

Code of conduct

Code of Conduct

STALKON

Sp. z o.o.



"We are committed to complying with our ethical principles and we stand for honesty running a business".

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Preface

Dear Colleagues,

Combining the company's operations with the principles of ethics is for us a key factor of long-term success and is part of the tradition of Stalkon Sp. z o.o. ..

This Code of Business Ethics contains the basic standards and principles that apply in our daily work.

This code applies to all employees of Stalkon Sp. z o.o.

The Code defines important standards of conduct regarding responsibility, proper behavior in the workplace, business and finance.

Responsibility and ethical behavior towards employees, customers, business partners, state institutions, society and the environment play a very important role in the value system of Stalkon. Violation of ethical and legal principles is not only contrary to these values, but also damages our reputation and can have serious legal consequences. People who act illegally and get rich at the expense of the company act to the detriment of all of us - shareholders, management and employees.

Such offenses reduce the company's income and limit its investment and development potential, and may even threaten the company's existence, and thus the jobs it guarantees.

Therefore, Stalkon Sp. z o.o. attaches great importance to ensuring the constant and continuous development of the company by complying with applicable laws and regulations and by creating conditions for employees that allow them to freely express their opinions on the problems that arise and to take specific actions to prevent violations of applicable standards and regulations.

Remember that each of us is responsible for observing the principles of ethical and proper conduct at work. We must be aware that each of us is personally responsible for our own actions and decisions.

The Management Board of Stalkon Sp. z o.o.,

Mariusz Złotucha
President
of the Management

Roman Andrzejczak
V-ce President
of the Management

Responsibility

Compliance with laws and regulations

Compliance with local, national and international laws and regulations in the course of conducting business activity is particularly important in Stalkon Sp. z o.o. All employees and associates are expected to perform their duties will comply with applicable law.

Employees and associates who have doubts as to whether a specific action or omission violates legal provisions are asked to consult with their supervisor or with the legal department within the company.

Human rights

We respect and protect the privacy, personal dignity and other rights of each of our employees, customers, suppliers and others with whom we do business.

We condemn all forms of forced labor and labor performed by children. We comply with applicable human rights norms and regulations,

justice at work, minimum wages and other employment conditions regulated by law.

Ill-treatment of employees and disregard for their age, gender, health, safety and employment rights are unlawful and will not be tolerated.

Environment, health and safety

We are committed to the responsible use of natural resources in the production and distribution of our products and services, and we are committed to delivering them without harming the environment.

To maintain a balance between our activities and the environment, we strive to use resources such as energy, water, materials and space in a responsible manner.

It is a matter of course for us to provide safe and healthy working conditions for all our employees. We attach great importance to a safe, healthy and risk-free workplace, which means that we must comply with relevant health and safety regulations and standards and apply preventive measures to eliminate potential hazards.

Product safety

We maintain partnership relations with our clients. Successes in our business are based on long-term relationships with customers. Therefore, we want to offer our clients the highest quality products and services.

The safety of our products and services is of fundamental importance to us. Under no circumstances may these products and services be defective or dangerous, or endanger the health and property of our customers or third parties.

Relations with state institutions

Our relations with state institutions and offices and their representatives are impeccable and transparent, and always legal. They are carried out as part of normal business activities (e.g. obtaining licenses / permits) or when responding to letters and official inquiries.

It is recommended that upon receipt of an official letter and before taking any action, employees immediately contact the company's management board.

Rules of behavior in the workplace

Dealing with company property, software and intellectual property

Each employee makes every effort to ensure that the resources at his disposal are used in accordance with their intended purpose and are not wasted. These resources include, among others corporate property, intellectual property rights and software.

We exercise extreme caution when collecting, storing, using and sharing personal data and always act in accordance with applicable laws and regulations.

Mutual trust and respect

We strive to ensure that in our company there is an atmosphere of mutual tolerance and respect, and we support the creation of various workplaces in which the unique value of each unit is recognized, where each employee is treated with due respect and in a fair and dignified manner.

Everyone has the right to just, dignified and complete respectful treatment. Any discrimination against employees, customers, contractors and suppliers will not be tolerated.

All decisions regarding recruitment, hiring, use disciplinary measures or promotions, as well as others

employment conditions must be undertaken without any discriminatory practice. Discrimination occurs when an individual or group of people is treated, whether intentionally or unintentionally, worse than others because of their race, ethnicity or nationality, sex, pregnancy or maternity, marital status, age, disability, religion, sexual preferences or other reasons. Discrimination includes the physical or verbal intimidation, harassment, humiliation and treatment of people in an offensive and disrespectful manner, which harms productivity and creates a work environment characterized by coercion, hostility or disrespect.

Freedom of expression

Most ethical and legal violations are detected and reported by employees. That is why we value an honest, open atmosphere in the workplace where anyone can submit critical views and comments without fear. This behavior should be encouraged as it helps to reduce the number of infringements and contributes to the detection and correction of irregularities.

Employees should feel that in the event of any problems related to the working environment, they can turn to their supervisor or management for help without fear.

Workers who report violations in good faith must be protected from potential reprisal and intimidation. It is absolutely unacceptable to intimidate such people.

Supervisors and management are required to be at the disposal of employees wishing to present a confidential matter, and are required to resolve it impartially and conscientiously.

Privacy and protection of personal data

We keep employees' personal information strictly confidential and believe that information relating to each employee and customer should be treated with equal respect and care.

We take great care in collecting, storing, using and sharing personal data (names, addresses, telephone numbers, birthdays, health information, etc. regarding employees, customers and third parties) and always act in accordance with applicable laws and regulations.

Confidentiality

Service and professional secrets must be kept confidential. These can be customer projects and documentation, records, reports, contracts / contracts, financial and personal data, investigations, lawsuits, intellectual property issues or new business plans. This restriction applies to confidential information recorded in any form (digital, printed, etc.).

due care in discussing confidential information in public places is considered a breach of the confidentiality rule.

Employees with access to particularly important information (financial, HR, legal, confidential information about other companies, etc.) must exercise discretion even when talking to their own colleagues.

Unauthorized and illegal transmission of information about the company or customers to third parties, eg competition and a lack of

This obligation also persists after the termination of the employment relationship.

Taking care of health and safety at work

All employees are expected to keep them safe and a healthy work environment. An indispensable condition in this regard is strict compliance with our health and safety regulations and practices.

Employees are obliged to immediately report any violations against these rules to their immediate supervisor or the HSE Inspector.

Business and Finance

Financial honesty

All business related transactions and documents must be prepared accurately and in a legal manner. Money laundering, theft, fraud, embezzlement and terrorist financing are absolutely unacceptable.

Money laundering occurs when natural or legal persons try to hide the profit of crime, terrorism or other illegal activities by giving them the appearance of legitimacy.

It is also forbidden to unlawfully use the company's equipment, proprietary information or trade secrets.

All transactions, assets and liabilities must be properly documented and recorded in accordance with the financial reporting guidelines of Stalkon Sp. z o.o.

Keeping reliable financial records means that they are prepared according to high quality standards, with high accuracy and a sense of responsibility in all sectors of the company's business activity.

Bills, financial documents, contracts and other company data must not contain any inappropriate or misleading information that has been manipulated, distorted or falsified.

Anti-corruption and anti-bribery activities

Corruption and bribery are related to the promise or demand of gifts or money to private or public persons in return for a favor, financial gain, illegal, formal or other gain.

We consider unlawful all forms of corrupt behavior, i.e. accepting and giving material and non-material benefits in order to obtain a favorable decision or obtain confidential information.

Each employee is obliged to inform the immediate supervisor about the attempt to award him benefits or about the benefits actually obtained.

An employee may give small and customary gifts in a given country to partners or their associates, as well as to other persons, e.g. on the occasion of the completion of a project and / or as a courtesy, as long as it is not against the regulations of a given country. Small gifts are considered small gifts whose value does not exceed EUR 50.

It is forbidden to give gifts in cash.

Implementation and monitoring

Responsibility of employees

All employees of Stalkon Sp. z o.o. are obliged to comply with the ethical principles included in the Code.

Employees are required to report to their supervisor any breach of the Code and any material circumstance related to its principles. In the event that the employee has good reasons, in order to omit his

supervisor, he should report to the President of the Management Board or the Plant Director.

Notices of violations of the Code can be made while maintaining anonymity and ensuring the confidentiality of the information. An employee or associate who in good faith reports a violation of the Code will not face any sanctions.

Management supervision

Board members will monitor compliance with the principles included in the Code of Conduct.

As part of the annual IMS Review,

the Management Board will present its observations and general assessment of compliance with the principles of the Code of Conduct in the Company.

Sanctions

In the event of an employee violating the Code of Ethics, the employer has the right to take the consequences. The type and extent of the sanction will depend on the degree of violation of the Code.

assessment. Violation of the rules will lead to taking appropriate steps, which may include termination of employment. Another possible consequence is a civil action including a possible claim for damages.

Reporting violations

All employees of Stalkon Sp. z o.o. and its other stakeholders have the opportunity to report on violations or on justified suspicions of violating the provisions of the Code.

In the event of a breach of the Code, we may report this fact:

- the direct supervisor or, if the employee has good reasons to omit

the supervisor, the Plant Director or the Management Board,

- send an e-mail to the following address: poczta@stalkon.com.pl,
- send the application by post to the company's registered office address,
- put it in a box hanging on the premises of the company.

Each application should contain the applicant's personal data and signature.