



Code of Ethics for Suppliers





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1. Introduction

Wawel S.A. is committed to working only with suppliers who share our ethical values and strive for the highest quality standards. This Code of Ethics for our contractors, suppliers, manufacturers, service providers involved in the production and/or delivery of goods and/or services **[Suppliers]** sets forth expectations for our Suppliers in terms of social, environmental responsibility and compliance with the law.

Suppliers of Wawel S.A. involved directly or indirectly in the execution of the contract/order shall comply with the provisions of applicable national and international law. In addition, they should avoid any action that could cause Wawel S.A. to violate applicable laws or be subject to penalties under applicable laws.

2. Anti-Corruption

Suppliers agree to avoid any corrupt practices in connection with the negotiation, conclusion or execution of contracts/orders. In particular, they will not make or allow illegal payments, offer bribes, gifts, gratuities or commissions as an inducement or reward for performing or refraining from any activities related to contracts/orders.

3. No Conflict of Interest

In all instances, Wawel S.A.'s suppliers should avoid conflicts of interest and not engage in any activities that are or may be perceived as influencing decisions that are unfavorable to Wawel S.A. and the concluded contract/order.

Wawel S.A. requires that all business transactions be conducted in a transparent and fair manner.

4. Sanction Clause

The Supplier represents that neither it, its subsidiaries or its affiliates:

- a. are currently subject to any (economic) sanctions administered or enforced by Poland or the European Union or any similar sanctions imposed by any other authority, governmental or otherwise ("Sanctions")
- b. are currently the subject of an investigation or proceeding that may result in the imposition of Sanctions;
- c. have conducted business in the last 5 years in a country or territory that was, or whose government was, subject to Sanctions at the time;
- d. are currently at odds with or have engaged in any conduct constituting a violation or circumvention of the Sanctions or facilitating, enabling, assisting in any violation or circumvention of the Sanctions within the past 5 years.





5. Social Responsibility, Human Rights, Labor Laws

The Parties are committed to the principles of the United Nations (UN Global Compact); in particular, they shall:

- a. Promote the protection of international human rights and prevent violations by implementing anti-discrimination policies, ensuring equal employment opportunities, and educating employees about human rights.
- b. Ensure safe and healthy working conditions that meet applicable health and safety standards and regulations. Take appropriate and effective measures to ensure the protection of employees from accidents, occupational diseases and any injuries arising in connection with the performance of their duties.
- c. Not use any forms of slavery and forced labor, by conducting regular supply chain audits and requiring certification in accordance with international standards.
- d. Address workplace discrimination by introducing anonymous whistleblowing channels and training managers on diversity and barrier removal. Support freedom of association and collective bargaining by recognizing trade union organizations and promoting social dialogue.
- e. Not cooperate with entities that use forced child labor.
- f. Undertake environmental responsibility initiatives, such as implementing programs to reduce greenhouse gas emissions, recycling and sustainable resource management.

6. Compliance with Labor Laws

Suppliers are required to comply with labor laws, including respect for employee rights, not allowing bullying, harassment, violation of dignity, and creating a hostile atmosphere in the workplace.

7. Environmentally Friendly Technologies

Suppliers are committed to using environmentally friendly technologies and supporting environmental protection efforts. Suppliers are required to operate in accordance with and within the limits of their environmental certificates and/or permits.

8. Preventive Approach to the Environment

Suppliers are required to support a preventive approach to environmental protection and minimize the negative impact of their operations and promote sustainable production methods. Suppliers should use specific methods and technologies, such as implementing environmental management systems, reducing greenhouse gas emissions, minimizing waste, using biodegradable materials, eliminating harmful substances, and preserving water resources.

9. Confidentiality and Secrecy

Suppliers agree to maintain strict confidentiality of all information obtained in connection with the execution of the order/contract, including commercial, technological, financial and personal data. This information may be used only to the extent necessary to perform obligations under the contract/order and may not be disclosed to third parties without the prior written consent of Wawel S.A., unless disclosure is required by applicable law.

Suppliers agree to implement and maintain appropriate organizational and technical measures to ensure the protection of confidential information and the preservation of confidentiality both during and after the cooperation.

10. Final Provisions

The Code obliges all Suppliers cooperating with Wawel S.A. to strictly comply with the principles set forth therein, which form an integral part of the General Terms and Conditions of Purchases of Wawel S.A. and constitute a necessary condition for a given entity to qualify as a Supplier of Wawel S.A.

Suppliers are required to take appropriate measures to familiarize employees and all participants in their supply chain with this Code.

In addition, the Supplier undertakes to provide mechanisms to monitor compliance with the Code, in particular by:

- a. Enabling an audit by Wawel S.A. or independent entities to assess compliance with the Code.
- b. Using whistleblowing systems that allow employees and subcontractors to report potential violations.

In case of knowledge or suspicion of violation of the rules of this Code, the Supplier undertakes to immediately inform Wawel S.A. in order to clarify the situation. The proper address for reporting violations is ethics@wawel.com.pl

If Wawel S.A. finds any violation of the rules of this Code, Wawel S.A. may terminate the contract/order with immediate effect, without the right to compensation or remedy for damages to the Supplier. The Supplier will also be obliged to cover expenses incurred by Wawel S.A. as a result of the violation.

This code is publicly available at www.wawel.com.pl

The Code of Ethics for Suppliers was adopted by the Resolution of the Management Board of Wawel S.A. No. 116 of December 22, 2025.

