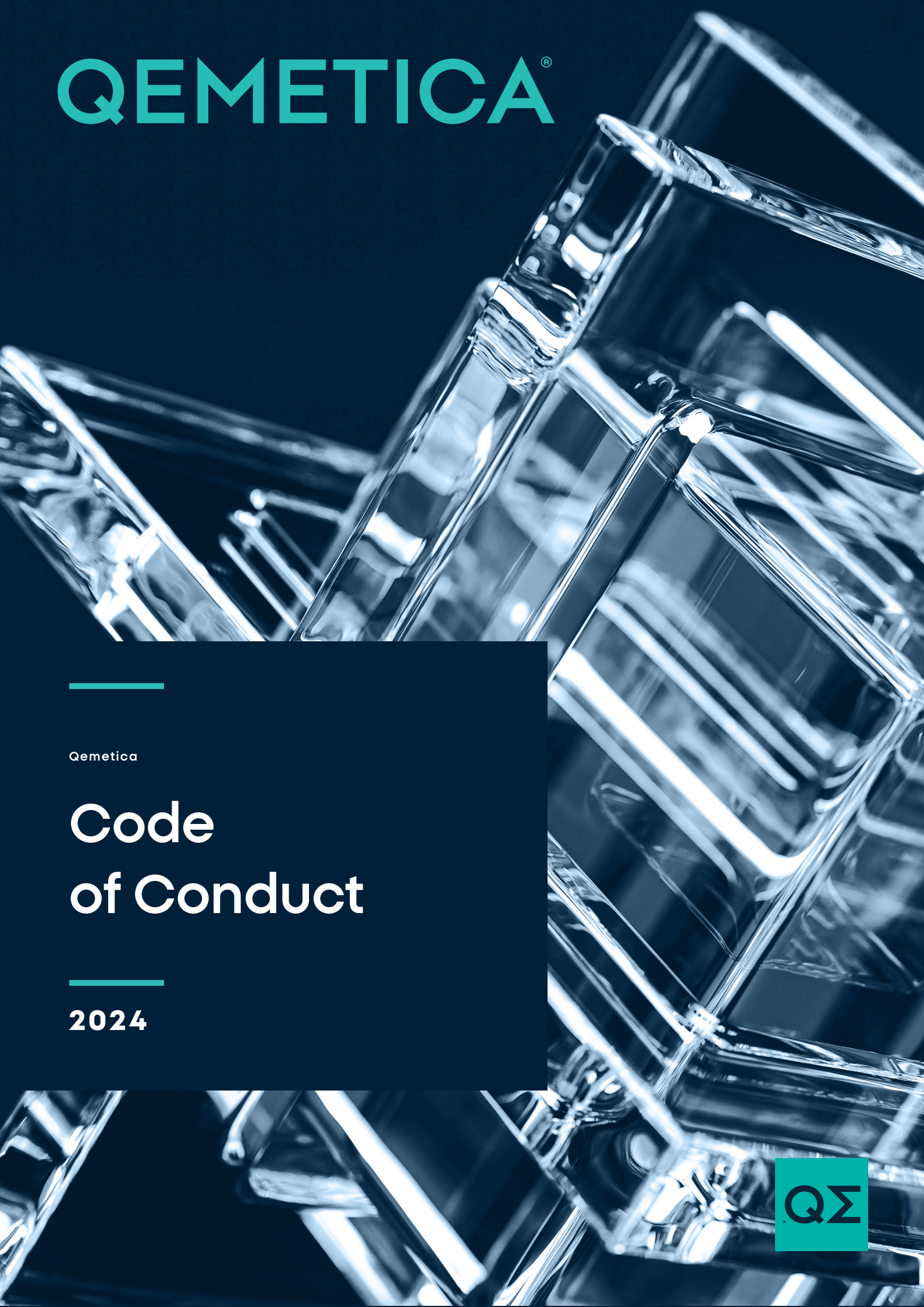
QEMETICA®



Qemetica

Code of Conduct

2024

The success of QEMETICA depends directly on our conduct. Together, we focus our efforts on building the future and developing our organisation. This requires engagement of all employees within QEMETICA, the trust of our partners, customers and shareholders, but also public authorities and communities in eachlocation where we operate.

In order to achieve this, we must strictly comply with laws and regulations, both internal and those applicable to all of us. At the same time, we must ensure that each decision comes from a sense of ethical accountability.

In this spirit, we have jointly developed the Code of Conduct of the QEMETICA, i.e. a set of rules and standards of conduct that we adhere to in our daily work. The Code is also the source of our values, forming the foundation of QEMETICA's business – to be reliable, honest and effective, as well as friendly to employees and our environment.

To us, the Code is a signpost that sets the course of action on everyday basis. It provides support in situations that we may experience while performing our work.

On the other hand, for our customers it is the basic information about the principles we apply to build relationships with our business partners. When it comes to all our other stakeholders, including shareholders, local communities and public institutions, the Code is our commitment to adhere to fundamental principles and set ambitious goals that enable us to implement the idea of sustainable development, respect for the law, respect for equality, protection of the natural environment and our planet's resources. It is a reflection of the standards and best practices that guide us in conducting responsible and ethical business operations.

Our Code is based on the four values of the QEMETICA, responding to the challenges of the modern world related to all aspects of our business activities. These values, namely, do the right thing, work together and go beyond, supported by robust and unambiguous principles of ethics, law, safety and mechanisms of reacting to any disturbing phenomena and signals, are at the very core of QEMETICA - a modern, effective, reliable, transparent and environmentally friendly chemical holding, with a global scale of operations.



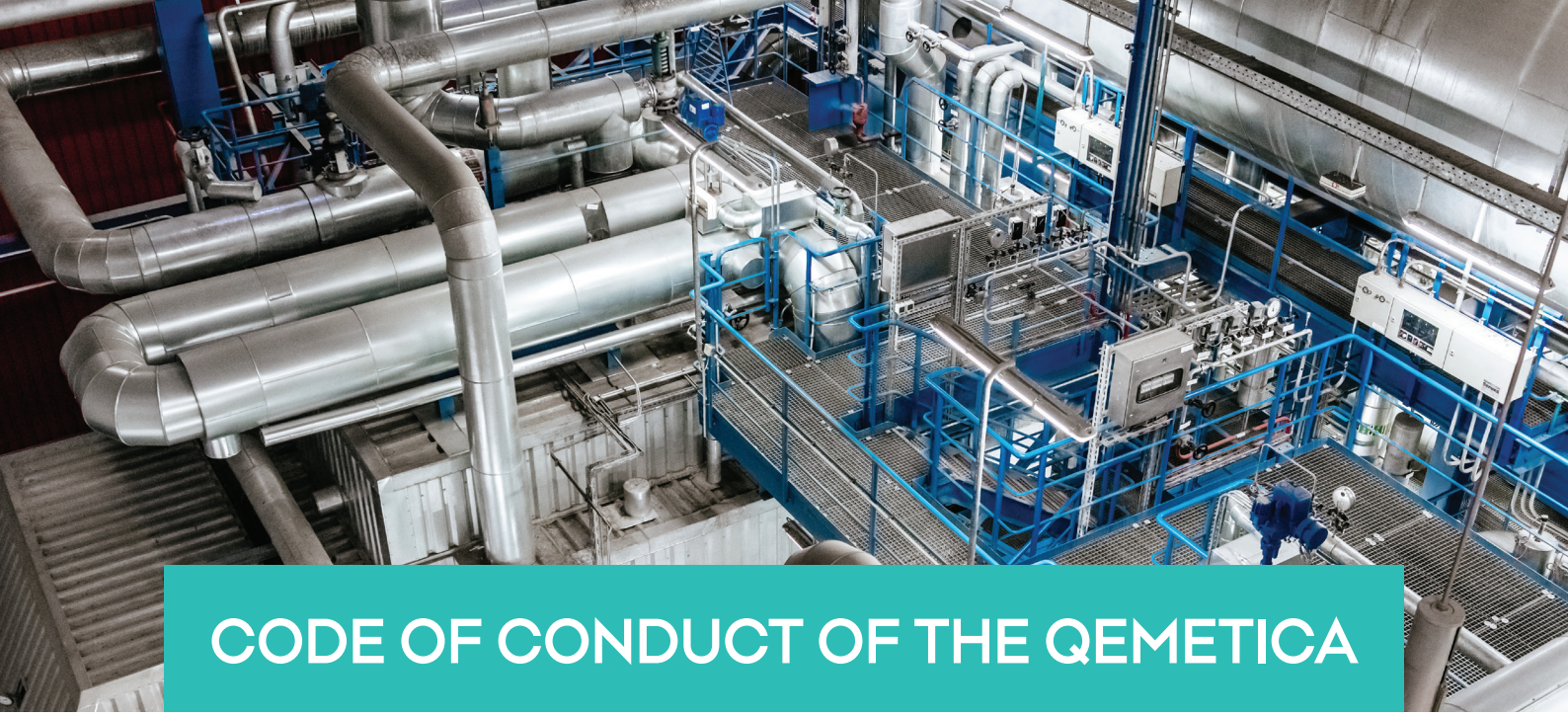
Sebastian Kulczyk

CHAIRPERSON OF THE SUPERVISORY BOARD OF QEMETICA S.A.



Kamil Majczak

PRESIDENT OF THE MANAGEMENT BOARD OF QEMETICAS.A.



CODE OF CONDUCT OF THE QEMETICA

Code application

The Code describes behaviour models addressed to all employees and associates of QEMETICA - regardless of the form of the their contractual relationship. The provisions of the Code are also targeted at our business partners and shareholders, since we are convinced that common values and principles form the very foundation of effective cooperation and sustainable development, based on respect for law and honesty. The Code is a guideline for all decisions made at each level of QEMETICA, thus, internal policies and procedures are based on its provisions, creating a uniform system of corporate documents..

We cherish the values of the QEMETICA

We have developed our values in the course of extensive cooperation. Defining and describing values enables us to better understand the uniqueness of QEMETICA and the expectations that we set for ourselves.

We base our activities on the following four fundamental values:

Doing the right thing

By working to build value for our clients, both internal and external. We care about the company's good results and that is why we keep our commitments, taking full responsibility for our tasks and we act in the spirit of an entrepreneur, taking care of the company as if it were our own.

Work together

By always communicating with positive intention, sharing and asking for feedback, talking kindly and treating each other with respect. We support and benefit from diversity and are able to challenge each other constructively, appreciating each other every day. .

Going beyond

By ensuring that each of us takes care of our own safety and good energy to act, in order to build openness to change, courageously challenge the status quo and look for the best solutions to find job satisfaction and act with passion.



OUR PEOPLE

We observe and safeguard human rights

The human being is of essence to us. Therefore, we attach great importance to business ethics, which is permanently inscribed in our strategy and everyday work. We are proud to be a signatory of the United Nations Global Compact declaration. We adhere to internationally recognised human rights and labour standards. Within QEMETICA and in relations with the market environment, we support and promote freedom of association. We support the elimination of all forms of slavery, forced labour, child labour and the actual abolition of juvenile labour..

Safety at work is the highest priority to us

We care about the health and safe working conditions of our employees, customers, suppliers and subcontractors providing us with their services or staying on the premises of our plants. We are guided by the following two fundamental principles::

1. zero tolerance for people who violate occupational health and safety regulations and standards, and
2. ensuring high OHS standards.

We are continuously improving our activities in the area of occupational health and safety, among others, by modernising our production technology, taking into account, first of all, our employees' safety. We systematically raise the awareness and qualifications of our employees in work safety, striving to eliminate accidents/injuries at work and occupational diseases. We promote the participation and involvement of employees in the continuous improvement of our occupational health and safety system, as well as in preventing potentially accidental events. The high health and safety standards that we have put in place apply not only to our employees, but also to our suppliers, subcontractors and any other individuals staying on our premises.

We ensure a friendly work environment, free from mobbing and other forbidden behaviour

Together, we build friendly relations based on partnership principles. We have the common responsibility for professional behaviour to ourselves and others. We listen to and appreciate our associates, we respect their opinions and decisions, even if they differ from ours.

We create a work environment free from any mobbing, humiliating, ridiculing or isolating behaviour. We promote the principles of equal treatment in the recruitment, employment, remuneration and promotion processes in which our employees are involved. We take care of the dignity and friendly working environment for each employee, showing them due respect regardless of their religion, skin colour, beliefs, gender, sexual orientation or age

We have zero tolerance for alcohol and intoxicants in the workplace

Work requires conscious thinking and the ability to respond quickly as the safety of other associates or our business partners depends on it. We do not tolerate alcohol or drugs in the workplace, either their consumption or being under their influence at the time and place designated for carrying out official duties..



OUR WORLD

We respect the natural environment

We are part of the chemical industry, which is of great benefit to mankind, but at the same time, there is some price involved, namely its impact on the environment. This means that while running our business, we remember about responsibility for the fate of future generations and our planet. Accordingly, we strive to eliminate any negative environmental effects of our operations, and where possible, to minimise them. We make every effort to ensure that our actions are fully consistent and harmonious with the idea of environmental protection. We observe generally applicable environmental protection laws and, where possible, adopt more restrictive internal standards. We understand the impact of greenhouse gases on the climate and that is why we are implementing ambitious projects aimed at minimising emissions and full decarbonisation in the future. We minimise environmental protection risks, among others, by reducing the use of natural resources and energy, eliminating or reducing the amount of harmful emissions, by-products of production processes and waste. We use water in a sustainable manner, minimising its consumption and taking care of the quality of local resources.

We support local communities

We care for local communities wherever our production plants are located. We are aware of our importance as an employer and work together with local authorities, NGOs and residents to improve their life quality. Our objective is developing good neighbourly relations based on open dialogue, consultation and collaboration. We engage in employee volunteering for local initiatives, and as a Group, we support socially significant initiatives in our immediate environment..



OUR GROUP

We improve ourselves

We are prepared to make bold choices and decisions in line with our values and the Code. We are continuously expanding our knowledge and experience to achieve excellence in the chemical industry. We strive to apply the best practices in all areas of our operation, while not forgetting about innovative solutions..

We ensure compliance

We proactively learn about and comply with applicable laws, internal regulations as well as industry and ethical standards – both in social and professional relations. Compliance with legal requirements and ethics in all areas of QEMETICA's operations has a positive effect on our work, regardless of the tasks performed and the place in the structure of QEMETICA.

We protect our Group's information and secrets

Confidential information plays a special role in our Group's business strategy, and any loss, destruction of, or access to, such information by unauthorised individuals may give rise to very serious consequences. We exercise particular care when accessing and processing trade secrets, personal data, expertise (know-how) of our Group and confidential information within the meaning of the public trading regulations. We protect our data against different types of threats, in particular, those related to cybercrime.

We use our company assets in a responsible way

We protect the assets and resources of QEMETICA entrusted to us against damage, destruction, theft or loss. We use the assets of QEMETICA responsibly because we are aware that they have been made available to us in order to attain specific business goals. We use the QEMETICA's assets made available to us for personal purposes to a minimum necessary extent, in line with the QEMETICA's internal regulations. We never use the Group's assets entrusted to us for our personal gain or to compete with others.

We do not tolerate any fraud or corruption

We clearly and consistently apply a zero-tolerance policy to all fraud and corruption. We show honesty in our business operations and in our daily duties, in relations with our business partners and state and local government officials, in all countries in which we operate. We also expect honesty and compliance from our business partners, with whom we work together to develop best practices to protect the trust, value and reputation of QEMETICA.



OUR BUSINESS PARTNERS

We respect free competition

Effective and fair competition is at the core of our business. We adhere to the rules of fair competition, thus having a positive impact on the economy and the quality of business transactions. Hence, we are able to offer our customers the highest quality products while achieving the set business objectives. We respond and take action where there is any violation of the principles of fair competition, either inside or outside QEMETICA, by our business partners.

We counteract conflicts of interest

A conflict of interest may jeopardise the impartial and objective performance of official duties for QEMETICA. We take measures with a view to identifying, explaining and managing cases of connections, relationships, contacts, evidence of gratitude as well as transactions or any other commitments that may affect, either directly or indirectly, the loyalty and impartiality of decisions made by our employees. We disclose the possibility of a conflict of interest to the immediate supervisor or the Ethics Committee of the QEMETICA in order to make an objective and fair decision aimed at eliminating or solving the problem..



WE REPORT DOUBTS AND VIOLATIONS

Contact with the immediate supervisor

As part of everyday duties and professional situations, doubts, dilemmas and questions may arise. There may also be situations in which we find a violation of ethical principles, law or internal regulations. In any doubt, we contact our immediate supervisor who has the adequate knowledge and experience in this regard. We report violations only in good faith. When reporting doubts or identified violations, we act in line with the values of our QEMETICA.

Official communication channels

We use the following official communication channels:

- notification by telephone – by calling: 22 639 17 99;
- (ii) email notification to the following address: compliance@qemetica.com,
- (iii) personal or written/letter notification: Compliance of the QEMETICA., ul. Wspólna 62, 00-684 Warszawa.

Investigation procedure

We carry out a fair investigation procedure whenever we receive a violation report. We protect the anonymity of the whistleblower – by not disclosing their identity, other personal data, including their image. In special cases, we ensure protection of the whistleblower against retaliation. All our investigation activities are carried out in complete confidentiality..