



# **Code of Conduct for Suppliers of Inplag sp. z o.o.**

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Version 01

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## 1. Introduction

This Code of Conduct for Suppliers (hereinafter: "the Code") sets out the minimum requirements for ethical, social and environmental standards and respect for human rights that INPLAG sp. z o.o. (hereinafter: "INPLAG") imposes on all its suppliers, subcontractors, service providers and other business partners (hereinafter: "the Suppliers").

The purpose of the Code is to ensure that the cooperation between INPLAG and the Suppliers is conducted in a responsible and transparent manner and in compliance with the effective national law and international standards.

INPLAG attaches particular importance to the compliance with the principles connected with:

- respecting the human rights,
- ensuring decent working conditions,
- protecting the environment,
- counteracting corruption.

This applies to both own activities of INPLAG and those of all entities participating in the Company's supply chain. In this regard, INPLAG expects that each Supplier shall:

1. Read this Code and follow it in their business.
2. Take measures to ensure the compliance with the provisions of the Code throughout the Supplier's value chain, in particular in the Supplier's relations with further suppliers, subcontractors, service providers and other cooperating entities and persons.
3. Actively promote the ethical, social and environmental standards set out in the Code within their own organisational structures and among their business partners.

## 2. Compliance with the law

The Suppliers are required to comply with all applicable laws, regulations and standards under local and international law, in particular with regard to:

- human rights and working conditions,
- environmental protection,
- anti-corruption and anti-monopoly regulations,
- information security and personal data protection regulations;

In the event of any discrepancy between the provisions of this Code and the generally applicable law, the Suppliers are required to apply the more stringent requirements.

## 3. Human rights and working conditions

INPLAG recognises **the Universal Declaration of Human Rights** as a fundamental document shaping the ethical standards of business conduct and expects the same from its Suppliers.

The Suppliers of INPLAG are strictly required to respect the human rights in accordance with **the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights**, and other widely recognised standards, in particular by:



## Respect for human dignity

The Suppliers are required to respect the dignity, integrity and privacy of every person. All forms of **physical or mental violence, coercion, sexual harassment, bullying** and **corporal punishment** are absolutely unacceptable and constitute a gross violation of the ethical standards required by INPLAG.

## Prohibition of forced labour and slavery

All forms of forced labour, human trafficking and deprivation of liberty for the purpose of work are prohibited. The Suppliers are required to ensure that all persons working for and on their behalf do so voluntarily and are **free to leave their place of work** in accordance with the applicable law.

## Prohibition of child labour

The Suppliers are required to comply with the minimum age for employment as specified by international and Polish regulations in this area, in particular the guidelines of the ILO (International Labour Organisation).

In addition, INPLAG expects the undertaking of the measures preventing the use of children for any work that threatens their health, safety or development.

## Prohibition of discrimination and equal treatment

The Suppliers are required to ensure that the working environment is free from any forms of discrimination based on gender, age, race, ethnic origin, nationality, religion or beliefs, sexual orientation, gender identity, disability, political views or social or economic status.

Every person employed by the Supplier must be treated with respect and on an equal basis. When selecting business partners, INPLAG is guided primarily by their professionalism, reliability and compliance of the undertaken activities with ethical values. INPLAG does not discriminate against the Suppliers in any way. This applies in particular, but not exclusively, to the entities belonging to the groups that are under-represented in the business environment, such as:

- Minority Business Enterprises (MBE);
- Disadvantaged Business Enterprises (DBE);
- Veteran Business Enterprises (VBE) and Disabled Veteran Business Enterprises (DVBE);
- businesses owned or operated by members of the LGBTQ+ community;
- companies run by People of Colour (POC);
- and other entities managed by representatives of social groups with limited representation in the market.

The Suppliers are required to comply with the internationally recognised human rights, in accordance with the principles **of the United Nations Global Compact** and the guidelines of the **ISO 26000** standard on social responsibility in business.

INPLAG expects the following from the Suppliers:

- They shall respect and support the human rights, including the right to equal treatment and non-discrimination.
- They shall not become involved in or tolerate any form of discrimination, harassment, exclusion, physical, mental or verbal violence against employees, contractors or other



stakeholders.

- They shall actively promote diversity and equal opportunities in employment, regardless of ethnic origin, nationality, gender identity, age, disability, religion, sexual orientation, political views or social or economic status.
- They shall ensure that the working environment is free from prejudice and based on mutual respect, dignity and social integration.

Furthermore, INPLAG expects its Suppliers to apply **an equally open, inclusive and non-discriminatory approach** towards all social groups also within their **supply chain**, with taking into account the values of diversity and equality in their relations with further partners, subcontractors and suppliers.

### **Freedom of association and the right to collective bargaining**

The Suppliers shall recognise the employees' right to form and join trade unions and to engage in collective bargaining in compliance with the applicable national law and international conventions.

INPLAG does not accept any form **of repression, discrimination or retaliation** against the employees exercising these rights. The employees should be able to freely and safely express their collective interests.

### **Right to safe and decent working conditions**

The Suppliers are obliged to provide their employees with safe, healthy and hygienic working conditions. This applies to both the physical conditions and the employees' mental well-being.

INPLAG expects that the Suppliers not only meet the minimum legal standards but also take measures to continuously improve working conditions.

## **4. Environmental responsibility**

The Suppliers of INPLAG are required to conduct their business in an environmentally responsible manner, to respect the natural resources and to limit the negative impacts on the climate, ecosystems and human health. INPLAG expects its suppliers to be actively involved in the achievement of the sustainable procurement objectives by complying with the legal regulations in the following areas:

- emissions of pollutants into the air, water and soil,
- waste management,
- nature conservation and biodiversity,
- reporting obligations in the area of environmental protection.

### **Resource management and energy efficiency**

The Suppliers of INPLAG are required to use raw materials, construction materials, water and energy rationally, and to implement energy-saving and material-efficient technologies. They should reduce their consumption of fossil fuels, promote renewable energy sources (RES) and monitor and report their carbon footprint.



## **Circular economy**

INPLAG expects its Suppliers to take measures aimed at reducing greenhouse gas emissions, including but not limited to the following activities:

- strive to reuse the materials,
- use secondary and renewable raw materials wherever possible,
- reduce waste at every stage of production and assembly,
- implement design strategies that promote material optimisation.

## **Climate protection**

INPLAG expects its Suppliers to take measures aimed at reducing greenhouse gas emissions, including but not limited to the following activities:

- identifying the sources of emissions in their operations and supply chain,
- setting the measurable emission reduction targets,
- implementing the decarbonisation measures (e.g. energy-efficient machinery, low-carbon logistics),
- participating actively in the environmental and climate initiatives.

## **Protection of biodiversity and green areas**

The Suppliers should avoid the activities that lead to the degradation of green areas and areas of natural value. In particular, they shall:

- counteract uncontrolled deforestation, soil and water contamination,
- take into account the impact on fauna and flora when implementing the investment projects,
- undertake the compensatory measures (e.g. replacement planting),
- minimise the emissions of noise, vibrations, dust and the light pollution on construction sites.

## **Environmental management and continuous improvement**

INPLAG expects its Suppliers to have an environmental management system in place or, if they do not have one, to at least regularly train their employees in the scope of the environmental protection. It is important for INPLAG that the Suppliers monitor the environmental indicators and have an action plan in place in the event of environmental incidents (e.g. chemical spills). Each Supplier should actively cooperate with INPLAG to improve the environmental performance of the supply chain.

## **5. Ethics and integrity in business**

### **Anti-corruption and anti-bribery**

The Suppliers cooperating with INPLAG are required to strictly comply with anti-corruption rules and all forms of unfair influence on business decisions. It is unacceptable to offer, accept or demand any material or non-material benefits that could be considered a form of bribery or abuse. Any case that may raise suspicion of bias should be immediately eliminated. The Suppliers should implement the internal mechanisms to prevent such situations and regularly train their employees in professional ethics and compliance with the applicable anti-corruption regulations.

## **Fair competition and transparency of operations**

INPLAG requires its Suppliers to be fully transparent and to respect the principles of fair competition. The Suppliers should conduct their business in a transparent manner, respect legal standards and the equality of all market participants. Any anti-competitive practices, including price fixing, bid rigging or deliberate unlawful and unethical actions leading to the exclusion of other entities from the market, are prohibited. Ethical business conduct also means clear and honest communication with public administration authorities and all entities in the value chain.

## **Money laundering and terrorism**

The Suppliers are required to conduct their business in a transparent manner and in compliance with the applicable laws on counteracting money laundering and terrorist financing. It is unacceptable to take any action that could result in the legalisation of proceeds from crime or their concealment, or the transfer of funds, goods or resources to persons or organisations associated with terrorist activities. To this end, the Suppliers shall exercise due diligence in verifying the sources of funding for their business activities and the identity of their business partners, customers and subcontractors. It is required to pay particular attention to the transactions originating from high-risk jurisdictions or involving politically exposed persons (PEPs), companies with non-transparent ownership structures and payments made by third parties.

## **Sanctions regulations**

The Suppliers are strictly required to comply with the applicable national and international regulations on economic sanctions, embargoes, export controls and trade restrictions. This applies in particular to the regulations issued by the European Union, the United Nations, Poland and other relevant regulatory authorities in the area of goods and financial exchange. The Suppliers may not enter into any business relationship with any entities, natural or legal persons that are on official sanctions lists or conduct business in a manner that could result in a violation of trade, technology or financial embargoes. It is also unacceptable to circumvent the sanctions through intermediaries, chain transactions or fictitious third parties. To this end, the Suppliers are required to submit the relevant declarations regarding sanctions against entities and sanctions relating to goods and services.

## **Avoiding conflicts of interest**

INPLAG requires the Suppliers to identify and eliminate the potential conflicts of interest that could compromise their impartiality or adversely affect the relationships of INPLAG. It is required to immediately report and appropriately manage the situations in which the personal, family or financial interests of supplier's representatives may conflict with the business interests of the contracting authority. The transparency in this regard is the basis for the long-term and responsible cooperation that INPLAG strives for and values.

## **Protection of information and intellectual property**

The cooperation with INPLAG often involves the access to confidential data, technical documentation or commercial information. The Suppliers are obliged to maintain complete confidentiality and to protect the information entrusted to them from unauthorised access. This also applies to the compliance with the rules on protection of intellectual property belonging to INPLAG and to other third parties. All data must be processed in a responsible

manner, in compliance with the personal data protection regulations and industry standards for information security.

### **Personal data protection**

The Suppliers cooperating with INPLAG are required to comply with the national and EU regulations on personal data protection, in particular the provisions **of Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR)**. This includes personal data of customers, employees, contractors and other confidential information processed in the course of cooperation. The Suppliers are required to ensure the appropriate technical and organisational measures to guarantee the security, integrity, confidentiality and availability of data. Data processing should only take place within the scope and for the purposes clearly specified by INPLAG, and any activities beyond the agreed purpose of processing are prohibited.

### **Accuracy of documentation and reliability of reporting**

All documentation, invoices, declarations or reports provided by the Suppliers must be true and made in good faith. Falsification of documents, concealment of information or creation of a semblance of legality for dishonest practices constitutes a serious breach of ethical principles. INPLAG reserves the right to verify the data and to conduct the compliance audits which may also include the ethical elements and control mechanisms applied by the Supplier.

### **Social responsibility and reputation**

INPLAG expects its Suppliers to be committed to the principles of social responsibility, in particular by promoting an organisational culture based on respect for dignity, principle of equal treatment and honesty in professional relations.

The Suppliers are obliged to take measures aimed at preventing all forms of discrimination, abuse and unethical treatment of persons employed or cooperating within the scope of their business activities. The compliance with these principles is an integral part of the requirements effective at INPLAG and in commercial relations with INPLAG.

The Suppliers should conduct their business in a manner that does not damage their own reputation or that of INPLAG. The ethical policies and practices applied by the Suppliers should be consistent with the principles set out in this Code.

### **Responsible supply chain**

The Suppliers of INPLAG are required to conduct their business in a conscious and responsible manner, with taking into account the impact that their purchasing decisions and selection of subcontractors may have on people, the environment and the society throughout the value chain.

The responsibility for the compliance with ethical, social and environmental standards is not limited to the activities of a single organisation but also extends to direct and indirect suppliers, manufacturers of materials, raw materials and components. The Suppliers of INPLAG are required to:

- Actively identify, assess and minimise the risks related to human rights violations, environmental degradation, illegal employment, forced labour, corruption or failure to ensure safe working conditions at every stage of their supply chain.
- Take into account the risks in the regions with increased geopolitical, social or environmental risks, in particular those related to the sourcing of raw materials



from areas affected by armed conflict, poverty or violations of the rights of local communities.

The Suppliers are required to implement due diligence measures in their purchasing structures, of which:

- developing and applying the responsible sourcing policy,
- introducing the mechanisms for the assessment of suppliers and subcontractors,
- applying the contractual clauses which require the compliance with social and environmental standards,
- conducting the regular audits and trainings among their partners and personnel responsible for purchasing.

INPLAG expects the Suppliers to promote the principles of this Code in further links of the value chain and to commit their partners to comply with the standards in the areas of human rights, integrity, anti-corruption and environmental protection. If any significant irregularities are identified, they shall take immediate corrective actions and cooperate with INPLAG to eliminate the risks and prevent their recurrence.

## 6. Whistleblowing system

INPLAG promotes a culture of openness, accountability and transparency and therefore recognises whistleblowing mechanisms as an integral part of risk management, regulatory compliance and maintaining the highest ethical standards in the supply chain.

INPLAG is aware that not all entities are required to implement appropriate reporting procedures for violations. Nevertheless, being guided by the principles of ethics and business maturity, INPLAG **encourages all its Suppliers**, regardless of their legal obligations, to implement the **secure, confidential and effective mechanisms for reporting violations, irregularities, abuses or unethical conduct**.

These mechanisms should enable the whistleblowers to report without risk of retaliation, discrimination, repressions or any negative professional consequences.

The Suppliers who are legally obliged to do so should implement the internal procedures and ensure that the reporting channels are in place to allow for anonymous or named reporting of potential irregularities in areas such as corruption, human rights violations, threats to the natural environment, breaches of health and safety regulations, bullying, discrimination and other unethical behaviour, money laundering and other economic crimes.

INPLAG expects that every report shall be treated seriously and that the Suppliers shall take the appropriate **investigative and corrective measures** and shall simultaneously ensure the protection of whistleblowers.

## 7. Expectations towards Suppliers in relation to this Code. Consequences of violations

INPLAG treats this Code for Suppliers as a key instrument for the implementation of social, environmental and ethical responsibility in business relations. The Code is an integral part of business cooperation and sets out the basic standards of conduct and INPLAG expects

that they shall be complied with by all its Suppliers, subcontractors, service providers and other partners in the value chain.

The Suppliers are required to familiarise themselves with the content of the Code and to implement its provisions in their own operations, of which by establishing the appropriate internal policies, control procedures, employee trainings as well as risk monitoring and assessment mechanisms. INPLAG also expects that the suppliers shall actively promote the principles of the Code among their partners, including further subcontractors and suppliers, striving for their consistent application throughout the supply chain.

The Suppliers are required to maintain and document the compliance of their activities with the provisions of this Code. Upon the request by INPLAG, they should be prepared to present relevant documents, procedures and other materials confirming the compliance with the specified standards.

In the event of audits, compliance reviews or other forms of control, the Suppliers are obliged to:

- fully cooperate with the representatives of INPLAG or entities acting on its behalf,
- provide the necessary access to information, data and locations covered by the audit,
- ensure open and honest communication in the event of incidents, risks or doubts regarding the compliance.

In the event of a breach of the Code, the Supplier is obliged to immediately take corrective action and measures to prevent similar irregularities from recurring in the future.

INPLAG reserves the right to assess the severity of the breach and to apply appropriate remedial measures which – depending on the scale and nature of the breach – may include:

- issuing a written warning and a request to remedy the breach,
- suspending the fulfilment of orders or the cooperation,
- excluding the Supplier from future procurement procedures,
- terminating the commercial contract with immediate effect,
- reporting the matter to the relevant administrative or supervisory authorities.

The compliance with **consistent, transparent ethical, social and environmental standards** is the foundation of sustainable and responsible business relations between INPLAG and its Suppliers.

The detailed information on the policies, procedures and codes effective at INPLAG which all Suppliers should familiarise themselves with is available at:

<https://inplag.pl/compliance/>.

*The Management Board of INPLAG Sp. z o.o.*

