



CODE OF ETHICS

Third edition 1.12.2023

CONTENTS





ETHICAL VALUES & ABOUT US	5
A LETTER FROM THE PRESIDENT OF METALPOL	8
THE HISTORY OF THE PLANT.....	10
HOW WE RUN OUR BUSINESS	12
WE FOCUS ON HONESTY	14
HOW WE PROTECT OUR ASSETS AND THE ENVIRONMENT	17
HOW WE WORK TOGETHER	20
WE BUILD QUALITY	25
WE INVEST IN SOCIAL DIALOGUE	27
REPORTING CONCERNS.....	29



We would like to confirm that as the supplier as part of our business relationship with Metalpol Węgierska Górka sp. z o.o. we acknowledge and comply with the following Code of Ethics:

.....
Date

.....
Company name

.....
Signature

ETHICAL VALUES & WHO WE ARE



OUR VALUES



WE PLAY FAIR

We tell the truth to ourselves and to others

WE PROVIDE QUALITY

We continuously improve our processes and offered products

WE BUILD PARTNERSHIP RELATIONS

We care for our partners and their business

WE ARE IN AGREEMENT

We obey the law and follow our principles

WE SHARE KNOWLEDGE

We build an organizational culture based on

WE HAVE A SENSE OF RESPONSIBILITY

We are aware that proper conduct is not always easy but it is necessary

WE SHOW RESPECT TO PEOPLE

We are tolerant, empathic and we value otherhood

WE INVEST IN HUMAN CAPITAL

We give our workers the opportunities to continuously improve their competences

Our whole team strives to follow those ethical values in our everyday work. The Code of Ethics and Conduct describes in detail the ways how we achieve it as well as outlines our expectations of ourselves and the people we cooperate with. The Code supports our strategy, helps in protecting our people and cares for the interests of the foundry industry.



METALPOL Węgierska Górka sp. z o.o. knows the significance of following the provisions of law and regulations in accordance with the set ethical standards as part of conducted business activity.

The activity of METALPOL is based on the policy of sustainable development and the corporate social responsibility strategy towards all of its partners. All actions are implemented with observance of the corporate social responsibility strategy and, at the same time, with care for the employees and the natural environment.

The company, as the partner of the local community, tries to meet the needs of the nearest residents by implementing the policy of corporate responsibility. METALPOL proactively listens to the voice of the local community and takes into account its needs as well as respects the culture and indigenous customs of the country and the region it operates in. When making business decisions, METALPOL pays attention to the possible impact on the regional community.

This code is to express the basic ethical values and present the adopted rules and norms of conduct that connect the workers of METALPOL based on indicated principles and values. The code establishes standards of conduct arising from the sense of responsibility for actions towards interested parties of METALPOL.

Our activity is founded on a long-lasting tradition. That is why we combine tradition with modernity on a daily basis. We draw on the best parts of the history of our company and utilize proven market practices. We intend to create an environment that will reflect our fundamental principles so that the Company is associated with the highest standard.

The Employees and Management of METALPOL assume the values and rules of conduct described in the Code and undertake to follow them in their everyday work.

This Code of Ethics was approved by the General Manager of METALPOL Węgierska Górka sp. z o.o. and is commonly available to the employees and other interested parties on our website:

www.metalpol.com

A LETTER FROM THE PRESIDENT OF METALPOL WĘGIERSKA GÓRKA



Dear Sirs!

The Code of Ethics of METALPOL constitutes a structured record of principles and values that our Company has been following since its establishment on 29 February 2000.

In its formalized form, the Code further emphasizes the obligation of all members of our Organization to continuously comply with the highest ethical standards.

It also serves as the expression of our responsibility regarding history, continuity of the tradition of the Company established in 1838 and being the oldest operating cast-iron foundry in Poland, as well as its future and growth.

The contents of the Code - the principles and standards described in it - apply to all the Members of our Organization, regardless of their position, function, gender, age or years of service.

Responsibility and ethical conduct towards the Employees, Customers, Business Partners, state institutions, the surrounding communities and the respect for the natural environment play a crucial role in the value system of METALPOL.

Failure to follow ethical and legal rules is not only in conflict with the said values but also detrimental to our reputation and the future of the Company. People who do not comply with established rules and who favor personal gains at the expense of the Company act against all other members of our Organization as well as our Business Partners.

This document was created in order to promote universal values among the members of our Organization and all external contacts of the Company to set the foundations for mutual relationship based on reliability, honesty and respect for all participants of the said relations so that we can create a friendly environment for all of us, both in business and in everyday work.

I think that following this document, its spirit and principles, is a clear message and guideline for all Employees of METALPOL and the wide group of contractors about the methods used to achieve business goals.

As a company, we shape economic, social and cultural relations with respect for the legal order. I am convinced that employees of METALPOL, when fulfilling their duties apart from those strictly laid down by law, combine professionalism and compliance with standards of business and personal ethics.

However, rules of ethics will not replace our own responsibility. They also do not exempt from the need to continuously search for the right course of action, not only with regard to business. In this scope, what matters is our knowledge and ability to share experiences.

I believe that professionalism and ethics as the leading values in the life of our organization are the right choice that will allow for further growth of the Company as well as the people who form it.

Marek PODGRODZKI

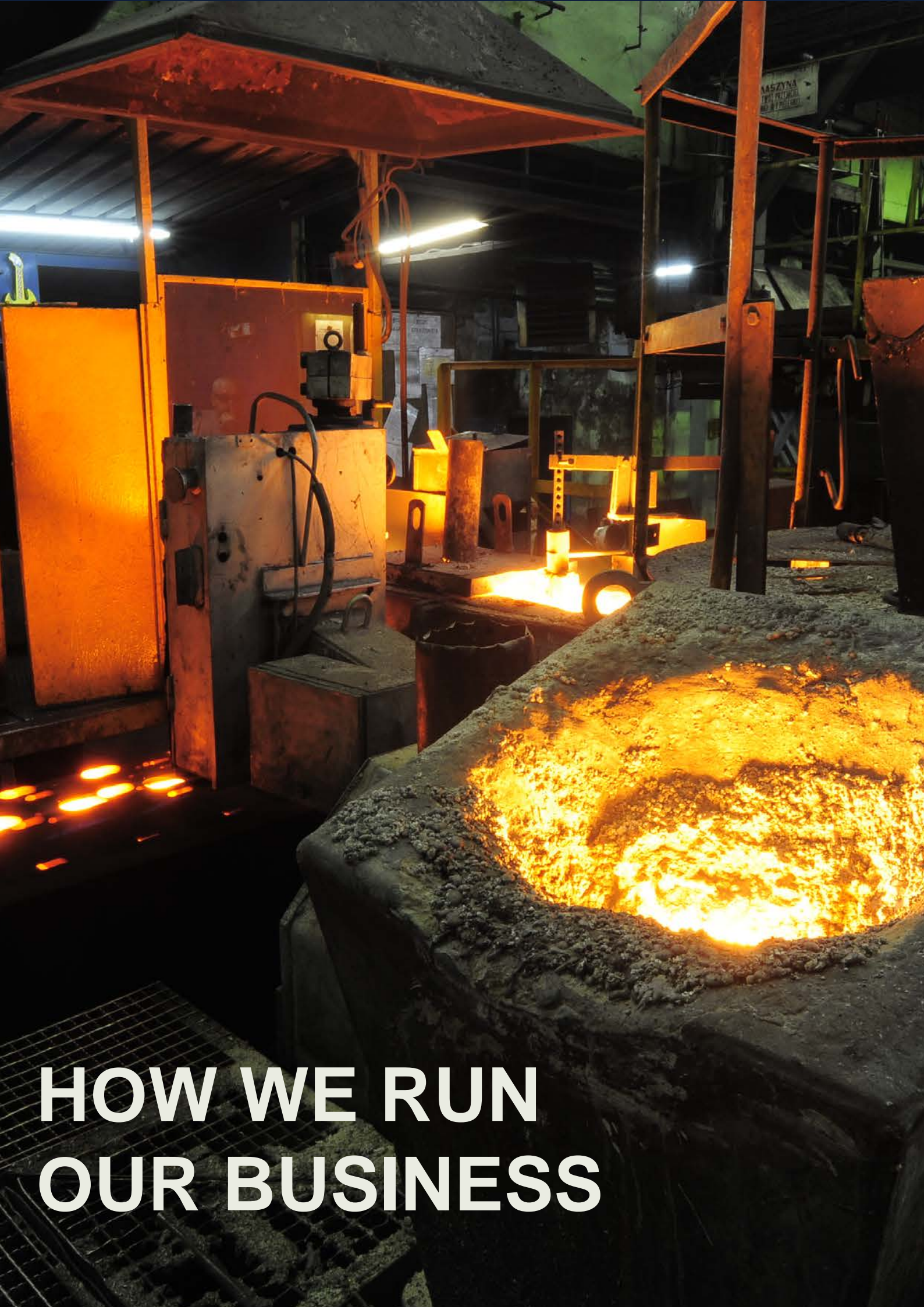
President of the Management Board

THE HISTORY OF THE PLANT





1838	Establishment of steelworks belonging to Archduke von Habsburg
1860	Beginnings of the foundry
1926	Launch of production of 5m ø1200 pipes
1945	Nationalization of the factory and establishment of state-owned company "Fabryka Armatury i Odlewnia Węgierska Górka"
1975	Launch of the DISAMATIC moulding line and 6-ton electric furnaces
2000	Establishment of METALPOL Węgierska Górka
2006-2007	Launch of the BMD horizontal moulding line, expansion of the melting plant and restructuring of the facility
2011	Management buy-out of 100% of shares of METALPOL
2017	Launch of the LORAMENDI moulding line with vertical mould separation
2021	Expansion of the mechanical processing department and the automatic grinding department



**HOW WE RUN
OUR BUSINESS**

FIGHT AGAINST CORRUPTION AND BRIBERY



METALPOL aims at minimizing the risk of corruption. That is why clear and transparent rules have been formulated in the anti-corruption policy of the organization.

The goal of the implemented anti-corruption policy is to establish coherent rules regarding procedures in case of identified abuse and to prevent and counteract undesired actions within the scope of financial fraud taken against the Company as well as unlawful activities against the Code of Ethics.

The anti-corruption policy should be followed by all employees and sub-contractors of the Company, regardless of their position, years of service or relation with the Company. Any contracts with contractors, sub-contractors and customers can be handled only as part of business relations.

PERMITTED ACTIONS

Accepting and offering small holiday gifts of cultural and customary nature.
Accepting and proposing humble gifts the value of which, as a rule, does not exceed a value equivalent to PLN 150. Gifts must not include cash or cash equivalents.

PROHIBITED ACTIONS

Providing, promising to provide, offering or soliciting gratification in form of a payment, a gift, a trip, an invitation (meals, parties, entertainment) or other benefits in order to achieve a specific business advantage or to show gratitude to a business partner, government official or mediator for achieving a business advantage in order to streamline or speed up routine procedures.

A promise of payment or accepting a payment, a gift, a trip, an invitation (meals, parties, entertainment) or other benefits as well as a promise to receive them from third-parties in a situation where you suspect or are certain that someone expects specific business advantages in exchange.

WE FOCUS ON HONESTY



FAIR COMPETITION



METALPOL complies with the antitrust law that prohibits activities which negatively affect the consumers and the competition.

Employees of the Organization do not make defamatory remarks about our competitors and do not unjustifiably criticize their products and services. The Company does not undertake any action aimed at concluding anti-competitive arrangements concerning price fixing, market sharing and tender deals.

REMEMBER...

All business decisions must be made without arrangements with the competitors.

THOROUGH REPORTING

To ensure the interests of the Customers, METALPOL cares for accuracy and completeness of the provided information. Our Company complies with the applicable regulations on data protection. In particular, it refers to personal data of business partners, consumers and employees.

At METALPOL, we pay the utmost care to respecting the rights under intellectual property protection of our business partners and the entrusted property. We protect confidential information, particularly personal data, and we use them in a manner required for specific activity and we expect the same from our partners.

METALPOL places great emphasis on accurate and credible financial, environmental and ESG reporting. We want to prevent concealment of illegally obtained gains and to disclose them as legal revenue. METALPOL expects honest reporting of all the suppliers and timely delivery of all required documents to METALPOL, if applicable.

CHOICE AND COOPERATION WITH THIRD PARTIES



 THE DOS	 THE DON'TS
Verify transactions that are subject to obligatory monitoring	Do not cooperate with business partners located or registered in a sanctioned country
Due to the fact that countries and territories can also be subject to sanctions, verify the physical location of the business partner	Remember that a cooperation that breaches sanctions can have a negative impact on whole METALPOL
Remember to regularly check the list of countries subject to trade sanctions presented in the appendix to the Trade Sanctions Screening Manual because the situation changes dynamically	

At METALPOL, we want to have a positive contribution in building a friendly and ethical business environment.

We continuously implement ethical business practices and expect the same from our business partners.



When choosing our suppliers, we take into consideration the requirement to comply with the applicable laws and respect business honesty.

We do not maintain trade relations with sanctioned countries or parties and also refrain from trade and financial cooperation with entities that are on the list of entities subject to restrictions. We expect the same from our business partners.

We strive for building long-term relations with our employees and partners on the basis of mutual respect and trust. Thus, we expect that there will be not activities that could have a negative impact on the operations of METALPOL.

Our goal is to avoid conflicts of interest and, if their complete elimination is impossible, to minimize their influence.

CONFLICTS OF INTEREST

 THE DOS	 THE DON'TS
Preventively report any actual or potential conflicts of interest	Do not make any decisions regarding METALPOL in case of an actual or potential conflict of interest
Inform about conflicts of interest as long as they exist	
Comply with all the established mitigating actions in order to minimize the outcome of conflicts of interest	Do not hide an actual or potential conflict of interest - we can use the information to protect you and the Company

HOW WE PROTECT OUR ASSETS AND THE ENVIRONMENT



METALPOL carries out activities in favor of the protection of the environment and minimization of the negative impact arising from the conducted operations through implementation of an environmental policy and compliance with legal regulations, including realization of the provisions of the European Green Deal and the decarbonization policy.

In order to reduce pollution and potential threats to the environment, we have implemented and applied the Environmental Management System based on standard 14001:2015.

When it comes to its decision-making process, the Organization takes into consideration the potential influence of new undertakings on the natural environment and conducts regular inspections within the scope of the corporate impact on the environment, with sustainable and long-lasting development of local ecosystems in mind.

We efficiently manage energy with the aim to obtain it from renewable sources. We take steps in order to continuously improve the power efficiency and reduce emission of greenhouse gases which are harmful to the climate.

We place great emphasis on optimum resource management throughout the whole realization cycle of the production process. METALPOL wants its manufactured goods to have no negative



As a foundry with long history, METALPOL is aware of its influence on the environment. That is why the Company continuously makes attempts to protect the nature and minimize the negative effects by reducing the amount of emitted pollution and generated waste, utilizing rational resource management, preventing failures, minimizing the use of harmful substances with particular regard to significant environmental aspects.

METALPOL promotes the importance of protection of the natural environment among its staff by actively increasing the environmental awareness among employees of the company.

METALPOL undertakes active measures in order to avoid obtaining materials for production from illegal or unethical sources, including countries that do not respect international regulations on human rights. The Company meets all requirements of international and domestic legislation in this regard and expects its partners to meet the above-mentioned requirements throughout their conducted activities.

Activities of the company are realized based on the application of advanced environmentally-friendly technologies and constant improvements of the organization processes.



HOW WE WORK TOGETHER



Suspected
abuse within
the scope of rules
of the Code
of Ethics of METALPOL
or other regulations of law
must be reported to
one's superior or
via the communication
channel
etyka@metalpol.com

WE PLAY IN ONE TEAM

METALPOL complies with the international standards regarding human rights and the international labor standards, treating them as fundamental and universal.

By acknowledging the employees' right to free association, the Company enters into dialogue with representatives of trade unions operating within the enterprise.

METALPOL guarantees freedom of opinion, conscience, religion, beliefs and speech. At METALPOL, we shall not tolerate any acts of physical, verbal, sexual or emotional harassment, intimidation, abuse or threats by co-workers or executives at the workplace.

METALPOL respects and supports diversity among its staff, treating all the workers equally and preventing any signs of discrimination. The goal of the Organization is to create a workplace where everyone has equal chances, regardless of their social identity.



Suspected
abuse within
the scope of rules
of the Code
of Ethics of METALPOL
or other regulations of law
must be reported to
one's superior or
via the communication
channel
etyka@metalpol.com

WE RELY ON MUTUAL RESPECT

The employees are our most precious resource. One of the key objectives of the Organization is to utilize compromise in everyday work and to establish long-term partner relations with the workers.

We pay great attention to increasing the knowledge resources of the organization and investing in human capital. METALPOL provides an open information policy, giving the employees a chance to submit any concerns and participate in the process of improving the organization.

METALPOL also creates equal chances of employment and career development by promoting high quality labor and entrusting the employees with duties that are relevant to their professional competences.

The organizational culture of the Company is based on mutual respect and exchange of experience. The mission of METALPOL is to continuously strive for enhancing not only its products but also the organization as a whole.



Suspected
abuse within
the scope of rules
of the Code
of Ethics of METALPOL
or other regulations of law
must be reported to
one's superior or
via the communication
channel
etyka@metalpol.com

WE HAVE A SENSE OF RESPONSIBILITY

We do not employ young workers below the minimum age for labor applicable in a given country or jurisdiction. During the recruitment process, we utilize proper and accessible mechanisms of age verification.

We do not tolerate any forms of forced labor, modern slavery, human trafficking and enslavement within our business activity or supply chains.

We ensure that workers are always treated according to the applicable standards, based on a fair assessment of their action and transparent remuneration rules.

We make sure that throughout the whole recruitment process and period of employment, the employees will not have to pay any fees or other payables for the employment.

We comply with all applicable domestic regulations and binding industry standards regarding work time and work hours, overtime work, remuneration and other employee benefits.



Suspected
abuse within
the scope of rules
of the Code
of Ethics of METALPOL
or other regulations of law
must be reported to
one's superior or
via the communication
channel
etyka@metalpol.com

HEALTH AND SAFETY

METALPOL believes that quality goes hand in hand with safety of the employees. Thus, we concentrate our efforts on building a friendly workplace that meets all the requirements within the scope of occupational health and safety.

We ensure that, as part of the idea of continuous improvements, we want to achieve the safest and most hygienic working conditions that reflect the current state of the art. We acknowledge potential dangers and treat proper protection as priority.

The Organization respects and applies regulations on occupational health and safety. We support any activities aimed at increasing safety and we are serious about any reports that are to prevent accidents at work. Our continuous efforts to improve OH&S conditions are based on regular assessments of the OH&S level, reducing occupational hazards and increasing awareness among the Employees.

We also try to prevent physical and mental exhaust of the Employees. We implement projects to improve the ergonomics of work stands and reduce the inconvenience of the working environment at the Company.

We want to build an employee-friendly facility based on increasing one's qualifications and promoting involvement in activities to make our workplace better.



**WE BUILD
QUALITY**





In the interest of ensuring our Customers' satisfaction, our primary objective is to provide the Customers with products that meet their requirements, with particular emphasis on aspects connected with product safety.

The strategic goals of the company include establishing the highest quality standards in the foundry industry, maintaining the already owned and acquiring the required certificates, meeting the applicable requirements, including obligations regarding compliance, implementing innovations in the realized processes. In order to ensure a high standard of the Customer's satisfaction, METALPOL maintains and improves the implemented Integrated Management System based on 9001:2015, 14001:2015, 45001:2018 and IATF 16949:2016.

The idea of continuous improvements is a permanent element of our organizational culture that is based on efficient communication, motivation of employees and great quality awareness. Our intent to make improvements is built on reliable information acquired as part of monitoring of risks and the efficiency and effectiveness of organization processes. Being aware that product quality depends on all Employees of the company, we actively participate in activities aimed at enhancing the existing system, processes and goods.

The central theme of the activities of our company includes optimization of manufacturing processes by keeping up with the pace of technological development, constant modernizations of the production equipment, active cooperation with the suppliers, continuous elimination of mistakes and errors, implementation of advanced production management methods and effective and economic management at every stage of production.

WE INVEST IN SOCIAL DIALOGUE





METALPOL follows the objective of conducting long-term corporate growth in a stable way, according to the principles of honesty and integrity, having regard to the needs and expectations of interested parties of the organization. As the partner of the local community, METALPOL tries to meet the needs of the local residents. Our efforts are focused on building a friendly workplace and a dialogue with suppliers and customers to fulfill the idea of achieving mutual benefits. Supporting the development of both the local community and economy is the key aspect of business responsibility.

The corporate responsibility policy of METALPOL with regard to the interests of the involved parties is, among others, implemented by:

- applying the code of ethics in the conducted business activity,
- establishing partnership relations with the interested parties,
- creating equal opportunities and preventing discrimination at the workplace,
- investing in human capital as the most important resource of the organization by providing training, courses and education refunds,
- cooperating with universities and scientific centers,
- meeting customers' requirements,
- constantly improving the implemented Integrated Management System,
- cooperating with local suppliers, including sharing experience, implementing standards, promoting good practices as part of the supply chain,
- participating in local cultural and artistic activities,
- striving for higher OH&S standards at the workplace,
- acting as social investor by financing grants for the most talented members of the local community, supporting local vocational and pre-school education, allowing realization of apprenticeships and internships,
- building an organizational culture based on mutual respect, two-way communication, continuous improvements and team work.



**REPORTING
CONCERNS**

REPORTING VIOLATIONS OF THE CODE OF ETHICS AND CONDUCT



Our goal is to conduct activities in an honest, ethical and lawful manner. We expect the same from our employees and business partners, which has been described in detail in the Irregularity Reporting Policy.

We build awareness among our employees and business partners about the need to react to and report any violations of the code of ethics and the existing policies. The Management Board of the Company undertakes corrective and preventive action aimed at eliminating the occurrence of similar incidents in the future.

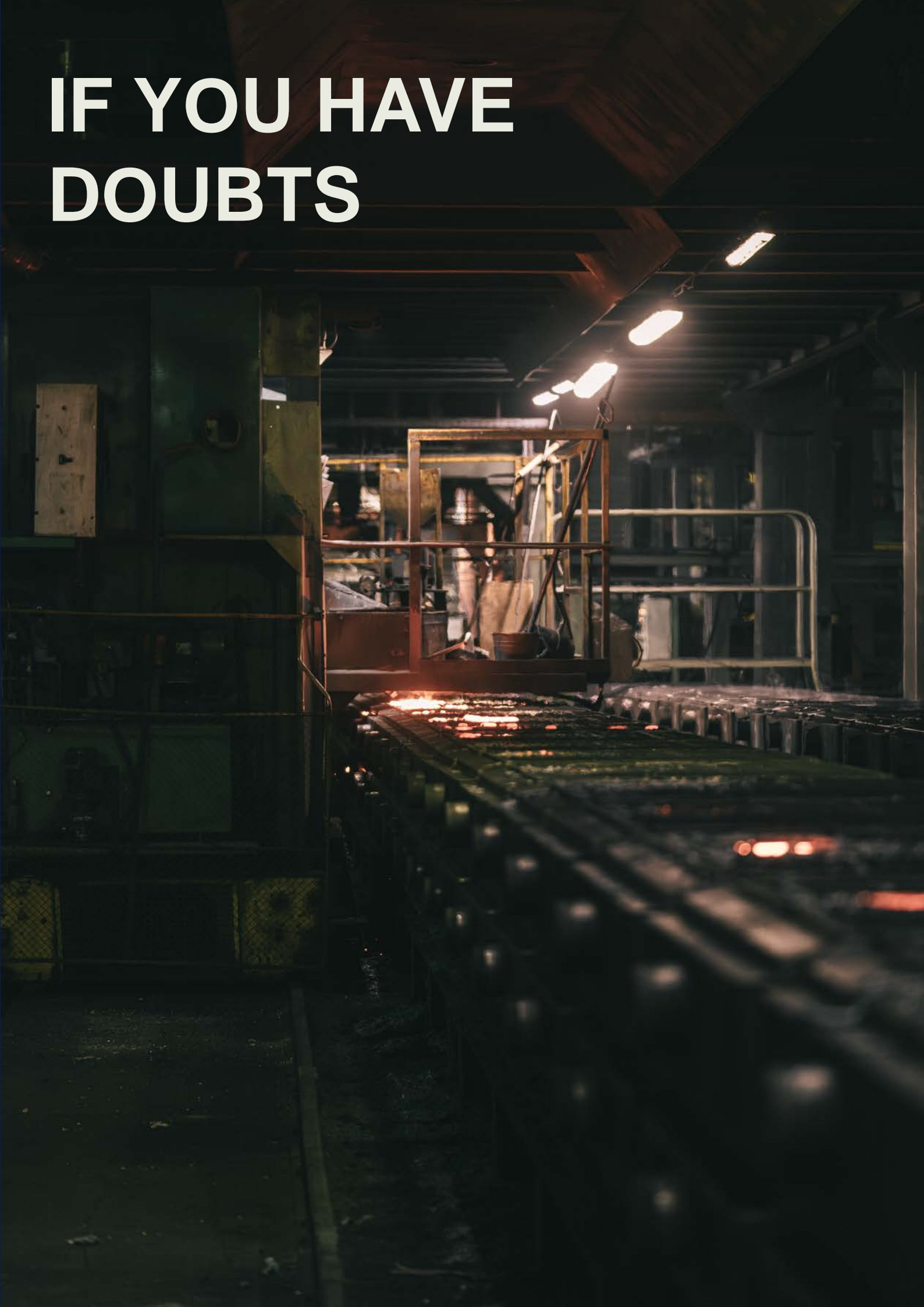
It would be impossible for this code of ethics to regulate in detail every possible situation that each of us may end up in. Thus, employees and business partners must be guided by common sense in everything they do as part of their employment and business cooperation.

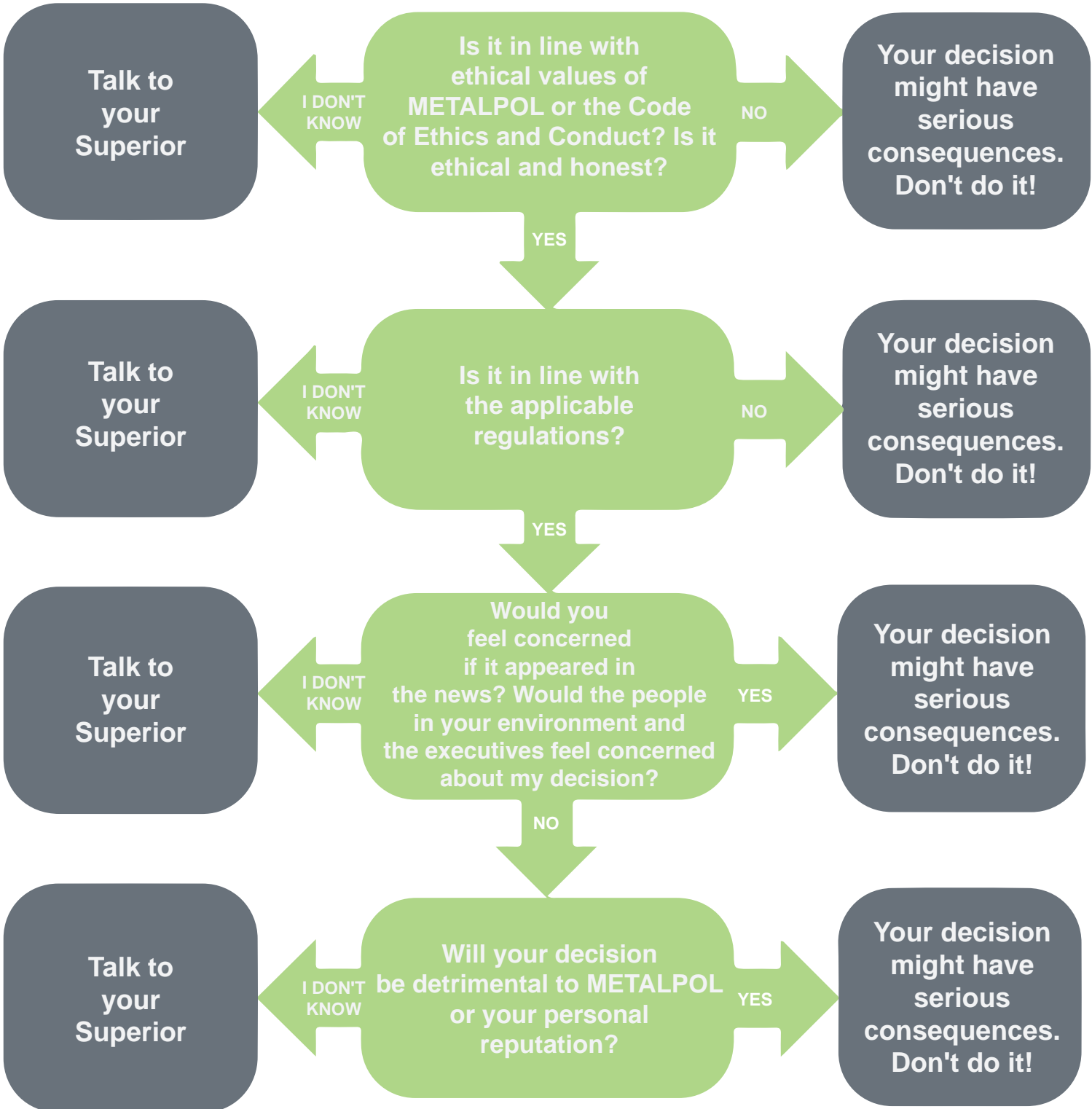
In order to provide support in situations where it is difficult to properly determine the right decision, the next page contains a diagram of conduct to help in deciding whether a specific course of action is in line with our ethical values.

The purpose of this Code is to present transparent ethical values we want to follow to our employees and people we collaborate with. Its goal is to promote the obligation to work in an honest, responsible and ethical way.

Suspected
abuse within
the scope of rules
of the Code
of Ethics of METALPOL
or other regulations of law
must be reported to
one's superior or
via the communication
channel
etyka@metalpol.com

**IF YOU HAVE
DOUBTS**







This Code of Ethics was approved by the General Manager of METALPOL Węgierska Górka sp. z o.o. and is commonly available to the employees and other interested parties on our website: www.metalpol.com