

§ 1

Glossary of Terms

The terms used in this document are hereby defined as follows:

- 1) **Client** - a third party contracting MEWO S.A. to provide services
- 2) **Partner** - a person performing paid work for MEWO S.A. regardless of the type of employment relationship
- 3) **Code** - this MEWO S.A. Code of Ethics
- 4) **MEWO S.A.** - MEWO Spółka Akcyjna (Joint Stock Company), based in Straszyn at ul. Starogardzka 17A, 83-010 Straszyn, entered into the National Court Register kept by the District Court Gdańsk-Północ, VII Commercial Department, under KRS number 0000625922, NIP number 583-315-93-42, with a share capital of PLN 200,000 and paid-in capital of PLN 200,000.

§ 2

General provisions

1. The Code is a set of internal rules and principles of conduct to be observed by the Partners, and at the same time, it establishes the framework for conducting business activities by MEWO S.A.
2. The Code applies to all areas of MEWO S.A. activity.
3. MEWO S.A. takes the position that acting ethically, in compliance with the rules set out in the Code is the key to business success. The objective of MEWO S.A. is to build long-term relationships based on trust and responsibility for its Clients and Partners as well as for the natural environment (as a company implementing Corporate Social Responsibility).
4. MEWO S.A. does not approve of conduct which is contrary to law, good practice or commonly accepted ethical standards.
5. If a breach of provisions of either a generally applicable law or the Code is detected, each Partner has the right to report such a breach. This can be done anonymously. MEWO S.A. ensures the confidentiality of the information contained in a report as well as the very act of filing the report.

§ 3

Our values

1. The activity of MEWO S.A. is based on values which are reflected in this Code.
2. The day-to-day activity of MEWO S.A. is guided by the following values:
 - a) honesty and responsibility,
 - b) ensuring safety to life and health,
 - c) sound and lasting relationships,
 - d) continuous development and innovation,
 - e) environmental protection.
3. When performing their duties, Partners should act according to the values listed above.
4. Each Partner is responsible for ensuring that their conduct is in compliance with generally applicable provisions of law as well as ethical standards, in particular those set forth in the Code. This means that the Managers and Heads of Departments have particular responsibility and obligation to set a good example by their behaviour. The tasks of the Managers and Heads of Departments include ensuring that Partners are acquainted with the Code and that they observe its rules.

§ 4

1. In its relations with Clients, MEWO S.A. shall act in accordance with the contracts concluded taking into account the Clients' interests and the best interest of MEWO S.A.
2. Partners shall perform their duties properly, impartially, honestly and to the best of their knowledge.
3. Partners shall strive to provide the highest standard of services with due respect for the internal regulations and rules.
4. Provisions of contracts shall be phrased in an unambiguous and explicit manner.
5. Partners are required to identify Clients' needs and offer them the best possible solutions.

§ 5

Conflict of interest

1. "Conflict of interest" means any known circumstances which might lead to a conflict between the interests of MEWO S.A, a Partner, and also a Client.
2. Should a conflict of interests arise, or in case of any unclear situations or doubts as to whether a conflict of interests could arise (which would be difficult to resolve on one's own), a Partner is obliged to inform a Head or a Manager of the relevant Department or the Management Board about this fact.
3. MEWO S.A. ensures that no tasks which may inherently expose Partners to a conflict of interests are included within the scope of duties and powers assigned to them.

§ 6

Acceptance of benefits

1. A Partner shall neither accept nor present any gifts in circumstances where accepting or presenting a gift may indicate providing or obtaining a financial advantage or compensation for a service rendered or to be rendered.
2. A Partner shall neither accept any unjustified financial advantages, including gifts, services, loans, nor agree to receive preferential treatment from a Client in exchange for cooperation with MEWO S.A.

§ 7

Confidentiality protected by law

1. A Partner shall observe confidentiality and shall neither disclose classified information nor use it in order to gain a financial or personal advantage.
2. MEWO S.A. especially protects the following information:
 - a) trade secrets,
 - b) information related to personal data,
 - c) confidential information,
 - d) professional secrets.

§ 8

Personal data

1. Each Partner who has access to personal data shall be aware of the importance of protecting personal data and maintaining its safety, and shall take measures necessary to protect the rights and interests of those who entrust the safety of their personal data to them.
2. A Partner shall not pass any information containing personal data in a manner which is contrary either to provisions of law or the internal regulations of MEWO S.A. on that issue.

§ 9

Ensuring life and health safety of the Partners

1. MEWO S.A. declares that life and health are of supreme importance to it.
2. In order to protect life and health, it has been implementing the highest HSE standards.
3. MEWO S.A. uses personal protective equipment of the highest standard and carries out activities to raise awareness of all Partners regarding their use.
4. MEWO S.A. has implemented an alcohol and drug policy.
5. In order to verify the safety regulations implemented, audits, inspections and controls are carried out.

§ 10

Complaints and claims

1. MEWO S.A. is committed to building the best possible relationships with Clients. Partners provide Clients with a complete, accurate and comprehensible offer. This allows the gaining of trust of Clients who perceive MEWO S.A. as a reliable business partner.
2. If a Client submits a complaint or claim, MEWO S.A. considers it in a proper, timely, and comprehensible manner complying with internal rules in this regard.
3. MEWO S.A. examines the complaints and claims received in order to determine the causes of Clients' dissatisfaction and to take remedial actions, especially the ones aimed at improving the quality of the services provided.

§ 11

1. MEWO S.A. pursues its goal. Partners are aware that mutual assistance and cooperation enables reaching a common goal. Partners optimise their actions and account for the results of work and services provided by them.
2. The Partners endeavour to continuously develop their competences and improve the quality of the services provided by adapting to the ongoing changes in the industry, taking into account the legal, technological and infrastructural environment.
3. MEWO S.A. is able to respond to these changes and adapt its offer as well as the manner of activity to suit Clients' needs.
4. The continuous development and proactive approach allow projecting MEWO S.A. as a reliable company applying the highest standards and following the current trends.

§ 12

1. MEWO S.A. shall perform any activity with due care for the environment

2. The detailed rules to prevent potential environmental hazards have been specified in the document entitled "Environmental policy".
3. In order to ensure that the approved regulations are implemented, Partners undergo training and audits are conducted.

§ 13

Final provisions

1. Partners are required to comply with the provisions of the Code and follow its rules.
2. Partners shall be subject to disciplinary sanctions for violations of the rules set out in the Code.
3. Partners, especially those holding managing positions, should promote the knowledge of the Code among their colleagues.

Straszyn, 12.11.2024



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