



SUPPLIER CODE OF CONDUCT

TORIMEX GROUP Sp. z o.o.
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1. Introduction

Torimex Group strives to meet the highest standards in the areas of social, human rights, environmental, employee health and safety in its operations, and expects the same from its suppliers.

In the following Code of Conduct for Suppliers, we define our expectations and binding requirements towards business partners, compliance with which is the basis of trust, ensuring long-term business relationships based on the principles of partnership and mutual respect.

This Supplier Code of Conduct is based on the following international standards and conventions:

- The 10 Principles of the UN Global Compact
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- Paris Agreement on Climate Change
- CSRD Corporate Sustainability Reporting (ESG) Directive
- UN Agenda 2030 (17 Sustainable Development Goals)

2. Terms of cooperation

This Code of Conduct applies to all TORIMEX suppliers and is communicated to both potential and current suppliers.

All TORIMEX suppliers are required to comply with the standards set out in this document, local, national and international business laws and regulations, and to apply the same principles in their supply chains.

Suppliers undertake to map their supply chain and provide TORIMEX with all required information in the event of any suspected activity by any link in the supply chain that is inconsistent with the provisions of this Code.

TORIMEX will assess compliance with specific standards based on the adopted Supplier Qualification procedure, implemented in the form of self-assessment sheets, fact-finding process or audits.

Suppliers must provide access to required documentation where necessary and provide TORIMEX with any information that may impact its environmental and social performance.

If a supplier fails to meet requirements, remedial plans with agreed deadlines will be developed, and TORIMEX will monitor progress and support suppliers in developing their competencies and improving their efficiency.

TORIMEX reserves the right to immediately terminate a supplier's relationship for violations of the "zero tolerance" policy or for repeated and deliberate violations of the Code without taking corrective action. TORIMEX may also exclude suppliers who fail to comply with local, national, or international regulations or fail to meet the requirements set forth in this document.

3. Definitions

Supplier – any supplier of goods and services, including contractors and subcontractors performing work for or on behalf of TORIMEX.

Zero tolerance rule – conduct that is unacceptable and results in immediate termination of cooperation.

ESG – standards relating to the environment, society and corporate governance, methods of their measurement and non-financial reporting.

4. Human rights, working conditions

4.1. Respect for fundamental human rights

Suppliers must support and respect international human rights and treat workers and contractors fairly, equitably and with respect for their rights.

Suppliers must take care of their employees by respecting their dignity, privacy and rights, including the rights of people from vulnerable groups.

4.2. Terms of employment

Suppliers are required to provide fair and appropriate employment conditions, labor standards, and employee benefits in accordance with local and international laws governing wages and contracts with workers and their suppliers.

Working hours, including overtime, must comply with applicable laws, industry standards or ILO conventions, whichever is more stringent.

Every employee must have a signed employment contract in a language they understand. Working hours must not exceed maximum limits set by law, and employees are entitled to rest, vacation, and sick leave in accordance with applicable regulations.

Suppliers must ensure that wages are at least equal to statutory, tariff, or industry minimum wages. In the absence of such regulations, wages must cover workers' basic needs. Deductions from wages must not be used as a form of discipline, and wages must be paid regularly and without delay.

Pay discrimination in any form is unacceptable.

4.3. Occupational health and safety

Suppliers are required to provide their employees, subcontractors, and other stakeholders with safe and healthy working conditions, both physically and psychosocially. They must comply with local and national occupational health and safety regulations, have implemented and documented occupational health and safety policies and/or procedures (including those related to evacuation and rescue operations), and have appropriate infrastructure and equipment to ensure safety.

In addition, each employee must receive regular health and safety training, be insured against occupational accidents, and the supplier must constantly work to improve working conditions and safety.

4.4. Anti-discrimination and equal treatment

Any form of discrimination is prohibited. This includes prohibiting exclusion, preference, or differentiation based on ethnic origin, social origin, health status, gender, age, religion, sexual orientation, political affiliation, disability, nationality, pregnancy, or other personal characteristics. These laws apply to all aspects of employment, such as recruitment, promotion, remuneration, working conditions, and training.

The supplier is obliged to ensure that no forms of harassment, intimidation, threats or persecution of employees occur.

4.5. Child and youth work

Children must not be employed in any stage of production or service provision. Suppliers must comply with national laws on the protection of children and young people, taking into account exceptions under the relevant ILO conventions on minimum age for employment, and take all measures to prevent the employment of anyone under the legal minimum age.

The minimum employment age must not be less than 15. However, minors under 18 may not be engaged in work that endangers their physical or mental health, safety, or morals, nor may they participate in illegal activities such as drug trafficking, prostitution, or the production of pornographic content.

4.6. Right to Association

Suppliers must respect workers' rights to free association and collective bargaining. Workers must not be discriminated against, harassed, or dismissed in retaliation for exercising their labor rights, filing grievances, or participating in union activities.

Where freedom of association and collective bargaining are restricted by local law, suppliers should ensure these rights through alternative mechanisms, in line with ILO guidelines (e.g. works councils).

4.7. Forced labor

All work must be performed voluntarily, and any form of coercion is strictly prohibited. This includes forced labor under threat of punishment, modern forms of slavery, prison labor, human trafficking, and other forms of coercion. No worker may be compelled to work through force or intimidation.

Employees must not be subjected to verbal, psychological, sexual, or physical abuse or harassment. This applies to both suppliers and their subcontractors.

5. Environmental protection

Suppliers are required to comply with environmental regulations at local, national and international levels, and to report on all operational responsibilities related to their operations.

They must have the required permits, decisions, and licenses related to environmental protection. Furthermore, they must have an environmental protection policy in place and monitor their environmental impact.

5.1. Caring for the environment to meet basic human needs

Suppliers are required to ensure that their activities do not lead to any restriction of human habitation, in particular harmful changes to soil, water or air pollution, harmful noise emissions or excessive water consumption, which could negatively impact the natural resources necessary for food production.

Furthermore, their actions must not endanger people's health, deprive them of access to clean drinking water, or impede access to sanitation facilities. Land, forests, and water resources that are the source of people's livelihoods must not be illegally seized or result in the displacement of people for the purposes of construction or other industrial use of these lands.

5.2. Managing environmental impact

Suppliers should actively manage their environmental impacts, paying particular attention to climate, energy, water, waste, chemicals, air pollution, and biodiversity conservation. They should also set targets and implement improvements to minimize these impacts.

5.3. Protection of natural resources

Suppliers should set goals and take appropriate actions to:

- avoiding the emission of harmful pollutants into the atmosphere,
- minimizing energy consumption and CO₂ emissions,
- minimizing water consumption,
- designing products and services that will be characterized by low energy consumption and greenhouse gas emissions throughout the entire life cycle: from design, development, production, transport, use and disposal to recycling,
- circular economy, i.e. increasing the efficiency of material use in order to reduce the amount of waste or sewage generated throughout the product life cycle,
- refrain from using raw materials and semi-finished products from sources considered critical (e.g. conflict minerals).

5.4. Waste

Suppliers are obliged to minimise the amount of waste generated and to collect, store and dispose of it in an environmentally friendly manner, in accordance with applicable legal regulations.

6. Business ethics

Suppliers must comply with national and international laws, and all activities must be conducted in accordance with good business practices, meet high ethical standards, and support free competition. Any form of corruption, bribery, money laundering, or anti-competitive conduct is prohibited.

6.1. Counteracting corruption

Suppliers and their employees must comply with all applicable anti-corruption laws and maintain a zero-tolerance policy towards all forms of bribery, corruption, extortion, and embezzlement. This includes, in particular, bribes, kickbacks, gifts, excessive donations, and hospitality to customers, suppliers, public officials, and other stakeholders. All transactions must be transparent and properly documented.

6.2. Fair competition

Suppliers are required to comply with applicable laws and regulations regarding free and fair competition and to exercise zero tolerance towards any conduct or practice that could restrict or harm competition. This includes, but is not limited to, collusion, abuse of dominant market positions, exploitation of customer-supplier relationships, dividing markets into customer or supplier territories, and anti-competitive boycotts.

6.3. Sanctions

Suppliers must comply with all trade and economic sanctions regulations. They must not purchase or sell products or services for TORIMEX from sanctioned entities. They must also implement appropriate procedures to ensure that the entity in question is not subject to sanctions.

6.4. Data protection and confidentiality

Suppliers undertake to protect personal data and confidential information obtained in the course of their business, in particular to protect them against accidental or unlawful destruction, loss, alteration and unauthorized access, and to ensure compliance with applicable national and international data protection regulations.

6.5. Disclosure of irregularities

Suppliers are obligated to promptly report any suspicious activity or violations of this Code of Conduct and to inform potentially affected parties that they can report violations directly to TORIMEX.

Suppliers must also provide employees within their organization with the ability to report potential compliance violations, as required by law.

Any attempts at intimidation or retaliation against anyone who reports actual or suspected violations in good faith are unacceptable.

7. Final provisions

Effective date: February 1, 2026.

Supplier's Declaration

I, the undersigned, declare that I have received the Supplier Code of Conduct of Torimex Group Sp. z o. o. and, as the authorized representative of the above-mentioned company, hereby undertake to comply with the provisions contained therein and to cooperate in accordance with its principles and values.

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Date

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Company name

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Name and surname

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Position

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Signature



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