

EXPOM S.A. is an experienced manufacturer of large-sized steel structures for various industries and one of the largest employers in its region. Due to the major scale of our operations, the way we carry out our business affects equally lives of hundreds of persons, the effective operation of other firms and organizations and the whole economy. This places enormous responsibility on us. Therefore, we pay special attention to issues of sustainability and responsible business. We follow the business strategy that is in line with interests of our environment and is based on the responsible use of resources.

We want to cooperate with Suppliers who understand and share our approach to responsible business and sustainability and aim at improving and developing their best practices in areas in which we set ambitious objectives for ourselves and that are essential for us.

This Code of Conduct establishes basic requirements for suppliers and business partners of EXPOM S.A. with respect to their duties towards their counterparties, employees and the environment.

The Supplier hereby undertakes:

I. Within social standards:

1. To follow statutory laws and secondary regulations applicable in relevant legal systems.
2. To ensure the protection of all human rights that are accepted by the international community by preventing any violations of human rights and avoiding any involvement in such violations; special attention should be paid to ensuring the respect for human rights with regard to especially vulnerable entities or groups, such as women, children and migrant workers as well as native communities.
3. Not to use slavery, servitude, enforced or compulsory labour or human trafficking and not to contribute to any of them.
4. Not to employ any personnel under 15 years old, and in countries that are subject to an exception set forth in the ILO Convention No 138 for developing countries – not to employ persons under 14.
5. Not to employ persons under 18 years old for hazardous work according to the ILO Convention No 182.
6. To respect the right of employees to organise themselves, including to recognise the right of employees to establish and join trade unions and to carry out collective bargaining; not to discriminate or favour members of employee organizations or trade unions.
7. To promote the equality of opportunities and ensure equal treatment of employees at a workplace and counterparties regardless of skin colour, race, nationality, ethnic origin, political affiliation, social origin, disability, sex, sexual identity and orientation, marital status, religious beliefs or age.
8. Not to tolerate any types of unacceptable treatment of individuals, such as mobbing, sexual harassment or discrimination, including with gestures, language or physical contact of sexual nature, coercion, threats, abuse or exploitation.
9. To follow all applicable regulations concerning working time all over the world.
10. To pay fair salaries for work and to follow all applicable regulations concerning pays and remunerations all over the world.
11. To follow all regulations of labour law.
12. To care for equal access to decent working conditions, both for persons employed under a contract of employment and persons who work for the supplier under another type of contract. A preferred form of employment in our chain of supplies is a contract of employment.

13. To manage personnel and a workplace in a responsible manner (e.g. ensuring the development of competences of employees, caring for safety at a workplace, life-work balance, etc.) and to determine one's objectives in this respect.
14. To provide one's personnel with access to a secure mechanism of reporting any violations of this Code of Conduct.

II. Within environmental protection

1. To follow applicable statutory and international standards concerning the environment. To minimise environmental pollution and continually improve conservation.
2. To regularly assess one's business in terms of its adverse affect on the environment and endeavour to prevent this risk.
 - a. To aim at setting objectives of reducing the negative impact of one's business of the natural environment (recorded, e.g. in the form of an environmental policy or another binding document).
 - b. To endeavour to acquire raw materials in a responsible manner and caring for the natural environment and/or to take account of environmental criteria in one's procurement decisions and to reduce the consumption of raw materials and natural resources, including water, and to manage them reasonably.
 - c. To minimise emission of greenhouse gases, including carbon dioxide, resulting directly and indirectly from the operations of the supplier, to an extent that is adequate to the scale and type of supplier's business.
 - d. To follow regulations that concern waste management.
 - e. To aim at minimising waste generation relating to one's business.
3. To ensure the proper management of generated waste, including the cooperation with authorised recipients of produced waste in order to minimise the risk of negative impact of waste on the natural environment.

III. Within ethical standards and management systems

1. Not to tolerate any forms of corruption or bribery and not to be involved, directly or indirectly, in any forms of corruption or bribery, and not to give, offer or promise any material benefits to public officials or counterparties from the private sector in order to influence official actions or obtain an unfair advantage. The above guidelines include giving or accepting facilitation payments.
2. Not to propose or accept any forms of hospitality or gifts that may affect unfairly or may create appearances of influence on business decisions of the Supplier or EXPOM, their clients or other persons.
3. To make sure that all reports, documents, and invoices are complete, accurate, present truth and do not misinform.
4. To follow domestic and international regulations on competition and not to be involved in price fixing, agreements concerning the division of market or customers or in bid rigging with competitors.
5. To avoid any conflicts of interest that might affect business relationships, and even situations that may give an impression of such a conflict of interests and/or disclose such internal conflicts and conflicts towards EXPOM. To inform of any and all potential conflicts of interest that occur between EXPOM and the Supplier or are related to a transaction otherwise. For example, if there is a personal relationship between parties of organizations involved in a transaction.
6. Not to facilitate, either directly or indirectly, money laundering or financing terrorism.
7. To process personal data in a confidential and responsible manner, to respect privacy of all persons and ensure effective protection of personal data and their use exclusively for legitimate purposes.

8. To ensure that any and all measures that concern personal data, e.g. their collection, registering, comparison, storage and deletion or combination of the above activities take place according to applicable rules and regulations.
9. To follow applicable regulations concerning export controls and customs regulations.
10. To ensure that products delivered to EXPOM S.A. do not contain any minerals or their derivatives that come from conflict regions that finance or bring benefits to military groups, either directly or indirectly.
11. To make reasonable efforts to ensure that employees and sub-suppliers follow the rules set forth herein.
12. To make payments in time and before deadline, except for situations where there is an actual dispute.

EXPOM S.A. expects that its suppliers will follow the rules of this Code. We count on that if any non-conformities are disclosed in actions of Suppliers to the standards presented herein, our Suppliers will take adequate corrective actions. Moreover, we undertake to support our Suppliers in raising the awareness of responsible business and sustainability. We believe that the adaptation by Suppliers to standards set forth herein will contribute to deepening our cooperation and reinforce the development of the business of EXPOM S.A. and our Suppliers.

revision date 24.09.2021