

Supplier Code of Conduct

The IGEPA POLSKA code of conduct for business partners

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Introduction

Igepa Polska Sp. z o.o. with headquarters in Krakow (IGEPA POLSKA) endeavours to manage and develop its business responsibly and sustainably throughout the entire supply chain. In its procurement activities IGEPA POLSKA pays attention to social and ecological aspects such as human rights, labour conditions, prevention of corruption, and protection of the environment, in addition to process-related, economic and technical criteria. IGEPA POLSKA is committed to ecologically and socially responsible business management. We expect our business partners to do the same. Therefore, innovation and sustainability – in addition to costs, quality and reliability - are crucial factors for IGEPA POLSKA when selecting and evaluating suppliers.

This “Supplier Code of Conduct” (SCoC) sets out requirements for all IGEPA POLSKA suppliers. The supplier undertakes to comply with the principles and requirements of this SCoC and to encourage their suppliers and/or subcontractors to comply with the standards and regulations set out in this SCoC.

In addition to applicable laws and regulations, the SCoC includes minimum standards for our suppliers and is an integral part of all contracts between suppliers and IGEPA POLSKA. If there are any discrepancies between the requirements set out by laws and regulations and this SCoC, or between the supplier’s own code of conduct and this SCoC, the supplier shall comply with the more stringent provisions.

This Code constitutes a model contract within the meaning of Article 384 of the Civil Code and an integral part of agreements concluded by IGEPA POLSKA with the supplier.

In addition to this SCoC, further requirements may apply to certain procurement categories. The SCoC is based on laws and regulations in force in Poland, as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guiding Principles for Children’s Rights and Business Conduct, the United Nations Guiding Principles for Business and Human Rights, the International Labour Standards of the International Labour Organization, and the United Nations Global Compact.

On the basis of the Code, IGEPA POLSKA, which is part of the IGEPA Group, aims to implement due diligence in its supply chain. As such, IGEPA POLSKA may exercise the rights described in the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz; LkSG) towards suppliers.

Definitions

A „supplier“ is a natural person or legal entity who provides goods and/or services to IGEPA POLSKA or provides goods and/or services on behalf of IGEPA POLSKA. The term „IGEPA POLSKA representative“ includes all legal and contractual representatives of IGEPA POLSKA.

Compliance with law and regulations and due diligence

The supplier undertakes to conduct their business in accordance with legal regulations. This is the crucial basic principle for economically responsible conduct. The supplier complies with applicable legal requirements and obligations.

In particular, the supplier must:

- Comply with all applicable national laws and regulations in relation to the respective contractual relationship.
- Demonstrate, through appropriate management systems, policies and guidelines, effective risk management, training and allocation of sufficient resources, their commitment to and compliance with the requirements of this SCoC or their own equivalent code of conduct as well as all other applicable laws and regulations. Measures taken should be adequate for the extent and nature of the supplier's business operation.
- The supplier undertakes to cooperate and provide support insofar as corrective and/or preventive measures in terms of the LkSG are to be implemented, even if IGEPA POLSKA is not obliged to apply them as an entity subject to the legislation of the Republic of Poland.
- Ensure that their employees and business partners, as well as other relevant stakeholders, have access to grievance mechanisms to confidentially and/or anonymously raise their concerns about potential misconduct in relation to the requirements of this SCoC. The supplier must also have procedures in place to address these concerns and to remedy confirmed cases.
- In case of doubt, the supplier must be able to demonstrate that they are in compliance with the respective standards of this SCoC.



Corporate responsibility and business integrity

In particular, the supplier must:

- Ensure that business decisions are made without any conflict of interest with personal concerns or other activities. Not tolerate corruption in all its forms in any way and never offer, accept or arrange bribes or non-monetary benefits with the aim of obtaining a contract or other advantage in commercial transactions.
- Avoid inappropriate business conversations that could improperly influence the outcome of business decisions.
- Not pay for travel or accommodation expenses of IGEPA POLSKA representatives. Gifts are only permitted in reasonable small amounts. Reasonable and socially adequate catering in connection with business events is permissible.
- Avoid conflicts of interest for the supplier and their employees without disregarding the legitimate business interest. Such potential conflicts of interest shall be reported to IGEPA POLSKA.
- Never participate in money laundering or the financing of terrorist or criminal activities, and comply with applicable trade sanction programmes. This requires due diligence before selecting a business partner.
- Compete fairly and in compliance with all applicable antitrust and competition laws without, for example, agreeing to price fixing, quantity fixing, market share or customer allocation, or sharing competitively sensitive information.
- Comply with relevant data protection acts and related regulations.
- Protect entrusted, confidential and sensitive information with due care and ensure secure electronic data processing - any IT-related risks must be identified and remedied, and inspections must be performed on a regular basis.
- Comply with all applicable rules and regulations relating to product safety as well as quality and due diligence requirements for all goods supplied such as devices, products, chemicals and services, including regulations established by IGEPA POLSKA as appropriate.



Health and safety in the workplace

In particular, the supplier must:

- Comply with all occupational health and safety requirements applicable by law, and provide a safe and healthy working environment for employees and visitors. All accommodation provided by the supplier shall be safe, comfortable and sanitary.
- Appoint a person responsible for occupational safety and health within the organisation.
- Take necessary steps - including appropriate monitoring, procedures, labour inspections, emergency plans and provision of safety equipment - to prevent workplace hazards and accidents.
- Monitor and record occupational safety and health (OSH) efficiency and hazards as well as report and investigate all OSH incidents.
- Ensure that personnel have received adequate OSH training, make an effort to raise awareness of health and safety issues among their employees and subcontractors, and ensure safety culture through transparent communication.



Human rights and labour rights

In particular, the supplier must:

- Respect internationally recognised human rights and perform due diligence with regard to human rights, avoid adverse impacts and remedy those where appropriate.
- Provide equal opportunity to all employees and not discriminate against anyone on the basis of ethnicity, gender, disability, sexual orientation, religious or political beliefs, or other such characteristics. This applies to interactions within the company as well as with business partners. IGEPА POLSKA expects the supplier to promote equal opportunity and prevent discrimination with regard to recruitment, promotion or training and further education measures. In particular, discrimination includes differences in income for work of equal value.
- Not tolerate physical, psychological, verbal or sexual harassment or abuse toward employees.
- The supplier shall respect the ban on child labour, in particular the ban on employing a child under the age at which compulsory education ends according to the law at the place of employment, and must not employ workers under the age of 15 (in accordance with ILO Convention 138 on child labour).
- Ensure that the employment of young people above the minimum age but below 18 years of age does not jeopardise their education, health, safety or morals.
- The supplier shall respect the ban on employing people in forced labour, all forms of slavery, slave-like practices, servitude or oppression in the workplace, including withholding of passports or other documents from employees.
- Follow ethical recruitment procedures and ensure that any recruitment agency working on behalf of the supplier does the same. Employees must be given written contracts of employment and no recruitment fees may be charged.



Human rights and labour rights

In particular, the supplier must:

- Respect the right of employees to organise, form and join (or not join) a trade union and negotiate collectively.
- Pay workers at least the statutory minimum wage and recognise their right to adequate remuneration. Overtime must be compensated at a premium rate or in accordance with national legislation. Wages and overtime must be paid regularly and directly to the employees.
- Stipulate reasonable working hours that comply with applicable laws and collective agreements. Overtime must be voluntary unless exceptions are permitted by collective agreements or similar contracts.
- Provide all employees with at least 24 consecutive hours of rest in each seven-day period, unless national regulations binding individual suppliers provide for more favorable conditions in this respect.
- Allow employees to freely enter and leave their workplace and any accommodation provided by the supplier.
- The supplier shall respect the ban on wrongful eviction and the ban on wrongful confiscation of land, forests and bodies of water when acquiring, developing or otherwise using land, forests and bodies of water, the use of which secures a person's livelihood.
- The supplier respects the ban on hiring private or public security personnel if the ban on torture is disregarded, life or limb are harmed, or the freedom of association is affected due to insufficient instruction or monitoring during the assignment of the security company.



Protecting the environment

In particular, the supplier must:

- Comply with the applicable environmental protection laws and environmental regulations. The supplier ensures all environmental permits are obtained and up to date, and are observed by their company.
- The supplier will use resources efficiently and ensure adequate operational monitoring to minimise adverse environmental effects. Depending on the industry, regular operational monitoring must be performed with regard to emissions and energy consumption, water usage and wastewater, raw materials, pollution as well as storage and handling of chemicals, hazardous materials and waste.
- Actively monitor greenhouse gas emissions from operations, comply with any reporting obligation, and seek to reduce them.
- Seek to promote and improve the circular economy in their business models, product design and operations.
- Identify the impact of their operation on biodiversity and act where necessary to protect biodiversity.
- Proactively prevent environmental incidents and ensure that appropriate preventive and corrective action can be taken to adequately respond to such incidents.
- Systematically address and communicate environmental offences and complaints to affected parties, including IGEPA POLSKA, if they may be affected.
- Provide - to a reasonable extent - environmental performance data as input for environmental assessments, product life cycle assessments and/or product declarations and labels when requested by IGEPA POLSKA.



Audit and contractual safeguarding

The supplier will allow IGEPA POLSKA or a third party authorised by IGEPA POLSKA to verify compliance with the requirements of this SCoC through dialogue, disclosure of information or, if deemed necessary by IGEPA POLSKA, a site visit. Such verification will take into account the supplier's interest in undisturbed operations, and will be in line with the supplier's legal and contractual obligations.

If IGEPA POLSKA determines that the supplier is not in compliance with this SCoC, IGEPA POLSKA shall indicate which issues need to be remedied or improved. The supplier shall then immediately take corrective action and provide adequate evidence of the respective remediation and/or improvements. IGEPA POLSKA reserves the right to cancel outstanding orders, suspend future orders and/or terminate the business relationship with the supplier if a breach of this SCoC is identified by IGEPA POLSKA or the supplier refuses or is unable to take corrective actions required by IGEPA POLSKA. IGEPA POLSKA reserves the right to cancel unfulfilled orders (withdraw from the contract) - upon a declaration submitted within 2 months of identifying the violation.

This applies notwithstanding any agreements between IGEPA POLSKA and the supplier of which this SCoC forms an integral part, ordinary and extraordinary termination policies, and shall not generate any claims by the supplier against IGEPA POLSKA.



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