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|  | **KONSMET Sp. z o.o.**  ul. Lipowa 4, 77-133 TUCHOMIE  tel./fax. : +48-(0-59)-821-50-87  NIP : 842-14-33-686  REGON : 770879289  KRS: 0000987240 Sąd Rejonowy Gdańsk-Północ w Gdańsku  VIII Wydział Gospodarczy Krajowego Rejestru Sądowego  Kapitał zakładowy: 50 000,00zł BDO 000088320 |

### Ethics and Integrity Policy

Effective Date: 05.12.2022  
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#### 1. **Introduction and Purpose**

At Konsmet, we are committed to upholding the highest standards of ethics and integrity in all aspects of our business. This Ethics and Integrity Policy provides guidance on the conduct expected of all employees, contractors, and representatives of our company. We strive to build a respectful, responsible, and compliant workplace and to conduct business fairly and transparently with all our partners.

#### 2. **Core Ethical Values**

Our ethical values serve as the foundation for all company activities. We are committed to:

* Integrity: We conduct all business with honesty, fairness, and transparency and are committed to creating lasting, positive relationships with our partners. It is our belief that only robust and long term cooperation based on mutual trust can stand the test of time.
* Respect and Inclusion: We foster a culture of mutual respect, valuing diversity, and ensuring an inclusive work environment where everyone can contribute and feel valued.
* Responsibility: We take responsibility for our decisions, actions, and their impact on the company, our community, and the environment. We intend to affect our area in a positive way and to be seen as a contributor to our local community.

#### 3. **Conduct in Business Practices**

* Compliance with Laws and Regulations: We follow all applicable laws, regulations, and industry standards in every region where we operate. This includes our commitment to Conflict Minerals Regulations as well as ethical mineral sourcing standards.
* Confidentiality and Privacy: We protect confidential information related to our company, employees, customers, and suppliers, ensuring responsible data handling and respect for privacy at all times. The exact handling of confidential information may vary between suppliers and is most often specified in two-way confidentiality agreements.
* Conflicts of Interest: We actively avoid conflicts of interest that could compromise the integrity of our decisions. Any potential conflict of interest should be disclosed to management. Management makes conflicts of interests known to partners when they arise and before any partners are affected.

#### 4. **Anti-Corruption and Fair Dealing**

* Gifts and Hospitality: We allow the giving and receiving of modest gifts and hospitality in the course of business, provided they are reasonable, transparent, and not intended to improperly influence any business decision. In practical terms this allows for business dinners and souvenirs. Accepting items of significant value is, however, strictly forbidden.
* Bribery and Corruption: We do not tolerate bribery or corruption in any form. Our employees never engage in bribery, offer or accept kickbacks, or participate in unethical practices to gain or retain business.

#### 5. **Ethical Sourcing and Environmental Responsibility**

We are committed to ethical sourcing and sustainable practices, particularly regarding minerals and materials. Our sourcing practices align with ethical sourcing standards and conflict mineral regulations to ensure we avoid contributing to human rights abuses in supply chains. We expect our suppliers to uphold these same standards and perform our due diligence in this regard.

#### 6. **Reporting and Accountability**

* Open Communication: We encourage open communication and provide a secure and confidential way for employees to report suspected unethical behaviour. Concerns should be reported to our HR staff or company leadership. HR will forward such concerns to board members, who in turn will bring the matter before the board.

* Non-Retaliation Policy: We are committed to protecting employees from retaliation when they report concerns in good faith.
* Disciplinary Actions: We take violations of this policy seriously, and breaches may result in disciplinary action, up to and including termination, depending on the severity of the violation.

#### 7. **Continuous Improvement**

* Training and Awareness: as new values and requirements appear, we make sure that both experienced and new employees are briefed about our policies and comply to them. Our policies are available publicly on the company website.
* Policy updates: We review this Ethics and Integrity Policy regularly and update it as needed to ensure it aligns with evolving legal requirements, industry standards, and company values.

#### 8. Contact regarding this policy

Should you have any questions or suggestions regarding this policy, or would like to externally report a violation, please contact bartlomiej.sternal@konsmet.com.pl