



METALLURGY PLANT
„WSK RZESZÓW” Spółka z o.o.

CODE OF ETHICS

ISSUE III

Rzeszów - 2022

Zakład Metalurgiczny "WSK Rzeszów" Sp. z o. o. (hereinafter "ZM", "Company" or "company") delivers products to the Polish, European and United States markets. Growing customer requirements, efforts to maintain the developed position on the market and the need to acquire new customers require the Company to produce products of the highest quality, guaranteeing the fulfillment of customer expectations and requirements, as well as statutory requirements and regulations, while taking care of the natural environment, as well as work safety and employee satisfaction.

We consistently implement our plans through:

- continuous improvement of the Quality Management System based on the ISO 9001 standard and IATF 16949 specification as well as the Environmental Management System compliant with the requirements of the EN ISO 14001 standard,
- close cooperation with customers and suppliers,
- raising the awareness of the staff in the field of quality, health and safety and environmental protection.

The activity of ZM is based on the common awareness that responsibility for the quality of performed tasks rests with all employees.

Activities aimed at ensuring high-quality products and services, reliability towards contractors, employees and the environment prove the responsible approach to managing the Company and are one of the sources of its success. ZM is of the opinion that in all spheres of its activity it is also necessary to maintain basic ethical values. In conditions of strong competition, the Company cannot function in the long term without a favorable assessment of the environment and without compliance with ethical standards. The Company's reputation and trust in it is one of the Company's greatest values.

Therefore, ZM introduced the Code of Ethics as a set of basic values and methods of managing the Company, which are followed in the course of running a business under the applicable legal regulations.

The rules contained in the code apply to all employees, regardless of their position.

The introduction of the code confirms that ZM strives to maintain the highest standards of honesty and reliability in mutual relations within the Company and in relations with customers and suppliers.

This Code of Ethics has been approved by the Management Board, which undertakes to regularly assess compliance with the principles contained in the code and update its content on the basis of received conclusions.

The Management Board of ZM "WSK Rzeszów" Sp. z o. o

*Member of the
Management Board
Production Director*

Marek Tyńk



*Member of the
Management Board
Financial Director*

Maciej Perenc



*President of the
Management Board
Plant Director*

Władysław Jasiczek



ZM key ethical values:

TRUST

- respect for human dignity
- shaping proper economic relations
- the highest quality in all undertaken activities
- We treat our partners with respect, and relations with them are characterized by care for mutual interests

HONESTY

- clear definition of the rules of cooperation
- high quality of work
- fulfillment of a given word
- obeying the law
- impeccable behavior towards our partners (customers, employees, suppliers, subcontractors, government bodies, competitors) and the general public

RESPONSIBILITY

- conscientious fulfillment of obligations
- settling the set goals with the achieved results
- responsibility of the managerial staff for the team reporting to him

PROFESSIONALISM

- care for environmental protection
- transparent and effective control system.
- we take all risks with full awareness, prudence and discipline

DEVELOPMENT

- setting goals and their consistent implementation
- improvement in all areas of activity
- openness to changes

CLARITY

- clearly defined responsibilities for each position
- transparent relationships with partners

I. Taking care of the highest standards of work

ZM focuses on the efficiency and competences of its employees. By improving qualifications, we ensure an appropriate level of knowledge in the company, we support the individual development of each employee, we take care of providing relevant information and appropriate working conditions. ZM promotes teamwork free from any prejudices and consciously draws strength and values from the diversity of its employees. In return, it makes every effort to provide its employees with fair and regularly paid remuneration, development opportunities, interesting and ambitious challenges and safe working conditions. The company abides by the prohibition of the work of children under 15 years and adolescents, forced labor, modern slavery, corporal punishment, mental and physical coercion and insults, and prohibits sexual harassment, and recognizes the workplace as free from such practices.

The company's goal is to create a favorable working climate and opportunities for employees to honestly explain all issues regarding behaviors and decisions considered ethically reprehensible.

Privacy protection is another important element in ZM's activities, contributing to building trust and defining the rules for sharing information about individual persons. The basic assumption is that the Company collects and stores only the information about individual employees that is necessary for the conduct of the company's operations. Each employee has the opportunity to view a set of information about him. The use of personal data for other purposes is inconsistent with the accepted principles.

ZM respects and complies with international human rights standards and international labor standards, treating them as fundamental and universal.

Respects and implements the provisions of labor law and occupational health and safety, and ensures that employees are always treated in accordance with applicable ethical requirements.

Comply with the prohibition of discrimination on the basis of: race, social status, ethnic origin, religion, disability, disability, gender, sexual orientation, relationship or political affiliation, age or marital status. It guarantees freedom of views, conscience and religion as well as freedom of belief and expression.

At the same time, each employee should actively participate in the process of obtaining information, should strive to reconcile his own goals with the goals of the company and treat the latter as a priority.

We expect all employees and business partners to be guided by applicable laws and other authoritative guidelines in the country and abroad in making all business decisions and actions.

ZM respects the applicable law on the association and activity of employees in trade unions. Pursuant to the legal regulations, employees have the option of establishing or joining a trade union and the right to conclude collective bargaining.

II. Relationships with contractors

Our activities are focused on meeting the legitimate requirements and expectations of customers. We are able to meet the needs of the market thanks to close contact with the client, professionalism, innovation and an appropriate price-quality ratio of the services provided. We openly exchange information and experiences with our clients and ensure an appropriate degree of confidentiality and discretion.

We document all business transactions in a complete and impeccable manner, in accordance with the legal regulations and internal regulations in force in the Company. We do not keep any additional books or records. In addition, all employees involved in financial accounting and cost accounting are obliged to transparently prepare accounting documents in accordance with the actual state and taking into account the principle of cost truth.

1. Relations between the Company and contractors will be based on mutual trust.
2. ZM will provide good quality and solidly constructed products and services. The most important principles of ZM are: responsibility for customer satisfaction and respect and openness to their needs. ZM provides its customers with products of the highest quality, which is obtained as a result of high skills, experience and competence of employees, and makes every effort to ensure that the delivered products and services meet the highest standards and customer expectations.
3. ZM manufactures products based on materials purchased from approved suppliers who meet the requirements of ZM or from suppliers indicated from the customer, without the possibility of counterfeiting parts.
4. The payment for the provided service or delivered goods will be made on time and in accordance with the concluded contract.
5. The financial strength of the Company will be used in moderation.
6. The company recognizes that accepting gifts or other benefits by employees may create situations perceived as an attempt to induce people to offer some benefits in return for the donor. Therefore, the following rules should be followed:
 - do not persuade anyone to accept a gift, - do not give cash gifts, - reasonable, small gifts and hospitality may be acceptable if they do not cause any obligation on the recipient and can be reciprocated to the same extent, - inform your superiors about any received an expensive gift and the service rendered.
7. Information regarding the relationship between the Company and contractors should be treated confidentially. The company will keep confidential information obtained from the client confidential
8. In advertising and other forms of communication, the Company will avoid providing false, exaggerated or incomplete information.
9. The company will avoid practices aimed at increasing sales through any illegal marketing endeavors.
10. Any comments made by customers who are dissatisfied with the goods, services or behavior of employees will be considered with a sense of full responsibility.
11. The information we provide, especially to offices and the public, must be complete, impartial, accurate, objective, up-to-date and understandable in all respects.

III. Fair competition

1. ZM adheres to the principles of fair competition in the markets of the whole world, preventing bribery, illegal payments and corruption. The company competes fairly with its competitors and will not undermine their reputation.
2. ZM aims to ensure long-term positive mutual cooperation trust.
3. The selection of suppliers is carried out in accordance with the tender rules that are in accordance with the applicable legal regulations and the internal procedure for dealing with such cases. The Company considers all information about relations with suppliers confidential.
4. ZM respects diligence in settling its obligations and expects the same from its contractors.
5. The company will not try to obtain information about competitors by illegal means.
6. The company will not use restrictive commercial practices that are illegal.

7. Our employees or proxies may not take any actions that may in any way conflict with the applicable provisions of law, such as entering into any agreements with other enterprises or establishing specific methods of action aimed at preventing, limiting or distorting the activities of competition.
8. In dealing with competitors, employees will avoid situations that could allow the disclosure of confidential information about the Company.
9. Our employees cannot derive any benefits or help in gaining benefits from the opportunities that may arise as a result of using information or position in the Company.
10. At ZM, we actively work to avoid, neutralize or limit organizational conflicts of interest. We strive to eliminate unfair competitive advantages or role conflicts, which may compromise the ability to objectively assess the situation.

IV. International Business

1. The company undertakes to obey the laws in force in other countries and to respect the community living in it.
2. The company will respect the traditions and culture of each country in which it operates.
3. We also declare respect for good manners and existing social practices in a given country.
4. The company will act responsibly in the field of international trade, in accordance with agreements recognized by Poland.
5. The company strictly adheres to all international export control laws and regulations, and obtain licenses, export and import documents. Watch over the legality of your activity, especially export activity, checking its type, and whether the intended use or use of our products is not subject to restrictions or is not prohibited.
6. ZM does not conduct any transactions with persons or entities on the "black lists" and with the list of countries on which economic sanctions have been imposed.
7. ZM monitors suppliers in supply chains to identify sources of minerals and to support efforts to combat the use of minerals of such origins that contribute directly or indirectly to the financing of armed groups in the Democratic Republic of Congo or neighboring countries.

V. Occupational health and safety, natural environment and environmental awareness

1. Occupational health and safety - is an important topic at ZM. Responsibility for the safety created in the workplace applies to everyone, regardless of the occupied positions. ZM declares:
 - continuous improvement of the occupational safety and health protection in accordance with the applicable regulations in this regard, the law and standards;
 - constant improvement of methods of recognizing threats and preventing accidents at work and occupational diseases;
 - implementation of solutions reducing the nuisance of work;
 - improving the qualifications of employees and promoting attitudes of commitment in actions to improve working conditions.
2. The company will be guided by a high degree of responsibility in its activities natural environment.
3. ZM complies with legal regulations in the field of environmental protection, consciously limits the impact of its activities on the natural environment, minimizing the consumption of natural resources and the generation of waste resulting from its current operations.

4. The company is committed to protecting the environment and using natural resources in a way that is required responsible. In connection with the above, the Company will: - make every effort to ensure that: the production cycle, sewage management, waste disposal, emission of exhaust gases and noise meet the prescribed standards, - it will analyze the effects of each new project on the environment, - it will conduct regular environmental impact reviews.
5. The company also promotes an ecological lifestyle among its employees by conducting campaigns encouraging active participation in environmental protection.

VI. Links with the authorities and local communities

1. The Company will make every effort to be a socially sensitive economic entity, serve the community through activities beneficial to the Company and the community, and provide favorable employment opportunities and good working conditions.
2. The company will take into account the interests of the entire environment, trying to take into account both national and local interests.
3. The company should support the local community as much as possible. Potential charitable donations will be made under the rules established by the Company.

VII. Code implementation

1. This Code of Ethics does not constitute a legally binding obligation for the Company, neither nor does it authorize employees or other persons to make any legal claims, however, while constantly reviewing this Code and our behavior so far, we also evaluate our experience to be able to continuously ensure more and more consistent compliance with the principles and values contained in this Code.
2. The Code of Ethics introduces ethical standards that every employee of the Company should read.
3. The provisions contained in the code apply to the entire community of the company, every employee, regardless of their position.
4. Popularizing ethical principles is the task of every employee, regardless of their position in the organizational structure. Such an attitude will undoubtedly contribute to the constant growth of the work culture and organizational culture at ZM, thanks to which the individual and team results will be of better quality.
5. The company will monitor the compliance of its decisions and methods of operation with the principles adopted in the Code.
6. The Code of Ethics will be published on the intranet and on the company's website.
7. All our business partners can read the content of the Code of Ethics.

VIII. Reporting of irregularities

Reports regarding violations of the Code of Ethics or the occurrence of irregularities or abuse can be reported at www.zmwskrz.com.

At ZM, we guarantee that the person reporting violations will be treated with due respect, anonymity and will be covered by the available means of protection against potential retaliation.

ZM is committed to adhering to the high standards of business ethics and integrity contained in this Code of Ethics, but also expects all of its suppliers to conform to similar labor and ethical standards.

ZM expects confirmation from each supplier providing goods or services directly or indirectly to ZM that they will act in accordance with ZM's Code of Ethics.