

Code of Conduct

We promote responsible business conduct, including decent working and environmental standards within all Prime Label Group plants and in our total value chain. We cooperate closely with our suppliers, distributors and other partners in pursuit of our aim for continuous improvement for people, society and the environment.

This Code of Conduct covers human rights, workers' rights, the environment, corruption and animal welfare. It is in line with the UN Guiding Principles on Business and Human Rights and is based on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Our Principles

1. Human Rights (UN Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights)

- 1.1. Human rights must be supported and respected within the Group own operations and in the supplier chain.
- 1.2. It must be ensured that neither employees nor business partners participate, directly or indirectly, in violations of human rights. This also includes situations when the company fails to pose questions of human rights or benefits from violations that are carried out by a third party.

2. Child Labour (UN Convention on the Rights of the Child Art. 32, ILO Conventions Nos. 138, 182 and 79, and ILO Recommendation No. 146)

- 2.1. The minimum age for workers shall not be less than 15 and comply with:
 - the national minimum age for employment, or;
 - the age of completion of compulsory education, whichever of these is higher. If local minimum is set at 14 years in accordance with developing country exceptions under ILO Convention 138, this lower age may apply.
- 2.2. There shall be no recruitment of child labour defined as any work performed by a child younger than the age(s) specified above.
- 2.3. No person under the age of 18 shall be engaged in labour that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development, including night work.



- 2.4. Policies and procedures for remediation of child labour prohibited by ILO conventions no. 138 and 182, shall be established, documented, and communicated to personnel and other interested parties. Adequate support shall be provided to enable such children to attend and complete compulsory education.
- 2.5. If child labour is detected, the company must act based upon the best interest of the child and find suitable solutions in consultation with the child and the family of the child.

3. Forced and compulsory labour (ILO Conventions Nos. 29 and 105)

- 3.1. There shall be no forced, including slave, bonded or involuntary prison labour. All labour must be voluntary without threat of penalty or similar.
- 3.2. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to terminate their employment following a reasonable period of notice.

4. Discrimination and harassment (ILO Conventions Nos. 100 and 111 and the UN Convention on Discrimination Against Women, UN Covenant on Civil and Political Rights, Art. 7)

- 4.1. There shall be no discrimination at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic affiliation, sex, civil status, pregnancy, religion, social or ethnic origin, nationality, physical ability, political opinions, union membership, gender crossing identity or expression, age, health condition, or sexual orientation, or other character trait that is protected by applicable legislation. Discrimination refers to any distinction of employees that is not based on merits or qualities but involves differential treatment on biased grounds.
- 4.2. Procedures must be in place to promote diversity and equal opportunities in the operation.
- 4.3. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds, e.g. marriage, pregnancy, parenthood or HIV status.
- 4.4. Harassment may not occur in the operation. Harassment refers to instances when employees are exposed of harsh or inhumane treatment. Any form of psychological or physical abuse or punishment, threats of physical abuse, sexual or other harassment and verbal abuse, as well as other forms of intimidation, is prohibited.

5. Freedom of Association and the Right to Collective Bargaining (ILO Conventions Nos. 87, 98, 135 and 154)

- 5.1. Workers, without distinction, shall have the right to join or form trade unions of their own choosing and to bargain collectively. The employer shall not interfere with, obstruct, the formation of unions or collective bargaining.
- 5.2. Workers' representatives shall not be discriminated and shall have access to carry out their representative functions in the workplace.
- 5.3. Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.



6. Regular Employment (ILO Convention No. 95, 158, 175, 177 and 181)

- 6.1. Obligations to employees under international conventions, national law and regulations concerning regular employment shall not be avoided using short-term contracting (such as contract labour, casual labour or day labour), sub-contractors or other labour relationships.
- 6.2. All workers are entitled to a contract of employment in a language they understand.
- 6.3. The duration and content of apprenticeship programmes shall be clearly defined.

7. Wages (ILO Convention No. 131)

- 7.1. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages should always be enough to meet basic needs, including some discretionary income. Salary must be paid directly to the employee at the agreed time and in full.
- 7.2. All workers shall be provided with a written and comprehensible contract outlining their wage conditions and method of payments before entering employment.
- 7.3. Deductions from wages as a disciplinary measure shall not be permitted.

8. Working Hours (ILO Convention No. 1 and 14)

- 8.1. Working hours shall comply with national laws and benchmark industry standards, and not more than prevailing international standards. Weekly working hours should not on a regular basis be more than 40 hours.
- 8.2. Workers shall be provided with at least two days off for every 7-day period and have breaks during the working day.
- 8.3. Overtime shall be limited and voluntary. The total of overtime and regular working hours must not exceed an average of 48 hours within a 7-day period over an accounting period provided by law. Exceptions to this are accepted when regulated by a collective bargaining agreement.
- 8.4. Workers shall always receive overtime pay or time-off equivalent for all hours worked over and above the normal working hours (see 8.1 above), minimum in accordance with relevant legislation.
- 8.5. Leave, including holidays, public holidays, sick leave and parental leave must be approved and reimbursed in accordance with national law.
- 8.6. All workers must be covered by social insurance in accordance with national law.

9. Health and Safety, Chemicals (ILO Convention No. 155 and 170, ILO Recommendation No. 164)

- 9.1. The working environment shall be safe, healthy and hygienic, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed, handled safely and safety data sheets must be available. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in, the course of work, by



minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

- 9.2. There must be a register of accidents and incidents. Incidents mean events that could have led to an accident.
- 9.3. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers. Workers must regularly receive relevant training and instructions to be able to manoeuvre machines and other equipment.
- 9.4. Workers must have access to all necessary protective equipment without having to pay for it.
- 9.5. Temperature, air quality and noise level must be regulated in accordance with local legislation.
- 9.6. Where the working environment cannot be changed, it must be remedied with protective equipment.
Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 9.7. Accommodation, where provided, shall be clean, safe and adequately ventilated, and shall have access to clean toilet facilities and potable water.
- 9.8. Fire drills should be held regularly. Fire equipment, evacuation plans and emergency exits must be available and well visible in all space.

10. Environment

- 10.1. Measures to minimise adverse impacts on human health and the environment shall be taken throughout the value chain. This includes minimising harmful chemicals/chemicals, minimising pollution, promoting an efficient and sustainable choice and use of materials and resources, including energy and water, minimising greenhouse gas emissions in production and transport, protecting biodiversity, land & wood, The local environment at the production site shall not be exploited or degraded.
- 10.2. Compliance with local, national and international environmental protection legislation and regulations must be assured. A system for law enforcement control with law lists must be in place, and relevant discharge permits obtained.

11. Marginalised Population (UN Covenant on Civil and Political Rights, art. 1 and 2)

- 11.1. Production and the use of natural resources shall not contribute to the destruction and/or degradation of the resources and income base for marginalised populations, such as in claiming large land areas, use of water or other natural resources on which these populations are dependent.

12. Anti-Corruption (UN Convention against Corruption and bribery legislation)

- 12.1. Corruption in any form is not accepted, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. All forms of corruption must be countered.



13. Sanctions

- 13.1. Financial sanctions are a significant part of the global fight against financial crime and are used by governments all over the world to restrict or prohibit trade with foreign targets which are involved, or suspected of being involved, in illegal activities.
- 13.2. All [Company name] business partners must regularly check that they do not conduct business with any persons, groups, entities, or countries on the given sanction lists:
 - the UN consolidated sanction list published on: <https://www.un.org/securitycouncil/content/un-scconsolidated-list>
 - Office of Foreign Assets Control, Sanctions List (U.S): <https://sanctionssearch.ofac.treas.gov/>
 - Other Sanctions List are the consolidated list of persons, groups and entities subject to EU financial sanctions published on http://eeas.europa.eu/topics/sanctions-policy/8442/consolidated-list-ofsanctions_en or any similar sanction list issued or maintained or made public by any of the Sanctions Authorities.

14. Animal welfare

- 14.1. Animal welfare shall be respected. Measures should be taken to minimize any negative impact on the welfare of livestock and working animals.
- 14.2. National and international animal welfare legislation and regulations shall be respected.

Signed by:

Arkadiusz Sapiecha



PRIME LABEL INVESTMENT COMPANY
CEO
12.12.2024



