



Code of Business Conduct

I. Preamble

The present Code of Conduct applies to Spomasz Pleszew S.A., which is a recognized supplier in the field of machinery and equipment for the food industry and competence in the field of automation. Spomasz Pleszew S.A. stands for trust, reliability and sustainability. In this context, honesty towards partners also plays an important role for us.

We publish this code because we, Spomasz Pleszew S.A., want to comply with all relevant legal and ethical requirements as well as recognized environmental and social standards.

II. Scope

Spomasz Pleszew S.A. undertakes to comply with the standards set out in this Code of Conduct, as an expression of strengthening mutual business relations with our partners. This applies to each business partner with whom Spomasz Pleszew S.A. has direct business relations.

III. Human rights and fair labor conditions

We conduct our business in compliance with our business ethics, respect and promote internationally recognized human rights. We operate under the assumption that we do not violate or engage in human rights violations in any business dealings with our business partners and their suppliers. We therefore adhere to the following human rights, labor rights, conventions and standards:

1) Human rights

Wherever we operate, we comply with all applicable laws and respect internationally recognized human rights as set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

2) No child labor

We comply with ILO Conventions No. 138 and No. 182 and therefore do not use child labor. In particular, we do not employ children under the legal minimum age at any stage of production or processing. The permitted minimum age shall not be less than the age of completion of compulsory schooling, and in any case, shall not be less than 15 years. Employees under the age of 18 may only be employed if in compliance with the applicable provisions of law, e.g. regarding working hours and conditions, and observing educational and schooling requirements. Children must be not forced to engage in any other activities that may be harmful to their physical or mental health and safety. Accordingly, we do not accept child labor such as all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and forced or compulsory labor, including the forced or compulsory recruitment of children for use in armed conflicts, exploitation, procuring or offering of a child for prostitution, for the production of pornography, the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in relevant international treaties, work which, by its nature or the circumstances in which it is performed may harm the health, safety or morals of children.

3) Prohibition of forced labor

We recognize that forced or compulsory labor is prohibited. The term forced or compulsory labor means any work or service that is required of an individual under the menace of any penalty and for which the individual has not volunteered. We only use voluntary work and do not use forced, bonded or involuntary labor. Employees must be allowed to retain control over their identity and other official documents (e.g. passport, work permit or any other personal legal document). Employees are not required to pay fees or make other payments or incur any other debts during the recruitment phase and employment period in order to be or remain employed. Spomasz Pleszew S.A. is responsible for paying fees and payments that the employee incurs in connection with employment.

Any punishment, psychological and/or physical coercion is prohibited. Disciplinary guidelines and procedures comply with applicable laws and they are clearly defined and communicated to employees.

4) Prohibition of discrimination

We promote a respectful working environment. We do not discriminate or tolerate discrimination based on gender, race, religion, age, disability, sexual orientation, nationality or other characteristics protected by law.

5) Payment and working hours

We comply with national laws and binding industry standards regarding working hours, overtime, wages and salaries as well as other employer obligations. We pay our employees on time and clearly inform them about the rules of their remuneration.

Reductions of wages and salaries as a disciplinary measure are not allowed unless permitted by law.

6) Freedom of association and collective negotiations

Employees at Spomasz Pleszew S.A. have the right to freely decide to join or not to join a union, be elected to a union or appoint employee representatives of their choice, without fear

of being punished, threatened or intimidated. We recognize and respect the right to negotiate collectively under applicable law.

IV. Occupation health and safety

We strive to achieve a high level of occupational health and safety by choosing an appropriate approach to occupational health and safety management in our company.

Spomasz Pleszew S.A. complies with the applicable occupational health and safety regulations and ensures a safe and healthy working environment in order to protect the health of employees, protect third parties and avoid accidents, injuries and work – related illnesses. Employees are properly trained in the field of occupational safety regulations.

V. Anti – bribery and corruption

Spomasz Pleszew S.A. complies with legal requirements for combating corruption. We conduct our business ethically and in accordance with all applicable anti-corruption laws and we do not practice or tolerate any form of corruption. We must not promise, give or accept any bribes or illegal inducements to or from our own business partners. All our transactions are documented in accounting records, in accordance with applicable law.

VI. Prevention of money laundering

Spomasz Pleszew S.A. complies with all applicable anti-money laundering laws and regulations. We keep all financial records and prepare reports in accordance with international laws and regulations.

VII. Fair competition

Spomasz Pleszew S.A. complies with all applicable competition and antitrust laws. In particular, we undertake to refrain from entering into agreements or engaging in concerted practices that have as their object or effect the prevention, restriction or distortion of competition.

VIII. Environmental responsibility

Spomasz Pleszew S.A. promotes environmental responsibility and protection at every stage of production and processing. Spomasz Pleszew S.A. protects the environment and conducts its activities in an environmentally responsible manner. This applies in particular to resources and compliance with applicable laws in the field of environmental protection. The international environmental management standard ISO 14001 serves as a parameter for ecologically responsible business activities. All manufactured products comply with the laws and regulations regarding environmental protection at the place of production and in their market segments. This applies to the complete product life cycle and the materials used. We take

appropriate actions in accordance with this Code of Conduct to protect the environment. This includes identifying chemicals and other substances that are potentially harmful ones if released into the environment.

IX. Data protection

Spomasz Pleszew S.A. collects, uses and stores data in accordance with all applicable data protection and privacy laws. We respect all individuals' privacy and we do not re-identify or attempt to identify anonymous data. We ensure that any third parties we intend to contract to process or access personal data which we are responsible for, comply with all applicable data protection laws and provide an adequate level of data protection equivalent to that required by the EU General Data Protection Regulation.

X. Confidentiality

Spomasz Pleszew S.A. at all times treats all non-public information received from its partners, in the context of mutual business relationships, as confidential and takes all precautions that may be necessary to prevent the disclosure of such information to any third party. We exercise the same care and diligence that we use to protect our own confidential business information.

XI. Reservation of the right to amend the Code of Conduct

Some human rights, labor rights and related standards and ethical principles may be more at risk than others today. As a result, we may place more emphasis on some laws and standards in this document than others. However, as the situation and legislation may change, this Code of Conduct will be reviewed periodically and we reserve the right to change provisions set out in this Code of Conduct.

President of the Management Board

SPOMASZ Pleszew S.A.

Tadeusz Rak

