

**CODE OF ETHICS AND  
CODE OF BUSINESS  
CONDUCT OF  
RE ALLOYS**



This Code of Ethics and Code of Business Conduct (hereinafter the "Code") is a set of rules, guidelines and instructions that stipulate principles with respect to ethics and due diligence in terms of the business operation of the company.

All employees, mandataries, Management Board Members or holders of commercial power of attorney are obliged to abide by the Code.

Each of us is responsible for ethical, fair and lawful operation. Acting in compliance with law, ethics and internal regulations applicable at Re Alloys, we create a work place based on the social responsibility values.

### **BASIC VALUES WE FOLLOW**

In our everyday work, we follow the following principles that build a socially responsible, good work place:

- a) drive for self-improvement and achieving the best possible results
- b) knowledge and professional experience sharing
- c) caring for good working atmosphere based on collegueship, ethics and impeccable manners,
- d) caring for good social relations, observing generally adopted good behaviour rules, respect for rights, dignity and other personal interests,
- e) acting in compliance with law and all internal regulations of Re Alloys
- f) respect for disagreements.

Business operations performed by us are conducted in a transparent and reliable manner in order to build sustainability-based relations with our partners.

### **MANAGEMENT, SENIOR AND MIDDLE MANAGERS**

Management staff, senior and middle managers are obliged to define and observe ethical standards, build social relations based on respect for human rights and dignity. Management staff is obliged to set an example for subordinates, also for mandataries of Re Alloys. The above-mentioned people should be attentive to any kind of breach hereof and respond to reported irregularities. Management staff is also expected to build social relations based on trust, safety and professionalism.

### **EMPLOYEES, WORK ENVIRONMENT, HEALTH AND SAFETY OF THE EMPLOYEES**

The Re Alloys employees shall be treated equally in terms of employment conditions and shall have equal access to promotion and possibilities of enhancing their vocational qualifications.

Re Alloys respects the ban on child labour, discrimination, forced labour, corporal punishment, mental and physical constraint or insult, mobbing and sexual harassment.

At Re Alloys, it is forbidden to use professional status to achieve personal gains or violation of personal interest, also to divulge incorrect information.

At Re Alloys, no form of bullying, persecution and humiliation is accepted and anyone who has experienced such situation even once should inform management staff of this fact or report it in line with the procedure of reporting actual or potential breaches.

At Re Alloys, we observe the occupational health and safety rules, we follow rational use of raw materials and environmental protection principles.

## **RELATIONS WITH CUSTOMERS**

Each customer is equally important and with each of them we build relations based in fair conduct and professionalism.

Management staff and employees are obliged to maintain business relations in a manner compliant with ethics, respect and honesty and to impart true and fair information of the products' quality.

Imparting information in a misleading manner should be absolutely avoided.

## **RELATIONS WITH SUPPLIERS**

The headline target for building relations with suppliers is the transparency of measures taken at supplier selection, also the consistency of contractual provisions.

We oblige our suppliers to read this Code, the Code of Conduct for Suppliers, the General Orders Completion Conditions, and also to observe the provisions stemming from those regulations.

## **INFORMATION SECURITY AND DATA PROTECTION**

Caring for information security and protection of our employees' and counterparties' personal data are of key importance to us. Each employee, representative of management staff, also each of our counterparties and business

partners is obliged to abide by law in terms of security and protection of personal data and to observe provisions arising from confidentiality agreements.

Details in information security and personal data protection are set out in the Security and personal data protection policy and in the cybersecurity instruction.

### **PROHIBITION OF ACCEPTING AND OFFERING FINANCIAL GAINS**

Everyone who works for or cooperates with Re Alloys is obliged to read and observe the Policy on countering unfair practices. Hereby, we recall a few significant rules being of huge importance for building socially responsible business relations.

Due to their professional duties, the Re Alloys' Employees are subject to ban on accepting and asking for financial gains, in particular from customers and suppliers of Re Alloys, also from entities which seek to conclude a contract with Re Alloys.

Financial gains shall mean in particular cash, gifts, awards, credits, journeys, employment or service provided by customers, counterparties, suppliers etc.

Acceptance of a minor financial gain may occur only in case when the item has advertising or promotional nature or when it has little value, customarily handed at special occasions and does not oblige to reciprocity.

Due to performance of their official duties, the Re Alloys employees may not offer financial gains to counterparties, customers and other entities cooperating with Re Alloys, which the gains may have an influence on establishing the cooperation or on the conditions of the cooperation between the entities and Re Alloys.

Moreover, none of the Re Alloys Employees may, neither voluntarily nor under pressure, promise or give any financial gains to a state officer, in particular cash, gifts, awards or goods in-kind, regardless of its quantity or value, nor may they promise employment at Re Alloys in return for settling cases or favouring the interests of Re Alloys.

### **CONFLICT OF INTEREST**

The Employees have to avoid any situation which may bring a conflict between their personal interests (or interests of their family members) and the interests of Re Alloys, in particular they cannot and shall not allow for a situation leading to a conflict between the interest of Re Alloys and a private interest of the Employee.

At Re Alloys, it is forbidden to conduct, without the Re Alloys' consent, a competitive activity by the Employees, in particular in cooperation with companies competitive to the activity conducted by Re Alloys, meaning such an activity that in consequence interfere with the interest of Re Alloys (**conflict of interest**) or potentially may do harm to Re Alloys or pose a threat for the Re Alloys' image or interest.

Each employee is obliged to report an actual or potential conflict of interest, also to inform of their additional job that may cause a conflict of interest while working for Re Alloys.

### **COUNTERING AND PREVENTING CORRUPTION**

In order in particular to prevent corruption, everyone is obliged to read and observe the Policy on countering unfair practices.

At Re Alloys, there is an absolute prohibition of corrupt actions.

### **FINAL PROVISIONS**

Each employee, mandatary or a person having business relations with Re Alloys is obliged to read and adhere to this Code, also to refrain from any measures that could be detrimental to Re Alloys, could compromise its integrity, impartiality and image.

You should be aware that in case of committing an unethical act resulting in a financial loss or social and organisational ramifications for Re Alloys, the company may resort to available remedies or hold someone liable (upon civil or criminal code).

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