

RESPONSIBLE BUSINESS PARTNER POLICY

Introduction and policy statement

The Glamox Group of Companies (Glamox), including ES-SYSTEM sp. z o.o. with its registered office in Kraków, ES-SYSTEM NT sp. z o.o. with its registered office in Kraków, ES-SYSTEM Wilkasy sp. z o.o. with its registered office in Wilkasy and ES-SYSTEM Projekty sp. z o.o. in liquidation with its registered office in Krakow, is committed to responsible business practices and conducting business with the highest ethical standards. **Glamox** wants to maintain stable and honest business relationships with all its “Business Partners”, including but not limited to, suppliers, advisers, agents and clients.

This Responsible Business Partner Policy (“the Policy”) intends to support **Glamox** as it strives to meet the increasing need for transparency with regard to how businesses manage their broad range of operational, social and environmental responsibilities.

Glamox expects their Business Partners to adopt the principles set out below to ensure alignment with **Glamox** own commitments to social responsibility.

We in **Glamox** want all our Business Partners to view us as their preferred Business Partner. As such, we strive to achieve a positive reputation in all aspects of our business. We respect the laws, cultures, dignity and rights of individuals in all countries where we operate. Compliance with national, regional and international rules, laws and conventions is compulsory and business ethics extend beyond simple compliance. We conduct our business with integrity, which makes our Employees, and Business Partners proud to work for, and with, us.

The principles:

1 Compliance with legal requirements

1.1 Business Partners will comply with all applicable laws and regulations in all locations where they conduct business including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection, insider dealing and anti-competition laws.

2 Act with integrity in all business dealings

2.1 **Glamox** acts with integrity at all times and we expect our Business Partners to behave in the same way.

2.2 Business Partners will not engage in personal activities or public comments that are intended to damage **Glamox** business interests or reputation.

2.3 Business Partners must record all business transactions accurately, prudently or transparently, in compliance with applicable accounting standards and recognised best practice.

2.4 Business Partners should insist and ensure their agents, suppliers and others working on their behalf act lawfully, and in accordance with the standards set out in this Policy.

3 Anti-bribery and corruption

3.1 Business Partners will comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and all applicable local laws where **Glamox** and its subsidiaries operate.

3.2 Business Partners will not offer, promise, give (including facilitation payments), demand or accept bribes or other improper advantage, including excessive gifts and entertainment, in order to obtain, retain or give business.

4 Gifts and Hospitality

4.1 Business entertaining and hospitality involving individuals representing **Glamox** must be kept reasonable and proportionate and be done entirely for the purpose of maintaining good business relations and not to influence unfairly any future business decisions. The provision of gifts should be rare and aligned with company policy.

5 Competition Law

5.1 **Glamox** believes in competing fairly in the market place. Business Partners will comply with all applicable antitrust and competition laws, which prohibit agreements, business practices or conduct that are anti-competitive or unreasonably restrain trade. Competitor information will be obtained and maintained in accordance with applicable competition laws at all times.

6 Equal opportunities & human rights

6.1 Business Partners should recruit, select and promote their employees solely based on qualifications and skills. **Glamox** will not accept any form of employment discrimination including hiring, compensation, advancement, discipline, termination or retirement because of race, colour, religion, gender, sexual orientation, national origin, age, or disability.

6.2 **Glamox** requires its Business Partners to uphold all internationally recognised human rights wherever their operations are located. **Glamox** will not tolerate the use by its Business Partners or their supply chains of child or compulsory labour, human trafficking, slavery and any behaviour that does not maintain human dignity and respect.

7 Conflicts of interest

7.1 Business Partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of **Glamox**. Business Partners must declare all and any conflict of interest in any business dealing to **Glamox** to allow **Glamox** to take appropriate action.

8 Health, safety and security

8.1 Business Partners will provide their employees with a safe and healthy workplace in compliance with all applicable land laws and regulations. Business Partners should protect their employees, physical assets, information and reputation from potential security threats including cyber security threats.

9 Confidential information

9.1 Business Partners will protect all intellectual property and other confidential information provided by **Glamox**. All information provided by **Glamox**, which is not in the public domain, is deemed confidential and should only be used for its intended purpose.

10 Environment

10.1 Business Partners will operate in a manner that protects the environment and must comply with all applicable environmental laws, regulations and standards. Operations, sourcing, manufacture, distribution of products and the supply of services should be conducted with the aim of protecting and preserving the environment.

11 Financial records and Money Laundering

11.1 All business dealings must be carried out in a transparent manner and recorded accurately in **Glamox** books and records. **Glamox** will not tolerate any actual or potential involvement in money laundering or market abuse.

12 Communication

12.1 Business Partners will make these principles known to employees dealing with **Glamox**, and promote and monitor compliance.

13 Maintaining records

13.1 Business Partners will maintain documentation necessary to demonstrate compliance with these principles.

14 Application and compliance

14.1 **Glamox** reserves the right to conduct enquiries and investigations of Business Partners' conduct to satisfy ourselves that these principles are being met. Note that failure to demonstrate compliance with these principles will require the implementation of corrective action by the Business Partner, and may result in contract termination.

* * * * *

ES-SYSTEM sp. z o.o. with its registered office in Kraków has adopted this Policy on **28 July 2020**.