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CODE OF CONDUCT

ForgeX Polska Sp. z o.o.

1. General Principles and Company Mission

At ForgeX Polska Sp. z o.o., we believe that we can run a prosperous enterprise while being guided by the principles of integrity, honesty, fairness, and full respect for all applicable laws. We understand that our manufacturing operations impact people and the environment – particularly at the local level, but also on a global scale. As part of our continuous pursuit to ensure high-quality products, we maintain the highest ethical and professional standards. This document sets out the norms and practices that must be strictly observed by all employees of our organization, regardless of their position.

2. Human Rights and Working Conditions

2.1. Modern Slavery and Forced Labor

ForgeX Polska categorically condemns and prohibits the use of all forms of modern slavery, including servitude, forced or compulsory labor, debt bondage, and human trafficking. Every employee performs their work voluntarily, has the right to terminate their employment relationship in accordance with the law, and retains full control over their identity documents.

2.2. Ethical Recruitment

Recruitment processes within our organization are conducted in an ethical, fair, and transparent manner. ForgeX Polska covers all costs associated with recruitment. It is strictly prohibited to charge candidates any recruitment fees or to manipulate the employment process in a manner that violates the employee's dignity.

2.3. Freedom of Association and Collective Bargaining

The organization respects the statutory right of employees to freedom of association, to establish and join organizations representing their interests (e.g., trade unions) without fear of retaliation, discrimination, or harassment. We also recognize the right of employees to engage in open dialogue and collective bargaining.

2.4. Non-Discrimination, Diversity, Equity, and Inclusion (DEI)

We build a culture based on diversity, equity, and inclusion. All employees are provided with equal opportunities in terms of employment, promotion, training, and remuneration. Any discrimination based on race, religion, gender, age, marital status, family status, political or trade union affiliation, origin, disability, sexual orientation, or any other grounds is strictly prohibited.

2.5. Anti-Harassment and Protection of Women's Rights

ForgeX Polska applies a zero-tolerance policy towards all forms of physical, psychological, and verbal violence, threats, mental coercion, insults, bullying, harassment, and sexual harassment. We attach particular importance to protecting women's rights, ensuring equal treatment, equal pay for work of equal value, and full support and protection for pregnant women and nursing mothers.

2.6. Rights of Minorities and Indigenous Peoples

We respect the rights of all communities, including national and ethnic minorities, and indigenous peoples. Our operations are conducted in a manner that does not infringe upon their cultural, social, and economic identity.

2.7. Land, Forest, and Water Rights and the Prohibition of Forced Evictions

ForgeX Polska conducts its operational activities exclusively on legally acquired industrial lands. The organization strictly respects local rights to land, forests, and water resources. We commit to refraining from any actions resulting in the unlawful acquisition of land or the forced eviction of local communities.

2.8. Child Labor and Young Workers

The organization categorically does not use child labor. We comply with the national statutory minimum age for employment. The legal employment of young workers (minors) is permitted solely within the framework of vocational training and apprenticeships, in accordance with the Labor Code. Young workers are subject to special protection (including an absolute ban on night work, overtime, and work in conditions threatening their health or safety).

2.9. Remuneration, Employee Benefits, and Working Hours

ForgeX Polska guarantees that wages and employee benefits are paid on time and meet or exceed statutory minimum wage standards. Working hours, including overtime, as well as the right to rest and leave, are accounted for transparently and in full compliance with applicable Labor Law.

3. Health, Safety (HSE) and Environment

3.1. Use of Private or Public Security Forces

To protect property and employees, ForgeX Polska may use the services of public or private security forces (security agencies). The organization rigorously ensures that security personnel operate within the limits of the law, undergo appropriate training, and strictly respect human rights. The use of torture, inhumane treatment, violence, or any form of intimidation against employees and third parties by security forces is strictly prohibited.

3.2. Occupational Health and Safety (OHS) Standards in Production

Employees are key to the company's development; therefore, we provide them with safe working conditions. The standard ensuring this minimum includes:

- Developing and continuously updating risk assessments for workplaces.
- Conducting reliable periodic and on-the-job OHS training.
- Equipping employees with high-quality personal protective equipment (PPE).
- Providing production equipment fitted with appropriate, certified protective measures and safeguards.
- Ensuring the availability of first-aid equipment at the workplace.
- Systematically monitoring working conditions, including noise, temperature, and lighting measurements.
- Providing adequate areas for rest and recovery.

3.3. Natural Environment

ForgeX Polska is fully aware of the impact of production processes on the surroundings and continuously minimizes its negative environmental footprint. The essential minimum implemented by the organization is strict compliance with applicable environmental protection, waste management, emissions, and recycling regulations in force in the area of operations.

4. Business Integrity and Corporate Risks

4.1. Anti-Corruption and Anti-Bribery

ForgeX Polska condemns all forms of corruption, extortion, and bribery. The organization's employees do not offer any financial or material benefits to clients or public officials in order to influence their decisions. The giving and receiving of symbolic business gifts whose value does not exceed 100 PLN is permitted. Offering, giving, demanding, or accepting loans, fees, rewards, or any other benefits as an inducement to engage in business activities is strictly prohibited.

4.2. Conflict of Interest

All employees are obliged to avoid situations where their private interests (financial, family, or personal) could conflict with the interests of ForgeX Polska. Any potential conflict of interest situations must be immediately reported to a Superior or the HR Department.

4.3. Anti-Money Laundering (AML)

ForgeX Polska strictly adheres to regulations concerning anti-money laundering and combating the financing of terrorism. The organization conducts commercial transactions solely with partners of documented identity and legal sources of capital.

4.4. Fair Competition and Export Law

The organization strictly complies with laws protecting fair competition and fair trade. We do not participate in price-fixing or illegal market allocation. Furthermore, we comply with all international and national export and import laws and regulations.

4.5. Data Protection and Privacy

The organization attaches great importance to privacy protection by complying with personal data protection regulations (GDPR) and safeguarding the data and intellectual property of its clients and employees against unauthorized access, loss, or misuse.

5. Whistleblowing System

The implementation of ethical standards requires transparency. Violations of the law or the principles of this Code may be reported by a wide range of stakeholders, including:

- employees,
- beneficiaries,

- business partners,
- contractors,
- national / local authorities,
- employees of other organizations.

Reports concerning violations of this Code of Ethics or the occurrence of irregularities or abuses can be submitted via the website www.forgex.pl.

5.1. Guarantee of Protection (Non-Retaliation Policy) ForgeX Polska guarantees an absolute ban on any retaliatory or discriminatory actions, or negative consequences against an employee or any other reporting person who has reported a violation or suspected violation in good faith. Every report will be investigated with due diligence and confidentiality.

Approved by:

Władysław Jasiczek



President of the Management Board of ForgeX