

**Quality Management System**

**The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

Table of contents:

1. Purpose of the procedure
2. Scope of application
3. Legal basis
4. Terminology and abbreviations
5. Liability
6. Description of the procedure
7. Documentation and records
8. Related documents
9. List of Appendices

Developed by: Izabela Flak	Checked by: Joanna Pilipczuk	Approved by MZ:
		Approved by MZRP
		Approved by MZ GPBP:
		Approved by MZKP:
		Approved by MZB:
		Approved by MZN:
		Approved by PRInż:
		Approved by MZE:
		Approved by Bud Work Service:
		Approved by A-Grotex:
		Approved by ModQ Solutions S.A.:
		Polwax S.A.

**Quality Management System****The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

## 1. Purpose of the Policy

The purpose of the Policy Towards Suppliers and Subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group (hereinafter: "Policy", "Policy Towards Suppliers and Subcontractors") is the collection and systematization of ethical and environmental standards applied in GMZ and the extension of their application to the entire supply chain (Suppliers and subcontractors) in accordance with the adopted due diligence requirements.

At the same time, the policy confirms the fundamental principles of good practices applied by GMZ companies in relations with their suppliers and subcontractors.

## 2. Scope of application

The procedure covers all entities from the MOSTOSTAL ZABRZE Group, as well as other entities from the Group's supply chain with which business relations are conducted (Suppliers and Subcontractors), including, above all, permanent business relationships.

We believe that the introduction of common standards of conduct and cooperation will contribute to the development of more durable and stable relations for the mutual benefit of all parties involved.

## 3. Legal basis

1. Directive of the European Parliament And of the Council on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937, the so-called CSDD Directive;
2. OECD Guidelines for Multinational Enterprises;
3. UN Guiding Principles on Business and Human Rights;
4. Declaration of the International Labour Organization (ILO);
5. International Charter of Human Rights.

## 4. Terminology and abbreviations

**Quality Management System**

**The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

<b>MZ</b>	Mostostal Zabrze S.A.
<b>GMZ</b>	MOSTOSTAL ZABRZE Group
<b>ESG</b>	Sustainable development based on 3 pillars: E – Environment, S – <b>Social Responsibility</b> and G – <b>Corporate Governance</b>
<b>Human rights</b>	a set of rights and freedoms that everyone enjoys regardless of race, sex, language, religion, political beliefs, national and social origin, wealth, etc. Human rights are inalienable (they cannot be renounced) and inviolable. They advocate respect for the values most precious to man, such as life, dignity, freedom, free development, etc. Respect for these rights in our ongoing business relationship is paramount to us and is not subject to any negotiation in accordance <b>with the International Charter of Human Rights</b> .
<b>International Charter of Human Rights</b>	Adopted by the United Nations in 1948, it is now an integral part of international politics and international law as a set of shared principles and a general goal for humanitarian treatment of others.  Link: <a href="https://libr.sejm.gov.pl/tek01/txt/onz/1948.html">https://libr.sejm.gov.pl/tek01/txt/onz/1948.html</a>
<b>Respect for employees' rights</b>	it covers all labour law standards and regulations that govern the obligations and liability for non-compliance or labour law standards that are protective by nature. The basic international document on labour rights is <b>the Declaration of the International Labour Organization</b> .
<b>The Declaration of the International Labour Organization</b>	sets out the objectives and tasks of the International Labour Organization (ILO), adopted in Philadelphia in 1944; it is also known as the Declaration of Philadelphia. The ILO is an organization dealing with labour problems, in particular the reduction of child labour, the protection of employees' rights, the improvement of working and living conditions, the creation of jobs and training, and the development of international labour standards.  Link: <a href="https://www.mop.pl/html/miedzynarodowe_standardy/podstawowe_prawa.html">https://www.mop.pl/html/miedzynarodowe_standardy/podstawowe_prawa.html</a>
<b>Adverse effects on the environment</b>	adverse environmental effects resulting from a violation of one of the prohibitions or obligations under international environmental law conventions

**Quality Management System**

**The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

<b>Adverse effects on human rights</b>	adverse effects on protected persons resulting from the violation of one of the human rights or related prohibitions
<b>Supply chain</b>	The sequence of actions taken by the Supplier(s) and/or Subcontractors for the GMZ Companies, as a result of which the ordered products and services are supplied to GMZ Companies.
<b>Supplier</b>	a company or person that provides a product or service
<b>Permanent business relationships</b>	business relationships, direct or indirect, that are permanent or expected to be permanent, due to their intensity or duration, and that do not constitute an insignificant or merely ancillary part of the value chain
<b>Ethical clause of GMZ</b>	The ethical clause of MOSTOSTAL ZABRZE Group, referring to human rights, ethical and environmental issues, constituting <b>Appendix 1</b> to this Policy

**5. Liability**

1. Each employee of organizational units dealing with relations with Suppliers and Subcontractors in companies belonging to GMZ is obliged to familiarize themselves with the content of this Policy and its appropriate application.
2. Employees of organizational units dealing with relations with Suppliers and Subcontractors are obliged to behave ethically in relations with Suppliers and Subcontractors, including transparent and consistent communication with them in compliance with the rules in force in GMZ.
3. Employees of organizational units related with Suppliers and Subcontractors are obliged to include ethical clauses as part of agreements concluded with them, which constitute Appendix 1 to this Policy. This obligation can also be fulfilled, in justified cases, by obtaining a statement constituting Appendix 2 to this Policy.
4. The MZ Management Board Office and employees of organizational units dealing with relations with Suppliers and Subcontractors will make every effort to provide Suppliers and Subcontractors with the necessary knowledge regarding their expectations regarding ethical, social, and environmental issues.

**Quality Management System****The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

5. GMZ expects each Supplier and Subcontractor of GMZ companies to read this Policy. In addition, the Supplier and the Subcontractor are expected to evaluate its supply chain to ensure compliance with the GMZ principles of respect for human rights, and ethical and environmental issues set out in this Policy. Thus, in the event that the Supplier and the Subcontractor cooperating in the performance of a contract concluded with a company that is part of GMZ undertake to cooperate with its subcontractor or other supplier, the Supplier and the Subcontractor of GMZ are expected to advise them on this Policy and oblige them to comply with its rules.

## 6. GM's expectations of Suppliers and Subcontractors

Suppliers and Subcontractors are expected to comply with the following standards:

### 6.1. In terms of respect for human and employee rights

- a) **Non-discrimination - the Supplier or Subcontractor** shall not accept or tolerate any form of discrimination against employees based on their race, colour, sex, language, religion, political or other views, caste, nationality or social origin, personal characteristics, place of birth, trade union membership, sexual orientation, health, age, disability ,or other distinctive features.
- b) **Compliance with the prohibition of forced labour – the Supplier or Subcontractor** prohibits all forms of forced labour, including semi-slave labour, slave labour, or human trafficking.
- c) **Compliance with the prohibition of child and minor employment – the Supplier or Subcontractor** shall in no case tolerate child labour unless permitted by law, and any exception must comply with the guidelines of the International Labour Organization.
- d) **Respect for freedom of association and collective bargaining – the Supplier or Subcontractor** shall respect the rights of employees to form, join or not join trade unions or other organizations chosen by them representing their common interests, carried out in accordance with the law and social norms.
- e) **Compliance with the prohibition of harassment, harassment and harassment – the Supplier or Subcontractor** shall protect employees against any act of physical, verbal, sexual, or psychological abuse, humiliation or threats in the workplace, whether by colleagues or superiors.
- f) **Compliance with working hours, benefits and wages – the Supplier or Contractor** shall ensure compliance with all applicable laws and industry standards regarding wages, working hours, overtime, and other benefits.

**Quality Management System****The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1

- g) **Compliance with the right to holidays and sick leave – the Supplier or Contractor** shall enable all employees to exercise the right to sick leave and holiday, parental leave or leave intended for the care of their own or adopted children, in accordance with national law.
- h) **Compliance with the right to safety at work – the Supplier or Subcontractor** shall ensure safe and hygienic working conditions appropriate to the country of the activity and its specificity, and shall make efforts to prevent situations threatening the life and health of employees in the workplace.
- i) **Compliance with the law of migrant workers – the Supplier or Subcontractor** shall conduct the recruitment process of migrant employees fairly and without coercion.

**6.2. Respect for ethical principles**

- a) **Compliance with the prohibition of all forms of corruption** – the Supplier or Subcontractor shall prevent all forms of corruption.
- b) **Granting and accepting property benefits, sponsorships and donations** – the Supplier or Subcontractor shall avoid situations in which he or she would provide or accept any form of hospitality or gifts that may improperly influence the business decisions of either party. At the same time, the Supplier or Subcontractor shall respect the rules and observe the policy regarding hospitality and gifts at GMZ.
- c) **Avoidance of conflicts of interest** – the Supplier or Subcontractor shall avoid situations in which, in cooperation with GMZ, a conflict of interest may arise.
- d) **Personal Data Protection** – the Supplier or Subcontractor shall ensure that all activities relating to Personal Data (including its collection, recording, storage, and deletion) are carried out in accordance with applicable regulations.
- e) **Counteracting the phenomenon of mobbing** – the Supplier or Subcontractor does not accept mobbing in the workplace and ensures equal access to working conditions regardless of the form of employment as permissible by law. The Supplier or Subcontractor shall treat everyone with honesty, respect, and dignity, regardless of gender, age, religion, sexual orientation, education, nationality, worldview, political beliefs, disability, or position.
- f) **Prevention of money laundering and terrorist financing** - the Supplier or Subcontractor is obliged to comply with the applicable law in the field of preventing money laundering. The Supplier or Subcontractor shall pay particular attention to suspicious transactions and entities reluctant to provide reliable information. The Supplier or Subcontractor does not accept, allow or support activities that constitute money laundering or terrorist financing.

**Quality Management System****The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group**

Reference to the standard: ISO 9001 sec. 7,5; 8,4; 9,1

- g) **Compliance with applicable trade clauses and restrictions** - the Supplier or Subcontractor shall comply with export clauses and restrictions resulting from applicable law and shall not violate any prohibitions or restrictions on the trade in drugs or other drugs or weapons.
- h) **Tax integrity** – the Supplier or Subcontractor is obliged to pay all applicable taxes related to transactions carried out in cooperation with GMZ, as well as to issue invoices to companies from GMZ reliably and in compliance with tax law. The Supplier or Subcontractor should purchase goods and services from entities guaranteeing that the VAT will be shown on invoices and paid in accordance with the applicable tax law.
- i) **Confidentiality** - the Supplier or Subcontractor shall ensure the protection of confidential information entrusted to it by GMZ, customers, and others.
- j) **Fair competition** - the Supplier or Subcontractor shall act in accordance with national and international competition law and shall not participate in price collusion, market or customer division, or in the setting of tenders.

### 6.3. In terms of respect for the environment

- a) **Respect for the environment** – the Supplier or Subcontractor shall comply with the law regarding the environmental impact of its activities and responsibly manages the environmental impact of its business activities.
- b) **Taking actions aimed at minimizing the negative impact on the environment** - the Supplier or Subcontractor shall undertake actions to minimize the negative impact on the environment, including optimization and reduction of the consumption of natural resources, the use of resources – including water and energy – in an efficient manner, and shall strive to monitor and reduce greenhouse gas emissions resulting from the activities of Suppliers and Subcontractors.

## 7. Documentation and records

In order to implement the provisions of this Policy, the Supplier or Subcontractor are obliged to submit a Declaration, in the form of an ethical clause contained in the agreement concluded with the company

<b>MOSTOSTAL ZABRZE</b>	Index PGMZ-12	Version A	Page(s) 8/9
<b>Quality Management System</b>			
<b>The uniform policy towards suppliers and subcontractors in respect of human rights, ethical, and environmental issues in the MOSTOSTAL ZABRZE Group</b>			
Reference to the standard: ISO 9001 sec. 7.5; 8.4; 9.1			

from GMZ, constituting Appendix 1 to this Policy. This obligation can also be fulfilled by submitting a declaration, which constitutes Appendix 2 to this Policy.

For the avoidance of doubt, failure by the Supplier or Subcontractor to make a statement about the application of the standards set out in this Policy, as well as their non-application, does not exclude the possibility of establishing relations with such a Supplier or Subcontractor by GMZ companies. However, this factor shall be considered negative in the decision-making process aimed at selecting a Supplier or a Subcontractor.

## 8. Related documents

- The Code of Ethics, which consists of the following documents:
  - The anti-mobbing and anti-discrimination procedure;
  - The procedure for anonymous reporting of violations of law, procedures, and ethical standards;
  - The uniform policy on the security of personal data;
  - The uniform anti-corruption policy of the MOSTOSTAL ZABRZE Group;
  - The uniform policy of respect for human rights in the MOSTOSTAL ZABRZE Group;
  - The uniform procedure for reporting violations in the MOSTOSTAL ZABRZE Group according to the Whistleblower Protection Act of 14 June 2024;
  - The integrated due diligence procedure for sustainable business development;

## 9. List of Appendices

Appendix 1 – Ethical Clause of the MOSTOSTAL ZABRZE Group

Appendix 2 – Statement for Suppliers and Subcontractors



MOSTOSTAL ZABRZE S.A.	Quality Management System	Appendix 1 – PGMZ-12
Ethical Clause of the MOSTOSTAL ZABRZE Group		Version: A

## Appendix 1 – Ethical Clause of the MOSTOSTAL ZABRZE Group

1. In this clause, capitalized expressions have the following meanings:
  - Company:** means any company belonging to the MOSTOSTAL ZABRZE Group;
  - GMZ:** means the MOSTOSTAL ZABRZE Group, in which the parent company is MOSTOSTAL ZABRZE Spółka Akcyjna in Gliwice;
  - Contractor:** means a natural person, legal person or organizational unit without legal personality, with which the Company establishes or has established cooperation in any field of activity, in particular business activity;
  - Parties:** collectively the Company and the Contractor;
  - Party:** the Company or the Contractor, depending on the context;
  - Policy:** Uniform policy towards Suppliers and Subcontractors in respect of human rights, ethical and environmental issues in the MOSTOSTAL Zabrze Group, in force at GMZ and available at <https://mz.pl/firma/kodeks-etyki>.
2. The Contractor warrants to the Company that, while conducting its business and cooperating with the Company, it will fully comply with the standards and ethical standards regarding the rights of human individuals and their communities, labour rights, business activity and environmental protection set out in applicable law and internal procedures or policies, and will counteract violations or abuses of law, both directly and through entities dependent on the Contractor or related to it.
3. The Contractor agrees to fully comply with the requirements contained in the Policy.
4. The Contractor shall ensure that both the Contractor and any of its subsidiaries or related parties, as well as its suppliers, subcontractors, and service providers involved in the Contractor's supply chain in cooperation with or for the benefit of the Company:
  - 1) adhere to the principles of respect for fundamental human and civil rights;
  - 2) comply with the prohibition of any form of discrimination or harassment;
  - 3) adhere to the principle of preventing the employment of persons whose employment would violate generally applicable law, health and safety requirements, fire and environmental regulations and the conditions of this clause, in particular the prohibition of child labour and any forced labour;
  - 4) comply with sanctions or restrictive measures under applicable law;
  - 5) comply with export clauses and restrictions resulting from the relevant provisions of applicable law;
  - 6) does not violate any prohibitions or restrictions on the trade in drugs;
  - 7) does not violate any prohibitions or restrictions on arms trade;
  - 8) comply with the rules on combating terrorism, money laundering, and corruption;
  - 9) respect and protect competition laws;
  - 10) refrain from any act of unfair competition or that may lead to a conflict of interest;
  - 11) comply with laws or agreements regulating the protection of trade secrets or confidential information;
  - 12) comply with environmental regulations.
5. The Contractor undertakes to inform the persons employed by the Contractor or cooperating with the Contractor on any basis and inform the subsidiaries or affiliates of the Contractor of the terms and conditions set out in this Clause and on the obligation to comply with them.
6. The Contractor undertakes to immediately inform the Company of any identified violation of the terms and conditions of this clause electronically at [naruszenia@mz.pl](mailto:naruszenia@mz.pl).

<b>MOSTOSTAL ZABRZE S.A.</b>	<b>Quality Management System</b>	Appendix 1 – PGMZ-12
<b>Ethical Clause of the MOSTOSTAL ZABRZE Group</b>		Version: A

7. Any breach of the rules hereof shall constitute a breach of the terms and conditions of cooperation between the Company and the Contractor, which entitles the Company to terminate such a cooperation.

MOSTOSTAL ZABRZE S.A.	Quality Management System	Appendix 2 – PGMZ-12
<b>Statement for Suppliers and Subcontractors</b>		Version: A

**Appendix 2 – Statement for Suppliers and Subcontractors**

Acting on behalf of -----

[company name]

We declare that we have read the “Uniform Policy Towards Suppliers and Subcontractors in respect of human rights, and ethical and environmental issues in the MOSTOSTAL ZABRZE Group” on the corporate website [www.mz.pl](http://www.mz.pl) and we undertake to comply with it in cooperation with a company belonging to the MOSTOSTAL ZABRZE Group, also within our own supply chain.

-----

[signatures]