

## Pularys Code of Conduct

Version 2023

### Preamble

The PULARYS Code of Conduct is designed to help identify and address ethical issues, stop inappropriate activities, provide mechanisms for reporting any concerns, promote honest and ethical conduct, provide timely reporting and communications with full and accurate information and comply with applicable laws and regulations. It is also designed to foster a culture of honesty and responsibility for one's conduct.

PULARYS prefers to cooperate with suppliers, consultants, distributors and other business partners who also adhere to the principles listed in this Code of Conduct. PULARYS encourages its business partners to apply standards of conduct consistent with the principles of this Code of Conduct.

### 1. Forced Labour / Basic human rights and labour protection

PULARYS does not use or support forced labour, whether in the form of prison labour, indentured labour, bonded labour, or otherwise. We allow employees to keep their identification documents and to resign from their positions at any time. We respect the right to break work and a limitation of working hours to the permissible level. PULARYS does not withhold salary, benefits, property or documents to force employees to continue work. Employees will be given the right to leave the premises after their workday and the right to end employment. PULARYS does not use nor support human trafficking.

### 2. Child Labour

Child labour is not tolerated. Persons who, due to their age, are subject to compulsory school attendance, and especially individuals under 15 years of age, may not be employed. PULARYS uses proven and effective systems to verify the age of employees.



### **3. Harassment and Abuse**

PULARYS treats every employee with respect and dignity and does not subject any employee to physical, sexual, psychological, verbal or other harassment or abuse. It is forbidden to charge recruitment fees to migrant workers.

### **4. Nondiscrimination**

PULARYS ensures equal opportunities for employees and does not subject any person to discrimination in employment (including hiring, salary, benefits, advancement, discipline, termination, or retirement) based on gender, marital status, race, religion, age, disability, sexual orientation, nationality, political opinion, social or ethnic origin or any other condition that could give rise to discrimination. PULARYS has a reporting mechanism in place to report incidents of discrimination, health & safety issues or violations of human rights.

### **5. Health and Safety**

PULARYS provide a safe and healthy work environment to prevent accidents and injury to health from occurring and comply with applicable laws and regulations. PULARYS conducts regular health and safety training (OHS training) in accordance with EU regulations. We identify, assess and minimize the impact of emergencies by implementing emergency plans and response procedures. These plans and procedures must include the following: emergency exits must be accessible and fully functional at all times, fire extinguishers must be visible, accessible, present and charged, evacuation plans must be posted and drills must be conducted annually. We identify, evaluate and control exposure to hazards and ensure the use of any applicable personal protective equipment.

### **6. Freedom of Association and Collective Bargaining**

PULARYS recognises and respects the right of employees to exercise freedom of speech, freedom of association and collective bargaining, and non-interference. Management is encouraged to engage in direct communication with employees and not to discriminate against employees engaged in such activities.



## 7. Wages and Benefits:

PULARYS shall pay employees at least the minimum wage required by applicable laws and regulations, or the prevailing industry wage if no minimum wage law applies, and shall provide legally mandated benefits.

## 8. Hours of Work/ Compensation

PULARYS follows a 40-hour workweek, except in exceptional business circumstances and by agreement with the employee. Employees have at least two days off every seven days. In addition to compensation for regular working hours, PULARYS compensates employees for overtime hours at the statutory rate. Overtime work is voluntary and limited to a maximum of 8 hours per week. PULARYS does not pay employees less than their normal hourly rate multiplied by 1.5 for overtime hours.

## 9. Ethical Standards

PULARYS is held to the highest standards of integrity. Corruption, bribery and extortion are strictly prohibited. PULARYS respects all the intellectual property rights and applicable regulatory requirements of the countries to which it delivers. PULARYS exercises commercial activities with integrity, avoiding and combating the following practices:

- Conflicts of interests: All PULARYS representatives should conduct their personal and other outside business and financial matters in a manner that does not appear to conflict with PULARYS's interests.
- Corruption: PULARYS does not participate in or support any corrupt practices. PULARYS representatives must not offer any rewards or benefits to customers, suppliers or other potential business partners that would violate applicable law. PULARYS's employees are not allowed to accept financial benefits, gifts or other types of remuneration from third parties that could have a real or apparent impact on the objectivity of decisions made.
- Money laundering: PULARYS respects all laws and regulations applicable in terms of money laundering.
- Competition: PULARYS respects all laws and regulations applicable in terms of competition law.
- Intellectual property: PULARYS undertakes to exercise their activities in respect of the intellectual property rights of third parties and, more widely, to respect all laws and regulations applicable in terms of intellectual and industrial property.



## 10. Environmental Impact / Sustainability

PULARYS complies with all applicable environmental laws and regulations in its country regarding the management of hazardous materials to limit waste and materials as well as emissions generated under their influence. PULARYS oversees their elimination thanks to environmentally-respectful solutions and strives to produce and act in an ecologically responsible manner. PULARYS uses a waste and packaging management system and is entered in the BDO Register according to the Polish legal act no. Dz.U.2022.699. PULARYS annually submits a report on the records of waste, used electronic equipment and packaging. The protection of the environment is a very important issue that must be faced uncompromisingly. In particular, the handling of toxic and hazardous chemicals and materials and their disposal must be designed in such a way that the environment and the health of people and nature are not harmed. Waste management, transport, logistics and emissions are a particular focus here. Certified and sustainable product and packaging solutions shall be preferred. PULARYS strives to protect natural resources, and more particularly to apply a policy aimed at reducing energy and packaging and recycling of the resources used.

In accordance with Directive 2001/95/EC of the European Parliament and of the Council of 3 December 2001 on general product safety, products are placed on the market by PULARYS only if they do not endanger the safety and/or health of users or third parties. A safe product is a product which, under normal or reasonably foreseeable conditions of use, including the duration of use of the product and, depending on the type of product, the method of commissioning and the requirements of installation and maintenance, does not create any threat to consumers or poses a negligible risk compatible with its normal use and taking into account the high level of requirements for the protection of human health and life. PULARYS declares that the goods placed on the market comply with Regulation (EC) No 1907/2006 (REACH) of the European Parliament and of the Council of 18 December 2006.

## 11. Animal Welfare

For products containing animal-derived materials, PULARYS does not tolerate any cruelty or animal neglect. PULARYS takes into consideration the five animal freedoms, as defined by The World Organisation for Animal Health.



## 12. Quality of products and services

The products delivered by PULARYS correspond to the agreed specifications and samples and are free from defects that are harmful to the health, life or property of people. Applicable legal requirements for product safety during production, transportation and storage must be fully complied with. Delivered products are free from prohibited substances and comply with the applicable legal provisions in their current form.

## 13. Data & IT security

PULARYS ensures that the manufactured products do not infringe the intellectual property rights of third parties (e.g. patents, trademarks, design patents, copyrights, licenses). Personal data may only be processed by taking into account the GDPR regulations, collected for legitimate business purposes and used only in a legal, transparent manner. A transfer is allowed only when it is passed on to authorized persons. The stored information is protected in accordance with safety regulations and only kept for as long as necessary. In the event of access by third parties to personal data, they must be obliged to protect it. The requirements for establishing, implementing, maintaining and continuously improving a documented information management system must be complied with. PULARYS formulates requirements and objectives for information security and cost-effective management of security risks and ensures compliance with all laws and regulations.

