



PBS

CODE OF CONDUCT

The **Code of Conduct** establishes our standards of behavior, serving as a practical guide for our daily operations. It holds every employee personally accountable for upholding the performance and reputation of PBS Sp. z o.o., fostering strong relationships with all stakeholders.

1. Introduction

PBS Sp. z o.o. operates as a dynamic and competitive organization in the trade of raw materials worldwide. The company maintains a strong and continually expanding position in production, marketing, and distribution activities, emphasizing sustainability and ethical business practices.

The PBS Code of Conduct outlines the expected standards of behavior for employees, business partners, and stakeholders, fostering integrity and professionalism in every interaction. This Code sets the foundation for how we conduct business with customers, colleagues, investors, regulators, and partners, aligning our operations with internationally recognized standards.

PBS Sp. z o.o. adheres to the principles of:

- The eight core conventions of the International Labour Organization (ILO);
 - The Ten Principles of the United Nations Global Compact;
 - The United Nations Guiding Principles on Business and Human Rights.
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2. Key Commitments

Business Partners

We are committed to:

- Complying with all applicable legal regulations.
- Acting as a reliable and trustworthy partner.
- Competing fairly while adhering to the principles of transparent communication, reliable information, and sound risk management.

Customers

Our commitments to customers include:

- Conducting marketing activities responsibly and ethically.
- Ensuring open and constructive dialogue.
- Safeguarding the confidentiality and security of sensitive customer data.

Employees

For PBS employees, our commitments focus on:

- Guaranteeing equal opportunities and preventing any form of discrimination, whether for current or potential employees.
- Ensuring safe and healthy working conditions.
- Upholding the freedom of association and the right to collective bargaining.

Suppliers

In our dealings with suppliers, we emphasize:

- Excellence and objectivity in all supplier relationships.
- Encouraging suppliers to comply with applicable laws and regulations.
- Promoting adherence to principles aligned with those implemented within PBS.

Communities

Our responsibilities toward the broader community include:

- Minimizing the environmental impact of our operations.
- Maintaining robust environmental management standards.
- Promoting human rights by adhering to the Ten Principles of the United Nations Global Compact.
- Considering the social impact of our activities.

3. Compliance with Laws and Regulations

PBS Sp. z o.o. ensures all its activities comply with relevant legal and regulatory frameworks, including international standards. All employees are responsible for understanding and adhering to applicable laws and should seek guidance from Legal and Compliance teams when in doubt.

4. Compliance with Sanctions and Trade Restrictions

PBS Sp. z o.o. operates in strict accordance with all sanctions and trade restrictions. Employees must ensure compliance with changing regulations, avoiding business dealings with restricted entities or individuals.

5. Compliance with Anti-Money Laundering Laws

PBS is committed to preventing money laundering and fraudulent financial activities. Employees and business partners are expected to maintain vigilance against any suspicious transactions or schemes that attempt to legitimize illicit funds.

6. Bribery and Corruption

PBS enforces a zero-tolerance policy on bribery and corruption, abiding by international anti-corruption laws and Polish regulations. Comprehensive training and detailed policies ensure employees act with integrity in all business dealings.

7. Commitment to Human Rights

PBS is dedicated to respecting human rights, following the UN Guiding Principles on Business and Human Rights. Employees and partners must uphold the dignity, respect, and equitable treatment of all individuals.

8. Commitment to Environmental Sustainability

PBS prioritizes environmental stewardship, striving to minimize its ecological footprint. Efforts include reducing greenhouse gas emissions, conserving resources, and managing waste responsibly.

9. Compliance with Health and Safety Regulations

PBS ensures safe and healthy working environments for its employees and partners. All facilities meet stringent health and safety standards, and business operations prioritize the well-being of all involved.

10. Compliance with Competition Laws

PBS competes ethically and legally, refraining from any activities that constrain competition or compromise market fairness.

11. Managing Conflicts of Interest

Conflicts of interest must be promptly identified and reported. Employees must avoid situations where personal interests conflict with company responsibilities.

12. Relationships with Counterparties and Partners

PBS values long-term partnerships and maintains rigorous know-your-customer (KYC) procedures to ensure ethical collaboration.

13. Relationships with Public Officials and Governments

PBS engages with authorities transparently and respectfully, adhering to confidentiality requirements.

14. Accuracy of Books and Records

Employees must maintain accurate documentation and records, ensuring integrity in reporting and avoiding any misrepresentation of business activities.

15. Dignity and Respect in the Workplace

PBS fosters a workplace free of discrimination and harassment, promoting fairness, trust, and mutual respect among all employees.

16. Confidentiality and Data Protection

Employees must protect confidential information related to PBS, its stakeholders, and partners. Any breaches, whether intentional or inadvertent, must be reported immediately.

17. Enforcement of the Code

PBS takes breaches of the Code seriously and will impose appropriate disciplinary actions, including dismissal, where violations occur.

This **Code of Conduct** reflects PBS Sp. z o.o.'s unwavering commitment to ethical business practices, sustainability, and integrity in every aspect of its operations.