



# **CODE OF ETHICAL CONDUCT**

**Kodeks Etycznego  
Postępowania**

**Code of Ethical Conduct**

**Verhaltenskodex**

**Code de Déontologie**

**Código de Conducta Ética**

**КОДЕКС ЕТИЧНОЇ  
ПОВЕДІНКИ**

**КОДЕКС ЭТИЧНОГО  
ПОВЕДЕНИЯ**



Code of Ethical Conduct, Sanok Rubber Group

Edition 3, valid from 15.06.2022

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## 1. INTRODUCTION

Sanok Rubber Group performs its tasks based on the core principles of corporate social responsibility, in a reliable and trustworthy manner. This means taking into consideration social and environmental issues during all performed activities, accounting for impact on society and the environment, transparency, ethics of conduct, respect for interests of business partners, respect for law, including human rights, and respect for international standards of behaviour.

The Group's standards of conduct are laid down in this Code.

Our priority is an open and precise communication of the adopted principles. In order to achieve this goal, we put every effort to ensure that all companies cooperating with the Group have accepted and adopted the standards we set forth in our Code.

The Code of Ethical Conduct is dedicated to all Group employees, customers, suppliers and other business-related stakeholders.

**Piotr Szamburski**

President of the Management Board  
Chief Executive Officer



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## 2. OBJECTIVE OF ESTABLISHING THE CODE OF ETHICAL CONDUCT

The major objective of the Code of Ethical Conduct functioning in Sanok Rubber Group is promotion of attitudes and principles of conduct during everyday work arising from the need to build ethical culture. The Code's objective is to make it easier for all workers and cooperating entities to shape attitudes and make correct choices by indicating the ethical standards applicable in the Group.

Values included in the Code arise from the Group's culture based on respect for the welfare of its workers, the environment and shareholders.

The Code contains standards of conduct adopted in Sanok Rubber Group and it constitutes guidelines with regards to the Group's relations with co-workers, customers, suppliers, competition as well as the social and natural environment. Guidelines included in the Code do not make workers exempt from the obligation to conduct an assessment individually of a given situation which may affect the Group's reputation.

Each person employed by Sanok Rubber Group, suppliers of materials and services as well as other interested parties are obliged to observe the Code of Ethical Conduct.



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## 3. OUR CORE VALUES

Considering the overarching principle of respect for the rule for law, observing international standards of conduct and our sense of responsibility for the impact exerted by our activity on the environment, we declare that we shall act in accordance with principles laid down in this Code.

### RESPECT FOR HUMAN RIGHTS AND PARTNERSHIP

We respect human rights, including freedom, equality, the right to work, legal protection, social protection, education and starting a family. Our decisions and actions do not violate dignity of people and entities. We build long-term relations based on mutual respect, trust and mutually beneficial relations with our workers and business partners.

### RESPONSIBILITY

During building the Group's value and reputation, we assume responsibility for our impact on the environment. Irrespective of our standpoint, we make every effort in order to make full use of our knowledge and skills. Decisions are made in a responsible manner and agreements as well as obligations are implemented consistently.

We conduct our business activity in the spirit of sustainable development and corporate social responsibility.



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## TRANSPARENCY

This value is strengthened by clear communication with co-workers and business partners. We clearly communicate rights and requirements. We provide employees with necessary resource base to perform their tasks.

Our cooperation with customers, contracting parties and other shareholders is characterised by openness and lucidity regarding presentation of reasons for our actions.





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## 4. WORKERS

### 4.1. Personal strategy

The creation of a climate enabling the fulfilment of the needs and expectations of both workers and the employer and consequently, building high efficiency work culture constitutes to a significant component of our personal strategy.

We search for, employ and support development of the workers' professional career based on their qualifications and skills. The recruitment and professional career process, staff evaluation and promotion take place in a manner ensures equal treatment of workers and job applicants.

The workers are forbidden to give, accept or solicit advantages, exert pressure on co-workers or offer favours with the aim to employ a given person, change the terms and conditions of employment or ensure promotion.

We support fulfilment of the workers' professional ambitions by their professional development. Workers who improve their skills and qualifications develop along with the company. Each worker is obliged to perform their tasks making use of their qualifications, their best knowledge and their skills.

The Group ensures financial means and determines the basic training policy.

Our business relationship is based on integrity, clearly defined requirements and expectations.



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## 4.2. Forced labour

Forced labour means labour performed by a given worker against their will for which they receive no remuneration or for which they receive remuneration which does not comply with the applicable law.

No forms of forced labour are permissible. We do not benefit from these forms of labour. The Group does not force anybody to work or provide services and it does not impose penalties if somebody refuses to do so. We accept only voluntary work and provision of services. Furthermore, we do not benefit from forced prison labour, slavery or human trafficking. The Group has a zero tolerance approach to any form of modern slavery.

## 4.3. Absence of discrimination and prosecution

All workers are treated equally, irrespective of their sex, age, skin colour, outer appearance, disability, ethnic origin, nationality, religion, beliefs, sexual orientation, parenthood, property status, political convictions, trade union membership, occupational position, seniority, employment for a definite or indefinite period of time, full-time or part-time employment or other conditions on which discrimination is based. We make every effort in order to oppose all forms of discrimination, harassment, mobbing, victimisation and bullying.

We respect freedom of opinion and expression as well as the right of people to have different views and express their opinion. However, we do not accept imposing somebody else's philosophy and its ostentatious presentation.

We do not accept slander or the distribution of false information.





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## 4.4. Right to form and join associations

We respect our worker's right to freedom of association and to be part of political parties and associations.

Workers may freely organise and join trade unions in accordance with local law and regulations of trade union organisations. Representative organisations created by our workers take active part in developing collective labour agreements. Workers participate in making decisions regarding their affairs, including the terms and conditions of employment, through their representatives appointed in accordance with the applicable legislation and existing practices.

Sanok Rubber Group declares its willingness to constructively cooperate with the workers' representatives, engage in dialogue and aim to reach agreement relating to the achievement of the balancing of interests. None of the workers' representatives is either favoured or discriminated against.

## 4.5. Not employing children

Sanok Rubber Group decisively declares that it does not and will not employ children.

Non-strenuous work performed by children above the age of sixteen years for the purpose of apprenticeship which is not harmful to them and which does not impede their participation in classes or other activities necessary for their full development is not regarded as employment of children.

The Group also undertakes not to establish and maintain business relations with entities which employ children.



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## 4.6. Occupational Health and Safety (OHS)

We aim at creating a culture of safety in the workplace. Our priority is to ensure the health and life of employees and other people staying within the company's premises, to prevent occupational accidents and diseases by ensuring proper work organisation, safe machinery and tools.

We conduct various activities improving OHS:

- we arrange workstations in such a manner so that they prevent injuries and occupational illnesses, we apply technical solutions improving OHS,
- we conduct research on factors which are detrimental to health at the workplace and we conduct a risk assessment and identification of threats to workers,
- we limit workers' exposure to chemical agents, we broaden the awareness of workers, visitors and subcontractors by conducting trainings on OHS and presenting visualisations,
- we provide the required protective equipment, including collective and individual protection measures, in order to prevent occupational diseases and accidents in the workplace,
- we determine the OHS criteria for the assessment and qualification of subcontractors,
- we encourage workers to take part in creating safe working conditions.

We require our workers and persons staying within the company's premises to strictly observe safe working practices and procedures.



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## 4.7. Balance between work and private life

The Sanok Rubber Group of Companies promotes the principle of work-life balance among workers, which includes performing work duties within designated hours and limiting overtime work. This principle shall also apply to the use of free time during business trips.

## 4.8. Sanok Rubber Group's property

The workers use the resources entrusted with them and other resources accessible to them. They use them in a responsible, efficient manner, only for the purpose of performing tasks for the benefit of the Group. The workers are responsible for the protection of the Group's property against its loss, damage, use in a manner which is not compliant with its intended purpose and use by unauthorised people.

## 4.9. Conduct outside the workplace

All workers shape Sanok Rubber Group's image and reputation by their conduct.

We respect the right to privacy, taking into consideration that irresponsible behaviour of one worker may cause significant damage to the Group. Therefore, each worker must know their public speeches and publicly expressed opinions should not cause be liable to damage to the Group's reputation.



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## 4.10. Contact with public institutions

Contact with public institutions is made through authorised people and it takes place in compliance with the provisions hereof.

We cooperate with state institutions and are subject to the control of relevant entities in accordance with applicable law. Workers are authorised to provide institutions conducting control with information and are obliged to be fully involved and to cooperate with them.





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## 5. BUSINESS PARTNERS

All established business contacts serve Sanok Rubber Group's best interests and are established with respect for the rights and for the benefit of the customers. We follow the principles of responsibility and trust in its relations with business partners.

Due to the fact that we are a global company, we comply with international trade laws governing the movement of products, technology, software and technical information across national borders.

We respect the stakeholders' interests and rights and respond to their concerns, if any.

### 5.1. Fair competition

Fair cooperation with business partners based on the observance of competition law principles and antitrust law principles is Sanok Rubber Group's standard.

We are not engaged and do not participate in activities aiming at restricting competition. We support anti-trust and anti-dumping practices.

We respect our competitors' reputation as we are aware of the fact that we co-create the market and compete on brand, business conditions, and the quality of our products. At the same time, we take the social impact of our business activity into consideration. In addition, we do not take advantage of social conditions, such as poverty in order to gain an unfair advantage over our business competitors.





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## 5.2. Tackling corruption

Corruption means misuse of entrusted powers in order to gain private benefits.

Sanok Rubber Group's workers are obliged to comply with the highest standards of integrity in their relations with co-workers and business partners inside and outside the Group.

Sanok Rubber Group's workers are not allowed to use business contacts in order to gain benefits for themselves, for the benefit of third parties or to act to the detriment of the Group. None of the workers grant or receive profits whose granting or receiving exerts influence on making a given decision.

The Sanok Rubber Group adheres to the principles of fair competition, preventing bribery, illegal payments and corruption. It is the responsibility of the employees of the Sanok Rubber Group to avoid corrupt behaviour, i.e. accepting and offering financial benefits that could be considered as improper remuneration or benefits as part of business and commercial activities.

An unfair benefit is a benefit which could be considered as a bribe to the recipients, given for them to perform their official duties in the manner expected by the benefactor. This prohibited benefit may include cash, a gift, entertainment, leisure travel, or other types of services. This does not apply to business meetings (lunches, dinners) with clients, business partners, which take place as part of the official duties and small occasional gifts, both received from and given to business partners.

We recommend donating the gift funds to a good cause indicated by us, rather than giving occasional gifts to our employees.

We do not carry out activities regarded as money laundering and we do not accept and use money obtained



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as a result of criminal acts. We verify credibility of a given partner and legality of their business activity before we start a business relationship with them.

### 5.3. Trade compliance

Due to the fact that we are a global company, we comply with international trade laws governing the movement of products, technology, software and technical information across national borders.

### 5.4. Prevention of conflicts of interest

It is the responsibility of the employees of Sanok Rubber Group to avoid any activity leading to a conflict of interest. The following situations, in particular, may cause a conflict of interest:

- worker's disposal (direct or indirect) of financial participations or having a legal interest in a competitive company or another entity which is, or which strives to become a customer, supplier or service provider of the Group,
- involvement of workers or members of their families (irrespective of the form of this involvement) in the work of another business entity which is or strives to become a customer, supplier or service provider of the Group or which conducts competitive activity,
- the receiving of unjustified personal benefits by workers from a third party due to their function in the Group,
- other situations where the worker's interest is contrary to the Group's interest.

Taking care of Sanok Rubber Group's image, we undertake activities aiming at the elimination of conflicts of interest. We avoid situations in which their personal interests or interests of legal entities or natural persons they



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are related with are in conflict with the Group's interests. Workers are obliged not to take any actions that may generate a conflict of interest, including financial, personal or family interests.

A situation which may constitute a conflict of interests should be reported to a direct superior who is obliged to choose a solution which will enable the avoidance of a controversial situation.

### 5.5. Respect for property rights

At Sanok Rubber Group, we implement practices fostering respect for property rights, including traditional knowledge. We are not engaged in activities violating property rights as well as we are not involved in forging or piracy. We also makes sure that we may use a given property or dispose of it in accordance with the law. We ensure fair payment for property which has been acquired or used by us.

We use legal software and we use it in accordance with the law.



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## 6. NATURAL ENVIRONMENT

### 6.1. Prevention of pollution

We identify environmental aspects of our business activity and we assess the impact of our decisions and activities on the environment. We also know the sources of environmental pollution as well as the waste sources.

We take measurements, record and report the results of our impact on the environment, including the amount of waste, raw material and energy consumption as well as the amount of waste produced. Negative influence on the environment is counterbalanced by activities aiming at its protection.

Owing to the fact that we use hazardous substances and their mixtures in the production process, we apply protective measures and implement preventive measures to avoid their release into the environment.

Awareness-raising and educational activities are conducted among the workers in order to support activities aiming at the protection of the environment, both within the organisation and in the influenced area.

### 6.2. Sustainable resource use

We reasonably use the environment, fulfilling all legal requirements. We identify the used resources and we take measurements, register and report their consumption. We search for and implement methods which improve the efficiency of their use. At the same time, we reasonably manage natural raw materials and we undertake activities aiming at economical use of electrical energy.





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## 6.3. Supply chain due diligence

Due diligence is a process involving the identification, prevention, mitigation and elimination of actual and potential hazards resulting from activities that cause violence, lead to the violation of human rights and have negative impact on the environment.

In order to exercise due diligence, we check whether the metals and minerals in our supply chain are sourced in a responsible manner.

Owing to the fact that we are engaged in the policy of responsible sourcing of raw materials, we do not use raw materials the extraction and trade of which financially support military operations.

Our suppliers are required to provide statements that the raw materials supplied by them are not conflict minerals.





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## 7. LOCAL COMMUNITY

Operating within a specified community and local environment, we strive to maintain positive and mutually beneficial relations by means of the financial support of cultural events, citizens' initiatives, activities of sports clubs, local health care, societies and associations helping those in need.

## 8. HANDLING OF INFORMATION

### 8.1. Personal data protection and data safety

While conducting its business activity, Sanok Rubber Group gathers confidential data regarding its workers and contractors. These data are used only for specific purposes. It takes place in a manner which is compliant with the applicable provisions of law and with the best practices concerning data protection. Confidential data of workers, members of their family, customers, suppliers, job applicants and other groups of people are protected and safely stored.

The Group's workers are obliged to observe the requirements regarding data protection, provisions of law and internal regulations relating to protection of information.



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## 8.2. Official secret and handling of confidential information

Each worker is obliged to keep the received information related to Sanok Rubber Group's activity and other non-public information confidential. The Group does not disclose data which are significant for the implementation of business objectives and whose disclosure could be detrimental to the Group's interests.

The Group's workers and workers of the cooperating companies are obliged not to provide third parties with any confidential information.

Confidential information also comprises information concerning remuneration and other benefits related to work, particularly their amount of and principles for their establishment. Information on remuneration is not provided to unauthorised people employed both in the Group and in institutions which cooperate with Sanok Rubber Group.

## 8.3. Reporting

Our statements and reports are true, comprehensible, precise and prepared on time.

Statements and announcements are prepared by authorised workers.

Reporting is carried out in accordance with legal requirements and involves a wide range of activities, including OHS and environmental impact. Financial data is disclosed in reports in accordance with generally accepted accounting practices.

Any issues related to our impact on the environment, social responsibility and corporate governance are laid down in the Group's non-financial report published on the website of Sanok Rubber Company SA.



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## 9. FUNCTIONING OF THE CODE OF ETHICAL CONDUCT

The Code shall be made available to all workers of Sanok Rubber Group, entities which work for the benefit of the Group and business partners. The Code is available at Sanok Rubber Company S.A.'s website and at the internal website as well as at individual websites of all subsidiaries.

Should there be any ambiguities regarding the application of the Code, a given worker asks for the assistance of their superior or a person acting as the Ethics Officer.

Sanok Rubber Group encourages workers at all the Group's levels and interested parties to actively participate in improving the Code and to submit comments concerning its content and application.

Violations of the provisions of the Code shall be treated rigorously, including imposing sanctions adequate to the significance and character of a given violation. Failure to observe the principles of the Code may also result in the termination of employment.

During conducting proceedings for the violations of provisions of the Code, workers are obliged to cooperate in compliance with the principles of discretion.



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## 9.1. Ethics officer

A person who acts as the Ethics Officer has been appointed in each of the Group's members.

Their tasks comprise:

- the promotion of the principles of conduct included in the Code,
- supporting workers in compliance with the provisions of the Code,
- the explanation of doubts concerning the observance of the principles of the Code,
- accepting proposals regarding changes and forwarding them to the parent company's Ethics Officer,
- undertaking explanatory activities regarding the violation of the principles of ethical conduct,
- undertaking activities aiming at the amicable resolution of conflicts arising from the violation of the principles of the Code.

The Ethics Officer keeps confidential information regarding people reporting cases of violations of the Code.

Information concerning the person acting as the Ethics Officer is available at all Group members.





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## 9.2. Reporting violations of the code

All workers and shareholders of Sanok Rubber Group may report cases of violations of the principles of the Code. The Ethics Officer is a person responsible for accepting reports. Information may be reported to the Ethics Officer by means of:

- a direct meeting,
- a telephone call,
- the sending of information to the relevant e-mail addresses:
  - Draftex Automotive GmbH: [ethiksprecher@draftex.de](mailto:ethiksprecher@draftex.de),
  - COLMANT CUVELIER RPS: [service.rh@ccrps.fr](mailto:service.rh@ccrps.fr),
  - Stomil Sanok – Dystrybucja Sp. z o.o.: [rzeczniketyki@stomildystrybucja.pl](mailto:rzeczniketyki@stomildystrybucja.pl),
  - Stomil Sanok Ukraina Sp. z o.o.: [rzeczniketyki@stomilsanok.com.ua](mailto:rzeczniketyki@stomilsanok.com.ua),
  - Sanok RC S.A. and in other companies: [rzeczniketyki@sanokrubber.pl](mailto:rzeczniketyki@sanokrubber.pl).

Such a report should contain the contact information of the reporting person.

The Ethics Officer ensures discretion with respect to all people reporting a given violation.

Having received the notification, the Ethics Officer shall immediately undertake explanatory proceedings. He analyses it on their own or engages with other people who provide support during explaining a given issue and the undertaking of various activities.





**SANOK RUBBER**

**Kodeks Etycznego  
Postępowania**

**Code of Ethical Conduct**

**Verhaltenskodex**

**Code de Déontologie**

**Código de Conducta Ética**

**КОДЕКС ЕТИЧНОЇ ПОВЕДІНКИ**

**КОДЕКС ЭТИЧНОГО ПОВЕДЕНИЯ**

The Ethics Officer notifies the Director / Manager of the area in which has the occurred violations of the principles and undertaken actions. The reporting person receives a reply concerning taking into consideration the reported issue within a week from the completion of the relevant proceedings.

Workers may also report violations concerning the observance of the principles of the Code to their superior.

### 9.3. Final provisions

Suffering any consequences as a result of reporting any potential violation of the Code in good faith or asking for an explanation are both unacceptable.

All activities carried out in order to explain the reported issue are conducted in a manner which protects the identity and reputation of the person concerned.