

PROCEDURE

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| Reference: BOSMAL/P-14-01/02 | Data wydania: 13.12.2023 | |
| Title: CODE OF ETHICS & CONDUCT | Stron: 6 | Załączników: 1 |

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1. PURPOSE

The purpose of the Code is to shape the culture of work within the Company and outside it. The Code shows that our Company maintains high ethical standards, surpassing the obligations arising from rules of law. It builds mutual trust among employees, promotes transparency of activities and provides our employees, business partners and customers with clear information. In the dynamically changing business and social environment, the Code is of particular importance. The Code of Ethics only complements and strengthens the standards of conduct set out in the provisions governing the rights and obligations of employees to serve operational efficiency and transparency of BOSMAL and to build trust among contractors.

2. SCOPE OF APPLICATION

The Code of Ethics sets out the principles and ethical values that embody employee behavioural standards in order to fulfil the mission of the BOSMAL Automotive Research and Development Institute (further BOSMAL) and are the compass which guides all employees on what route to take when there is a choice to make.

3. SCOPE OF APPLICABILITY

This Code applies to all employees of BOSMAL, whatever the form of employment, interns, trainees, volunteers and all other business partners cooperating with BOSMAL, irrespective of their legal status.

4. DIVISION OF RESPONSABILITIES

The Management Board is responsible for:

- shaping culture and ethical standards and promoting them among employees .

Employees are responsible for:

- following the principles described in this document.


5. DEFINITIONS AND ABBREVIATIONS

5.1. Definitions

| Definition | Description |
|-----------------|--|
| BOSMAL/Instytut | Instytut Badań i Rozwoju Motoryzacji BOSMAL Sp. z o.o. |

5.2. Abbreviations

| Abbreviation | Description |
|--------------|----------------|
| | Not applicable |

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For the names of departments, please refer to the currently valid organigram in BOSMAL/R-0-03.

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6.1. Declaration

As an organization, we state that we follow the Gender Equality Strategy 2020-2025. Therefore, based on the implemented Anti-mobbing Policy, we care for the full safety of our employees, also in terms of protecting employees against mobbing. We provide all our employees, regardless of gender, equal access to the necessary tools at the workplace, such as participation in training, conferences, and subsidies for further education.

We work against any gender pay gap. We pay our employees based on their education, experience and, above all, qualifications, without any form of discrimination that could contribute to the gender pay gap.


In the recruitment process, we rely on the substantive requirements dedicated to vacancies.

We appoint both women and men to teams implementing research projects, and the only criterion we apply is knowledge and experience. The provisions contained in the national legislation respected by the Company, such as: Labor Code Act guarantees an equal distribution of care duties of our employees at home towards minor children, including childcare, as well as in the form of parental leave, regardless of gender.

Acting in the spirit of ethical and social responsibility, we unequivocally condemn all forms of modern slavery understood as forced labor, human trafficking, and other forms of human exploitation. We commit to complying with all applicable national laws and international standards regarding the fight against modern slavery. We act in accordance with human rights principles and support global efforts to eliminate employee mistreatment. In our commitment to full transparency, we commit to actively monitoring and auditing our supply chain to identify, prevent and eliminate all cases of modern slavery.

6.2. Internal Relations


- 1) The work carried out in each role is for the BOSMAL's sole benefit .
- 2) Performing official duties by an employee, within the framework of the competences granted, requires respect for generally applicable norms and laws, adherence to established principles of social coexistence and good manners.
- 3) The privileges given to the employee shall be used exclusively for the purpose of fulfilling the purposes for which those rights were granted to him.
- 4) The employee contributes to the accomplishment of the mission of the BOSMAL by executing the duties assigned to him – i.e.: meeting consumer demands and expectations, delivering timely services that ensure professional consistency.
- 5) The employee carries out the tasks entrusted to him, with respect for self and others, and willingly shares experience with the new generation of employees.

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- 6) When performing duties assigned to him, the employee acts in compliance with the basic code of ethics and ethical principles that are:
- the rule of law,
 - impartiality, independence and selflessness,
 - honesty, reliability and responsibility,
 - professionalism in action,
 - partnership,
 - courtesy and empathy in relationships with employees, supervisors, subordinates and peers (use of generally accepted standards of courtesy in direct contacts, phone calls or correspondence),
 - high personal culture and suitability of the outfit (taking care of their appearance by staying on the premises of BOSMAL in an appropriate and tidy outfit and wearing safety and work clothing in accordance with its intended purpose),
 - aiming for personal development and competences by extending knowledge and improving professional qualifications,
 - respecting attributes of corporate image, in particular the name and logo (looking after property, image and good name of BOSMAL and its employees, demonstrating due diligence and cost efficiency),
 - refraining from works that interfere with the duties or adversely affect objectivity of decisions taken and not indulging in practices that may result in activities conflicting with the BOSMAL's interests.

6.3. External relations

- 1) Making sure that contractor relations are based on integrity and mutual trust (cooperation is always based only on substantive reasons, fair competition with competitors without undermining their reputation).
- 2) Respecting intellectual property of contractors, including confidentiality of the personal data entrusted to us.
- 3) Fostering only fair and open competition respecting ethical values for market players.
- 4) Counteracting corruption by keeping a reliable and transparent accounting system.
- 5) Receiving and granting customarily accepted formal gifts of small value is in compliance with our principles described in the Anti-Corruption Policy (ensuring full impartiality of relations with contractors).
- 6) Avoidance of cooperation with entities which violate fundamental values binding upon BOSMAL, as described in this document.
- 7) Counterparties have the right to access full information on the services provided in the BOSMAL's offer, final prices and terms of sale, as well as to information on any circumstances affecting the services and mutual relations.
- 8) Not engaging in any political event.

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6.4. Surroundings

- 1) Taking full responsibility for the environmental impact of the operations of BOSMAL. Compliance with environmental constraints arising from statutory regulations. Focusing on finding solutions that prevent the adverse effect at the source.
- 2) Maintaining the ISO 14001 environmental management system which is an essential part of the effective management system for key processes.
- 3) Creating new jobs due to continuous investments and the company's development.
- 4) Maintaining transparent, corruption-free, and transparent relationships with public officials.
- 5) Promoting corporate social responsibility not only in internal relations, but also by supporting social, cultural and educational activities undertaken in the local environment. If possible, supporting local sports clubs, scientific projects and artistic groups.
- 6) Promoting pro-family values and a friendly atmosphere by endorsing, inter alia, the pro-family initiative based on the principle of harmony and balance between family, private life and work (organizing annual integration meetings for BOSMAL employees and employees' children).

6.5. Primacy

This Code is the main and overriding document governing ethics and business practices. There are also other internal regulations that complement the Code in areas particularly vulnerable in terms of ethics and law, i.e. the Anti-bribery and Anti-corruption Policy [BOSMAL/A-14-01](#) and the Workplace Anti-harassment Policy [BOSMAL/A-2-01/02](#).

6.6. Summary

- 1) It is the responsibility of all BOSMAL employees to read and understand this Code and affirm this fact by signing a related declaration and complying with this Code.
- 2) In the event of any potential violation of the principles contained in this document, the employees should raise their concerns and report them in good faith to their immediate supervisor or directly to the Legal Compliance and Standard Management Team, and when reasonably justified, to the President of the BOSMAL's Management Board.
- 3) A breach of the rules of behaviour adopted in this document should be reported directly to the Legal Compliance and Standard Management Team using one of the three available channels: electronically (e-mail: etyka@bosmal.com.pl), by mail, or in person.
- 4) A breach of the rules set out in the Code of Ethics may result in disciplinary action against an employee with all the sanctions provided for by the labour law.

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6.7. Final provision

- 1) The Code of Ethics is accessible both electronically and internally on the intranet platform and website of BOSMAL, as well as in a readable form the newsletter.
- 2) The Code is made known to staff by issuing the President's Order and shall enter into force on the date of its approval.

7. RELATED DOCUMENTS

| Reference | Description |
|-----------------------|----------------------------------|
| <u>BOSMAL/A-2-01</u> | Workplace Anti-harassment Policy |
| <u>BOSMAL/A-14-01</u> | Anti-corruption Policy |

8. APPENDICES

8.1. Forms

| Document type | Title | Retention Period (years) |
|---------------|----------------|--------------------------|
| | Not applicable | - |

8.2. Appendices

| Document type | Title | Retention Period (years) |
|-------------------|--|--------------------------|
| <u>Appendix 1</u> | Acknowledgment Statement with Code of Ethics & Conduct | for employment period |

| TABLE OF REVISIONS | | |
|--------------------|----------------|--|
| Edition Date | Edition number | Description of revisions |
| 24.10.2022 | 1 | |
| 13.12.2023 | 2 | The provisions in point 6.1 of the Code of Ethics and Appendix 1 to this document have been updated. |