



# ETHICAL CODE OF CONDUCT

The Company's strategic goal is to grow its net income, resulting mainly from dynamic growth, while maintaining the highest standards of service quality, but also balancing the achievement of our goals with the way we get there.

We are aware of our social and environmental responsibility to ensure sustainable development. We take responsible action to efficiently use natural resources and protect our environment. In our daily work, we are guided by values such as honesty, tolerance, transparency and, above all, respect for others.

This Ethical Code of Conduct elaborates the principles and conduct arising from generally applicable laws, including the Hydrapres work regulations. It is the result of observations and remarks made in connection with the company's activities by both the company's management and employees. It is the foundation of our company's activities to strengthen and further build the trust of customers, shareholders, employees, suppliers, service providers, relevant governmental and supervisory authorities, our competitors and society as a whole.

We expect from our employees:

- knowledge and application of the provisions of the Ethical Code of Conduct
- to disagree with deviations from accepted ethical standards and values
- to promptly report any comments and irregularities regarding compliance with the Ethical Code of Conduct
- building an organization's culture based on the ethical standards and values described in this document

From the external entities with which we cooperate, we expect:

- to be familiar with the Ethical Code of Conduct implemented at Hydrapres S.A. and to respect the ethical standards and values contained therein
- to adhere to ethical standards and values in all activities resulting from their cooperation with us
- to immediately inform us of any irregularities noted in connection with the violation of ethical standards and values, related to the functioning of the Company,

President of the  
Management Board

Mateusz Jędrzejewski

## **1. Work Environment and Employees**

### 1.1. Health and Safety of Employees

Hydrapres is concerned about the health and safety of its employees. The company adheres to the principles of occupational health and safety, and provides all employees with decent and safe working conditions.

The company continuously monitors laws and guidelines from government bodies on issues relating to health standards, particularly for young people, pregnant women and the disabled, and adjusts working conditions to current requirements on an ongoing basis.

The company provides employees with health and safety training, conducts risk communication activities, and provides appropriate personal protective equipment free of charge.

Employees are required to report (to their immediate supervisor or to the Occupational Health and Safety Service) any violation of occupational health and safety regulations and rules, accidents, near misses, injuries and situations that endanger the life and health of persons, as well as company property.

External entities performing work on the premises of Hydrapres S.A. are obliged to familiarize themselves with the document "Conditions for staying and performing work on the premises of Hydrapres S.A."

### 1.2 Prohibition of Work of Children and Young People

In our Company, we do not accept child labor. To support vocational training, we provide practical vocational training for students of trade schools. Employment and work of juveniles is carried out in accordance with applicable laws. Young workers do not work in conditions that are potentially hazardous to their health, development and safety.

### 1.3 Working Hours and Prohibition of Forced Labor

At our Company, we comply with statutory working time standards, and provide employees with adequate daily and weekly rest time. Any overtime work is performed by employees on a voluntary basis.

As an Organization, we respect the European Convention on Human Rights prohibiting, among other things, inhumane treatment, slavery and forced labor, and guaranteeing, among other things, the right to liberty and security of person, respect for private and family life, freedom of thought and expression.

### 1.4. Equal Opportunity for All Employees and Ethical Recruitment

Hydrapres assumes that its success depends on the full commitment of all employees.

The company provides equal opportunities for all candidates and employees in recruitment, training, promotion and other benefits.

In the recruitment process, candidates are evaluated solely on their competence and experience. Care is taken to ensure that candidates are presented in an understandable way with information about the responsibilities of the position, position easement, salary, opportunities to improve competence and development paths.

Each employee is evaluated through the prism of responsibilities, competencies, skills and commitment. We provide each employee with equal opportunities for development, upskilling and promotion (including through internal recruitment). We tailor development programs to the needs of the individual employee to ensure the optimal use of his or her skills for the development of the organization.

#### 1.5 Prohibition of Discrimination, Respect for the Rights of Women and National Minorities

We believe that all people are born free and equal in dignity and their rights.

The Organization prohibits conduct that has the purpose or effect of treating Employees unequally, particularly on the basis of gender, age, disability, race, religion, nationality, appearance, political beliefs, union affiliation, ethnicity, religion, sexual orientation, as well as the type and duration of employment and position held.

#### 1.6 Prohibition of Harassment

We do not tolerate behavior that has the hallmarks of harassment, sexual harassment, which involves intimidation, harassment, humiliation and ridicule of an Employee, either physically, verbally, or non-verbally.

#### 1.7. Privacy

We respect and care for the privacy of each Employee. Only such personal information as is necessary for the operation of the Company may be collected. Employees must be informed of what kind of information is collected about them and give their consent, and have the opportunity to inspect their personnel file. Personal information is confidential, it cannot be disclosed without the consent of the persons concerned, except in cases specified by law.

#### 1.8. Communication

Employees should be informed about all aspects of the company's operations that affect them, as well as the company's strategy, goals and achievements.



There must be open channels of communication that stimulate an atmosphere of mutual trust and respect between the Company and Employees. Every Employee should have the opportunity to talk about Company problems with his or her supervisor or a member of management.

Communication is carried out in accordance with generally accepted principles of personal culture, respect for the other person, as well as guaranteeing appropriate conditions for each other's comfort of expression.

### 1.9. Salaries and Employee Benefits

All Employees are treated equally in terms of remuneration conditions, while taking into account the scope of duties, level of responsibility, commitment and competence, ensuring that the remuneration paid enables the satisfaction of basic needs and maintenance of a decent standard of living for Employees and their families.

The rules for payment of salaries are open to all Employees.

As far as possible, the Organization provides access to a package of non-financial employee benefits that Employees can customize according to their individual needs.

### 1.10 Freedom of Association

The Company recognizes the right to freedom of peaceful assembly and freedom of association at all levels.

## **2. Protection of the Interests of the Company and its Assets**

### 2.1. Intellectual Property and Internal Documents

Hydrapres' intellectual property is one of the company's most valuable assets, the protection of which is the responsibility of all Employees.

Intellectual property includes, but is not limited to, all materials, regardless of their form, including financial and legal documents, quotations and calculations submitted to customers, and technical and design documentation, know-how, names and trademarks.

Management and Employees are not permitted to disclose any information that is Hydrapres' intellectual property without permission. Employees, during the term of their employment, as well as after its termination, are required to maintain confidentiality with respect to all information obtained in any way during the course of their professional activities for Hydrapres.

Any Employee with access to information is obligated to safeguard it against misuse.

Misuse of information may include using it for private purposes or disclosing it in exchange for a material benefit or to sabotage the Company's interest.

### 2.2 Data Security and Disclosure of Information

We protect our information databases from accidental or unauthorized alteration, destruction, or disclosure to unauthorized persons for the benefit of our customers, business partners and employees.

Any Employee with access to information is obligated to safeguard it against misuse. Misuse of information may include using it for private purposes or disclosing it in exchange for a material benefit or to sabotage the Company's interest.

All information relevant to our external stakeholders is disclosed in accordance with the Company's applicable laws and regulations.

### 2.3. Conflicts of Interest

Each employee is required to avoid situations that could lead to a conflict of interest, that is, a situation in which his or her personal interest conflicts with the Company's interest. The most common situations in which conflicts of interest arise are:

- having undeclared financial or other relationships with customers, contractors and other business associates,
- ties with competitors, such as through partial employment or consultation,
- undisclosed involvement in the production of goods or services competing with the company,
- performance of work for third parties using the company's facilities or during work time.

In the event that an employee is involved in activities or investments that may be in actual or potential conflict with the interests of Hydrapres, he or she is required to make a written statement of this fact and obtain the approval of the management or supervisory board to conduct them.

### 2.4. Misuse of Company Facilities, Property and Time

Misappropriation of company property for personal use or for resale is prohibited. Hydrapres identification marks may only be used for business purposes.

Employees may use Hydrapres equipment, company time and representation funds for non-business purposes only with the approval of their superiors.



### 2.5 Zero Tolerance for Corruption

At Hydrapres, we have zero tolerance for any form of corruption, understood as offering or promising any undue financial or other advantage in exchange for obtaining benefits for oneself or the company. All officers and employees are prohibited from approving or soliciting benefits related to their duties.

### 2.6. Accepting and Offering Material Benefits

It is permissible to accept and offer material benefits only if their nature and value do not give rise to suspicion of receiving preferential treatment, business, or financial advantage.

In case of doubt, an Employee should ask the immediate supervisor for clarification.

### 2.7 Financial Responsibility

The Company's books of accounts shall be kept in accordance with applicable laws and internal accounting policies.

## **3. Relations with Contractors and Competitors**

### 3.1. High Quality of Services

Hydrapres strives to provide its Customers with the highest quality services at a fair price so that they are satisfied and want to continue to use them. In the event of a conflict between the interests of the company or employee and the Customer, priority should always be given to the welfare of the Customer.

### 3.2. Reliable Information

Hydrapres is concerned with informing Customers about its products and services in such a way that does not abuse their trust or take advantage of their lack of experience or knowledge.

### 3.3. Consideration of Complaints

Hydrapres takes full responsibility for any products and services that do not meet standards of safety, high quality and reliability. Legitimate complaints shall be handled promptly and professionally.



### 3.4. Improvement of Services and Products

Hydrapres is committed to continuous improvement of its products and services. This is done through continuous evaluation by Customers and contractors, and by considering and responding to new market needs.

### 3.5. Counteracting Unfair Competition

Hydrapres supports fair and open competition. It considers as unacceptable acts such as:

- taking part in agreements with competitors aimed at restricting competition, such as price fixing, dividing markets or customers, limiting production, or boycotting a customer or supplier
- violating official secrets,
- inducing termination of employment or failure to perform work,
- copyright infringement,
- obstructing market access to other businesses,
- using unfair or prohibited advertising,
- making Hydrapres documentation and materials available to third parties without the consent of the company's management.
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### 3.6. Procedures for Selecting Contractors

Hydrapres develops and protects lasting relationships with contractors based on mutual trust. The selection of services or goods should be based not only on price or quality, but also take into account the contractor's acceptance of the application of responsible and sustainable business.

The selection of suppliers and buyers should be based on the following principles:

- experience, skills and level of services provided
- possessed certifications for the products/services offered or the ability to certify them,
- quality management system in place
- Technical and technological potential and level of production capacity
- sustainability and financial stability
- knowledge of the Ethical Code of Conduct implemented at Hydrapres S.A. and to respect the ethical standards and values contained therein

## **4. Environment and Society**

### 4.1 Environmental Protection



At Hydrapres, we respect the environment and strive to reduce our impact on it. We strive to do this by continuously improving our production processes.

When undertaking business activities, we always consider their impact on the surrounding environment. We strive for economical management of resources such as water, electricity, gas, while minimizing waste generation.

#### 4.2 Social Activities

Hydrapres actively participates in the life of the local community through financial and non-financial support of pro-social initiatives in the fields of culture, sports or safety.

We encourage our employees to initiate and actively participate in social actions.

#### 4.3 External Communication

All employees are obliged to take care of the Company's good image and should follow the principle of responsible communication with the public. All information provided must be truthful and not mislead the recipients. The principle is to be cautious in all non-service contacts concerning the Company primarily on forums and blogs or social networks.

### **5 Application of the Code in Practice**

#### 5.1. Compliance with the Code

Every officer, employee and co-worker is expected to know and abide by the Hydrapres Ethical Code of Conduct. Problems that arise in connection with the implementation of the Code, as well as any comments or suggestions for improvement, should be reported to the Board of Directors, whose responsibility it is to ensure that the Code works in practice.

Hydrapres will not tolerate any illegal or unethical activities. Any violation of the Code will be punished.



**HYDRAPRES**<sup>®</sup>  
RESPECTED BY THE BEST

*This Ethical Code of Conduct of Hydrapres S.A. is a consolidated version of the Ethical Code of Conduct dated 18 June 2018 and its supplement dated 2 October 2023, and is applicable as of 16 October 2023.*