

A diverse group of six business professionals (three men and three women) are standing in a modern office environment. They are all smiling and looking towards the camera. The man on the far left is wearing a brown blazer and light-colored trousers. The woman next to him is wearing a dark blue pinstriped blazer and jeans. The woman in the center is wearing a white button-down shirt and grey trousers. The man next to her is wearing a grey suit. The woman on the far right is wearing a light-colored blazer and trousers. The background is a bright, modern office with large windows and circular ceiling lights.

CODE OF CONDUCT

AT PCC EXOL

December 2025



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01 INTRODUCTION

» Ethics reinforces the values
that build responsible business.

A word from the Management Board

Dear Sirs,

As PCC EXOL grows, so does the importance of ethical responsibility in our daily operations. It is an element that truly shapes our organisational culture. Our successes make compliance with accepted ethical standards even more important — it directly affects the satisfaction of our stakeholders and strengthens our relationships with local communities and the environment in which we operate.

In today's chemical industry, the advantage goes to companies that combine high product quality and innovation with transparency, responsibility and respect for people and the environment. That is why we base the development of our organisation not only on technology and efficiency, but also on building strong, conscious and responsible relationships — both within the company and with external partners. This approach strengthens our commitment to a sustainable future and creates a stable foundation for further development.

Dariusz Ciesielski

President of the Management Board of
PCC EXOL SA

Adam Jarosz

Vice-President of the Management Board of
PCC EXOL SA

01/ Introduction

At PCC EXOL, we believe that responsible and modern business combines operational efficiency with concern for sustainable development and the needs of all stakeholders, both within and outside the organisation. We are aware that our employees are one of our most valuable resources, and their daily decisions contribute to the ethical culture of the company.

That is why we have created this Code of Conduct (hereinafter: Code), which sets clear standards and supports the building of responsible, trust-based relationships – within teams, with partners and throughout the entire environment in which we operate. The Code sets the direction for our actions and helps us maintain the highest standards of integrity, transparency and respect.

The Code of Conduct applies to all PCC EXOL employees, regardless of their function or position. We expect our management to not only comply with its provisions, but also to actively promote them, ensuring that every employee is familiar with the Code and applies it in their daily work.

Code of conduct as the basis for ethical principles within the company and its environment

PCC EXOL attaches great importance to ensuring the company's continuous development by complying with applicable laws and regulations and creating conditions for employees that allow them to freely express their opinions on existing problems and take specific measures to prevent violations of applicable legal and ethical standards.

Ethical conduct towards all stakeholders plays a very important role in our company's value system. Violating these principles is not only contrary to these values, but also damages the reputation of the entire organisation and may have serious legal consequences.

What is the purpose of the code of conduct?

The Code defines standards of conduct relating to corporate responsibility and appropriate behaviour in the workplace, which all employees are required to follow when performing their day-to-day tasks and making strategic business decisions. The Code clearly expresses values relating to integrity, transparency and ethical conduct in all areas of activity. It specifies the rights and obligations of employees, which must be met in order to maintain a high level of business ethics. The content of the Code will be modified as appropriate, in line with changes and developments at PCC EXOL, taking into account new legal and social conditions.

It is important to realise that some situations are not easy to resolve. The EXOL PCC Code does not provide ready-made solutions to problems, but indicates directions for action in areas where difficult ethical decisions have to be made, providing practical guidance. We take an open approach to our stakeholders in the co-creation of this Code. We believe that regardless of the role we play, wherever we operate and wherever we go, ethical principles apply to all of us, without exception.



If you have doubts about decisions you have made, are looking for solutions to interpersonal problems, have witnessed unethical behaviour or have other ethical questions, please refer to the Code of Conduct. See if it addresses the issues you are interested in. Then, contact your supervisor or a member of the CWB Partner** Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to your problem.

** CWB Partner Sp. z o.o. is a company within the PCC Group that provides outsourcing services, including HR and payroll, financial, accounting, tax and debt collection services.

The four pillars of ethical values

02 Corporate responsibility

- 01 Compliance
- 02 Risk management
- 03 Conflict of interest Corporate governance (applies to listed companies of the PCC Group)
- 04 Respect for company assets
- 05 Communication and representation of the company in its environment
- 06 Respect and support for local customs and cultures

03 Business relations

- 01 Bribery and corruption
- 02 Fair competition principles
- 03 Ensuring product quality and safety
- 04 Conduct towards business partners

04 Use of information

- 01 Protection of intellectual property
- 02 Privacy and personal data protection
- 03 Fairness of financial information
- 04 Protection and use of confidential information

05 Human rights and the environment

- 01 Respect for diversity
- 02 Intimidation and harassment
- 03 Mobbing in the workplace
- 04 Regulated employment relationship
- 05 Voluntary employment
- 06 Fair wages
- 07 Use of child labour
- 08 Freedom of association and the right to collective bargaining
- 09 Respect for the individual within the organisation
- 10 Health and safety at work
- 11 Care for the environment



02 CORPORATE RESPONSIBILITY

” We operate in accordance with the law, as this is the basis for our stable and responsible development.

02/ Corporate responsibility

01/ Compliance

PCC EXOL operates on international markets, taking into account the laws and customs applicable in various political and legal systems. Every employee responsible for operational activities at PCC EXOL is required to demonstrate knowledge of basic legal regulations and ethical standards, as well as the policies and internal regulations applicable at their place of employment.

Violations of applicable laws, ethical standards or internal regulations may lead to serious consequences in the form of financial penalties, criminal sanctions or loss of the company's reputation. Where the provisions of the PCC EXOL Code of Conduct set higher ethical standards than local law, the guidelines in this document shall apply, unless this would lead to unlawful actions. If local law guarantees higher standards than those contained in the Code of Conduct, these shall always be respected and treated as superior.

02/ Risk management

PCC EXOL's operations involve various types of risks, including legal, operational and financial risks, as well as risks related to the organisation's environment.

Risk management is part of the organisational management process, which is based on:

- systematic implementation of activities involving risk identification and assessment;
- establishing and implementing action plans for unacceptable risks;
- ongoing monitoring of risks, responding to identified incidents, and communication and reporting;
- taking risk information into account in decision-making processes;
- improving the adopted risk management system.

Comprehensive risk analysis allows for quick action to be taken to counteract unexpected events. PCC EXOL has implemented a Risk Management Policy. This policy defines the objectives and framework for risk management for all company employees.



If you have any doubts regarding ethical issues related to risk management, consult the appropriate persons responsible for decision-making in this area at your company. You can also contact a member of the CWB Partner Human Resources Department or send an e-mail to: etyka@pcc.eu.

03/ Conflict of interest

Conflicts of interest arise when the optimal decision for the company conflicts with an employee's personal professional or financial interests, clouding their professional judgement and objectivity.

At PCC EXOL, all employees, when cooperating with various stakeholder groups, are required to act in the best interests of the company and the PCC Group. In the event of a conflict, superiors must be informed. A conflict of interest may influence an employee's decision to cooperate with a given stakeholder if the employee's position allows them to influence mutual business relations. Immediate disclosure of potential or existing conflicts of interest in the workplace enables them to be quickly investigated and resolved.



If you find yourself in a conflict of interest, you are obliged to disclose it. Report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Allow competent persons to familiarise themselves with the facts related to the problem and await a decision on how to proceed.

04/ Corporate governance (applies to PCC Group companies listed on the Warsaw Stock Exchange)

The Code of Best Practice for WSE Listed Companies is a set of corporate governance principles and rules of conduct that influence the shape of relations between listed companies and their market environment. They are an important element in building a competitive position and contribute significantly to strengthening the attractiveness of the Polish capital market.

Corporate governance encompasses a set of rules of conduct addressed to both company bodies and their members, as well as to all shareholders. Corporate governance principles relate to the broadly understood management of a company. The aim of corporate governance is therefore to create tools that support effective management, effective supervision, respect for shareholders' rights and transparent communication between the company and the market.

PCC Group companies listed on the Warsaw Stock Exchange are obliged to apply corporate governance principles resulting from the Code of Best Practice for WSE Listed Companies. Detailed information on the corporate governance principles applied by PCC Group listed companies is available on their websites.



If you have any doubts regarding compliance with the adopted corporate governance rules, please consult the staff of the Investor Relations Department at PCC Rokita/PCC Exol. You can also contact a member of the Human Resources Department at CWB Partner or send an e-mail to: etyka@pcc.eu.

05/ Respect for company assets

All PCC EXOL resources and assets are their property and support employees in performing the tasks assigned by their employer. Each employee is therefore obliged to respect and protect the company's property.

Improper use of resources may affect all employees and may result in unnecessary costs, and thus a deterioration in the company's financial results. Therefore, each employee is required in particular to:

- protecting the company's assets, preventing their loss, damage and waste;
- ensuring that company assets are used for their intended purpose and by authorised persons
- respecting the rules on the transfer, sale and lending of company assets without authorisation;
- not using company assets for private purposes without authorisation



We use the company's assets in a responsible and rational manner. We strive not to expose the company to unnecessary costs associated with the misuse of resources and property. If you encounter a situation of misuse of property or abuse related to it, report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Never underestimate issues related to waste or misappropriation of assets. By respecting and protecting assets, we contribute to the financial security of the company.

06/ Communication and representation of the company in its environment

PCC EXOL promotes the idea of efficient and open communication, both within and outside the company, while respecting the principles of confidentiality of information concerning the company's activities and business partners.

Each employee should contribute to building the company's good reputation through their behaviour, represent it with dignity and present its values while maintaining all standards of business culture. Employees should avoid speaking on behalf of the company without proper authorisation and should not make any statements or declarations beyond their competence.

Every person employed at PCC EXOL is obliged to act in the best interests of the company and the PCC Group. The reputation of the organisation depends on the behaviour of each of our employees. Every day, we put a lot of effort into building a positive image of our organisation.



If you ever find yourself in a situation where the company's reputation is being damaged, or you encounter a problem of inappropriate behaviour by employees that could affect its image, do not hesitate to react. Remember that an unauthorised employee has no right to disseminate information about the company, take a position on its behalf on any matter, or express opinions and sign them with the company's name. If you notice that the information being disseminated is untrue, report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

07/ Respecting and supporting local customs

PCC EXOL's activities are based on acting in accordance with the culture and customs of the communities with which the organisation comes into contact.

We reject any form of discrimination. We respect and honour the customs, cultures and religions of the various communities with which we interact in our daily work. We believe in the value of diversity, which fosters creativity and development, and treat it as a great advantage.

Any inappropriate jokes or offensive remarks related to local customs are not acceptable in our company. They demonstrate a lack of respect for local communities and their customs.



If, while performing your professional duties, you have encountered cultural discrimination and a lack of respect for local customs by other PCC EXOL employees, report this to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who will respond to your report and help you find a solution to the problem.



We respect
and honour





03 BUSINESS RELATIONSHIPS

” We build relationships based on trust and partnership.

03/ Business relations

01/ Bribery and corruption

Business relationships are based on building mutual business relations in which the supplier and recipient form social, economic and technical ties with the aim of reducing the costs of mutual cooperation and increasing the value delivered.

Bribery and corruption involve giving or accepting promises, gifts or money from private or public individuals in exchange for favours, financial benefits, illegal activities or other tangible and intangible benefits. Therefore, honesty and transparency in relations with business partners are an important element of mutual respect, trust and good business practice.

PCC EXOL does not accept any business practices involving lawbreaking, fraud, corruption or bribery. Therefore, all employees are required to comply with the adopted rules, in particular those specified in the Anti-Fraud Policy, which eliminate corruption and bribery.*

Each employee is obliged in particular to:

- not giving money or offering other material benefits to public officials or business partners in order to persuade them to make decisions that are favourable to the company
- not accepting or demanding money or other material benefits from business partners or representatives of public institutions in exchange for business decisions that are favourable to the company.

It is permissible to accept customary and occasional gifts of low value and tokens of hospitality, provided that they comply with applicable law. Care should be taken to ensure that all gifts offered are consistent with the company's values and that their origin and method of production do not violate basic principles of ethics and respect for human rights. When offering or accepting gifts or other gratuities, every PCC EXOL employee is required to act in a transparent manner, in accordance with company policy, industry standards and applicable law.



If, while performing your professional duties, you encounter an attempt at corruption or bribery and fear that the matter may be uncomfortable for you, report it to your supervisor or an employee of the CWB Partner Human Resources Department, or contact the Legal Adviser. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Do not hesitate to speak openly about your dilemmas and thoughts. When accepting or offering gifts, always act prudently and consider the possible consequences. Do not create or avoid situations in which you could feel bribed. Do not put pressure on business partners by offering valuable gifts. Always be aware of the ethical values of the stakeholders you work with.

*Anti-fraud policy at PCC EXOL – a document binding on all Company employees.

02/ Principles of fair competition

Competition in business is an extremely important factor determining economic growth. It makes it possible to improve the quality of products offered on the market, gain an advantage and obtain opportunities to seek new, innovative applications. Competition intensifies efforts aimed at the self-development of organisations, making it possible to offer customers a whole range of products with diverse properties. We respect all our competitors operating in our business sphere.

All employees are required to unconditionally comply with the principles of fair competition and to act in accordance with competition laws applicable in the regions of the world where they conduct business.

Each employee is obliged in particular to:

- concluding agreements and organised activities that do not lead to a restriction of market competition;
- not disclosing any confidential information to competitors and other stakeholders operating in the company's business sphere, including information concerning pricing policy, strategy or customer data;
- exercising caution when conducting business negotiations;
- not persuading the company's customers and suppliers to cease cooperation with competitors and not taking actions that restrict competitors' access to sources of supply;
- not disseminating false information and opinions about product quality and not questioning the knowledge and competence of employees of competing companies; all matters concerning competitors and tasks requiring the use of market competition data should be consulted with the legal department.

Respecting the principles of fair competition is a measure of honesty and business integrity for our customers and suppliers. Therefore, we comply with the relevant regulations on fair competition and seek legal advice in the event of any problems.



If, while performing your professional duties, you encounter a violation of fair competition rules and fear that the matter may be uncomfortable for you, report it to your supervisor or contact an employee of the CWB Partner Human Resources Department or Legal Advisor. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

03/ Ensuring product quality and safety

Product quality and safety are important issues for PCC EXOL and its customers. By defining customer needs and treating them with respect, we build trust, which is the foundation of good cooperation and contributes to the growth of our good reputation. Every employee should be committed to achieving the highest product quality, from the manufacturing stage to market launch. This commitment applies in particular to:

- immediate response to any concerns related to:
- product safety and factors that could have a negative impact on people and the environment;
- quality control and laboratory analyses;
- compliance of product quality parameters;
- the occurrence of other factors or events that have a direct or indirect impact on product quality and safety;
- respecting and complying with all laws and regulations related to the manufacture, sale, labelling and transport of manufactured products;
- exercising due care in applying applicable health and safety standards at every stage of product manufacture and delivery;
- ensuring that any negative customer reactions are reported to the appropriate employees in cases where customer needs have not been met.

We are constantly striving to improve product safety and maintain the highest standards in this area in terms of the broadly understood well-being of the company's customers.



If you have concerns about the quality or safety of a product, report them to your supervisor or, as appropriate, to the Quality Representative/Health and Safety Specialist at PCC Rokita, or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Remember not to underestimate the importance of product safety and compliance with applicable standards.

05/ Conduct towards business partners

Good relations with various groups of business partners are of great importance in achieving PCC EXOL's commercial goals. In its cooperation with suppliers and service providers, PCC EXOL promotes compliance with accepted ethical standards. It builds relationships based on honesty, impartiality and loyalty. The quality of these relationships is extremely important not only from an image perspective, but also constitutes the essence of applicable business ethics principles.

In cooperation with our business partners:

- we act reliably and honestly;
- we ensure transparency of commercial terms and conditions of cooperation;
- we select suppliers based on known economic and legal criteria within the limits of applicable norms and standards;
- we ensure that the principles contained in the Sustainable Procurement Policy and the Supplier Code of Conduct are understood and accepted;
- we ensure that all confidentiality rules regarding the data provided are observed;
- we respect religious and cultural diversity.

Honesty and transparency in cooperation with suppliers and service providers is one of the key principles that guide PCC EXOL employees in the purchasing process. We are committed to complying with applicable law and respecting the provisions of the Code of Conduct relating to fraud, corruption and bribery in our relationships with our business partners.



If you have any concerns regarding the ethical treatment of suppliers, violations of the law in connection with the selection of a supplier, rules of cooperation, fraud or corruption, do not hesitate to react. However, do not make hasty decisions. If you feel uncomfortable, report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Remember that good relationships with suppliers and customers result in mutual trust and mutual benefits. Any fraud or dishonest practices have an irreversible and negative impact on good relationships and the company's image.



We operate transparently and in accordance with the highest standards of integrity.





04 USE OF INFORMATION

” We communicate responsibly,
in accordance with the law and principles.

04/ Use of information

01/ Intellectual property protection

Intellectual property protection covers rules relating to creations of the human mind, such as inventions, industrial designs, utility models, trademarks, geographical indications and works defined in the Act of 4 February 1994 on Copyright and Related Rights, regardless of their commercial value, and which are protected by rights including copyright, patents, protection rights for utility models, industrial designs and trademarks, company trade secrets or other rights specific to a given area of law.

Every PCC EXOL employee is aware of the consequences of failing to comply with the obligation to protect intellectual property, which may lead to a breach of the law, applicable agreements, distribution of copyrighted materials or unauthorised copies of protected materials.

PCC EXOL's activities include the design, development, provision, offering, marketing and sale of products and services that constitute the company's intellectual property. Therefore, we are particularly obliged to comply with the legal requirements applicable in this area.



If you have any doubts regarding a possible violation of the company's intellectual property rights, please contact your supervisor or seek advice from the Legal Adviser. You may also contact a member of the CWB Partner Human Resources Department directly or send an email to: etyka@pcc.eu. This also applies to all cases where there are doubts regarding the rights and obligations of individual countries in which the company's employees conduct business activities.

02/ Privacy and personal data protection

The protection of personal data is one of our company's fundamental responsibilities. Data protection regulations are primarily intended to ensure the security and privacy of individuals whose data is processed by PCC EXOL and its affiliates.

Every PCC EXOL employee is obliged to respect the privacy of colleagues, customers and business partners. Privacy protection is not only a legal requirement, but also an expression of our organisational culture and social sensitivity.

The rules governing the processing of personal data at PCC EXOL are set out in the Personal Data Protection Policy. PCC EXOL, i.e. the Data Controller, is responsible for organising and supervising data protection and determines the purposes and methods of data processing. It is supported in this task by the Data Protection Officer and the Information Security Department of PCC IT S.A.

Personal data is made available only to authorised persons, to the extent necessary for the performance of their professional duties or in accordance with applicable law. Each of us is obliged to maintain confidentiality and exercise particular caution when processing personal information.

At PCC EXOL, we ensure that personal data is processed in a secure and responsible manner. We collect and store only the information that is necessary for the proper functioning of the organisation. All information is processed in accordance with applicable regulations and with respect for the privacy of the data subjects.



If, while performing your professional duties, you encounter a violation of the rules for processing personal data and/or the privacy of PCC EXOL employees or its business partners, report it to your supervisor and the Data Protection Officer. You can also contact an employee of the CWB Partner Human Resources Department directly or send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

At PCC EXOL, we pay particular attention to respecting the privacy and protecting the personal data of our employees and contractors. We treat any violation of these principles with the utmost seriousness.

03/ Reliability of financial information

Transparency and financial clarity are among PCC EXOL's key ethical values. The principles governing the Finance Department's operations in terms of preparing and approving financial documentation and ensuring data accuracy and transparency guarantee that our investors receive reliable and accurate reports and financial statements on a regular basis.

All documents related to the business activities of PCC EXOL companies must be prepared accurately and in accordance with the regulations. For the company, reliable financial record keeping means preparing it in accordance with accepted quality standards and with due diligence. The necessary reports, financial documents, contracts and other data relating to the company's financial activities must not contain any inappropriate and/or misleading information that has been distorted or falsified.

PCC EXOL attaches great importance to the security of financial documentation and applies appropriate guidelines for its storage. The precision and timeliness of reports, settlements and financial statements testify to the company's reliability and business credibility.



If, while performing your duties, you encounter a problem related to inaccuracies in reports, settlements or other documents related to the company's operations, please contact the appropriate person responsible for managing the department of the company to which the document containing false or incorrect information relates. You can also contact a member of the CWB Partner Human Resources Department directly or send an email to: etyka@pcc.eu. There will always be someone who will try to answer your questions and help you find a solution to the problem.

04/ Protection and use of confidential information

At PCC EXOL, the responsible handling of confidential information is the responsibility of every employee and associate. Confidential information includes all data, documents, designs and arrangements that are not intended for public disclosure and whose disclosure could harm the interests of the company, its customers or business partners. Misuse of such information may lead to a loss of trust, damage to reputation or legal consequences.

Every person employed by PCC EXOL, as well as persons acting on behalf of or for the company, are obliged to maintain the confidentiality of all information to which they have gained access in connection with the performance of their professional duties, unless the disclosure of such information has been expressly approved in advance by authorised persons.

Each employee is obliged in particular to:

- familiarise themselves with and apply the provisions of the Personal Data Protection Policy;
- not disclose confidential company information to unauthorised persons;
- protecting confidential information obtained from third parties;
- refraining from disclosing to third parties any information or suggestions that could influence investment decisions regarding securities;
- avoiding discussing confidential matters in public places or other situations where confidentiality cannot be guaranteed;
- ensuring the security of information stored in both electronic and paper form;
- returning all confidential documents (originals and copies) upon termination of cooperation;
- applying the 'clean desk' and 'clean screen' rules and securing documentation appropriately.

IT systems are also an important element of confidential information protection. Every employee is required to use them in accordance with applicable law and internal rules. The security of ICT equipment and IT systems is supervised by PCC IT S.A., which provides the necessary tools to ensure adequate protection of the company's data.

Protecting confidential information about the company, its products or services is the responsibility of every employee. Failure to comply with the rules may lead to business and legal consequences, which is why we require the use of established procedures and safeguards in our daily work.



If, in the course of your duties, you have any doubts regarding data confidentiality, please report them to your supervisor or the Data Protection Officer, who will provide guidance and indicate the optimal solution. If you have witnessed the disclosure of confidential information about the company, report it to your supervisor or the Data Protection Officer, or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who will try to answer your questions and help you find a solution to the problem.

” We build trust through reliable and honest conduct.





05 HUMAN RIGHTS AND THE NATURAL ENVIRONMENT

” We respect people and care for the environment
because we understand how much we impact our surroundings.

05/ Human rights and the natural environment

01/ Respect for diversity

Diversity at PCC EXOL is one of our core values, recognised as a factor in creativity and a non-standard approach to the organisation and its place in the market environment. Diversity and counteracting inequalities are not only a response to growing social awareness, but also commercially justified activities supporting the development of PCC EXOL. Paying attention to diversity issues is not only a result of the need to adapt internal regulations to the provisions of the Labour Code, but also allows us to see the benefits of a Personnel Policy that takes into account the principles of diversity management.

Diversity in terms of employees, their backgrounds, customs and views encourages a broader perspective on many obvious business issues and allows us to better understand our customers.

Diversity cannot be a reason for discrimination on the basis of:

- gender;
- age;
- origin;
- religion;
- sexual orientation;
- political beliefs;
- trade union membership;
- family situation;
- illness and disability.

We do not show our employees disrespect for diversity or violate the principles of equal treatment.



If you feel that for some reason you are not being treated the same as your colleagues or are being discriminated against because of your origin, age, gender, religion, family situation or other social factor, report this to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Remember that if you are being discriminated against, you should react and not keep it a secret.

02/ Intimidation and harassment

Feeling intimidated or harassed can occur in any work situation. Intimidation can be verbal threats or take the form of non-verbal and physical behaviour.

At PCC EXOL, intimidation and harassment of employees in any form is not tolerated. Every employee has the right to be treated with respect and dignity.

The following are strictly prohibited:

- deliberately harming colleagues;
- inciting intimidation and threats;
- isolating other employees physically or socially;
- tormenting and humiliating;
- deliberately provoking actions that lead someone to make a mistake;
- sexual harassment.

Instead, you should:

- treat subordinates and colleagues with respect;
- support new employees and not use them solely for mundane tasks;
- inform superiors of any instances of harassment or intimidation.

At PCC EXOL, we strive to ensure a workplace free from intimidation, harassment and bullying.



If you have witnessed or been a victim of harassment or intimidation, you should be aware that you not only have the right, but also the obligation to report any such behaviour to your supervisor or a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

03/ Bullying in the workplace

At PCC EXOL, we do not tolerate workplace bullying in any form. Unacceptable bullying tactics include humiliation (e.g. defamation, inappropriate jokes, sarcasm), intimidation (e.g. prohibiting breaks under threat of losing one's job, verbal threats, forcing employees to stay after hours), belittling their competence, isolating them, humiliating them, and hindering their work.

Every person employed at PCC EXOL has the right to respect and personal dignity. Any behaviour that contradicts these values is unacceptable in our company.



If you have witnessed or been a victim of bullying, report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

04/ Regulated employment relationship

An employment relationship is the most common form of hiring employees. It also occupies a central place in labour law, as it distinguishes between employment (covered by labour law provisions) and non-employment relationships, i.e. those based on civil law contracts.

As far as possible at PCC EXOL, all work is performed on the basis of a recognised employment relationship as provided for by law. We do not evade our obligations towards employees under labour law or social legislation.

PCC EXOL respects and implements the rules governing the employment relationship with its employees. It also pays particular attention to compliance with applicable law in this area.



If you are facing problems related to the regulation of your employment relationship, report this to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. Zawsze, where someone will help you find a solution to your problem. Remember to always seek advice from people who are competent in the subject.

05/ Voluntary employment

Voluntary employment means that no work may be performed under duress, so no one is obliged to perform work against their will. Furthermore, an employment relationship cannot be established and its terms and conditions cannot be determined without the consent of both parties.

At PCC EXOL, we do not derive any benefits from forced labour, slave labour or compulsory prison labour. All employees of the organisation perform their tasks voluntarily and consciously, in accordance with their rights, aptitudes and qualifications. PCC EXOL employees have the right to terminate their employment after the expiry of the notice period or in another manner agreed with the employer. All tasks entrusted to PCC EXOL employees are performed by them in a conscious manner, without the use of any form of coercion.

Every person employed by the company has a Job Description Card, which specifies the scope of duties appropriate for a given position. Salary is both the value that an employee receives for their work, their main source of income, and the basis of their financial security.



If you have any questions or concerns regarding respect for voluntary employment in the company, do not hesitate to contact your supervisor or an employee of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to your problem. Remember that PCC EXOL is an ethically responsible company. We respect and implement the provisions of the international ETI Code of Conduct, which lists voluntary employment as one of its ethical values.

06/ Fair pay

Remuneration is both the value that an employee receives for their work, their main source of income, and the basis of their financial security.

PCC EXOL respects and implements the provisions and regulations of the law on employee remuneration. Before the commencement of employment, the terms and conditions of employment relating to the employee's salary for a given position are presented in an understandable form. Remuneration, together with all its components, is subject to legal protection, and any changes thereto require the agreement of both parties.

PCC EXOL has Collective Labour Agreements and Remuneration Regulations in place, in accordance with applicable law. Each employee is required to familiarise themselves with the provisions applicable at their employer. We do not apply disciplinary measures or other forms of deductions from remuneration not provided for by law. If they do occur, all disciplinary measures are documented and presented in writing.



If you have any doubts or if the provisions of the Remuneration Regulations and the Labour Code concerning remuneration are unclear to you, please contact a member of the CWB Partner Human Resources Department. There will always be someone who can help you find a solution to your problem. Do not be afraid to talk to your immediate superior. Clarifying any issues you may have regarding your remuneration will have a positive impact on your mutual relations.

07/ The use of child labour

PCC EXOL does not permit the employment of children. Therefore, we comply with all restrictions on the employment of persons under the age of 18. We recognise the right of every child to protection from economic exploitation and work that is hazardous, interferes with the opportunity to obtain an education, or is harmful to health and physical, mental, spiritual, moral or social development.

At PCC EXOL, we allow the employment of young people over the age of 15, but only as part of vocational training in secondary schools. Under labour law, a young person is a person who is over 15 but under 18 years of age. The purpose of the regulations on the employment of young people is primarily to protect them from economic exploitation and work that may be dangerous or harmful to their health, physical and mental development, or that may limit or even eliminate their opportunities for education.



If you encounter a problem related to child labour, report it to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

08/ Freedom of association and the right to collective bargaining

One of the fundamental rights guaranteed by law and ensured to the company's employees is the right to freedom of association. This enables people who share similar views and strive to achieve common goals to organise themselves.

At PCC EXOL, employees have the freedom of association and the right to collective bargaining on terms of employment. We take an open approach to trade unions and their organisational activities.



If you are facing a problem related to freedom of association and the right to collective bargaining, please contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to your problem.

09/ Respect for the individual within the organisation

The success of our organisation depends, among other things, on the high qualifications and potential of our employees. We expect all employees to work together in an atmosphere of mutual respect, trust and open communication.

We promote a culture of loyalty and solidarity, building positive relationships and treating our colleagues the way we would like to be treated ourselves. We promote teamwork and sharing both successes and failures. We share our knowledge and experience with those who may need it to perform their work more effectively or further their professional development, while remembering the confidentiality rules in force at PCC EXOL. We respect personal dignity and diversity of religions and cultures. We respect privacy not only in relation to ourselves, but also expect this from our customers, suppliers and service providers.

The provisions contained in the PCC EXOL Code of Conduct form the basis of our ethical culture, which every employee has the right to demand from their colleagues. The Code should not be treated as the sole determinant of proper conduct. We should all be aware that anyone who violates the law may be subject to disciplinary sanctions, including termination of their employment contract.



If you have any doubts about events that may result in a breach of the law by you or your colleagues, report them to your supervisor or contact a member of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.

10/ Health and safety at work

Concern for the safety of people and the environment has long been treated as one of our priorities, which is why PCC EXOL provides its employees with a safe and hygienic working environment that meets the standards of the chemical industry and takes into account potential hazards. It undertakes a number of measures aimed at preventing accidents, including by limiting various types of hazards in the working environment, and promotes the idea of safety, health and environmental protection.

As a responsible employer, PCC EXOL provides all employees with mandatory and regular training in occupational health and safety. Employees are provided with access to personal and collective protective equipment, changing rooms, social facilities and drinking water.

Each employee is obliged in particular to:

- strict compliance with the rules regarding not coming to work under the influence of alcohol, drugs or other intoxicants;
- compliance with applicable health and safety rules;
- performing assigned duties in a manner that is safe for oneself and colleagues;
- knowledge and application of procedures necessary in the event of a dangerous situation at the workplace;
- responding to and reporting any dangerous incidents to the appropriate services;
- using personal protective equipment as required by internal regulations;
- using tools, equipment and workstation equipment in accordance with their intended purpose.

Every employee has the right to refuse to carry out a work instruction if the employer fails to provide adequate health and safety measures for a specific task.

Guaranteeing safe and healthy working conditions for all employees is a matter of course for the company. PCC EXOL therefore attaches great importance to providing its employees with a safe and healthy workplace by complying with relevant health and safety regulations and standards and applies preventive measures to eliminate potential hazards.



If you observe a violation of health and safety rules while performing your duties, do not hesitate to react immediately. The lives and health of your colleagues may depend on your attitude. In emergencies, immediately contact the Emergency Services operating at PCC Rokita or notify your supervisor. If you have any questions regarding health and safety at work, please contact your supervisor or the Health and Safety Specialist at PCC Rokita Group. You can also contact a member of the CWB Partner Human Resources Department or send an email to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem. Remember never to condone the disregard of safe working practices. Always be aware that by disregarding health and safety regulations, you are compromising your own safety and that of others working around you.

11/ Care for the environment

In conducting its business activities, PCC EXOL always strives to ensure the highest environmental standards. We are aware of our responsibility towards the natural environment and future generations who will benefit from it.

We promote business activities that are both economically viable and environmentally friendly, including:

- the use and development of environmentally friendly technologies;
- compliance with national and EU environmental standards;
- compliance with internally adopted environmental protection regulations;
- striving to minimise the impact of our business activities;
- undertaking initiatives aimed at promoting environmental awareness;
- ensuring that stakeholders have access to information on environmental protection.

We act in accordance with the PCC EXOL Code of Conduct, which obliges all employees to manage property economically and to respect the pro-environmental policy.



If you have concerns about environmental protection that may result in a violation of the law, report them to your supervisor or contact the Environmental Protection Specialist at the PCC Group or an employee of the CWB Partner Human Resources Department. You can also send an e-mail to: etyka@pcc.eu. There will always be someone who can help you find a solution to the problem.



06

PERSONS RESPONSIBLE FOR ETHICAL ISSUES AND THEIR ROLE IN THE ORGANISATION

06/ Persons responsible for ethical issues and their role in the organisation

01/ What matters can be reported to those responsible for ethical issues in the organisation?

All supervisors and employees of the CWB Partner Human Resources Department are responsible for ensuring compliance with the principles and values expressed, among others, in the Code of Conduct. Human Resources Department employees are an impartial source for resolving ethical conflicts and supporting all interested parties in interpreting the provisions of the Code. They promote the resolution of problematic situations by conducting so-called explanatory proceedings, but they do not decide on the final solution to the problem on their own. They mainly act as mediators, whose role is to prevent problems from accumulating and to reach compromises. Indirectly, they also improve communication between company employees. These persons also mediate in relations between employees in conflict in such a way that neither party feels aggrieved. They are bound to discretion and confidentiality in their activities.

Any employee, contractor or representative of any other stakeholder group may contact a member of the CWB Partner Human Resources Department for assistance if they believe that values, ethical or social norms have been violated. All reports are treated confidentially. It should be noted that the role of those responsible for ethical issues is not to resolve conflicts between employees, but to investigate cases of violations in the course of work and violations of the Code of Conduct.

Reports may concern any ethical concerns or cases of violation or breach of specific rules, legal standards or other applicable procedures by any person employed by or cooperating with the company.



The person to whom you can report any concerns regarding the Code for the entire PCC Group is Mr Waldemar Preussner, who acts as the supervisor.

02/ Rules for reporting problems and complaints

When reporting problems and complaints, and during any investigation, the identity of the reporting person may be kept confidential at their request. However, we do not particularly encourage the use of this method. A person reporting a complaint or problem in good faith does not need to conceal their identity.

It is also very important to guarantee that there will be no retaliation against persons who report problems related to violations of the law and ethical principles in good faith. However, we must remember that we are fully responsible for our words and actions. Therefore, reports should not be used to retaliate or vent anger at superiors or colleagues.

The problem can be reported:

- to a selected CWB Partner Human Resources Specialist;
- to the CWB Partner Human Resources Manager (tel. 071 743512, 667 650 223);
- to the following address: etyka@pcc.eu;
- via the dedicated contact form available at www.pcc-exol.eu, in the Contact tab.
- In accordance with the internal reporting procedure, problems can also be reported via <https://app.sygnaapp.pl/internal/pcc/>

Applications can be submitted:

- in person, after making an appointment;
- by telephone;
- in writing;
- in any other manner convenient to the applicant.

03/ How to handle a report

The handling of a report involves the following stages:

- an open discussion between the person who received the report and the person reporting the problem;
- verification of the circumstances of the incident (while maintaining confidentiality);
- resolution of the matter and provision of feedback to the person reporting the problem.

At the request of the person reporting the issue, the person responsible for the report will present a solution to the matter in writing. In cases of reports related to violations of the law, after conducting an investigation, the person responsible will submit information about the irregularities found to the Management Board. The person reporting the issue has the right to inspect the results of the investigation. If the person reporting the problem or complaint considers that the results of the proceedings are not satisfactory, they have the right to report their concerns to the Management Board of the company.

The employee has the right to choose the CWB Partner Human Resources Department employee to whom they wish to report the problem. In the event of a gross violation of the Code of Conduct, the following consequences may be applied individually or in combination:

- obligation to repair moral damage caused to the victim;
- disciplinary conversation with the superior and verbal reprimand;
- written reprimand;
- other consequences depending on the type of situation in which the law or provisions of the Code were violated.

04/ Open dialogue as the basis for resolving ethical issues in the company

PCC EXOL promotes a culture of openness and honesty in communication, during which employees have the opportunity to fully express their concerns. We encourage all employees to openly express their opinions and problems and to report any behaviour or practices that violate the values and principles set out in the Code of Conduct.

PCC EXOL guarantees its employees all assistance and support in enforcing the principles of the applicable ethical culture, both within the organisation and in relation to its stakeholders.

05/ Protection against retaliation

PCC EXOL ensures that any form of retaliation against a person who reports violations of the Code of Conduct or applicable law will be subject to disciplinary proceedings, including the possibility of termination of employment. Retaliation is a violation of the Code of Conduct and applicable law.

06/ Internal reporting procedure

Based on the Act of 14 June 2024 on the protection of whistleblowers, the companies of the PCC SE Group have implemented a uniform system for receiving reports and following up on them, known as the Internal Reporting Procedure in the Companies of the PCC SE Capital Group of 17 September 2024.

The PCC Group is committed to promoting and ensuring integrity in all areas of its business. Anyone with knowledge of potential violations of the law relating to the Group's activities ('Whistleblowers') is encouraged to report them. Support and protection are guaranteed.

Whistleblowers may include, in particular: current and former employees of the Companies, job applicants, persons performing work on a basis other than an employment relationship, volunteers, apprentices, interns, and persons working under the supervision of a contractor.

A violation of the law is understood as an action or omission that is unlawful or intended to circumvent the law, which the Whistleblower has obtained information about in a work-related context, including: corruption, anti-money laundering and counter-terrorist financing, environmental protection, financial services, products and markets, public procurement, product safety and compliance, consumer protection.

The procedures do not apply if the violation affects only the rights of the reporting person or if the report of the violation is made solely in the individual interest of the reporting person.

In particular, individual personnel matters are not covered by the Procedure and should be reported to the immediate superior or the HR department.

Violations can be reported:

- To the Whistleblower Officer or, in justified circumstances, to his/her deputy,
- If the report concerns a violation committed by the Whistleblower Officer, it should be submitted directly to the Management Board of the company concerned.
- Reports can be made:
- In writing, electronically via the platform available at <https://app.sygnaapp.pl/internal/pcc/>



07 ETHICAL PRINCIPLES IN MARKETING AND ADVERTISING

07/ Ethical principles in marketing and advertising

01/ Marketing activities

In an era where there is a need to develop the idea of corporate social responsibility and raise awareness of the impact that marketing activities have on the market and its consumers, PCC EXOL recognises their growing role in shaping behaviours and attitudes, both in the economic, ideological and moral spheres. It recognises the culture-shaping and moral nature of marketing activities, seeing the need to eliminate negative phenomena in this area and stimulate positive ones. We understand the need to standardise certain standards in cooperation with our stakeholders around the world. We are committed to making every effort to ensure that the principles and values described in our Code of Conduct are observed.

Employees involved in marketing activities are obliged to:

- ensure that advertising messages in the media, on the Internet and on all electronic media do not contain any pornographic content, elements of violence, hatred, offensive behaviour or any manifestations of human rights violations;
- ensure that the content of all promotional and advertising materials of the company is based on true information;
- pay attention to the presentation of the features and properties of products in advertising materials in a reliable and objective manner;
- apply the provisions of the Advertising Ethics Code established by the Advertising Council and the Advertising Ethics Committee, which is a source of ethical conduct rules for all employees involved in advertising and marketing;
- respect international principles of ethics in advertising and marketing and act in accordance with the standards of the European Advertising Standards Alliance (EASA).



If you have any doubts regarding ethical issues related to PCC EXOL's marketing activities, please contact the Marketing Manager at PCC Rokita SA directly or contact a member of the CWB Partner Human Resources Department. You can also send an email to: etyka@pcc.eu. There will always be someone available to help you resolve your query.

02/ Charity and sponsorship activities

Sponsorship activities are governed by the principle of transparency, which identifies all interested parties and obligations towards the sponsor. The sponsorship agreement protects the independence, creative freedom and intellectual property of the sponsored entity. Our organisation ensures that the sponsored activity is carried out at an appropriate level and does not abuse its position in the course of the agreement.

When conducting our own charitable and sponsorship activities or participating in sponsorship activities within the PCC Group, we ensure that the good name of any of the parties or good manners, including religious beliefs, are never violated. Both sponsored events and all charitable and philanthropic activities in which PCC EXOL participates must not have a negative impact on the environment or promote activities that violate ethical principles and human rights.



Employees engage in marketing activities in accordance with the principles of transparency, accountability and honest communication.





08/ Summary

Ethics is the foundation of PCC EXOL's operations and covers every area of the organisation's functioning, both internal and external. Its effectiveness stems from a consistent approach to ethical culture, clearly defined values and principles that support responsible decision-making.

Transparent standards of conduct are crucial in employer-employee relations. They define the boundaries between acceptable and unethical behaviour and help to eliminate doubts. The principles described in the Code of Conduct apply to all PCC EXOL employees, and those in managerial positions have a special responsibility to model them in their daily work.

Ethics is based on respect for human dignity and fundamental rights. An organisation can only operate ethically if it consistently adheres to its values. These principles do not restrict the company's operations – on the contrary, they create a safe and transparent environment for cooperation for all stakeholders. For this to be the case, the values of the Code of Conduct must be a natural standard of operation at every level of PCC EXOL.