

# Corporate responsibility policy and Code of Ethic

















Lentex S.A. is aware of the importance of the company's compliance with applicable laws, social and intangible values, as well as the impact we have on the world around us. We strive to achieve a state in which we do not find irregularities in any of these aspects. We expect that our counterparties also share our position and make every effort to eliminate undesirable activities not only at ourselves, but also at their counterparties. We conduct our business in accordance with applicable laws and relevant regulations.

# CORPORATE RESPONSIBILITY POLICY AND CODE OF ETHICS OF LENTEX S.A.

Corporate responsibility policy and the Code of Ethic of Lentex S.A. comprises a set of recommended attitudes and guidelines concerning the standards of conduct at Lentex S.A. It is applicable to all employees of the company as well as persons working in the company's premises. We are aware that our behaviour and attitudes create the company's image; therefore, we are concerned with caring for its good and development, in order to create a friendly workplace and to become a professional partner in external contacts. Each of us is responsible for implementation of activities described in the Code.

#### **HUMAN RIGHTS**

Lentex S.A. believes that human is the company's most important resource, and their rights are inviolable and inalienable. Therefore, any violation of these rights results in the initiation of proceedings aimed at cease activities that have the appearance of human rights violations. We expect the same from our contractors.

#### **Child labor**

Lentex S.A. does not use child labor, that is, it does not employ persons who are statutorily defined as minors and are subject to legal protection in this regard.

# Forced labor, human trafficking

We believe that every employee has the right to freedom of choice of employer and to be employed in accordance with accordance with applicable laws that guarantee respect and human rights. LENETX S.A. does not employs and does not support the employment of forced labor and is opposed to human trafficking human beings.

# **Animal rights**

Lentex S.A. respects and upholds animal rights.

# **RELATIONS AT LENTEX S.A.**

The relations at the company are based on integrity and dialogue. We are convinced this is the only way to gain competitive advantage on the market.





# **Equal opportunities in employment**

We follow the principles of equality and non-discrimination in employment and promotion. We do not discriminate against any employee or job applicant on the grounds of nationality, religion, race, ethnic background, gender, age, sexual preferences, disability, political beliefs, form of employment, etc. Unequal treatment of an employee or job applicant constitutes a serious violation of the provisions of the labour law, equal opportunities of employment, as well as the company policy of Lentex S.A.

# **Respect of diversity**

Caring for the development of our company as well as richness of ideas and solutions, we respect diversity at our company. We believe that equal treatment in employment allows each individual employee to feel understood and accepted in the company.

# **Trainings and development**

Each employee has equal opportunities in the field of training, promotion and development of competencies within the framework of the occupied position, in accordance with the capabilities of Lentex S.A. The employees receive objective and reliable feedback concerning their work according to clear and specific rules.

#### Contracts and settlement of remuneration

Lentex S.A. employs people in accordance with the applicable law, always based on valid contracts. We provide full information concerning the scope of responsibilities and expectations. We apply clear principles of settlement of the worked hours, pursuant to the legal regulations in force.

# **Cooperation within the organization**

We care for the atmosphere of cooperation, mutual respect and sharing of knowledge. We do not use our role to obtain improper benefits. We care for the dignity of our employees and aim at conflict-free cooperation.

# Bullying, harassment, threats of violence

We provide a working environment free from any forms of bullying or harassment. Any verbal threats of violence are unacceptable. For this purpose, we have established the Anti-Harassment Commission, a body to investigate and resolve any cases of discrimination, bullying, harassment or threats of violence.

# Freedom of association and collective bargaining

We respect the right of employees to freedom of association. We guarantee every employee who is a member of a legitimate labor union protection from harassment, discrimination or other way to punish employees, employee representatives or union members because of their interest.





or membership in a labor union. Representatives of trade unions operating on the company's premises are invited to actively participate and speak out on issues of importance to the company's employees.

#### **Protection of confidential information**

Most procedures, specialist knowledge and company experience are subject to protection as business secrets. They comprise a valuable asset of the company. We do not disclose technical, technological, commercial and organizational information or personal data outside the company without an appropriate authorization, in accordance with the applicable law and regulations, both during the employment period and upon expiry thereof. We process personal data in accordance with the legal regulations in force.

We do not use confidential information in order to obtain improper personal benefits.

We do not distribute false information or act on behalf of the company without an appropriate authorization.

# Care for tangible and intangible property

We exercise care for the company's property and we use it exclusively for purposes connected with performance of professional duties. We care for the entrusted equipment, tools and materials, protecting them against theft and destruction. We protect the intellectual property of Lentex S.A. and we use it in a responsible manner.

# Corruption

We do not accept or give any intangible or tangible benefits having features of corruption. Lentex S.A. takes measures to counteract the of corruption on two levels, internal and external. In dealing with customers and partners, we promote a business attitude based on ethics. Internally, actions are taken to make employees aware of the dangers of the phenomena in question. Our goal is to ensure compliance operation with the law and the standards of conduct introduced in the organization

# Preventing the flow of funds to armed groups and conflicts.

We strive to procure components and raw materials whose mining, transportation, trade, processing and export are from approved sources, and the procurement of materials and raw materials directly or indirectly, does not provide funding for conflicts and human rights violations.

#### **CUSTOMER RELATIONS**

# **Care for cooperation**

In contacts with our customers, we treat them with respect and diligence, doing our best to fulfil our obligations towards them in a reliable and timely manner. We provide clear and specific answers to inquiries, excluding information treated as confidential by Lentex S.A. We do not deliberately mislead our customers. We protect our contractors' data which have been





transferred to us as a part of cooperation.

# **Quality of products and services**

We care for the top quality and specific standards of products and services. If they fail to meet the determined requirements, we apply complaint procedures and aim at improvement of our activities within the shortest time possible.

#### **SUPPLIER RELATION**

# **Selection of suppliers**

We select suppliers of goods and services pursuant to clear and transparent criteria, in accordance with the company's internal procedures. We do not allow discrimination on such grounds as nationality, market status, size of the company. We aim at avoidance of conflicts of interests in selection of suppliers. We evaluate suppliers during the cooperation pursuant to specific criteria.

# **Contacts with suppliers**

We care for partner relations with our suppliers. We treat them with respect and professionalism. We communicate any remarks concerning our cooperation, intended to improve the supplied products or services in a manner intended to avoid conflicts and disputes.

#### **RELATIONS WITH OUR COMPETITORS**

#### **Free competition**

We do not follow practices which could break the principle of fair competition. We do not take advantage of our market position in order to restrain our competitors. We do not share data which would cause damage to competing companies. We do not transfer false or offensive information concerning our competitors or their products and services.

# **Prevention of conflicts of interests**

We do not undertake activities which would be contrary to the company's interests, competitive towards Lentex S.A. or would hinder the performance of our duties.

# **ENVIRONMENTAL PROTECTION**

# Activity in compliance with the applicable n

We believe that environmental sustainability should be understood as meeting the needs of the present without compromising the ability of future generations to meet their own needs. We exercise due dilligence to comply with general environmental protection regulations and procedures in place at the company.





The focus is on responsible using natural resources, reducing water consumption, reducing waste generation, improving energy efficiency and reducing the carbon footprint of their operations. We care for the natural environmental, regardless of the occupied position or kind of work.

#### Prevention and reduction of adverse effects

We aim at reduction of the adverse environmental impact of processes taking place at our company, and we support new solution with a positive effect on the ecosystem. In case of implementation of new investments, we take account of their environmental impact. We care for reduction of excessive consumption of water, energy, paper, raw materials, etc. We segregate waste in specially designated places.

#### **OCCUPATIONAL HEALTH AND SAFETY**

# Compliance with the rules and employee trainings

We follow the applicable legal regulations and internal arrangements concerning occupational health and safety. We conduct regular trainings concerning occupational health and safety as well as fire protection regulations for all employees and persons working in the company's premises. We promptly respond in all situations connected with hazard to human life and health in order to prevent them or to reduce the consequences. We use personal protective equipment required at specific work stations. We provide reliable information concerning any violations of the OHS and fire protection regulations as well as the accident rate. We care for the improvement and expansion of the OHS and fire protection infrastructure in the area of the company. We undergo initial, periodical and follow-up medical examinations on a regular basis.

#### **Use of stimulants**

We maintain a strict prohibition on smoking in the premises of the company. We do not come to work under the influence of alcohol, drugs or other intoxicants. We do not use them at work or bring them to the company's premises.

# REPORTING OF VIOLATION OF THE PROVISONS OF THE CORPORATE RESPONSIBILITY POLICY AND CODE OF ETHIC

#### Measures taken

In case of a suspected violation or an observed case of violation of the applicable law or the Corporate responsibility policy and Code of Ethic of Lentex S.A., an employee, where possible, shall undertake individual action in good faith in order to resolve the problem. If such action is impossible to take, employees shall report their concerns to their direct superior. If discussion of the concerns with a superior is inappropriate or inconvenient to the employees concerned, they should contact a representative of the HR Department or the Office of the Management Board of Lentex S.A.











# **Report examination**

Every report is examined in an objective manner, with due diligence and on a confidential basis. A person who has received a report should take any and all necessary actions or make decisions as soon as possile in order to resolve the situation.

# Whistleblower protection

A person reporting a suspected violation or infringement of the Corporate responsibility policy and Code of Ethic of Lentex S.A. cannot be subject to any means of retaliation or reprisal.

