



Together we create **Grenevia**

Code of conduct for the business partners of Grenevia Group Companies

Together, as business partners, we are committed to the following principles to guide our conduct, affect the reality around us, and support the creation of long-term value for our businesses.

The Grenevia Group Companies' Code of Conduct is designed to define expectations of suppliers and help them understand what ethical and quality standards they must meet. Our business partners should commit to them in order to build lasting, mutually beneficial relationships with any of the Grenevia Group Companies.

These principles are an integral part of contractual obligations and cooperation with our business partners. The requirements and principles in question should apply to the activities of suppliers and other entities engaged in the process of fulfilling contracts with Grenevia Group entities.

We invite you to join us in challenging, developing and achieving your business goals while maintaining integrity, good ethical standing and respect for others. This Code is an expression of our commitment to creating

a better, fairer and more sustainable business world that benefits us today and for generations to come.

Community activities

Social norms provide the foundation for honest and ethical business partnerships, helping to build trust both inside and outside the organisation, as well as contributing to social and economic sustainability.

Social justice and human rights

Our business partners are committed to providing fair and equal employment conditions for all their employees, without discrimination on the basis of race, gender, age, sexual orientation, religion or ethnicity. We expect our business partners to respect and uphold human rights throughout the value chain.

Child labour

Absolute inadmissibility of child labour is fundamental to our commitment to ethical business practices and respect for human rights. Violation of this prohibition will lead to immediate termination of the contract and other consequences in accordance with applicable laws. Business partners pledge to absolutely prohibit the employment of children in their businesses. Only persons who have reached the minimum legal working age, as prescribed by law in the country of employment, may be employed. Business partners are also required to prohibit and take immediate action to eliminate all forms of child labour that are illegal and against social norms.

Employee rights

Business partners are committed to respecting and upholding fundamental worker rights, such as the right to freedom of employment, freedom of association, safe working conditions, decent wage and social benefits, as well as regulations related to working time, breaks and vacation time. Our business partners are also committed to opposing any form of forced labour. They should also take active steps to create a work environment free of any form of discrimination, bullying or inappropriate behaviour.

Safety and health

Business partners must take care to ensure safe and healthy working conditions and the provision of appropriate personal protective equipment to protect employees from the risk of accidents and occupational diseases. They are also required to adhere to all applicable regulations in the area of employee safety, taking into account the specific industry in which they operate.

Social responsibility

Business partners should be committed to actively participate in the communities in which they operate. This can include support for both global and local social and educational initiatives aimed at improving quality of life.

Sustainability

We encourage our business partners to think and act sustainably over the long term, reducing the negative impact on local communities and their employees.

Responsibility in the supply chain

Business partners should exercise due diligence in monitoring and evaluating the ethical conduct of their own suppliers and contractors.

Organisational culture

Our business partners should promote an organisational culture based on ethical principles, respect for human rights and sustainable development among their employees, contractors, suppliers and other stakeholder groups.

Climate and environmental measures

Including environmental protection measures in the code of conduct is an important step in promoting climate responsibility and sustainability in business relationships.

CO₂ reduction

Business partners agree to actively work to reduce greenhouse gas emissions resulting from their production and delivery processes. This includes investing in green technologies, optimising processes, as well as monitoring and reporting emissions.

Sustainable energy sources

Business partners should promote the use of sustainable energy sources, such as renewable energy, in their operations and encourage investment in photovoltaic installations, wind turbines and other green solutions.

Energy efficiency

Our business partners are taking steps to increase the energy efficiency of their operations. This can include upgrading equipment, implementing energy savings and reducing waste.

Environmental awareness

We expect our business partners to actively promote environmental awareness among their employees and other stakeholder groups. These measures may include training and information campaigns regarding climate change and actions that can be taken to combat it.

Green innovation

Our business partners are encouraging green innovations in their products and services. They support the development of more environmentally friendly products and encourage the recycling and reuse of materials.

Reporting and measurement of progress

Business partners are required to regularly report on their climate measures and monitor progress toward environmental goals.

Water

Our business partners are taking steps to reduce water consumption, both in production processes and current consumption. In addition, they are committed to using water in a conscious and responsible manner.

Integrity and transparency measures

Integrity and transparency are the basis for building long-term and sustainable business relationships. Business partners who adhere to these principles help create partnerships based on mutual trust, which result in benefits for both parties – including business stability, customer loyalty and responsiveness to changes in the market environment.

Compliance with laws and regulations

Our business partners are required to comply with all applicable laws and regulations on the local, national and international level. In addition, our business partners should have appropriate mechanisms and procedures in place to ensure transparency and legality of all operations.

Avoiding conflicts of interest

We expect our business partners to proactively identify and avoid situations where conflicts of interest may arise between their business activities and the interests of other entities or individuals. If such a conflict is identified, business partners are required to take immediate steps to resolve it.

Channels for reporting violations

Business partners should establish clear channels for reporting ethical violations or practices that do not comply with applicable laws. These channels should be accessible to all employees and business partners, and reports should be treated confidentially and without the possibility of retaliation against whistleblowers.

Fair competition

We expect our business partners to comply with the principles of competition and not engage in activities that violate antitrust laws. Trade secrets and information of competitors are respected and not used in an unfair manner.

Anti-corruption practices

Our business partners commit to zero tolerance of all forms of corruption and should implement effective procedures and mechanisms to prevent corruption in their organisation, such as employee training, whistleblowing procedures and monitoring activities to detect suspicious behaviour.

Conflict minerals

We expect our business partners to do their due diligence in determining the source and origin of the minerals that are used in their products. This assessment is intended to confirm that they do not come from areas where hostilities are taking place, and that the funds spent to acquire them are not used to finance armed groups.

Risk management

Business partners are committed to conducting regular assessments and managing the risks associated with their business activities. In this context, risks related to ethical aspects and transparency, such as the risk of corruption or regulatory violations, should be given special consideration. Action to minimise these risks should be considered a priority.

Money laundering prevention

Our business partners are required to strictly comply with laws and regulations preventing money laundering in the country in which they operate, and in accordance with international regulations in this regard.

Corrective measures

If violations are confirmed, business partners should introduce appropriate measures to remedy the damage, resolve the problem and prevent further violations. Corrective measures should also include the analysis and improvement of procedures, controls and preventive mechanisms so that future violations do not occur. Business partners agree to cooperate with Grenevia Group Companies to resolve situations that may affect joint business relationships.

Reporting violations

We encourage all business partners, their employees and all affiliated persons to report any suspected violations of this Code of Conduct. This will assist in reducing the effects of such violations and preventing their recurrence in the future. We urge our business partners to create their own systems for reporting violations. We also oblige our business partners to inform their employees and subcontractors about whistleblowing policies.

Inspections and audits

Grenevia Group Companies entering into individual business relationships with a supplier assert the right to take appropriate measures to verify that the provisions of this Code of Conduct are respected. Business partners agree to cooperate in any necessary inspections. We shall make appropriate agreements with the business partner in advance, regarding the scope,

timing and location of such inspections. Our business partners should themselves conduct regular audits and assessments of their operational activities to ensure their compliance with the applicable laws, regulations as well as the principles and values set forth in this Code.

Consequences of violation

Failure to comply with the obligations set forth in this Code of Conduct amounts to a violation of the principles of cooperation and can undermine mutual business relations. We expect that the business partner will make a timely notification to the Grenevia Group Company with which it has established a business relationship and provide information on the measures introduced to remedy the violation, as well as to avoid similar violations in the future. If a business partner fails to meet the above obligations or introduce corrective measures in a timely manner or if the identified violation of the Code of Conduct is of severe nature, we reserve the right to immediately terminate the cooperation. Depending on the type of agreement forming the basis of cooperation with a given business partner, the right referred to in the preceding sentence shall be tantamount to the right of an individual Grenevia Group company to submit a statement of termination of the agreement with immediate effect, or a statement of withdrawal from the agreement, with the maximum term for exercising the right to withdraw from the agreement being 100 days from the identification of the grounds for withdrawal.