

# CODE OF CONDUCT AND BUSINESS ETHICS AT TMR PLASTICS

#### **INTRODUCTION**

It is a priority for our business at TMR Plastics to be trustworthy and responsible. We care about communication of our values and principles of conduct in an open and transparent manner for everyone.

#### Why do we need a Code of Conduct?

Because, like any community, we need rules that will show us what to follow. The aim of the code is to help recognize and solve problematic ethical issues, stop the wrong actions, provide mechanisms for reporting any doubts and concerns, promote honest and ethical conduct, submit reports on the company's activities on time, issue messages containing complete and reliable information, comply with applicable laws, rules and regulations, and also to foster a culture of honesty and responsibility for one's behaviour.

The code of conduct has been carefully designed so that everyone is aware of their own responsibility and could take appropriate action (when we speak of responsibility, we mean not only responsibility for the environment and energy, but also responsibility towards colleagues and business partners).

#### Who is it for?

All employees, contractors, members of the Board, directors and agents of the company as well as any other third parties acting on behalf of the company (referred to collectively as "employees" in this code) must act in a manner compliant with the law and ethics as well as abide by both the letter and spirit of this Code. People in managerial positions have the greatest influence on employees, so they must inspire others to act honestly. We expect managers to:

□ implement the values of TMR Plastics;

 $\Box$  set an example by their behaviour;

 $\Box$  show active commitment to leadership and teamwork;

 $\Box$  create an atmosphere of openness in which employees are free to ask questions and report irregularities;

 $\Box$  take immediate action in situations where there is a violation of the code, our rules or laws.

# PRINCIPLES OF THE CODE OF CONDUCT

 $\Box$  We undertake to comply with the currently applicable laws and regulations as well as internally imposed guidelines.

 $\Box$  We are committed to follow basic ethical standards.

We recognize and comply with applicable national law and international regulations as well as internal guidelines and we undertake to comply with them. Any violations may cause harm to TMR Plastics, its employees and business partners.

# **RESPECT FOR EMPLOYEES AND BASIC ETHICAL STANDARDS**

 $\Box$  We apply internationally recognized standards in the field of human rights protection, we respect the dignity of our employees and we do not tolerate harassment, discrimination or mobbing

□ Everyone is treated with respect, without prejudice, honestly, fairly and decently.

We take the issue of discrimination very seriously. We require all employees to be treated with respect and dignity, and career opportunities depend on their skills, regardless of ethnicity, age, culture, religion, sexual orientation, skin colour or gender. Together, we create a working environment in which the above-mentioned rules are followed. Similar rules apply to the recruitment and hiring process. Discrimination, mobbing and similar personal attacks will not be tolerated.

We do not tolerate forced labour, both inside our company and in the case of cooperating companies.

We provide our employees with safe working environment that does not put their health in danger and working time conditions are in accordance with international standards and local law.

We respect the right of employees to associate (also in trade unions and other similar organizations). Our employees can also participate in collective negotiations with the employer in accordance with the applicable law.

# NATURAL ENVIRONMENT PROTECTION

TMR Plastics consistently strives to reduce our impact on environment. We expect our employees and business partners to act in accordance with legal regulations on environmental protection. The above-mentioned issue is specified in the quality and environment policy - appendix to this code of conduct.

# **ETHICS IN BUSINESS**

TMR Plastics has rules and customs relating to the compliance with the law and business ethics that reflect high ethical standards and fundamental values of the company.

#### □ Behavior towards competition

TMR Plastics strongly negates actions such as price fixing, collusion with customers or suppliers, set tenders, or the use of a privileged market position, the purpose of which may be blocking or restricting competition. We also require our partners to comply with legal regulations.

#### □ Data protection and confidential information

We protect confidential information and TMR Plastics company secrets. Personal data of employees and business partners are processed and stored in accordance with applicable law. We respect the information and trade secrets of other companies and individuals. Accordingly, we are obliged, as far as our responsibilities are concerned, to protect data and systems against unauthorized use, disclosure, modification, destruction or loss, in compliance with the company's privacy protection principles included in the GDPR policy as well as rules regarding information security.

Confidential and private information includes personal information and non-public company information. Confidential personal data include remuneration and earnings data, identification numbers, banking information, financial information and health or family information. Confidential, restricted information of the company, that has not been made public, includes business plans, price lists or information regarding costs, contracts and customer lists, materials disclosing operational goals or projects, copyrighted material, studies or strategies and internal financial information, know-how and other non-public information as well as intellectual property of the company. If there are any doubts whether confidential information should be disclosed, employees should seek advice from their supervisor. GDPR security policy for TMR Plastics is available on the server at W: \ ISO-TS \ 20. GDPR\_documentation and instructions

# $\Box$ Dealing with business partners, officials and persons in political office - counteracting bribery and corruption

Good business relations are very important to us, which is why we do not agree to jeopardize the reputation of TMR Plastics through any corruptive behaviour, such as accepting and giving bribes as well as other benefits. The above-mentioned provision does not apply to the offering and acceptance of occasional gifts and invitations, if they are of little value and if this is done occasionally as part of traditional hospitality and commonly accepted business activities, provided that no law is violated and it does not affect the recipient's decisions. Offering and receiving financial resources for one's own purposes is unacceptable. Putting pressure on officials or individuals from the private sector in order to obtain illegal advantage or preferential treatment is unacceptable.

#### Conflicts of Interest

In our daily work and business decisions, we always act in the interests of TMR Plastics, not on the basis of personal, family-related or any other interests. All employees are expected to avoid situations in which such a conflict may arise. TMR Plastics employees are committed to report such a situation without delay. Conflicts of interest are not always obvious. You should disclose situations that involve or may involve a conflict of interest as soon as possible to the supervisor or HR employee for verification. A conflict of interest does not have to mean a violation of the code; however, a failure to disclose such a situation constitutes its breach.

#### □ *Financial reporting and record keeping*

The company's financial statements, books and records must accurately reflect all corporate transactions

and comply with all legal and accounting requirements. All such records must be kept in a timely manner, reflect assets, liabilities, revenues and expenses of the company in reasonable detail. All this must be done fairly and accurately. All employees, not only those working in the accounting

and financial departments, are responsible for makin sure that that the company's accounting records do not contain any false or misleading entries. We have to adhere to the company's internal accounting control system; record data in a timely and accurate manner (including data used to determine wages, hours worked and overtime, as well as data used for reimbursement) and store documents in accordance with the retention rules regarding documentation. Each of us has to report any inaccurate, incomplete or false reports about which he or she receives information. We fully comply with the demands of our internal and external auditors, providing them with the most accurate and up-to-date information.

#### □ Anti-Trafficking and Slavery Actions

The company has a zero tolerance policy towards all forms of human trafficking and related activities. The TMR Plastics Policy Statement on Human Trafficking and Slavery is available as the Regulations on Human Trafficking and Slavery

# PROCEDURE IN THE CASE OF THE CODE VIOLATION

1. All persons employed at TMR Plastics are obliged to comply with this Code of Conduct. For the protection of the company and its employees, violations of the principles set out in it will not be tolerated and may have disciplinary consequences.

2. Employees can report any behaviour or activity that they consider inappropriate or even illegal. Moreover, if you have questions about the principles contained in the Code, do not hesitate to ask questions.

3. Reports and notifications may be submitted directly to superiors at the highest executive level, including the Management, as well as the HR Employee and the Man of Trust at the following address: zaufanie@tmr.pl.

4. Anonymous reports can be put into the "employee's remarks and applications" box located in the production corridor between notice boards.

5. Employees can be sure that their comments and problems will be treated as confidential and, that they will be resolved. We do not tolerate any actions against employees who report in good faith. Simultaneously, we protect the rights of those who have been wrongly accused. Careless accusation of colleagues is unacceptable. Deliberate accusation of other people also constitutes violation of the Code of Conduct.