



**CODE OF  
CONDUCT**



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# OUR CODE OF CONDUCT

## 1. INTRODUCTION

PPH "PARYS" Sp. z o. o. (hereinafter referred to as PARYS) as an organization operating in accordance with the principles of social responsibility in business, it not only observes the law and internal regulations, but also acts in accordance with the following principles: **commitment and responsibility, sustainability, product safety and quality, orientation to customer requirements, openness and transparency.**

This Code of Conduct serves as a guide for us to conduct ourselves in accordance with our values and commitments. It helps us make responsible and ethical decisions in difficult situations. By adhering to the Code of Conduct and all laws, we earn the trust and respect of our customers, stakeholders, suppliers, business partners and colleagues.

We also expect our business partners, suppliers or other PARYS service providers to adhere to the general principles of ethical conduct and social responsibility in their operations.

We realize that this Code of Conduct does not and cannot cover every situation we may encounter in our work. However, we must always make sure that we understand the laws and policies that apply to our company and act according to the highest ethical standards even if a case is not specified in our Code of Conduct.

In connection with this fact, a Compliance Officer has been appointed. If you have any questions or doubts about the application of the Code of Conduct or in the event of its violation, we are at your disposal. Feel free to contact us via the following e-mail address: [compliance-office@parys.pl](mailto:compliance-office@parys.pl)

Piotr Parys

CEO





## 2. INVOLVEMENT AND RESPONSIBILITY

### 2.1 Conformity to the Law

Focusing all activities on law and order and regulations is a obvious matter for PARYS. However, decisions made in accordance with the regulations are not always unequivocal. Accordingly, every employee should reflect on the legality of his or her actions, and, if in doubt, consult the appropriate contact person.

The following questions may serve as guidelines::

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- Is my behavior consistent with the company's values and my own ethical values?
- Am I sure that I will not regret my decisions later?
- Do I have all the necessary information to make a decision?
- Can I honestly take responsibility for my actions?
- What are the consequences of my decision or lack of action?
- Do I have the freedom to make my own decisions or am I under pressure?
- Are my activities free from any conflicts of interests?

Non - compliance with the values and the principles established in this Code may harm employes, customers, suppliers, the enviroment and the company itself. This damage may be both material and non-material.

Compliance with laws and regulations is the responsibility of every employee. In cases where there is a direct conflict between the law and the principles contained in our Code, the law takes precedence.

### 2.2 Health and safety in the workplace

The priority of our activity is to ensure healthy and safe working conditions. Thanks to this, we can prevent potential accidents related to the performance of our duties. Employees are requested to be vigilant at their workplaces and use personal protective equipment.

In the case of finding any irregularities, each employee is obliged to inform their supervisor about this fact.

### 2.3 Respect for human dignity

PARYS supports the observance of internationally recognized human rights and respects personal dignity, privacy and personal rights. Every employee has a responsibility to ensure that general laws are respected.

PARYS protects and grants the right to freedom of opinion and expression. It does not tolerate any unacceptable treatment of employees, such as physical and mental abuse, sexual harassment or discrimination. This includes the following rules:

- prohibition of child labour, i.e. PARYS does not tolerate any form of child labour or exploitation of children and young people
- prohibition of forced labour, i.e. PARYS rejects all forms of forced labour. No employee may be directly or indirectly forced into work by force and/or intimidation.
- respect for freedom of association and collective bargaining.
- ensuring diversity and equal opportunities.







#### **2.4 Counter corruption**

PARYS does not tolerate any form of corruption. We ensure that all our employees and representatives acting on behalf of the company actively prevent bribery.

Any actions that are intentional or that could appear to influence decision makers by promising, offering or granting benefits, are not acceptable in our business relationships.

To do this, we screen all third parties with whom we have a business relationship or from whom we receive services.

#### **2.5 Gifts acceptance procedure**

We consider it inappropriate to give or accept gifts as part of business relationships. However, there may be occasions when we are offered a small gift or invitation as a courtesy gesture. Then you should listen to your common sense and consider whether the person giving you the gift does not want to influence the decision we make.

Giving or accepting gifts is only acceptable if they are of moderate value and are a courtesy gesture consistent with general business etiquette. We do not approve of giving cash, gift cards or shopping cards.

#### **2.6 Advisers, service providers**

When external advisers or service providers are used, it is easy to create the impression of corruption due to the remuneration paid. PARYS prevents such activities. Only services actually performed can be remunerated. The remuneration must be commensurate with the service or consultancy work provided.

#### **2.7 Authorities representatives contacts procedures**

There are generally transparent guidelines when dealing with government representatives around the world. PARYS performs only services agreed on in the Contract.

#### **2.8 Donations and sponsorship**

PARYS does not make direct or indirect donations to political organizations, political parties or individual politicians. Exceptions to this rule should always be discussed with the Board. Sponsorship and donations to other non-political recipients must comply with the provisions of this Code of Conduct.

#### **2.9 Fair competition and antitrust law**

PARYS complies with national and international competition and antitrust laws.

It does not participate in price fixing, market or customer allocation. It is prohibited to apply practices against the law and/or connected with crime such as rigging tenders with the violation of the law which exclude or limit competition, price agreements, illegal division of regional markets or customers.

#### **2.10 Preventing money laundering**

Money laundering occurs when money or other property derived directly or indirectly from crime is put into the legal circulation of the economy, making such money/property appear legitimate.

Liability for money laundering does not depend on whether the perpetrator was aware that the money would be laundered through a legitimate transaction or bank transfer. Participation in money laundering can lead to severe penalties for all parties involved.



Therefore, PARYS maintains relations with reputable business partners whose economic activity is compliant with the law and whose financial resources are of legal origin.

We carefully check the identity of potential customers, business partners and other third parties. We also take comprehensive measures to ensure the transparency of our business relationships.

In addition, the company introduced an ordinance on the introduction of a policy on counteracting money laundering and financing terrorism.

### **2.11 Protection of information and intellectual property**

Confidential information and intellectual property with individual and specialized knowledge are among our most valuable assets. For this reason, we make every effort to protect these assets and respect the intellectual property of others.

In communication with external partners (suppliers, contractors, customers), only information necessary for this cooperation is provided. We meet the requirements of applicable law regarding the protection of business secrets. We conclude confidentiality agreements with external partners.

### **2.12 Data protection and cyber security**

We comply with all applicable information protection and cybersecurity policies, requirements and guidelines. We protect the data of our employees, customers, suppliers and other business partners.

Data processing at PARYS is limited to information required for business operations. Confidential information is not shared on public platforms. It is collected, stored and protected in a confidential and transparent manner,

only for predetermined purposes.

### **2.13 Foreign trade and export control**

The PARYS company complies with legal standards regarding foreign trade and export control - in particular, licensing requirements, export bans.

Employees are required to check the country's export regulations before deciding to import or export goods. If in doubt, seek advice from the competent authority.

### **2.14 Compliance with tax regulations and financial reporting**

We comply with all legal requirements and tax regulations to ensure proper accounting and financial reporting.

In addition, we make every effort to ensure that our records accurately reflect the nature of the transactions and events they document.







### 3. SUSTAINABLE DEVELOPMENT

#### 3.1 Pro-ecological and pro-environmental policy

Environmental policy is one of the most important goals of our company.

We operate in accordance with applicable laws and are guided by international standards, such as ISO 14001 Environmental Management System, to minimize negative effects on the environment. We are constantly improving our activities for the protection of the environment and climate in the dimension of our company. We regularly set environmental goals.

Care for natural resources, reduction of waste and reduction of emissions to the natural environment are the directions we set for ourselves in accordance with our environmental policy.

In the phase of design, production and analysis of the complete infrastructure, we take measures to reduce the consumption of energy, raw materials and other natural resources.

Waste, waste materials, emissions, excessive noise levels, sewage and other environmental pollution are kept to a minimum.

#### 3.2 Supply chain

In accordance with the principles of sustainable development and the Code of Conduct, PARYS expects its suppliers to comply with applicable law and recognized international environmental, social and corporate governance standards, so that their activities are compliant with ESG (Environmental, Social and Corporate Governance) standards .

They are based on the ten principles of the UN Global Compact initiative:

##### Human rights

1. Promotion and observance of human rights accepted by the international community
2. Elimination of all human rights violations by the company

##### Work standards

3. Respecting freedom of association
4. Elimination of all human rights violations
5. Abolition of child labour
6. Effectively counteracting discrimination in the field of employment

##### Natural environment preservation

7. A preventive approach to the natural environment
8. Undertaking initiatives aimed at promoting the attitude of ecological responsibility
9. Use and dissemination of environmentally friendly technologies



### Counteracting corruption

10. Combating corruption in all its forms, including extortion and bribery

In addition, we encourage our suppliers to enforce this standard in their supply chains.

Suppliers may adopt these principles or express their commitment by adhering to their own code of conduct.

In the event of any doubts as to the supplier's compliance with the above-mentioned ESG standards, we will take appropriate steps regarding our mutual relations.

In case of any doubts regarding illegal or improper conduct, please contact us via the following e-mail address: [compliance-office@parys.pl](mailto:compliance-office@parys.pl)

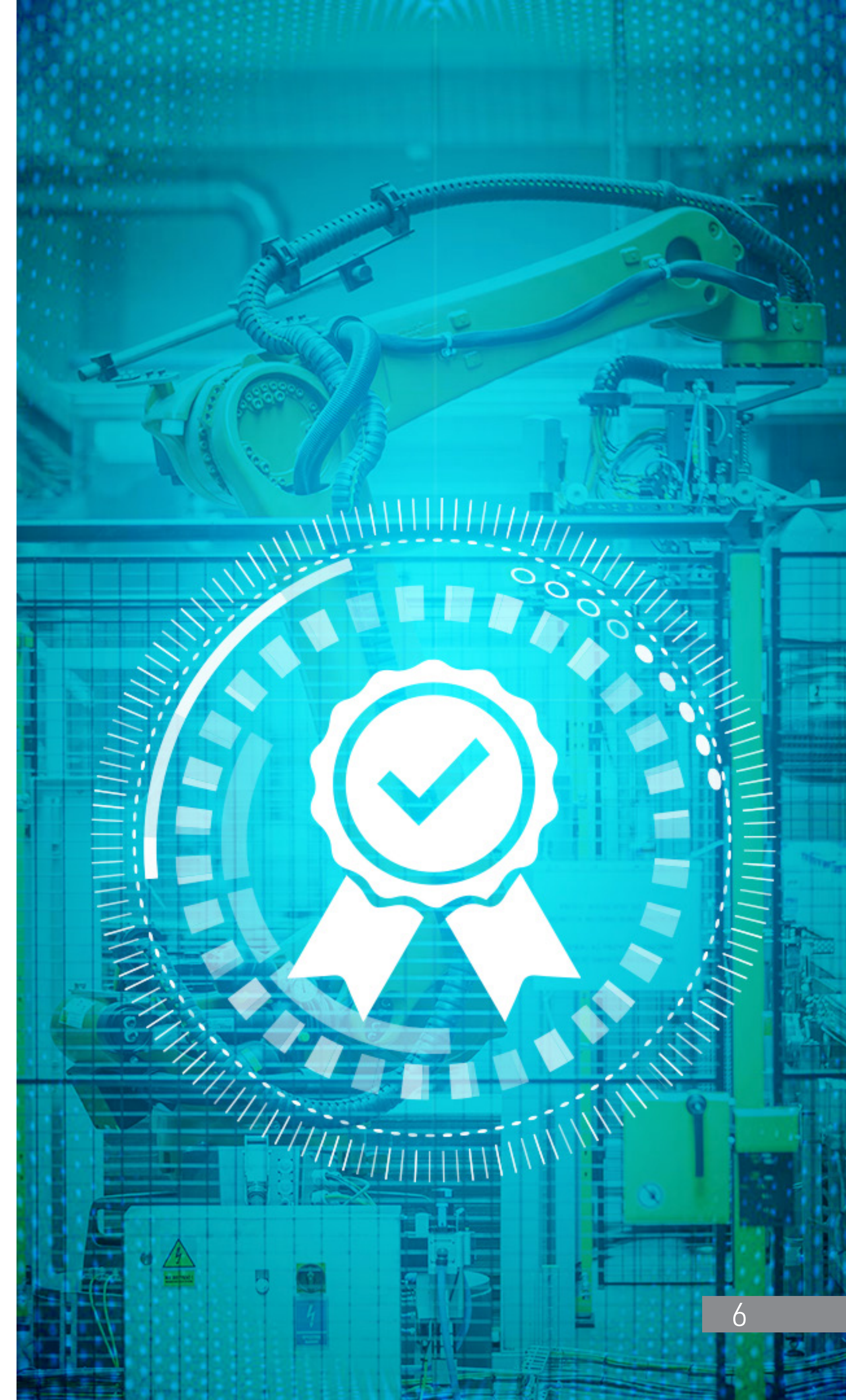
## 4. SAFETY AND QUALITY OF PRODUCTS, FOCUS ON CUSTOMER REQUIREMENTS

### 4.1 Product safety and quality

The PARYS company pays absolute attention to the safety and quality of products, which depends on the overall work of employees at every level. Thanks to this, we are able to meet the requirements of our customers.

### 4.2 Consumer Interests/Complaints Management

Customer needs are at the heart of PARYS' business activities. We know our customers and offer them individual solutions tailored to their needs. We take complaints seriously and consider them with commitment.







## 5. OPENNESS AND TRANSPARENCY

### 5.1 Freedom of association and the right to collective bargaining

The statutory right of employees to form, join and act in associations or organizations to promote and protect the interests of employees is permitted at PARYS.

The performance of work must not be disturbed in this process. The employer and employees' elected representatives should work together in a spirit of trust and in the best interests of all.

### 5.2 Equal treatment and non-discrimination

One of PARYS's strengths is the diversity of its employees. Each of them is open and tolerant in dealing with others. Employees and candidates are treated equally within the meaning of the general law on equal treatment, regardless of: gender, age, ethnic origin, sexual orientation, religion, belief, any disability/impairment.

### 5.3 Conflict of interests

A conflict of interest occurs when an employee's private interests interfere with the interests of the company, or there is a possibility that they will.

If employees pursue their personal interests and do not disclose them, or if they put their personal interests ahead of those of PARYS, this can cause harm to the entire organization and call into question its integrity and professionalism.

All employees are obliged to take care of the good of the company. We

believe that they make their decisions solely on the basis of objective criteria and are not guided by personal interests or professional considerations. In addition, we apply the rule of 4 eyes.

### 5.4 Documentation

Each employee should document their work in such a way that it is understandable to other employees and can be continued by them. In the course of work, business documents of significant value to the company are regularly created. Comprehensive and permanent documentation is also required to prove PARYS's integrity. In addition, there are legal requirements for data retention obligations.

### 5.5 Authority of representation and authority to sign

For the sake of good business relations with partners and for your own protection, PARYS should always be duly represented. Only the Management Board and Proxies have the right to sign agreements/ contracts and reports. For this reason, each employee must check their eligibility before signing any documents.





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