

# **CODE OF CONDUCT FOR SUPPLIERS**

## **ForgeX Polska Sp. z o.o.**

### **1. General Provisions**

In cooperating with our Suppliers, ForgeX Polska Sp. z o.o. is guided by the principles of responsible business and sustainable development. We have implemented this Code to support our Suppliers in building awareness and developing ethical practices. It constitutes a set of minimum requirements that our Suppliers must adhere to in their relations with ForgeX Polska and within their own supply chains.

When building relationships with business partners, we focus on fair cooperation based on transparency and mutual respect. We expect our Suppliers to strictly respect and apply the principles set forth in this Code and to promote awareness of sustainable development (ESG).

### **2. Labor Standards and Human Rights**

#### **2.1. Modern Slavery and Freedom of Employment**

The Supplier shall not participate in, tolerate, or financially benefit from any form of modern slavery, including human trafficking, servitude, forced, compulsory, or bonded labor. The Supplier's employees shall perform work solely on a voluntary basis, free from any psychological or economic coercion.

#### **2.2. Ethical Recruitment**

The Supplier commits to conducting recruitment processes in an ethical and lawful manner. It is unacceptable to charge job candidates any recruitment fees or to withhold their original identity documents in order to restrict their freedom.

### **2.3. Child Labor and Young Workers**

The use of child labor in service, production, and distribution processes is categorically prohibited. The minimum age for employment must comply with national legislation. Young workers (juveniles) may be employed solely for vocational training or light work, provided they are fully protected against night work, overtime, and conditions that threaten their health, safety, or morals.

### **2.4. Working Hours, Wages, and Benefits Transparency**

Working hours and overtime at the Supplier's facilities must comply with national regulations. Every employee must receive a written contract clearly specifying their remuneration and working hours. The payment of wages and employee benefits must be made in a timely manner and without delay, ensuring at least the statutory minimum wage that guarantees the fulfillment of basic living needs.

### **2.5. Diversity, Equity, Inclusion (DEI) and Fair Treatment**

The Supplier guarantees employees an open work environment free from harassment, bullying, sexual harassment, and verbal or physical discrimination. The Supplier ensures equal opportunities regardless of race, ethnic origin, national minorities, age, gender, women's rights (including maternity protection), disability, identity, sexual orientation, or trade union membership.

### **2.6. Freedom of Association and Collective Bargaining**

The Supplier respects the statutory right of employees to freedom of association, to establish or join trade unions and works councils, and to engage in collective bargaining. Employee representatives must be treated with respect and must not be discriminated against.

### **2.7. Rights of Local Communities, Indigenous Peoples, and Land Rights**

The Supplier commits to respecting the rights of local communities and indigenous peoples. The Supplier's operations must not lead to unlawful and forced evictions, nor violate local rights to land, forests, and water resources.

### **3. Health, Safety (HSE) and Environment**

#### **3.1. Occupational Health and Safety**

The Supplier shall provide employees with safe and healthy working conditions. The Supplier must identify hazards and regularly conduct risk assessments. Employees must undergo regular and documented health and safety training, have access to first-aid equipment, safety instructions, appropriate HSE signage, and be provided—free of charge—with personal protective equipment (PPE) suitable for physical, chemical, and biological hazards. All operating licenses and permits required by law must be kept up to date.

#### **3.2. Waste and Emissions**

The Supplier ensures that all waste is transported, stored, and managed in accordance with the law, preventing contamination of air, soil, and groundwater. The Supplier is obliged to constantly monitor, measure, and minimize gas emissions and waste volumes, aiming to reduce energy consumption.

#### **3.3. Natural Environment and Banned Substances**

The Supplier commits to environmental protection and reducing the negative impact of its operations. The Supplier guarantees that it does not use materials and chemical substances in production that are classified as banned by international and national regulations (including REACH/RoHS regulations).

#### **3.4. Use of Security Forces**

If private or public security forces are deployed to protect property, the Supplier guarantees that such personnel strictly respect human rights. The use of violence, torture, or any form of intimidation against employees by security personnel is prohibited.

## **4. Professional Ethics and Business Integrity**

### **4.1. Ethical Conduct and Anti-Corruption Principles**

The Supplier conducts its operations based on the principles of fair competition, prevents money laundering, and monitors conflicts of interest. There is a policy of zero tolerance for all forms of corruption, extortion, and bribery. In relations with ForgeX Polska employees, offering or accepting any loans, rewards, or commercial advantages is unacceptable. An exception is made for symbolic business gifts whose value does not exceed 100 PLN.

### **4.2. Data Confidentiality**

The Supplier commits to maintaining absolute confidentiality regarding all information obtained during the cooperation that constitutes a trade secret of ForgeX Polska Sp. z o.o., and to rigorously protecting personal data.

### **4.3. Conflict Minerals Responsibility**

The Supplier is required to take steps to determine whether the supplied products contain minerals originating from conflict-affected regions (tin, tantalum, tungsten, and gold – known as 3TG). We expect the implementation of due diligence processes in the supply chain to ensure that these raw materials do not directly or indirectly finance armed groups in the Democratic Republic of the Congo (DRC) or neighboring countries.

## **5. Grievance Mechanism and Accountability**

### **5.1. Whistleblowing Mechanism and Stakeholder Accessibility**

The Supplier commits to implementing a confidential, secure, and effective whistleblowing channel and procedure. This mechanism must allow for the safe reporting of violations by the same stakeholders as required by ForgeX Polska, including:

- the Supplier's employees,
- beneficiaries,

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

The Supplier guarantees an absolute ban on retaliation against any individuals who report violations in good faith.

If information is obtained regarding a violation of this Code in relations with ForgeX Polska, the Supplier, its employees, and the aforementioned stakeholders may report this fact directly via the supplier's platform.

## **5.2. Development of Own Code and Cascading Requirements**

The Supplier is required to develop and implement its own code of ethics (or an equivalent business conduct policy) that reflects the standards set forth in this document. The Supplier also commits to communicating these requirements to its subcontractors and suppliers in order to cascade responsible business standards down the supply chain.

*Approved by:*

*Władysław Jasiczek*

A handwritten signature in dark ink, consisting of a series of loops and strokes that form a stylized representation of the name Władysław Jasiczek.

*President of the Management Board of ForgeX*