

CODE OF ETHICS

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Introduction

The Code of Ethics has been established to define the principles of conduct at AK Spółka z o.o., aiming to enhance awareness among all employees and business partners. Its provisions are grounded in the commitment to uphold ethical standards and clearly defined norms of behavior in both professional and social interactions. Observance of these ethical principles fosters values that positively impact our relationships within the workplace and beyond.

The Code is designed to guide decision-making by highlighting key ethical standards and best practices in our professional activities. It also serves to prevent negative behaviors and practices, which often result from a lack of awareness.

Compliance with the values and principles outlined in this Code is expected from all employees, contractors, and business partners in the course of their daily work.

1. BUSINESS ETHICS

1.1. Anti-Corruption

- 1.1.1. We operate in an open, direct, and honest manner, complying with antitrust laws and fair competition standards.
- 1.1.2. Employees of AK Spółka z o.o. are not permitted to offer any financial or material benefits to current or potential business partners. It is also prohibited to solicit or encourage clients or suppliers to provide employees with gifts or favors.
- 1.1.3. AK Spółka z o.o. does not tolerate any actions that may be perceived as corruption or attempts at bribery.
- 1.1.4. Employees of AK Spółka z o.o. are committed to preventing corruption and are responsible for actively communicating the principles of the following anti-corruption policy in the course of their professional duties.
 - 1.1.4.1. All employees are required to report any circumstances that may affect their ability to perform their professional duties impartially.
 - 1.1.4.2. In the event that employees become aware of any corrupt behavior, they are required to preserve any potential evidence and notify the employer through their supervisor. If the matter involves the supervisor, employees must report directly to the employer.

- 1.1.4.3. When reporting instances of corruption, it is essential to maintain confidentiality regarding both the individuals reporting the incident and those involved.
- 1.1.4.4. In order to verify information regarding a reasonable suspicion of corrupt behavior and, if necessary, secure physical evidence, the employer conducts an investigation personally or through an authorized employee.
- 1.1.4.5. If a reasonable suspicion of corrupt behavior is confirmed, the employer takes appropriate action to impose disciplinary measures on the employee(s) whose involvement in corrupt activities has been verified.

1.2. Business Integrity, Advertising, and Competition

- 1.2.1. We act honestly and transparently in our relationships with clients, partners, and suppliers – we do not engage in fraud, unfair practices, or manipulation. We neither favor nor exclude any business partners.
- 1.2.2. We do not enter into prohibited agreements with competitors, set prices, or acquire confidential information unethically. All our employees comply with competition law and antitrust regulations – we do not discuss prices, commercial terms, or our know-how with competitors. We also ensure the accuracy of our communications and do not spread false information that could portray competitors in a negative light.
- 1.2.3. We expect our business partners to take full responsibility for their conduct to ensure fair competition.
- 1.2.4. Advertising of our products and services is accurate, truthful, and does not mislead customers.
- 1.2.5. Job advertisements contain accurate and truthful information about the positions offered, and employment terms – including salary levels – are clearly communicated to candidates during the recruitment process. The stated salaries are realistic, consistent with the offer, and in line with the company's policies – we do not promise conditions that cannot be met. The recruitment process is transparent, free from discrimination, and based on the principles of equal treatment.

1.3. Protection of Intellectual Property

- 1.3.1. We do not infringe on the intellectual property of others through unauthorized use, copying, distribution, or modification.
- 1.3.2. Intellectual property and confidential information must not be disclosed outside the company without prior authorization or consent from the employer.

1.4. Respect for Companies and People

- 1.4.1. We treat all employees with dignity and respect. Verbal abuse, psychological pressure, or physical coercion are not tolerated. AK Spółka z o.o. expects the same conduct from all its partners, both in cooperation and in interactions with other entities or individuals.
- 1.4.2. All discussions and negotiations are conducted with respect for conversational etiquette, understanding of different viewpoints, and consideration of cultural differences.
- 1.4.3. We recognize the emotions of others, demonstrate empathy, and respond in an appropriate and responsible manner.
- 1.4.4. We respect diversity and value its contribution to our daily work.

1.5. Data sharing control

- 1.5.1. Employees of AK Spółka z o.o. ensure the prompt and uninterrupted flow of information. To support collaboration, knowledge and information should be communicated immediately, completely, and without distortion.
- 1.5.2. Each of our employees uses only honest and lawful means to communicate and advance the company's interests.
- 1.5.3. Each of our employees is required to comply with data protection requirements, as well as legal regulations related to the safeguarding of information and the prevention of misuse of confidential, classified, or personal data.
- 1.5.4. Each employee is obliged to maintain trade and business secrets due to the specific functions they perform within the company.
- 1.5.5. We ensure that internal information is accessible only to individuals authorized to receive it.
- 1.5.6. We use communication systems, internet resources, and social media responsibly.

1.6. Conflict of Interest

- 1.6.1. AK Spółka z o.o. makes decisions regarding cooperation with business partners solely based on objective criteria, independent of personal interests or relationships.
- 1.6.2. We place great emphasis on ensuring that our employees do not engage in relationships with clients or external suppliers during the course of their professional duties that could result in biased decisions or a lack of objectivity.
- 1.6.3. Any employee who works for or provides services to other companies cooperating with AK Spółka z o.o. must report this in writing to the Human Resources Department. If a conflict of interest arises, such activity must be discontinued.

1.7. Accuracy and transparency of information

- 1.7.1. At AK Spółka z o.o., we place great importance on honesty, transparency, and integrity in record-keeping.
- 1.7.2. It is essential for us that all information we provide is accurate. Only then can we grow, learn, and build trust—both within the company and externally.
- 1.7.3. In particular, the following are strictly prohibited:
 - 1.7.3.1. Falsifying, modifying, destroying, or concealing any documents, records, data, or reports (whether in paper or electronic form) in order to hide information, distort the actual state of affairs, or mislead recipients.
 - 1.7.3.2. Deliberately providing false, incomplete, or otherwise misleading information in reports, declarations, certifications, or communications with clients, government authorities, business partners, or external institutions.
 - 1.7.3.3. Providing false or inaccurate information during audits, inspections, or controls, whether internal or external.

2. FORCED LABOR, CHILD AND MINOR LABOR

- 2.1. We respect fundamental human rights.
- 2.2. Any form of forced labor, including restricting freedom or threatening physical violence as a means of discipline or control, is strictly prohibited.
- 2.3. In the recruitment process, we comply with the minimum age requirements in accordance with national regulations.
- 2.4. Under no circumstances is the employment of children or minors permitted.

3. FREEDOM OF ASSOCIATION

- 3.1. We recognize the fundamental right of all employees to form trade unions and to elect their representatives.
- 3.2. We commit to sincere and trust-based cooperation with employee representatives, aiming to achieve a balance of interests.
- 3.3. In the event that trade unions are established, we will not apply any retaliatory measures against union representatives.

4. FREEDOM OF MOVEMENT

- 4.1. We respect the fundamental employee right to freedom of movement.
- 4.2. Any form of restriction on freedom of movement is strictly prohibited.
- 4.3. AK Spółka z o.o. does not withhold employees' passports, work permits, or any other personal documents.

5. EQUAL OPPORTUNITIES AND MUTUAL RESPECT

- 5.1. We promote a policy of equal opportunities and fair treatment. All decisions are based on merit, regardless of skin color, religion, gender, sexual orientation, status, origin, or level of ability.
- 5.2. We comply with applicable employment laws and expect all employees to treat each other with dignity and respect.
- 5.3. We do not discriminate against anyone on the basis of nationality, race, gender, religion, political affiliation, disability, sexual orientation, or any other reason.
- 5.4. We do not discriminate against anyone on the basis of religious beliefs. If necessary, the employer will provide appropriate facilities for religious practices.
- 5.5. Our principle is to recruit, employ, and support employees based on their qualifications and skills.
- 5.6. Our employees are prohibited from exhibiting any form of discrimination (e.g., harm, harassment, bullying, sexual harassment/exploitation) and are expected to engage in collaborative work based on mutual respect. We respect the dignity and privacy of others, avoiding situations that could place colleagues in awkward or compromising positions.
- 5.7. We maintain a culture of respectful communication, including electronic communication.
- 5.8. AK Spółka z o.o. bases its organizational culture on values and the individual needs of employees. The company provides opportunities for professional development and organizes training without discriminating against anyone.

- 5.9. We do not tolerate any form of workplace bullying, including persistent harassment, intimidation, or humiliation of colleagues. Every employee has the right to a safe work environment where they feel valued and treated fairly. All reports are taken seriously and handled confidentially, and the reporting individual is protected from any retaliatory actions.

6. HEALTH AND SAFETY

- 6.1. We comply with all applicable safety standards and regulations.
- 6.2. We are responsible for the safety and health of our employees. We ensure protection and a safe working environment in accordance with applicable laws.
- 6.3. By continuously improving the workplace, we aim to enhance quality, efficiency, and employee satisfaction. Each employee is responsible for their own health and complies with occupational health and safety regulations.
- 6.4. Safety and health are key values at AK Spółka z o.o. We always adhere to established occupational health and safety rules and regulations. Additionally, we consistently promote safe practices and avoid unnecessary risks for our employees.
- 6.5. We respond to employees' occupational health and safety needs and implement measures to improve the existing level of protection, taking into account changing work conditions. If necessary, the employer will provide appropriate rest facilities for pregnant employees and breastfeeding mothers.

7. SALARY AND BENEFITS

- 7.1. AK Spółka z o.o. respects legal requirements regarding the minimum wage.
- 7.2. AK Spółka z o.o. provides employees with detailed information about their remuneration.
- 7.3. Salaries and additional benefits are calculated and paid in accordance with applicable law.
- 7.4. AK Spółka z o.o. does not charge employees any fees during the recruitment process.
- 7.5. AK Spółka z o.o. does not deduct or impose any financial penalties from employees' remuneration.
- 7.6. AK Spółka z o.o. does not provide personal loans to employees and does not operate any savings programs beyond those required by law.
- 7.7. AK Spółka z o.o. may enter into loyalty agreements for the financing of training and studies aimed at improving employees' professional qualifications for a period not exceeding one year. The financing may not exceed 10% of the employee's base salary during the term of the agreement.

8. WORKING HOURS

- 8.1. AK Spółka z o.o. respects at least the minimum legal requirements regarding maximum allowable working hours.
- 8.2. The number of working hours, including overtime, complies with applicable legal regulations on permissible working hours and follows RBA standards, ensuring that total weekly working hours do not exceed 60 hours.
- 8.3. AK Spółka z o.o. adheres to applicable laws and standards regarding statutory days off.
- 8.4. AK Spółka z o.o. maintains a transparent and reliable system for recording working hours and remuneration.

9. RESPONSIBILITY FOR THE ENVIRONMENT

- 9.1. We operate in compliance with applicable laws, regulations, and permits related to environmental protection.
- 9.2. We are responsible for continuously improving our products to make them increasingly environmentally friendly. We utilize advanced and eco-friendly technologies. Each employee ensures that natural resources are used efficiently and responsibly, and that their activities minimize environmental impact.
- 9.3. The goal of AK Spółka z o.o. is to maintain the lowest possible environmental impact of our operations by preventing pollution, leveraging available resources and modern technologies, while considering both environmental and economic aspects.
- 9.4. Our production processes are designed to minimize waste generation, and waste segregation at the point of origin enables us to contribute to its reuse.
- 9.5. We manage chemicals responsibly by ensuring employee safety, minimizing environmental impact, assessing risks, and storing them properly.
- 9.6. Environmental protection is approached responsibly, with the goal of developing and promoting environmentally friendly technologies.

10. RESPONSIBLE SOURCING OF MINERALS

10.1 AK Spółka z o.o. does not source 3TG minerals (tin, tungsten, tantalum, and gold) from conflict-affected regions, including the Democratic Republic of Congo or neighboring countries. Accordingly, the company supports the development of the Responsible Minerals Initiative (RMI).

11. COMPLAINTS AND GRIEVANCES REPORTING

11.1. Any employee may report a suspected violation of laws or the Code of Ethics. Reports should be submitted through one of the following channels:

11.1.1 A discussion with their supervisor.

11.1.2 A discussion with a Human Resources representative.

11.1.3 An anonymous submission via the drop box located in the WP3 department, which is opened and reviewed at the end of each month.

11.2. The identity of the reporting individual will only be disclosed with their consent. For this reason, all communications are handled confidentially.

11.3. Each reported issue is forwarded to the CEO, who will decide on the course of action within 14 days..

11.4. A list of reported complaints and requests for a given month, along with decisions taken, will be posted on notice boards until the end of the following month.

11.5. AK Spółka z o.o. strictly prohibits any retaliatory actions against employees who report suspected violations of the law or this Code.

11.6. Any retaliatory actions must be reported immediately using the channels described in section 11.1.

12. AVARENESS AND AVAILABILITY OF THE CODE

12.1. We want every employee to be familiar with and understand the principles of the Code of Ethics.

12.2. All employees, regardless of their position within the organizational structure, have the opportunity to familiarize themselves with the values and principles outlined in the Code of Ethics.

12.3. Each supervisor ensures that employees in their area know and apply the Code of Ethics. We conduct training and require adherence to the Code's rules in daily work.

12.4. If questions or uncertainties arise regarding the application of the Code of Ethics, the first point of contact is the supervisor. Employees may also reach out to the Human Resources Department.

12.5. The Code of Ethics is available on the website www.ak.com.pl, on the intranet, and in the Human Resources Department.