

ONDE S.A. CODE OF ETHICS



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1. Aim and application of the Code.

The Code of Ethics describes responsibilities concerning standards of operations of the Company and its employees and collaborators. The Code specifies the most important values and attitudes that support the process of shaping the ethical environment and mutual trust.

The Code of Ethics supplements legal regulations, establishing behavioural frameworks and standards for employees and collaborators, regardless of their position in the Company structure, to ensure its functioning in a way building the Company value.

The aim of this regulation is to ensure implementation of the Labour Code provisions. The provisions of this Code are modelled after: the United Nations Universal Declaration of Human Rights, the Declaration of the International Labour Organisation, concerning fundamental rules and rights at a workplace, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the UN Global Compact principles, and the standards recommended for the compliance management system on counteracting corruption and the whistleblower protection system in companies listed on markets organized by the Warsaw Stock Exchange S.A. The Code is supplemented by other internal regulations, which together with the code form a set of principles in force at the Company.

2. Scope of application

2.1. This policy applies to all ONDE S.A. employees and collaborators.

2.2. Ensuring adherence to provisions of the Code shall be regularly monitored, and all necessary remedial actions shall be promptly identified and implemented.

3. Terms and acronyms.

Terms used in the Code shall have the meaning provided below:

3.1 **“Company”** – shall be understood as ONDE S.A. with its registered office in Toruń.

3.2 **“Administrator”** – shall be understood as a person coordinating the process of drawing up, reviewing, publishing and archiving regulations and maintaining registers, available at: procedure@onde.pl.

3.3 **“Employee”** – shall be understood as a person working for or providing services to the Company, regardless of the basis for establishing an employment relationship, and a person employed under a civil law agreement. For avoidance of any doubt, for the purpose of this regulation the Employee shall also be understood as people working for or providing services to the Company within the chain of value, regardless of existence or the nature of their contractual relationship with the Company, i.e.: Employees of delivery companies, subcontractors, and other business partners.

4. Procedure/document contents:

4.1. **Responsibilities**

4.1.1. **Human and employee rights**

4.1.1.1. The Company perceives human rights as a fundamental value, respects and promotes human rights in its relations with Employees, and expects the same from its Employees and stakeholders.

4.1.1.2. The Company does not tolerate any forms of child, forced, and/or compulsory labour. It does not accept practices that would restrict the freedom of Employees' movement.

4.1.1.3. The Company accepts only those working hours, remuneration, and benefits, which are consistent with current regulations. It recognises and respects collective agreements

and a right of our employees to associate. The Company maintains a dialogue with its employees to make sure their rights are respected.

4.1.2. Relations with Employees

- 4.1.2.1. The Company employs specialists and bases its activities on their competencies, knowledge, and experience. The Company enables its Employees to develop professionally and supports them in expanding their competencies.
- 4.1.2.2. Remuneration of its Employees depends solely on professional factors, education, experience, and responsibility.
- 4.1.2.3. The Company creates a friendly working environment.
- 4.1.2.4. The Company does not accept any forms of discrimination towards its Employees. It also does not tolerate any forms of harassment and bullying, either physical or mental.
- 4.1.2.5. The Company reacts to behaviours that are contrary to its values and principles of conduct, and internal regulations.
- 4.1.2.6. The Company promotes openness and commitment.
- 4.1.2.7. The Company strives to build a consistent and correct image, presenting its business policy as professional, responsible and focused on social and local needs.

4.1.3. Diversity

The Company respects diversity and different opinions, ensuring for everybody equal treatment in terms of conditions of employment, cooperation, and access to promotions and training. Employees are treated honestly, with respect and dignity, regardless of their sex, age, religion, sexual orientation, nationality, world view, political views, disability, or position held.

4.1.4. Sponsoring and social commitment

- 4.1.4.1. During sponsoring and social actions, the Company does not use any content that may offend and/or discriminate any groups. The Company acts responsibly, avoiding negative emotions and abusing the trust of its customers.
- 4.1.4.2. The Company does not get involved in events that may cause environmental or social damages. Furthermore, it does not get involved in projects of political nature, or infringing social standards.
- 4.1.4.3. The Company not finance political parties or organisations whose basic operations are of a political nature.
- 4.1.4.4. The Company maintains a foundation, Eryk Grzeszczak Foundation - "ERBUD - shared challenges" and the Employees also actively participate in its activities.

4.1.5. Preventing corruption

- 4.1.5.1. The Company promotes integrity and does not tolerate any corruption.
- 4.1.5.2. The Company does not request, receive, and/or propose such forms of entertainment or gifts that could influence - or apparently influence - business decisions, of the Company, Employees, or business partners.

4.1.5.3. The policy governing gifts and entertainment is in force at the Company. Furthermore, a process for approving and registering forms of entertainment and gifts given and received that exceed the established limits is in force at the Company.

4.1.5.4. The Company ensures observation of current legislation concerning prevention of money laundering. It is sensitive to suspicious transactions and entities unwilling to share reliable information. The Company does not accept actions understood as money laundering or financing of terrorism, it neither enables nor supports them in any way.

4.1.6. **Transparency**

4.1.6.1. The Company provides information in a reliable way - meticulously fulfils all information obligations applying to it, and ensures the said information is true, complete, and clear to stakeholders.

4.1.6.2. The Company ensures its business documentation is reliable and complete, and that its financial and non-financial reporting, required by legislation, is punctual and accurate. It strives to ensure that all documents created as a part of its operations are complete, correct, and consistent with relevant legal regulations and internal Company regulations.

4.1.6.3. The Company aims at transparency, it provides information to stakeholders communicating its decisions, and equips Employees with information they require to correctly perform their obligations. The Company puts emphasis on a regular exchange of information between managers and employees.

4.1.7. **Conflict of interests**

The Company avoids conflicts of interest. It is sensitive to situations in which private interests of its Employees may be contrary to those of the Company. Possible doubts are consulted with line managers, or the Compliance Officer.

4.1.8. **Fair competitions, relations with business partners**

4.1.8.1. Fair competition is the best for the Company, its Employees, and business partners. The Company complies to anti-trust and competition protection laws, as well as any other regulations in this area.

4.1.8.2. The Company cares for relations with its partners to ensure that they are based on trust, professionalism, mutual respect, and responsibility for own actions.

4.1.9. **International sanctions and import restrictions**

4.1.9.1. The Company observes global trade controls, import retractions, and economic sanctions imposed by the U.S., the EU, and Poland, which forbid us to do business with specific counties, entities, and persons.

4.1.9.2. The Company also adheres to applicable customs requirements concerning import and export of goods.

4.1.10. **Responsibility for assets**

- 4.1.10.1. The Company uses its assets in a responsible way. It protects components of its assets against any damage, theft, loss, and incorrect use.
- 4.1.10.2. The Company protects entrusted assets of its clients and other stakeholders against damage, theft, loss, and/or incorrect use.

4.2. **Innovations**

4.2.1. **Novel solutions**

The Company analyses business and technological trends, and supplies modern products and services based on the best technologies. The Company seeks novel solutions, which are then thoroughly tested before their implementation.

4.2.2. **Sustainable development**

- 4.2.2.1. The Company focuses on sustainable development. It constructs in an environmentally-friendly and cost-effective way, respecting nature of which it is a part. It introduces environmentally friendly solutions and environmental certification of buildings (Leed and BREEAM).
- 4.2.2.2. The Company focuses on energy efficiency, and strives to ensure that its approach to design, construction, and operation of buildings is in balance with environmental, economic, and social factors.
- 4.2.2.3. Decisions made by the Company take a long-term perspective into account.

4.2.3. **Environmental Protection**

- 4.2.3.1. The Company conducts its operations in a sustainable way, combining professional performance of business objectives with a responsible attitude towards the natural environment.
- 4.2.3.2. The environmental management system is based on the PDCA cycle, i.e. a model of continuous improvement covering stages of planning, doing, checking, and acting.
- 4.2.3.3. The Company unceasingly works on improvement of its performance and actions concerning environmental protection in its operations and projects. When it gets involved in specific projects, it considers environmental hazards associated with them. The Company supports innovations that contribute to a reduction of a negative environmental impact of its activities.
- 4.2.3.4. The Company purchases equipment with required certificates and meeting environmental protection standards.
- 4.2.3.5. The Company engages its stakeholders in its activities associated with the environment. This concerns its Employees, clients, and those people who live in the direct vicinity of locations where it operates.
- 4.2.3.6. The Company also cares for the natural environment while performing its daily professional duties.

4.3. **Safety**

- 4.3.1.1. Safe work is the Company's priority. It continuously introduces improvements, to minimise hazards. The Company perceives health and safety at a workplace as a fundamental right of the Employee and the most important component of the Company's stability.
- 4.3.1.2. All Employees are responsible for correct management of safety, and cannot expose either themselves or others to a risk of hazards that may cause injuries or other damages. Everybody performs their work in accordance with OHS regulations reflected in legislation and OHS instructions in force at the Company. Elimination or reduction of risks and hazards is in the interest shared by all Employees and the Company.
- 4.3.1.3. The Company strives to guarantee complete safety to all people present during the investment execution. The Company's aim is to reduce to zero the number of severe and fatal accidents.
- 4.3.1.4. The Company ensures that its Employees receive the required OHS training, and that they were trained appropriately.
- 4.3.1.5. All accidents at a workplace and all incidents and cases posing a health hazard are reported to the OHS Specialist.
- 4.3.1.6. The Company actively participates in Porozumienie dla Bezpieczeństwa w Budownictwie (the Construction Safety Partnership). It is an initiative of leading companies from the construction sector. The Partnership strives to completely eliminate accidents at work. The Company develops common OHS solutions and standard binding for Employees. The Partnership facilitates sharing of safety-related experiences.

4.3.2. Information security

- 4.3.2.1. The Company ensures that all operations on personal data are performed in accordance with current regulations. The Company protects personal information concerning Employees and other stakeholders.
- 4.3.2.2. The Company ensures due diligence in protection of all information, especially company secrets, obtained as a part of its operations, and secures that information against any unauthorized access or use.
- 4.3.2.3. The Company ensures that the access to personal data is provided only on a need-to-know basis to people that require them to perform their professional duties. All people provided with the access to personal data maintain the required measures for their protection. Personal data are retained for a period required to achieve the relevant purpose.

4.4. Reporting violations

- 4.4.1. The Company provides Employees and stakeholders with communication channels for reporting violations, cases of corruption, and other abuses. Employees have a right to promptly report any irregularities.
- 4.4.2. Failure to observe this code may result in disciplinary actions.

4.5. Miscellaneous

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- 4.5.1. The Compliance Officer is the highest tier in the organisation responsible for implementation and performance of the Code.
- 4.5.2. This Code must be reviewed at least once every 2 years; however, when there are no grounds for its amendment, its contents shall remain unchanged.

4.5.3. The Code must be communicated through the dedicated communication channels functioning at the Company.

5. Code archiving:

The Administrator is a person responsible for archiving this Code.

6. Change control.

7. The Company Management Board is authorised to introduce changes to this Code.

8. References and appendices:

None

9. History of changes.

New document.

10. Reviews withdrawn

The ONDE S.A. Code of Ethics adopted with the Management Board resolution No. 04/12/2023 of 12/12/2023.