

ETHICAL CODE

**EMERSON POLSKA SP. Z O.O. SP.K.**

**1. Ethical standards**

We are one of Europe's largest producers of forms and specialised prints, such as scratch cards and classified documents, and we feel obliged to promote ethics and wish to join the world's leaders in respecting human rights and environmental protection. The responsibility for achieving this goal lies with all employees of Emerson Polska Sp. z o.o. Sp.k.

This Code of Ethics has been approved by the Management Board of Emerson Polska Sp. z o.o. Sp.k., which undertakes to regularly assess compliance with the principles contained in the Code and to update its content based on the conclusions obtained.

The Code reflects the ethical values the company wishes to uphold. It represents for the employees of Emerson Polska Sp. z o.o. Sp.k. a model of conduct in relation to colleagues, superiors and customers, partners, and local communities, both in business and non-business relations.

This Code is distributed in accordance with the document distribution policy at Emerson Polska Sp. z o.o. Sp.k. indicated in the documentation of the Integrated Quality and Environmental Management System.

**2. Mission**

The primary objective of Emerson Polska Sp. z o.o. Sp.k. is to take care of customer satisfaction, satisfying their needs and requirements, especially in terms of high quality and safety of offered products and provided services. The products we manufacture meet



international quality standards, taking into account individual customer needs and the requirements of a dynamically developing market.

Emerson Polska Sp. z o.o. Sp.k. manufactures safe and legal products and bears full responsibility to customers for the manufactured products and services provided.

Our employees are trained in the implemented systems, are aware of the risks that have been identified throughout the life cycle of the manufactured and offered products, along with the services provided, and are at the same time responsible for their health safety.

### The Three Key Policy Pillars of Emerson Polska Sp. z o.o. Sp.k.

#### PEOPLE

A team of professional employees of Emerson Polska Sp. z o.o. Sp.k. is committed to producing the highest quality products and providing services that meet individual customer requirements.

#### TECHNOLOGY AND INNOVATION

Continuous investment in technological development and management systems, guaranteeing reliable execution of orders and enabling continuous enrichment of Emerson Polska Sp. z o.o. Sp.k. product and service offers.

#### CUSTOMER RELATIONS

Transparent rules of cooperation, individual order processing, and partnership contacts to ensure the highest level of satisfaction and loyalty of Emerson Polska Sp. z o.o. Sp.k. customers. Thanks to the implemented principles, we achieve a competitive advantage, ensure stability and build the leading position of our company.



### 3. Values

Both in its internal and external relations with its stakeholders, Emerson Polska Sp. z o.o. Sp.k. honours universal values, promoting: honesty, diligence, and conscientiousness in the performance of entrusted tasks, quality, and innovation as goals set individually by its own work, open cooperation for the common good, building and maintaining trust among co-workers and business partners, as well as respect, forbearance, and assistance, regardless of the position held or diversity of views.

### 4. Working standards

At Emerson Polska Sp. z o.o. Sp.k., there are labour regulations in place, which contain terms and conditions in accordance with the Labour Code, the Constitution of the Republic of Poland. The regulations apply to all employees - regardless of their position and the basis on which the employment relationship was established. It does not apply to people remaining with Emerson Polska Sp. z o.o. Sp.k. in a legal relationship governed by other legal regulations (e.g. the Civil Code). Each employee is obliged to familiarise himself/herself with the regulations and sign the relevant declaration.

The work regulations are a separate document with which Employees are familiar when they are hired and to which they have access during the course of their work - in accordance with the principles of the Information Security Management System.

#### Basic workers' rights

At Emerson Polska Sp. z o.o. Sp.k. the basic working principles set out in the Labour Code, as well as those arising from the scope of the SMETA system, apply.

Core labour rights include:



- the right to the lowest wage (order of the Ministry of Labour and Social Policy under delegation of art. 774 of the Labour Code) - i.e. retention of the lowest salary on a full-time employment basis,
- the right to respect for the employee's dignity (self-esteem) and other personal goods (art. 11<sup>1</sup> of the Labour Code) - this means treating the employee with respect and observing the principles of culture. A catalogue of goods is set out in art. 23 of the Civil Code, where the following are listed: health, freedom, honour, freedom of conscience, image, surname or alias, the secrecy of correspondence, inviolability of the dwelling, scientific, artistic, inventive and rationalisation creativity,
- the principle of equal rights of employees in terms of receiving similar compensation for work for employees with identical or similar qualifications, experience, and performing similar work (art. 11<sup>2</sup> of the Labour Code) - the principle of non-discrimination on the grounds of sex, age, race, disability, nationality, beliefs or affiliation applies here (prohibition of discrimination art. 11<sup>3</sup> of the Labour Code. and art. 32 par. 2 of the Constitution),
- the right to appropriate compensation for work (art. 13 of the Labour Code) - this means that an employee is entitled to compensation appropriate to his or her qualifications and skills, taking into account the type of work performed and the quantity and quality of work provided,
- The right to rest (art. 14 of the Labour Code) - this means that every employee has the right to annual leave, days off, and rest breaks.

Emerson Polska Sp. z o.o. Sp.k. like any organisation has responsibilities toward its employees. Among the most relevant are:

- the obligation to ensure safe and hygienic working conditions (art. 15 of the Labour Code), which directly and indirectly affect the quality of work,
- the obligation to meet subsistence, social and cultural needs (art. 16 of the Labour Code) - this relates to the operation of the social benefits fund, supporting employees as far as the workplace is financially viable,



- obligation to facilitate the improvement of professional qualifications by employees (art. 17 of the Code of Labour) - detailed rules and conditions for improving qualifications by adults are set out in the regulations

Emerson Polska Sp. z o.o. Sp.k also complies with the FSC's basic requirements for employee rights including:

It does not use child labour.

- does not employ workers below the age of 15 years or below the minimum age set by national law or local regulations, whichever is higher, except in the cases listed under point
- no person under the age of 18 is employed in hazardous or heavy work, except for training purposes in accordance with applicable national legislation and regulations.
- prohibits the worst forms of child labour.

Emerson Polska Sp. z o.o. Sp.k. does not use any form of forced or compulsory labour.

The employment relationship is voluntary and based on mutual consent, without the threat of punishment, and there is no discrimination in terms of hiring and performance.

Employment and professional practices are non-discriminatory.

The organisation respects freedom of association and the right to collective bargaining.

Employees have the option to establish or join an employee organisation of their choice.

We respect the full freedom of employee organisations to create their own statutes and rules.

We negotiate with legally established employee organisations and/or duly elected representatives, in good faith and with our best efforts.

## 5. Anti-corruption policy

### Introduction

Emerson's Board of Directors is convinced of the need to comply with applicable regulations,



including laws and ethical standards aimed at preventing any form of corruption, in the course of its business. We are committed to promoting our business activities in a transparent and responsible manner, respecting the highest ethical standards. The responsibility for achieving this rests with all Emerson employees, associates, and representatives.

This Policy applies to all Emerson employees, associates, and representatives. In addition, Emerson supports and encourages its customers, business partners, and suppliers to be ethical, and honest in their actions and to comply with applicable laws, including, in particular, the prevention of any corruption.

Ethical and responsible business conduct is a guiding and fundamental principle for Emerson in its operations.

## **The Objective of the Anti-Corruption Policy**

The purpose of the Anti-Corruption Policy is to establish rules and standards of conduct at Emerson aimed at preventing and responding to actions that may bear the hallmarks of corruption. To this end, Emerson establishes a set of rules to be applied, defining a catalogue of unacceptable behaviour that may constitute cases of corruption.

The Anti-Corruption policy at Emerson sets out how to deal with a corrupt threat or corrupt behaviour.

Emerson's Anti-Corruption policy is also addressed to all Emerson stakeholders (i.e. customers, suppliers, subcontractors, and any business partners) setting standards of conduct in business relations with stakeholders.

The principles set out in this policy are in addition to the regulations of national and international anti-corruption laws and it is the responsibility of every employee, associate, and representative of Emerson to comply with these regulations.

## **Definitions**



**Corruption** - corruption is defined as any act or omission to act, as well as the promise to do so, in order to obtain illegally or ethically an advantage given, promised or implied, whether material or immaterial, directly or indirectly.

**Corruptive behaviour** - occurs when a person is wishing to achieve an objective for themselves or for an entity or person they represent promises, offers, or gives a pecuniary advantage (i.e. an advantage, which value can be expressed in money, understood as an increase in the value of a property, as well as a decrease in liabilities encumbering the property) or a personal benefit (understood as a non-pecuniary benefit improving the situation of a given person) to a person who holds a public function or performs important functions in economic dealings in order to achieve this objective. It is irrelevant whether such actions are taken personally or with the help of intermediaries.

The most common corrupt activities include, in particular:

- bribery/hunting - including two varieties: passive (solicitation, coercion, agreement to receive an advantage, acceptance of an advantage) and active (offer, promise to give, or giving an advantage).
- use of public funds and assets for private purposes or personal gain,
- paid patronage/trafficking in influence - understood as invoking influence in an institution wielding public funds, or inducing a belief or reassurance in another person of the existence of such influence, including offering (active paid patronage) or seeking (passive paid patronage) an intermediary to arrange a matter in exchange for a pecuniary or personal benefit or the promise thereof.
- obtaining contracts, concessions or permits, and decisions by courts and public administrations,
- evasion of obligations arising from generally applicable legislation, including in particular customs and tax obligations,
- favouritism, nepotism, cronyism, and other prohibited practices in the area of labour relations.



Prohibited activities that are corrupt in nature are defined by generally applicable laws, including in particular the provisions of the Criminal Code.

## Principles of the Anti-Corruption Policy

All Emerson employees, associates, and representatives conduct themselves in accordance with applicable law by applying zero tolerance for corruption and paid patronage in all aspects of their business.

In accordance with the Anti-Corruption Policy adopted, it is prohibited for Emerson employees, associates, and representatives, either internally or externally, to take any of the following actions, whether directly or through others:

- bribery,
- coercion or inducement,
- paid patronage,
- legalising the proceeds of corrupt activities.

Emerson employees, associates, and representatives may not offer, give, promise, demand, or accept financial or personal benefits:

- which could be perceived as illegal, unethical, or inappropriate,
- which aim to influence the terms of a transaction,
- provided in cash or cash equivalents (e.g. gift cards, vouchers).

Gifts or favours outside the standard business relationship to current or prospective customers, their employees or agents, or other persons (including, but not limited to, government officials) with whom Emerson has a contractual relationship or with whom it intends to negotiate a contract are prohibited.

Representation and outings offered by or provided to Emerson employees in connection with business activities should be modest in nature and clearly intended to facilitate business discussions. Business representation in the form of refreshments and beverages is acceptable as





long as it is in compliance with local law, Emerson's policies and procedures regarding representation, sales, general and administrative expenses, occurs with reasonable frequency, and, as far as possible, is reciprocal in nature.

Gifts of sums of money are completely prohibited and, if offered, must be refused.

All promotions (e.g. discount programmes) and competitions with prizes, take place in accordance with this policy and generally applicable laws. Issuing gift cards, vouchers, etc. to customers and business partners is only possible on the basis of the regulations of promotions and competitions conducted by Emerson.

Emerson maintains its accounts and financial policies in a transparent manner and in compliance with applicable legislation. The use, including the marketing, of false documents and invoices, as well as the introduction of improper, ambiguous, or misleading accounting entries is prohibited. The use of any accounting procedures, techniques, or solutions aimed at making or accepting illegal payments is prohibited.

### **Ways of Implementing the Anti-Corruption Policy**

Emerson conducts activities to raise awareness of existing corruption risks by conducting regular training for employees, colleagues, and representatives.

Emerson has a mechanism in place for reporting corruption and paid patronage, as well as crimes or fraud related to accounting, internal control, and auditing.

Emerson has established and maintains and applies internal quality, environmental, and information security management procedures designed to ensure that it conducts its business in a manner consistent with accepted national and international standards.

It is the responsibility of all Emerson employees, associates, and representatives to avoid situations and actions that may lead to corruption. Failure by employees, associates, and representatives to comply with the Emerson Anti-Corruption Policy will be treated as a breach of their employment duties and may result in both disciplinary liability and criminal liability under common law.

### **Reporting corruption risks**



Suspected violations of the Anti-Corruption Policy or other laws, or unethical conduct of any kind, may be reported to: [etyka@emerson.pl](mailto:etyka@emerson.pl)

It is also possible to make anonymous paper submissions by placing them in the dedicated contact box located in Hall 3.

Emerson will not impose consequences in the form of termination of employment or employment relationships on employees who report whistleblowing. No form of discrimination or harassment will be tolerated against individuals who report in good faith their concerns or suspicions about potential corruption.

All applications will be considered and thoroughly investigated.

## **Monitoring compliance with the Anti-Corruption Policy**

Emerson's Board of Directors undertakes to regularly assess compliance with the principles contained in the Anti-Corruption Policy, including an occasional assessment of each reported incident. Based on the ongoing monitoring of compliance with the provisions of the policy, its content will be updated both when the need is perceived and on the basis of lessons learned.

## **6. Policy against bullying, sexual harassment and discrimination**

In order to shape the principles of social coexistence, including the prevention of mobbing, sexual harassment, and discrimination, emphasising that the interaction between employees and the employer, including the reporting of undesirable actions and behaviours bearing the hallmarks of mobbing, sexual harassment, or discrimination, is an important element in the process of preventing, counteracting and resolving the underlying problems, we have introduced a policy against mobbing, sexual harassment and discrimination at Emerson Polska Sp.z.o.o Sp.k.



Detailed rules are described in internal orders to the content to which all Emerson Employees, Associates, and representatives have access.

## 7. Implemented Management Systems

Emerson Polska Sp. z o.o. Sp.k. places particular emphasis on the quality of its products and services. Measures to enhance this value are taken to meet the growing and well-defined expectations of customers operating in the domestic and international markets.

The Integrated Quality and Environmental Management System and HACCP ensure the proper, system-managed implementation of all business processes affecting the quality of products and services. The smooth operation of the system ensures that all processes are monitored, supervised, improved, and adapted to the ever-changing market and technological conditions and customer requirements. The high quality of products and services is supported by a constant concern for the environment and the safety of employees and suppliers.

Applying the principles of the systems implemented at Emerson contributes to increasing trust between the company and its customers and suppliers. It also strengthens Emerson's image in the eyes of all those interested in the effects of our company's activities in the areas of the quality of the products and services offered, environmental impact, energy management, and ensuring health and safety at work.

Aware of the importance and significance of information security in the company, the Management Board of Emerson Polska Sp. z o.o. Sp.k. has also introduced an Information Security Management System (ISMS), based on the PN-ISO/IEC 27001 standard.

The main objectives of the system are:



- 1) identifying the information that needs to be protected and effectively ensuring its security, i.e. confidentiality, integrity, and availability, by appropriate technical and organisational means;
- 2) Enabling business management to manage information security risks by identifying threats, assessing the impact of their possible destruction, taking appropriate safeguards and countermeasures against them to prevent their occurrence, and preparing for their occurrence;
- 3) maintaining continuity of production in the event of a major breakdown of the production systems in use or of the company's headquarters;

The principles of sustainability, the impact of the state of the environment on quality of life, and other green issues are of great value to us.

Emerson Polska Sp. z o.o. Sp.k. is affiliated with the Forest Stewardship Council A.C., Oaxaca, Mexico, (hereinafter FSC) through membership and having a contractual relationship with FSC.

This allows us to affix the FSC mark to the products we produce.

Emerson Polska Sp. z o.o. Sp. k. is also a member of the SEDEX organisation offering its members a range of services related to the ETI Base Code standard. The annual audit according to the SMETA 4 Pillars methodology confirms the compliance of the Company's processes in four ethical areas:

- labour standards,
- health and safety,
- environmental assessment,



- business ethics.

## 8. Ecology

Emerson Polska Sp. z o.o. Sp.k. complies with legal regulations on environmental protection. It consciously limits the impact of its activities on the environment by minimising the consumption of natural resources and the generation of waste resulting from its current operations. It also promotes an ecological lifestyle among its employees by conducting campaigns to encourage active participation in environmental protection.

The cyclical external legal compliance assessments, which provide an overview of Emerson's compliance with applicable environmental legislation, confirm the highest standards implemented within the Company in this regard.

## 9. Corporate social responsibility (CSR)

Emerson Polska Sp. z o.o. Sp.k. has been extensively involved in social activities since its inception. We support schools, kindergartens, care facilities, and several other non-public institutions. We also help individuals who need our help and support. For years we have been a partner of the HARC Children and Youth Association and a Sponsor of the annual Volunteer Gala in Piotrków Trybunalski, and we actively participate in undertakings organised in our District.

Among our social activities, it is worth mentioning:

- public collections and in-kind support for the sick and needy,
- in-kind support for schools and care facilities,



In addition to charity-oriented social activities, the Company actively and systematically supports its employees through:

- organisation of annual team-building trips, joint special events (Company Christmas Eve / Children's Day),
- funding of sports cards as part of creating and supporting a healthy lifestyle,
- financing of medical packages as part of preventive health care and support for the treatment of employees and their family members,
- systematic payments from the social benefits fund - Christmas cards, gifts for children on the occasion of Children's Day and St. Nicholas' Day, subsidising the purchase of corrective glasses, support for employees in need related to a difficult life and financial situations.

## 10. Monitoring compliance with the Code of Ethics

Compliance with the principles set out in the Code of Ethics is the responsibility of every Employee.

Any ambiguities, or problems related to the interpretation of the content of the Code of Ethics are resolved by the persons designated for this purpose, with the active participation of the Emerson Board of Directors.

Emerson employees are encouraged to make any comments or modifications related to the content of this Code of Ethics.

Employees, associates, representatives as well as Emerson stakeholders can make enquiries and submissions both in person and by email to: [etyka@emerson.pl](mailto:etyka@emerson.pl)

