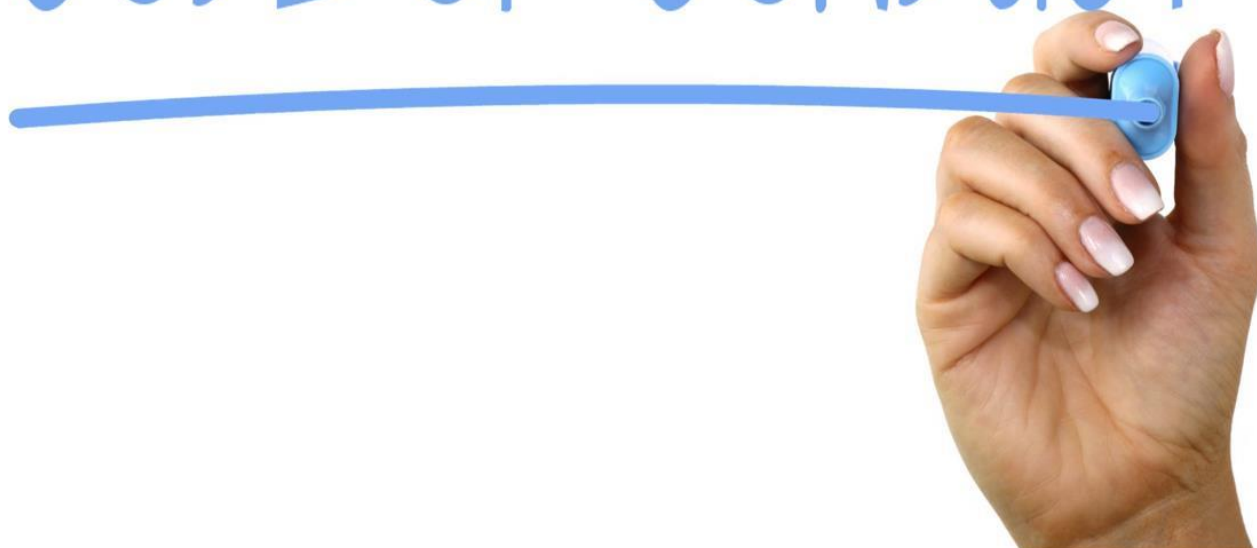


Zakład Budowy Urządzeń Dźwignicowych
ZBUD Sp. z o.o.
ul. Żabińska 6, 33-200 Dąbrowa Tarnowska

CODE OF CONDUCT



KODEKS POSTĘPOWANIA / CODE of CONDUCT

Spis treści / Summary

Cel spisania zasad **KODEKSU POSTĘPOWANIA** /

The purpose of writing the rules of Code of Conduct	3
1. Ogólne wymagania / General requirements	4
2. Przywództwo i współpraca w ZBUD / Leadership and cooperation in ZBUD	4
2.1. Osobista odpowiedzialność / Personal responsibility	4
2.2. Wzajemny szacunek / Mutual respect	4
2.3. Sprawiedliwe warunki pracy i prawa człowieka / Fair working conditions and human rights	5
2.4. Unikanie konfliktu interesów / Avoiding a conflict of interest	5
2.5. Obsługa środków / Handling of funds	5
2.6. Obsługa informacji i własność intelektualna / Handling of the information and intellectual property	5
2.7. Bezpieczeństwo pracy, zdrowie i ochrona środowiska / QHSE	5
3. Współpraca w ZBUD / Cooperation within ZBUD	6
3.1. Wybór dostawców / Selection of suppliers	6
3.2. Podrabiane części / Counterfeith parts	6
3.3. Odpowiedzialne pozyskiwanie zasobów / Responsible sourcing	6
3.4. Uczciwa konkurencja / Fair competition	6
3.5. Prawo konkurencji i antymonopolowe / Competition and antitrust law	6
3.6. Antykorupcja, Prezenty i korzyści / Anti-corruption, Gifts and benefits	6
3.7. Darowizny / Donations	6
3.8. Kontrola eksportu i sankcje / Export control and sanctions	7
4. Zgodność z KODEKSEM POSTĘPOWANIA / Compliance with the Code of Conduct	7
4.1. Naruszenie zasad / Policy violation	7
4.2. System Kart Doskonalenia BHP / QHSE Improvement Card system	7
4.3. Dane kontaktowe / Contact details	7

The purpose of writing the rules of Code of Conduct

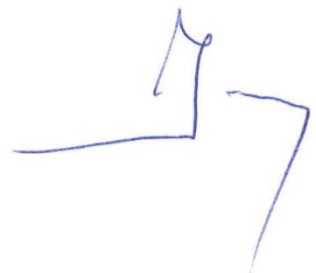
Bearing in mind the international scale of activities of the company ZBUD Sp. z o.o. we assessed the Code of Conduct and defined the basic rules and principles by which we work and by which we want to continue to develop in the future.

The Code of Conduct summarizes the high standards of the ZBUD company regarding our employees, our environment and also our external partners.

The Code of Conduct serves all of us, both management and employees, as guidelines in our daily work. It sets rules for each of us, and at the same time helps in responsible behavior, both externally in relation to our business partners and customers, and internally in relation to each other. Together, we are responsible for the image of ZBUD.

That is why we want to encourage all of you, our valued colleagues, to take the time to read the Code of Conduct and use it as a guideline in our daily behavior.

Yours sincerely



Ryszard Jędraszek

Chairman of the Board

1. General requirements

Our positive image and the trust of our customers, employees and society depend to a large extent on the behavior of everyone working in the company. Therefore, each employee is equally responsible for the adherence to the company's values and goals and for acting in accordance with their obligations and responsibilities.

It is for this reason that we need an appropriate set of rules and guidelines. This Code of Conduct summarizes the most important rules and guidelines that should be followed by all ZBUD employees.

We expect that all employees, without exceptions, not only adhere to internal rules, but also comply with legislation, avoid conflicts of interest,

2. Leadership and cooperation in ZBUD

We are convinced that the sustained success of our family business is largely based on a company culture built on values, and that each employee contributes to the company's success. We take our responsibilities very seriously and commit to upholding international human rights.

2.1. Personal responsibility

We expect all ZBUD employees to act in accordance with the legal requirements and guidelines of the company, and all managers are required to take the role of a role model. The personal dignity of each person must be respected and protected. All managers are required to prevent Code violations in the departments for which they are responsible.

protect ZBUD funds and respect tradition and values of the countries in which we operate or will operate.

We expect management, given their role as a role model, not only to communicate these principles, but also to lead by example and encourage employees to follow suit. This is the first form of contact for all questions and concerns related to the Code.

It is our responsibility to conduct all business transactions in an ethical and legal manner in order to create an environment where there is mutual trust, both with business partners and internally with our colleagues. In our opinion, this is the basis of long-term success and success.

Each employee must be clearly informed about this Code of Conduct.

2.2. Mutual respect

We do not accept any discrimination against our employees on the basis of sex, age, color, nationality, race, religion, social origin, disability or sexual orientation. As an internationally operating company, we work with employees of different cultures, mentality or nationality, and we are convinced that successful cooperation can only be realized with mutual respect and appreciation for each person.

2.3. Fair working conditions and human rights

We respect, protect and promote all laws in force to protect human and children's rights as

fundamental and general requirements throughout the world.

We comply with the law on working hours in the country concerned. We also comply with the minimum wage rules and provide all employees with fair working conditions in accordance with legal requirements. We reject any form of forced or child labor. Career development is based solely on the abilities, qualifications and achievements of each person. ZBUD respects the right of all employees to form and join an association to represent their interests as employees, to organize, and to bargain collectively or individually. We also respect any employee's choice to refrain from joining a union.

2.4. [Avoiding a conflict of interest](#)

We respect the privacy of our employees and their private life is not of our interest. However, a conflict of interest may arise in situations where an employee's private, social or financial activity is in conflict or potentially in conflict with the employee's loyalty to ZBUD. Such situations may arise, for example, in the case of cooperation or joint activities with other companies, with friends or family members in the same industry - crane design and construction. All business relationships that could expose the company to the loss of trade and design secrets should be avoided.

2.5. [Handling of funds](#)

We expect our employees to treat all tangible and intangible assets with respect.

These measures include: in buildings, real estate, vehicles, office equipment and skills patents, technologies and other information valuable for ZBUD that should be protected. All devices and equipment may be used for private purposes only with prior special permission.

2.6. [Handling of the information and intellectual property](#)

We require our employees to keep sensitive information, innovation and skills confidential and use them only for business purposes. They are the basis of our enduring success and may not be passed on or made available to third parties under any circumstances. The same applies to all personal data of ZBUD employees and business partners, in accordance with the applicable data protection regulations of the European Parliament and the EU Council. We respect the intellectual property of competitors, business partners and third parties.

2.7. [QHSE](#)

We are all responsible for the protection of people and the environment. It is our employees' responsibility to keep their place work in an orderly and safe condition, environmental protection and the economical and prudent management of available resources. All exceptions must be reported to the right supervisor. ZBUD cares about the highest standards of work safety, in accordance with internally developed procedures, even when the requirements in a given place are less stringent.

3. Cooperation within ZBUD

We strive to be a responsible partner, both in cooperation with our customers, suppliers and business partners, as well as within our company. In addition to our competence and the quality of our products, this also includes honest and transparent communication and compliance with our contractual obligations and relationships.

3.1. Selection of suppliers

We evaluate all offers from our suppliers fairly and impartially. The selection of a company and outsourcing of activities are strictly based on specific factors. We expect our suppliers to understand and respect our values. All contracts are negotiated in full and unambiguously, all subsequent changes or modifications are properly documented.

3.2. Counterfeit parts

The Supplier is expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, The Supplier shall provide notification to recipients of counterfeit product(s) when warranted and exclude them from the delivered product.

3.3. Responsible sourcing

ZBUD undertakes to use raw materials from legal sources and produced in a sustainable manner, and does not obtain minerals from regions affected by armed conflicts, which would contribute to financing these conflicts and violating human rights. In order to fully

comply with this obligation, ZBUD exercises due diligence in its activities and expects full support from its suppliers..

3.4. Fair competition

We adhere to the principles of fair competition and support the ideas of a free market and fair trade. All unfair practices are prohibited.

3.5. Competition and antitrust law

We expect each employee to adhere to the principles of fair competition and trade without exception in all countries where ZBUD operates or will operate. Therefore, it is unacceptable to conclude agreements with other companies that could affect competition. The same applies to the exchange of information regarding price, conditions, capacity, market shares, margins, costs and offer details.

3.6. Anti-corruption, Gifts and benefits

We do not accept any type of corruption, bribery, abuse or misappropriation. We take all our actions responsibly and honestly.

Any employee who is affected by the unethical behavior of customers or suppliers or vice versa will be held liable. There may be no benefits in any way related to requesting and receiving services and materials.

Gifts and invitations may only be accepted if their value cannot be considered to change your mind or behavior. Money gifts can never be accepted.

3.7. Donations

Various organizations and institutions ask us for donations. Each donation is subject to

approval by the president of the management board. The recipient and purpose of the donation must be known and judiciously thoughtful. The principle of disinterested action applies here.

3.8. [Export control and sanctions](#)

Export controls may impose bans, restrictions, government approvals, or other measures to monitor cross-border trade. It may concern the transfer of objects, technology as well as the

4. [Compliance with the Code of Conduct](#)

We expect all ZBUD employees to act in accordance with the legal requirements and the company's guidelines. Managers are encouraged to support employees in complying with the Code of Conduct. Any breach of the rules can lead to serious consequences for the entire company and, depending on its severity, is subject to labor or criminal law.

4.1. [Policy violation](#)

We believe all our employees make the right decisions and report any violations to the appropriate supervisor to resolve the issue on the spot in a constructive conversation.

Undoubtedly, however, there may be circumstances - especially if it is related to illegal business activity - where the problem needs to be resolved outside the immediate working environment. The following forms of contact are available for employees and third parties:

- ❖ Supervisor
- ❖ Management Staff
- ❖ Human resources department or finance department

transmission of information via e-mail or the cloud. In addition, doing business with Covered individuals or companies

sanctions is strictly prohibited, no matter what phase of the delivery process.

We comply with all laws relating to the import and export of goods, services and information.

❖ [System of Occupational Health and Safety Improvement Cards](#)

Employees who make good faith reports of any actual or perceived irregularities may not be discriminated against. If possible, ZBUD keeps the employee's personal data confidential.

4.2. [HSE Improvement Card system](#)

The system of HSE improvement cards enables anonymous reporting of irregularities on various levels of the company's operations. All reports are registered and considered once a month by the health and safety inspector and a member of the company's management board.

4.3. [Contact details](#)

Contact details:

Andrzej Wilk

vice president of the Board

Zakład Budowy Urządzeń Dźwignicowych
ZBUD Sp. z o.o.

ul. Żabieńska 6 33-200 Dąbrowa Tarnowska
nr telefonu +48 502 488 727

email: wilk@zbud.com.pl

www.zbud.com.pl