific institutions, which allows us to implement innovation and new technologies.

Ambition

Our employees strive for self-improvement and to achieve the best results within the limits of one's: competence, abilities, knowledge and experience.

Quality Commitment

Our actions are directed towards meeting Client's expectations - we strive for ensuring maximum satisfaction of the product portfolio. In order to maintain and improve the quality we employ a team of professionals, which has the necessary knowledge and skills required to carry out its tasks. We rely on the personal responsibility of each employee for the quality of all executed tasks.

Proactive attitude

In order to keep up with the changing reality and to meet the requirements of the market, we invest in people and seek new technological solutions. We achieve that goal through a series of training courses, which raise employees' qualifications, they also translate into team engagement in creating the highest product quality, as well as seeking and implementing new technological ideas.

Loyalty and integrity

This is the rule, which we are guided by every day, acting in the defense and interest of Our company. This rule stems from confidence in the company's quality, sense of community, dignity, resulting from the previously made decisions or keeping a promise.

Environment protection

Out of concern for nature, we use environmentally friendly technologies, we also don't exceed the applicable standards in terms of environmental protection.

2. In the company we create an opportunity for an open dialog among employees of different levels, which is important for the corporate culture based on partnership, fellowship and honesty. We encourage employees of every level to raise any complaints and requests concerning working conditions, atmosphere, working condition improvement and concerning workflows. The people who submit the complaints are ensured to be anonymous.
3. We apply audits and assessments regarding all processes occurring in the company. For all affected by non-compliance, where you need to correct oneself quickly, the corrective action process is started. The shape of this process is influenced by all employees, who are affected by the non-compliance. All employees are free to make their conclusions and requests, after being assigned corrective actions, they are obliged to apply to them.
4. We expect self-assessment and discipline from each employee to apply to the principles of the presented codex.

PRINCIPLE 4.

WE CARE ABOUT ENVIRONMENT AND WORKING SAFETY

1. We apply environmental regulations:

- We observe worldwide standards, laws and internal regulations associated with environmental protection, we implement them in company's life and ensure that all employees comply therewith;
- We commit ourselves to comply with legal requirements and other requirements concerning environmental protection connected with conducting business activity at all stages of product development;
- We conduct business in such way to minimize detrimental effect on the environment without any compromise on the operation of the factory in the process of products' manufacturing and quality;
- We strive to protect the environment in all our business activities;
- We recycle and use our own resources with the purpose of recycling, additionally our products are produced using recycled materials.

2. We care for health and safety through:

- Assessments of hazards at the workplace;
- Familiarizing employees with the occupational risk assessment at all workstations, as well as regular risk assessment updates;
- Providing employees with the appropriate personal protective equipment adjusted to particular workplace hazards.
- Posiadalo's staff trainings and trainings for external companies' employees that provide services related to OHS on the premises;
- Equipping employees with workwear like clothes and shoes (adjusted to working and weather conditions);
- Performing regular maintenance of carry-on firefighting equipment and firefighting installations, as well as performing personnel evacuation drill in case of an emergency.

3. We care about collective protection measures, working environment, machinery and devices:

- We require to comply with safety regulations and OHS rules, order at the workstation and carrying for the working environment;
- At our plant we use labelling in accordance with applicable requirement standards, which allows employees identify danger and hazards at the workstation appropriately;
- We design machinery, devices and workstations in accordance with ergonomic and best practice principles.

USING THE MENTIONED ABOVE BUSINESS ETHIC CODEX, WE ALL CONTRIBUTE TO **CREATING A FRIENDLY WORKPLACE**, AS WELL AS **ESTABLISHING THE COMPANY'S IMAGE AND VALUE** AMONG MARKET CUSTOMERS AND BUSINESS PARTNERS.

Prezes
Łukasz Posiadło
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