

A Code of Ethics
of the Śnieżka Group

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Preamble

We have developed the "A Code of Ethics of the Śnieżka Group" since we feel responsible for what we create, for the environment in which we operate and the local communities where we live.

The Code is a clear set of standards that are the basis of our daily decisions. Its purpose is to facilitate making the right choices by identifying patterns and ethical norms that are essential to our business.

The Code of Ethics defines the standards of conduct addressed to all employees of the Śnieżka Group, regardless of their position, working time, time and place of work, or the type of tasks performed.

The basics of the Code of Ethics - Our Values

The Code of Ethics is established on the Śnieżka Group's values and refers to Policies and other documents defining in our company areas related to broadly understood ethics.

Employees of the Śnieżka Group declare to act in accordance with the company's values:

- **Customer** - understanding the customer's perspective and providing optimal products and services.
- **People** - creating a culture of commitment and responsibility by building a climate of cooperation and development in a safe work environment.
- **Innovation** - constant search and implementation of new (digital) solutions and better ways of doing things.
- **Business efficiency** - standardization of activities, rational management of resources and decision-making based on data and facts, taking into account a strategic perspective.

Employee relationships

The activity of the Śnieżka Group is based on creating a culture of commitment and responsibility. In relations with employees, we place emphasis on safety, development of competences and skills, as well as promoting cooperation and effective communication.

In addition, we comply with international directives regulating this area, including the directives of the International Labour Organization, the United Nations Universal Declaration of Human Rights and the European Convention on Human Rights.

Employee health and safety

The Śnieżka Group feels responsible and is committed to ensuring a safe and hygienic working environment for all its employees and encouraging its sub-contractors to pursue the same. We undertake actions to protect our employees life and health against hazards in all aspects of our business. Our objective is to prevent accidents at work, occupational diseases and near misses.

Detailed guidelines are set out in the **HR Policy** and the **Quality, Environment and Health and Safety Policy**.

A friendly workplace

We are engaged in creating an organizational culture that contributes to employees being respected and appreciated and feeling that they can develop and fully use their professional potential.

Our aim is to create the image of the Śnieżka Group as an attractive employer, and thus ensuring attraction and retention of valuable employees.

The development of employees, which provides for building high commitment as well as transparency of activities carried out in the personnel area, is of key importance to us.

Detailed guidelines are set out in the **HR Policy**.

Equal opportunities for employment, remuneration, promotion, development and professional development

We provide all employees with equal opportunities in the field of recruitment, training and promotion. We apply transparent, understandable and legally compliant remuneration principles, based on the process of job evaluation and mapping.

Detailed guidelines are set out in the **HR Policy**.

Counteracting discrimination and mobbing

We believe that by fostering the diversity of employees, we build a work environment that affects the creativity, effectiveness and loyalty of employees, and increase the chances of attracting new talents and stimulating the team's innovation, which in turn translates into the business effectiveness of the Śnieżka Group.

We are committed to implementing the principles of diversity management, including the principles of equal treatment and

counteracting all forms of discrimination, both among our employees and associates in the entire value chain.

The Group counteracts any behaviour that may be discriminatory, mobbing, insulting, harassing or disrespecting other people. We do not accept any discriminating behaviour against persons who report issued related to the application of the Code of Ethics.

Detailed guidelines are set out in the **Diversity Policy** and the **Regulations for Counteracting Mobbing, Discrimination and Harassment**.

Forced labour, child labour and freedom of assembly

Neither does the Śnieżka Group employs minors nor does it accept forced labour or any form of modern slavery. The Śnieżka Group understands freedom of assembly in the business sector as primarily the ability of employees to freely express their opinions and positions on issues related to their work without fear of retaliation, intimidation or harassment.

Detailed guidelines are set out in the Respect for **Human Rights Policy**.

Environment relations

Suppliers

Our objective is to establish transparent relationships contributing to value both the Śnieżka Group and our suppliers.

The Code of Ethics defines general ethical principles regarding relations with suppliers of the Śnieżka Group. Detailed principles of cooperation are set out in **the Supplier Code of Śnieżka Group**. Relations between Śnieżka's employees and suppliers are based on a win-win approach and striving to ensure a long-term collaboration.

Detailed guidelines are set out in the **Procurement Policy** and **the Supplier's Code of Conduct**.

Customers

The Śnieżka Group adheres to the principles of fair marketing and advertising. We provide customers with full information about the company's products, services and activities, except for information constituting technical, technological, commercial or organizational secrets, the disclosure of which could expose the company to damage.

We strive to constantly improve the quality and reliability, paying meticulous attention to issues related to the health and safety of use of our products. The products are designed to be used as intended, they are in line with the relevant standards related to safety, environmental protection and other regulations.

We keep all obligations towards customers. We improve our processes and deliver products that are better and better tailored to their volatile needs. We provide professional, responsible and

reliable B2B and B2C customer service. We strive to build a long-term rapport with our customers by demonstrating honesty and reliability. We are convinced that we provide our customers with real value.

Local community

The overriding aim of all the actions taken is actual support and assistance in the selected areas, in accordance with the principle of equalling opportunities and sustainable development.

We participate actively in the life of local communities and provide support based on 3 pillars:

- **Colour** – the Group's social projects and other forms of engagement are centered around its vision. In relation to activities in favour of society, the message „Colours matter” means „change for the better”, „inspiration” and „joy”, present in the lives of the beneficiaries thanks to the projects implemented by the Group companies and its brands.
- **Local community** – the Group companies are engaged in crucial activities from the perspective of the inhabitants of their local communities. Also, the Group carries out activities throughout the country, addressed to public entities located in small towns or in areas where social exclusion is high.
- **Children and youth** – the primary beneficiaries of the Group's social actions are children and youth including their families and immediate milieu. Their support is rendered predominantly in cooperation with, or intermediated by, public bodies.

Detailed guidelines are set out in the **Social Involvement Policy**.

Natural environment

The Śnieżka Group's involvement in sustainable development includes the effective use of resources, respect for the environment and climate, and safe and healthy workplaces. We expect suppliers to make similar commitments to continuously improve the environment and care for our planet together.

Our aim is to design products so as to minimize their impact on the environment at every stage of the product life cycle. We make every effort to prevent waste and excessive con-

sumption of materials and raw materials, and the generation of waste in all processes, including production and packaging.

In addition, we are committed to improving energy efficiency, producing green energy, and monitoring and managing greenhouse gas emissions.

Detailed guidelines are set out in **the Quality, Environment, Health and Safety Policy and the Climate Policy**.

Corporate governance and ethics

Anti-corruption

We do not put up with any form of corruption. We do not offer or give any material benefits to our business partners, except for corporate gifts of insignificant value. We do not accept any material benefits from business partners.

When establishing or maintaining appropriate business relationships with partners, gifts of no significant value are allowed. Accepting or giving a gift should be accompanied by certainty that such action will not result in negative consequences for any of the parties.

Detailed guidelines are set out in **the Anti-Corruption Policy**.

A conflict of interest

One of our employees' duties is to take care of the reputation of the Capital Group, its companies and brands. Business decisions are made on an impartial basis, guided solely by the interests of the Group.

Employees at all levels should avoid situations in which a conflict of interest may arise. If there is a suspicion that a given situation may give rise to a conflict of interest, the employee should consult their supervisor.

Detailed guidelines are set out in **the Anti-Corruption Policy**.

Fair competition

The Śnieżka Group recognizes fair competition as a natural factor contributing to the development of the Śnieżka Group and the mar-

ket. The Capital Group undertakes not to conclude any agreements with competitive entities, whose purpose or effect would be to restrict free trade, in particular agreements restricting competition or infringing collective consumer interests.

Responsible communication

Responsible and effective communication is essential for the proper operation of the Group. Information regarding the Companies and the Group is provided outside by officially authorized entities. We communicate them in a reliable and responsible manner, bearing in mind the goodwill of the Śnieżka Group. We do not disclose information constituting the company's secret.

Detailed guidelines are set out in **the Information Policy**.

Protection of data and confidential information

Our objective is to ensure the security of the processed data and the continuity of the services rendered, i.e. by managing the control of access to information, providing training or implementing an effective model for managing the security of IT and OT systems (operating and IT systems).

Detailed guidelines are set out in **the Information Policy** and **Cyber Security Policy**.

Functioning of the Code of Ethics

We desire so that all employees of the Śnieżka Group to get familiar and apply in practice the content of the Code of Ethics. The Code is available on the website **www.sniezkagroup.com**, in NND's internal system and at immediate supervisor.

Should you have any doubt as to how to act in a given business situation, let the answers to these questions guide you.

- Is it legal?
- Is it in line with our organizational values?
- Is this appropriate?
- Do I have good intentions?
- Would I be proud to tell my friends, co-workers or anyone else about it?
- Could my action jeopardize someone's life, health, safety or reputation?

If you're still not sure? Talk to your supervisor.

Don't be indifferent! Report irregularity

To report a breach of ethical rules in force in Śnieżka, an employee may do so by:

- a confidential breach reporting channel available at **www.sniezkagroup.com/whistleblowing**
- e-mail: **violations.board@sniezka.com**,
- letter to the address:

President of the Management Board

FFiL Śnieżka SA

ul. Dębicka 44, 39-207 Brzeźnica

with a note **„Do not open – personally to the addressee”**

If the report concerns a member of the Management Board of Śnieżka or a member of the Team for Consideration of Reports, an employee may submit the report by:

- e-mail: **violations.supervisoryboard@sniezka.com**,
- letter to the address:

Name and surname of the member of the Supervisory Board

FFiL Śnieżka SA

ul. Dębicka 44, 39-207 Brzeźnica

with a note **„Do not open – personally to the addressee”**

All reports of a mobbing or harassment nature should be submitted in writing to the Anti-mobbing Committee in accordance with the information contained in **the Regulations on Counteracting Mobbing, Discrimination and Harassment**.

Protection of the reporting person

The Śnieżka Group undertakes to protect employees and business partners revealing violations of the law or the provisions of the Code of Ethics against the adverse effects of a decision to disclose irregularities and to apply applicable law to persons violating the personal rights of employees and their business partners.

The Śnieżka Group does not tolerate threats or retaliation against people reporting violations of the Code of Ethics in good faith. We ensure that any employee reporting a violation cannot be fired, demoted or suspended from work as a result of doing so.

The unit supervising compliance with the Code of Ethics:
Management Board of FFiL Śnieżka SA

Implementation:

The subsidiaries of the Śnieżka Group are obliged to implement the Code of Ethics in their daily work. All subsidiaries of the Śnieżka Group are required to take appropriate actions to pass on the provisions of this Code to their employees. The Code of Ethics is supplemented by detailed guidelines.

Refers to: The subsidiaries of the Śnieżka Group

Approved by: Piotr Mikrut, President of the Management Board
Document type: Code

Reference: HR Policy of the Śnieżka Group, Diversity Policy of the Śnieżka Group, Respect For Human Rights Policy of the Śnieżka Group, Anti-Corruption Policy of FFiL Śnieżka SA, Quality, Environmental and Health and Safety Policy of the Śnieżka Group, Climate Policy of the Śnieżka Group, Information Policy of FFiL Śnieżka SA, Cyber Security Policy of the Śnieżka Group, Social Involvement Policy of the Śnieżka Group and Procurement Policy of the Śnieżka Group and Supplier's Code of Conduct.

The Śnieżka Group reviews the Code of Ethics on a periodic basis in order to ensure its adequacy and suitability for the operations conducted by the Group. The most recent version applies in each case.

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