

# Supplier Code of Ethics



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## I. INTRODUCTION

**Wojskowe Zakłady Uzbrojenia S.A.** operates on the international armaments market as a specialised plant for defence missile technology, primarily medium- and long-range, and is a company with unquestionable experience established over 60 years in the overhaul and modernisation of missile technology for the Armed Forces.

The mission of **Wojskowe Zakłady Uzbrojenia S.A.** is innovative development in the area of supporting safety and maintaining the technical condition of armaments and military equipment of the Polish Armed Forces and allied armies at the level of full combat efficiency and its adjustment to the standards used in NATO, development in accordance with the national security policy, providing full satisfaction to customers, ensuring continuous improvement and use of the employees' potential.

**Wojskowe Zakłady Uzbrojenia S.A.** is a professional company that supports Polish technical thought, promoting the development of new technologies and the implementation of innovative solutions in missile technology of the Armed Forces. The achievements of the Company in this area have been highly recognised among Polish engineers and scientists as well as international military experts and specialists. The Company has achieved a significant position in the international group of companies modernising missile armaments and is one of the leading companies on the European market for the overhaul of anti-aircraft missile sets.

In its cooperation with suppliers, **Wojskowe Zakłady Uzbrojenia S.A.** operates in accordance with the principles of responsible business and sustainable development.

**Wojskowe Zakłady Uzbrojenia S.A.** presents this Code in order to support our suppliers in building awareness and developing ethical practices. It represents a set of principles and directives to be followed by our suppliers when dealing with us and participants in their own supply chains. We would like to build relationships with partners who are aware of our values, who are guided by the principles of fair cooperation, and who are committed to mutual respect and transparency. We expect from our suppliers that they ensure that the principles adopted by **Wojskowe Zakłady Uzbrojenia S.A.** and indicated in this Code are respected and applied by them. Along with the principles adopted in this Code, our suppliers should act in accordance with high ethical standards and promote and raise awareness of sustainability. Suppliers should be aware of the increasingly high market expectations of the services and products they provide and thus ensure their continuous improvement. We believe that an approach based on ethical collaboration and trust will be beneficial to us, our suppliers, as well as the social and business environment.

## II. PRINCIPLES OF ETHICAL CONDUCT

1. In line with our values and principles, we aim to have a positive impact on the environment, working conditions and the local community, while fulfilling our business obligations at the highest possible level.
2. The basis of our relationship with our business partners is the principles of responsible business, which is why we strive to select suppliers who maintain equally high ethical standards.
3. This **Supplier Code of Ethics** (hereinafter referred to as the Code), together with the **Code of Ethics of the Polska Grupa Zbrojeniowa S.A.**, sets out the requirements and expectations for ethical conduct of suppliers.
4. The rules apply to all suppliers of goods and services provided to Wojskowe Zakłady Uzbrojenia S.A.

## III. EXPECTATIONS FROM SUPPLIERS



### 1. Compliance with law

1. All suppliers are obliged to comply with laws (national and international) including human rights, environment, employment and working conditions, health and safety, as well as contracts and generally applicable standards and industry codes.
2. Suppliers are obliged to observe and respect the ethical values indicated in this Code.
3. Suppliers are obliged to pass this Code on to their employees and subcontractors in order to familiarise them with the rules and standards in force at Wojskowe Zakłady Uzbrojenia S.A.
4. Wojskowe Zakłady Uzbrojenia S.A. provides support to its suppliers in terms of building awareness of good practices and responsible business.



## 2. Human rights and labour standards

1. Any form of forced, slave or unrewarded labour is prohibited.
2. Employees perform their work solely on a voluntary basis. Employees should be given the freedom of employment to resign with notice any time in accordance with applicable law.
3. Suppliers are not allowed to use child labour and are required to comply with minimum employment age requirements. The employment of juveniles is only permissible on the basis of the labour legislation on vocational training. The supplier shall ensure that no children or minors work in the production and distribution process in violation of the Labour Code.
4. Suppliers are committed to providing a safe working environment free from all forms of violence, harassment and assault.
5. The right of workers to organise and conclude collective agreements must be respected.
6. Suppliers do not accept and counteract any acts of retaliation against a person who reports violations or expresses a different view or characteristic.
7. The supplier does not participate and does not derive any profit or benefit from trafficking in human beings.
8. It is unacceptable for the supplier's employees to carry out work in the form of debt forgiveness or other work that does not constitute an expression of voluntariness on their part. Employment cannot be conditional upon the retention of any original documents, including identity documents.

## 3. Anti-discrimination and equal rights



Suppliers must not discriminate in any way on the basis of gender, age, disability, race, religion, nationality, political opinion, trade union membership, ethnic origin, religion, sexual orientation, type of employment and working hours.

2. Suppliers are committed to the principles of professional equality applicable to all aspects of work, including recruitment, hiring, promotion, remuneration, professional qualification.



#### **4. Remuneration and working time practices**

1. Suppliers are obliged to guarantee workers' wages and other benefits in accordance with applicable minimum wage and overtime laws and rules.
2. Working hours must not exceed the limit set by law.
3. Employees must be provided with at least one day off during each seven-day work period, as well as the right to annual leave, maternity leave and other days off in accordance with the law.
4. Overtime must be done voluntarily and must not exceed 12 hours per week, unless otherwise agreed between the employer and the employee.



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

1. Safe and healthy working conditions must be provided, meeting current health and safety standards and regulations. Health and safety rules should cover, in particular, aspects such as:
  - a) signposting of emergency exits and a posted evacuation plan for the building,
  - b) availability and regular maintenance of fire extinguishers,
  - c) availability of first aid kit and personal protective equipment, regular inspection of machinery and equipment.
2. Suppliers should adhere to specific rules regarding the storage of hazardous materials.
3. Adequate working conditions that meet standards for cleanliness, ventilation and lighting of the premises and access to sanitary facilities must be provided.
4. The use of alcohol, drugs, other intoxicating substances and dangerous items should not be allowed in the workplace.



## 6. Fair business practices

1. All forms of corrupt behaviour are unacceptable. Suppliers have an absolute obligation to comply with applicable anti-corruption laws, taking into account supra- national regulations and anti-corruption regulations introduced in all countries in which they operate. Suppliers ensure that activities and processes are monitored on an ongoing basis to eliminate potentially corrupt behaviour and that appropriate countermeasures are taken.
2. It is prohibited to give or receive bribes, including illegal commissions or rebates or other unlawful inducements in order to gain or maintain an advantage or to influence an order decision or to modify or cancel an order.
3. It is inappropriate to give gifts or other forms of gratuities that could be perceived as an attempt to influence another person in an official, business or professional relationship. Only items of symbolic value and of a marketing nature are permitted.
4. Any situation that may constitute a conflict of interest should be avoided.
5. Classified information obtained in the course of co-operation with Wojskowe Zakłady Uzbrojenia S.A. should be treated with due confidentiality. This information should not be disclosed to third parties without the written consent of the Companies.
6. Suppliers commit to behaving ethically in their daily operations. Both the law and the common rules of the business environment are observed.
7. Suppliers act in respect of fair competition, anti-money laundering regulations, monitor and prevent conflicts of interest. Suppliers shall not disclose any information obtained in the course of cooperation, including confidential information and business secrets.
8. Suppliers promote ethical attitudes among their employees and business partners.



## 7. Environmental protection and social responsibility

1. Suppliers should conduct their activities with a view to protecting the environment at all stages of production, particularly in the sourcing, processing and disposal of materials.
2. Suppliers should implement solutions that contribute to minimising negative environmental impacts through efficient management of energy, water, waste and air emissions.
3. In conducting their business, suppliers should be guided by the welfare of the local community and take initiatives to support its development.



## 8. Compliance with the Code and control mechanisms

1. Each supplier cooperating with Wojskowe Zakłady Uzbrojenia S.A. is obliged to respect the values and ethical principles of the Companies and to observe the provisions of this Code in their activity.
2. The supplier is responsible for implementing and adhering to the principles set out in the Code, within his/her Company.
3. Any concerns or violations of this Code should be immediately reported anonymously or to a designated person using the following channels:
  - e-mail addressed to: [etyka@wzu.pl](mailto:etyka@wzu.pl)
  - in writing to the Company's address.
4. No employee shall be discriminated against or penalised for providing information regarding non-compliance with the Code.
5. Suppliers shall, as far as possible, ensure that their employees and other persons are able to report all irregularities and violations through the appropriate channels, while respecting the confidentiality of the reporters. Any retaliation against those who report violations is unacceptable. It is forbidden to take any action that would be hostile to persons who provide information about violations of the law or other applicable regulations.



6. If non-compliance is found, Wojskowe Zakłady Uzbrojenia S.A. may recommend a corrective action plan.
7. We oblige suppliers to comply with the provisions of the Supplier Code of Ethics and the Code of Ethics of Polska Grupa Zbrojeniowa S.A. by obtaining the following statement from them:  
***"Within the framework of my cooperation with Wojskowe Zakłady Uzbrojenia S.A. I declare that I have received documents in the form of the Supplier Code of Ethics and the Code of Ethics of Polska Grupa Zbrojeniowa S.A., with which I have become acquainted and I undertake to observe their provisions in the course of my cooperation with Wojskowe Zakłady Uzbrojenia S.A.  
In addition, I undertake to immediately submit to audits of my Company conducted by Wojskowe Zakłady Uzbrojenia S.A., the purpose of which is to check the application of and compliance with the principles set out in the documents provided."***
8. Failure to comply with the Code may result in termination of the relationship with the supplier.



## 9. List of contractual clauses that may be used by WZU S.A.

### 1. Ethical clause

Wojskowe Zakłady Uzbrojenia S.A. conducts its activities with a sense of responsibility for the consequences of its actions and applies uniform standards in assessing the ethical conduct of employees and third parties, respect for human rights, observance of labour rights and respect for the environment.

Wojskowe Zakłady Uzbrojenia S.A. takes care to respect human rights within the entire value chain presented in its business activities. In the spirit of social responsibility for the social life as a whole and out of concern for the common welfare of Wojskowe Zakłady Uzbrojenia S.A., they undertake actions related to observing laws and regulations in their operations, including international principles taking into account the concept of Corporate Social Responsibility (CSR). The Company is taking action related to the formation of appropriate economic and social relations.

In its activities, Wojskowe Zakłady Uzbrojenia S.A. strives to create a working environment based on mutual respect and tolerance. The Company ensures the protection of personal data and discretion to all persons who decide to report a suspicion of a breach of the rules in force at Wojskowe Zakłady Uzbrojenia S.A., as expressed in the

"Code of Ethics of Polska Grupa Zbrojeniowa S.A." and the "Supplier Code of Ethics of Wojskowe Zakłady Uzbrojenia S.A." or other regulations related to the concept of Corporate Social Responsibility implemented and applied by Wojskowe Zakłady Uzbrojenia S.A.

The content of these documents are available at [www.wzu.pl](http://www.wzu.pl).

## 2. No conflict of interest clause

- **/XXX/** declares that, to the best of its knowledge, at the date of signing of the Agreement, there is no conflict of interest that could hinder the proper performance of the Agreement/Procurement by **/XXX/**, affect its impartiality, the quality of its work or services, its independence or integrity.
- **/XXX/** declares that it undertakes to exercise the utmost diligence required for its business activities and to take measures to avoid conflicts of interest.
- **/XXX/** declares that during the performance of the Agreement/Procurement, in the event of any suspicion of a possible conflict of interest affecting the content of the declaration referred to in paragraph 1, s/he will immediately inform Wojskowe Zakłady Uzbrojenia S.A. in writing of such suspicion, indicating its justification, and will propose all necessary actions aimed at preventing the conflict, taking into consideration the broad interest of Wojskowe Zakłady Uzbrojenia S.A. and the principles of business ethics applied by him/her.

## 3. Anti-corruption clause

**/XXX/** declares that s/he did not offer or give any financial benefit in order to influence the decision of Wojskowe Zakłady Uzbrojenia S.A. on the selection of his/her offer. S/he did not influence the selection of Wojskowe Zakłady Uzbrojenia S.A. in a manner contrary to the law or good morals, and did not participate in any agreements or arrangements with other third parties aimed at influencing the selection of Wojskowe Zakłady Uzbrojenia S.A.

## 4. Environmental protection

**/XXX/** declares that s/he complies with the applicable legal provisions on environmental protection in the broad sense, in particular with regard to obtaining the necessary permits, filing notifications and submitting information and complying with the restrictions on the use of the environment, including, in particular, those resulting from due waste management. Furthermore, **/XXX/** declares that it operates in a sustainable manner and takes measures to reduce the negative impact of its own activities on the environment.

## 5. Observance of human rights

**/XXX/** declares that, with respect to employment, s/he applies the relevant provisions of the law in force in its business activity, including in particular the Labour Code and executive acts issued on its basis.

## 6. Impact on society - integration measures

**/XXX/** declares that s/he also takes social concerns into account in its business activities and seeks to maximise the integration of social, environmental, ethical and human rights values into the activities of itself, other stakeholders and society as a whole.

## 7. Supplier audit

Considering the quality of the contract implementation, occupational safety, environmental protection and corporate social responsibility standards, Wojskowe Zakłady Uzbrojenia S.A. reserves the right to carry out audits at **/XXX/** in the area subject to the contract. These activities are intended to assess the fulfilment of the requirements set out in the contract documents and other documents submitted for use, as well as the relevant laws, norms and standards applicable to the performance of the contract.

### **Designations:**

**/XXX/** – Contractor / Trading Party/ Bidder / Bidder's name