

CODE OF CONDUCT AND ETHICS

Autorobot-Strefa Sp. z o.o.

NIP/PL 6342266684;

Sąd Rejonowy w Gliwicach X Wydz. Gosp. Krajowego Rejestru Sądowego

KRS NR 0000156775 - Kapitał zakładowy: 5.114.050,00 PLN

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INTRODUCTION

Autorobot-Strefa is a company that has been operating since 1998. Acting on the broadly understood international market in the automotive and aviation industries as well as railway we are guided by the principles of maintaining the highest technical, business as well as ethical standards. We are developing our business seeking a balance between economics and ethics in such a way that it is beneficial for the natural environment and society, while also ensuring compliance with all applicable laws.

Our business standards ensure the highest quality of our products, but it is ethics and honesty, a sense of responsibility and respect towards others, and the pursuit of excellence that form the foundation of our basic values. These values unite us as a company and as a community, ensuring the reliability of our business practices, defining the way we treat our employees and contractors.

This Code of Conduct and Ethics at Autorobot-Strefa is a presentation of the values and principles that Autorobot-Strefa considers to be particularly important and the behaviours that are expected of all of us. All senior leaders, including management, support this Code and strive to ensure that its values and principles underpin our business. It is essential that all the employees become familiar with our Code of Conduct and Ethics and fully comply with it. Autorobot-Strefa will also work with business partners to encourage them to comply with this Code.

I encourage you to carefully read the Code to better understand how our core values affect our daily business decisions, work environment and interpersonal relationships. Thank you for complying with our Code of Conduct and Ethics and achieving sometimes very demanding goals.

Yours faithfully
Roberto Badellino
General Manager & CEO
Autorobot-Strefa Sp. z o.o.



OUR FUNDAMENTAL VALUES

RESPECT AND INTEGRITY

We follow standards and principles based on ethical models, therefore we treat others with respect, we respect their dignity and value the diversity of views, cultures and origin. We respect the contributions of others and try to find out their point of view. We deal fairly with suppliers, customers and other business partners.

COMPLIANCE WITH LAW

We comply with national and international law as well as fundamental ethical standards set by the United Nations.

SENSE OF RESPONSIBILITY

We seek to ensure our each single word has value. We remain our commitments to ourselves and to others, trying to do the right thing. We accept the consequences of our own actions. By admitting mistakes, we do not attack the people who try to proceed properly by asking questions or raising concerns.

COURAGE AND PURSUIT OF EXCELLENCE

We promote ethical attitudes and behaviour in every aspect of business cooperation among our employees, customers, suppliers, business partners. We run our business with a view to constantly improving the competences of our employees and the use of the latest technologies.

COMMITMENT

We strive to positively influence the lives of our employees and their families and the communities in which we operate.

AUTOROBOT-STREFA EMPLOYEES' DUTIES ON CODE OF CONDUCT AND ETHICS REGULATIONS COMPLIANCE.

Autorobot-Strefa Code of Conduct and Ethics is an obligation on the part of every employee to comply with the company's ethical norms and standards, as well as applicable law, irrespective of position, seniority, place and working time.

Being employees of Autorobot-Strefa to which the Code of Conduct and Ethics is addressed we commit ourselves to:

- comply with ethical norms and standards specified in the Code of Conduct and Ethics in both internal and external relations,
- comply with company procedures and applicable law,
- counteract unacceptable practices in our workplace - we always react when we witness behaviour contrary to accepted in Autorobot-Strefa with ethical principles and applicable law,
- report events constituting a violation of standards adopted in Autorobot-Strefa, ethical standards and applicable law.

AUTOROBOT-STREFA's MANAGEMENT RESPONSIBILITIES RELATED TO COMPLIANCE WITH THE PRINCIPLES IN THE CODE OF CONDUCT AND ETHICS.

Members of the management at all levels of management in Autorobot-Strefa are people who, by their attitude, should lead by example and models to be followed for other employees. The role of superiors in particular is as follows:

- Create subordinate employees with such conditions of achieving goals and tasks which helps building a work culture based on accepted ethical values,
- Disseminate the standards and rules of conduct set out in the Code of Conduct and Ethics in everyday professional practice by conversation with employees and paying attention to ethical issues at work,
- Provide all employees with the opportunity to read the Code,
- Provide in the area of competence the necessary explanations or advice related to resolving ethical dilemmas reported by employees,
- Receive reports from employees regarding situations that violate the principles adopted in Code of Conduct and applicable law, analyse them and taking appropriate actions,
- React to any behaviour that may result in negative consequences for Autorobot-Strefa,
- Provide the necessary support to employees who report ethical concerns and protect them against relation by unethical practitioners.

RETALIATION PROHIBITION

Autorobot-Strefa prohibits any retaliation against employees who in good faith, seek help or report actual or suspected violations of law, rules specified in the Code of Conduct and Ethics, or other company policies. "Good faith" means to the best of your knowledge and beliefs, everything you report is truthful, and no information has been intentionally distorted.

No manager may harass or allow harassment against an employee or person who has made a good faith report.

Any retaliation against an employee who has made a report in good faith will be subjected to disciplinary action up to and including termination of the employment contract. Disciplinary sanctions also may be applied to employees who knowingly file false reports. If you experience retaliation, report them as suspected misconduct.

ETHICS COMMITTEE AND REPORTING VIOLATIONS RELATING TO THE PROVISIONS OF THE CODE OF CONDUCT AND ETHICS CONDUCT

At Autorobot-Strefa operates an Ethics Committee aimed to analyse reports regarding violations of the provisions of the Code of Conduct and Ethics. Its tasks cover also support in the implementation of the Ethics Program aimed at fostering the company's culture based on the principles of ethics.

The Ethics Committee takes an independent position on violations of law and ethics adopted in the Autorobot-Strefa. Each employee of the Autorobot-Strefa being a witness of violation of law or the Code of Conduct and Ethics may take independent actions to improve a particular situation.

The employee may also report a violation of the law or the Code of Conduct and Ethics in open conversation with the immediate supervisor, whose duty is to give the necessary support. If due to the nature of the case, it is inadvisable to talk to your immediate supervisor, the employee may contact directly the representatives of the Ethics Committee who will undertake explanatory actions.

Each employee may also report a violation of ethical principles in anonymous form by sending a notification to the email address:

etyka@autorobotstrefa.pl

or by using a physical box labelled: "Zgłoszenia dotyczące naruszeń Kodeksu Etyki i Postępowania" ["Reports regarding violations of the Code of Ethics and Conduct"].

The contents of the box are opened by members of the Ethics Committee and because it is sealed and placed outside the monitored area, this guarantees that the applicant is fully anonymous.

In the course of the investigation, we provide identity protection and discretion to all persons who submit a notification. The identity of the person to whom any notification would apply would also be protected. This action is aimed at preventing negative consequences for the employee disclosing the violation and the person wrongly accused of the violation.

ETHICAL PRINCIPLES IN HUMAN RELATIONS COMPANY'S ETHICAL PRINCIPLES IN HUMAN RELATIONS

RESPECT FOR HUMAN RIGHTS

At Autorobot-Strefa, international human rights standards and international labour standards are respected and followed. We conduct business activities respecting fundamental human rights contained in the Universal Declaration of Human Rights adopted by the United Nations General Assembly.

Autorobot-Strefa strives to harmoniously achieve individual and social goals in the spirit of respect for human rights and concern for the common good. It observes the provisions of labour law and occupational health and safety, and also ensures that employees are always treated in accordance with these provisions.

Autorobot-Strefa offers its employees a work environment that promotes their personal development and creating relationships based on trust and mutual respect.

PROHIBITION OF FORCED LABOUR

Autorobot-Strefa supports and observes human rights within its sphere of influence, in particular in the field of effective elimination of forced labour. We will not tolerate human rights violations, in particular the use of forced labour, either in our company or our contractors.

FREEDOM OF ASSOCIATION

The Autorobot-Strefa recognizes the freedom of association and organization of employees and the conduct of collective or individual negotiations by employees in accordance with laws and regulations. To this end, Autorobot-Strefa engages in dialogue with employee representatives. Employees have the right to associate in accordance with their own choice to support or protect employees' interests or to join such an association. Autorobot-Strefa does not accept any discrimination or disciplinary measures against employees who peacefully and lawfully exercise the right of association and negotiate.

ETHICAL PRINCIPLES IN HUMAN RELATIONS

PROHIBITION OF CHILD LABOUR AND JUVENILE WORKERS PROTECTION

Autorobot-Strefa observes the prohibition of employing children. The company believes that work must not interfere in the child's education and development process and every child must be protected from work that poses a risk to physical and mental health.

FAIR AND LEGAL REMUNERATION RULES AND DECENT WORKING HOURS

Autorobot-Strefa complies with applicable legal provisions regarding the conclusion of an employment relationship, i.e. conclusion of employment contracts and remuneration. Employees receive a written confirmation of employment, which sets out the terms of employment in a language that they understand and contains information on working hours, remuneration and payment conditions.

Salaries must be paid on time, regularly and legally. Autorobot-Strefa will make every effort to ensure that the level of remuneration reflects the competences and education of employees, and always applies to agreed working hours. All deductions from remuneration must result from the conditions specified in the regulations.

Overtime work in Autorobot- Strefa will be ordered in accordance with legal requirements.

ETHICAL PRINCIPLES IN HUMAN RELATIONS DIVERSITY, RESPECT, NO DISCRIMINATION AND EQUAL OPPORTUNITIES FOR EVERYONE

Autorobot-Strefa does not accept any form of discrimination in employment and in labour relations. Observes the prohibition of discrimination and does not tolerate harassment based on: race, social status, ethnic or national origin, religion, disability, gender, sexual orientation, relationship or political affiliation, age or marital status, membership in employee organizations and any other factor being a source of discrimination.

Autorobot-Strefa guarantees freedom of opinion, conscience and religion, as well as freedom of belief and expression. It provides a work environment in which every employee should be treated with respect and dignity and should have equal development opportunities.

We do not accept mobbing, physical, sexual, psychological or verbal harassment, as well as intimidation or bullying of any employee.

PROTECTION OF PRIVACY AND PERSONAL DATA

At Autorobot-Strefa, we respect the personal data of our employees. We ensure that all activities on personal data, e.g. collection, recording, comparison, storage and deletion, take place in accordance with applicable regulations. We safeguard personal information about our employees and other stakeholders, and ensure that all persons who access personal data maintain appropriate measures to protect it.

This means that access to this information is only for people with appropriate permissions and a clear business need. Any breach of the obligation to keep personal data confidential should be reported to the Human Resources and Payroll Department as soon as possible. Autorobot-Strefa will make every effort to protect and treat confidential personal data, but employees should also be aware that all written communication as well as all data and information sent to electronic systems located in the Autorobot-Strefa company or received by or in these systems stored are company property.

HEALTH CARE AND PROVIDING HEALTHY AND SAFE WORKING CONDITIONS

Occupational Health and Safety are a priority for Autorobot-Strefa. Our goal is to provide a safe working environment for all employees and to ensure the safety of others who are affected by these activities. Autorobot-Strefa makes every effort to identify and assess the possibility of employees' exposure to health and safety hazards at work and to control and minimize their negative impact through appropriate projects, engineering solutions and administrative control measures, preventive maintenance and safe work procedures, as well as regular training in the field of occupational health and safety.

Appropriate measures will be taken to prevent accidents and damage to health as a result of work, in connection with it or during it, by limiting the causes of hazards in the work environment as much as possible.

Autorobot-Strefa expects every employee to know health and safety rules and practices and apply them on a daily basis in their position, and we encourage you to immediately report workplace injuries, illness or dangerous conditions, including situations that may cause an accident.

ENVIRONMENT PROTECTION AND RESPECT FOR NATURAL RESOURCES

Autorobot-Strefa complies with legal regulations in scope of environmental protection, and while setting ambitious goals, it constantly strives to limit the negative impact of its activities on the natural environment, minimizing the consumption of natural resources and reducing the production of waste resulting from ongoing operations.

Autorobot-Strefa understands its obligations in the field of environmental protection and will support the development of environmentally friendly technologies and will continue activities aimed at: ensuring efficient use of energy and natural resources, reducing carbon footprint, water consumption, reducing greenhouse gas emissions and non-recyclable waste.

In particular, we expect all employees to be involved in the proper use of energy resources and to avoid wasting them through easy-to-use daily activities and waste segregation to facilitate their proper disposal and recycling.

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FORMULARZ SKARGI PRACOWNICZEJ
(EMPLOYEE COMPLAINT FORM)

Szanowny Pracowniku,
Dear Employee,

Dziękujemy za skorzystanie z możliwości wyrażenia swojego zdania oraz zgłoszenia ewentualnych problemów związanych z warunkami pracy. Niniejszy formularz został przygotowany w celu umożliwienia składania skarg i sugestii, które mogą przyczynić się do poprawy naszego miejsca pracy.

Thank you for taking the opportunity to express your opinion and report any problems related to working conditions. This form has been prepared to enable you to submit complaints and suggestions that may help to improve our workplace.

Prosimy o dokładne wypełnienie poniższego formularza abyśmy mogli skutecznie zająć się Państwa zgłoszeniem. Dbamy o otwarty dialog i zobowiązujemy się do rzetelnego rozpatrzenia każdej skargi, aby zapewnić naszym pracownikom komfortowe i sprawiedliwe warunki zatrudnienia. Please fill out the form below carefully so that we can effectively deal with your request. We maintain an open dialogue and commit to thoroughly consider each complaint to provide our employees with comfortable and fair employment conditions.

Prosimy o przesłanie formularza na poniższy adres e-mail:
Please send the form to the following e-mail address:

etyka@autorobotstrefa.pl

PROCEDURA

PROCEDURE

- **Otrzymanie Skargi:**

Receiving a Complaint:

- Skarga zostanie zarejestrowana i przypisana do komisji etyki
- The complaint will be registered and assigned to the ethics committee

- **Weryfikacja i dokumentacja:**

Verification and documentation:

- Przeprowadzenie wstępnej weryfikacji zgodności skargi z regulaminem pracy i kodeksu etyki
- Carrying out a preliminary verification of the complaint's compliance with the work regulations and the code of ethics

- Dokumentacja skargi oraz ewentualnych dowodów

Documentation of the complaint and possible evidence

- **Rozpoczęcie Procesu Rozpatrywania**

Commencement of the Consideration Process

- **Rozmowa ze Skarżącym**

Interview with the Complainant

- Spotkanie komisji etyki z pracownikiem skarżącym w celu uzyskania dodatkowych informacji i zrozumienia sytuacji

Ethics committee meeting with the complaining employee to obtain additional information and understand the situation

- **Analiza Dowodów**

Evidence Analysis

- Szczegółowa analiza dostarczonych dokumentów i dowodów popierających skargę

Detailed analysis of the documents and evidence provided in support of the complaint

- **Konsultacja z Zaangażowanymi Stronami**

Consultation with Involved Parties

- Jeśli to konieczne, konsultacja z innymi pracownikami, świadkami lub zespołem pracowniczym

If necessary, consult with other employees, witnesses or the work team

- **Proponowane Rozwiązania**

Solution Proposals

- Wypracowanie propozycji rozwiązania sytuacji z uwzględnieniem zasad uczciwości i równości

Developing proposals to solve the situation taking into account the principles of fairness and equality

- **Spotkanie ze Skarżącym**

Meeting with the Complainant

- Przeprowadzenie spotkania z pracownikiem skarżącym w celu przedstawienia wyników analizy oraz propozycji rozwiązania.
Conducting a meeting with the complaining employee to present the results of the analysis and a proposed solution.
- **Podjęcie Działań Korekcyjnych**
Taking Corrective Actions
 - **Wdrożenie niezbędnych działań korekcyjnych lub poprawczych w celu rozwiązania problemu**
Implementation of necessary corrective or corrective actions to resolve the problem
- **Monitorowanie Sytuacji**
Situation Monitoring
 - **Regularne monitorowanie sytuacji po wprowadzeniu działań korekcyjnych**
Regular monitoring of the situation after introducing corrective actions
- **Dokumentacja Zakończenia Procedury**
Procedure Completion Documentation
 - **Zakończenie procesu rozpatrywania skargi i spisanie dokumentacji**
Completion of the complaint handling process and preparation of documentation
- **Zapewnienie Odpowiedzi**
Providing Response
 - **Przekazanie skarżącemu informacji o rezultatach procedury oraz podjętych działaniach**
Providing the complainant with information about the results of the procedure and the actions taken

FORMULARZ SKARGI PRACOWNICZEJ
EMPLOYEE COMPLAINT FORM

1. Imię i Nazwisko: _____
(First and Last Name)
2. Stanowisko: _____
(Position)
3. Adres e-mail: _____
(E-mail Address)
4. Numer kontaktowy: _____
(Phone Number)

Opis skargi:

(Complaint description)

1. Opisz dokładnie czego dotyczy skarga lub problem z którym się zwracasz:
(Describe exactly what your complaint or problem is about:)

2. Czy podjęto już próbę rozwiązania tego problemu na innym etapie? (Tak/Nie)
(Has there already been an attempt to solve this problem at another stage? (Yes/No))

Dokumentacja (jeśli dotyczy):

(Documentation (if applicable)):

1. Załącz dokumenty lub dowody popierające Twoją skargę
(Attach documents or evidence to support your complaint)

Podpis i Data

(Signature and Date)

1. Podpis: _____
(Signature)
2. Data: _____
(Date)