

**CODE OF ETHICS
FOR RABEN GROUP
SUBCONTRACTORS**

Date of issue:

Department responsible for the issue:

WORD FROM THE CEO

As a large business operating on the world stage, we are aware that we don't operate in an isolated social space. Each day we want to set sustainable trends in the industry which bring additional value to the environment. We also want to continuously support international efforts to shape the sustainable economy, hence our willingness to support the UN sustainable development goals. We believe that achieving this vision is not possible without business ethics and abiding by the highest standards by and in cooperation with our subcontractors.

In Raben Group we pay special attention to reliability and responsibility. In our daily business practice, we cooperate with many subcontractors and suppliers. The partners conducting business activities for the benefit of Raben Group are an important link in the entire value chain. Thus, the partnership gains a new, wider dimension. The dimension without ethical ambiguities and built on the foundation of dialogue, principles and ethics of cooperation.

I am proud to present the updated version of the Code of Ethics for Raben Group Subcontractors. This document has been inspired by such guidelines and recommendations as the Ethical Trading Initiative, the Ten principles of the Global Compact, the Agenda for Sustainable Development 2030, the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights and it aims to assist in meeting their requirements. In practice, it sets minimum rules of conduct that Raben Group expects from its subcontractors. I firmly believe that the directions outlined here will be a source of inspiration and measurable help in the daily choices of our subcontractors. Acceptance of this Code is the subcontractor's commitment that all current and future arrangements and business relations with Raben Group will be consistent with the guidelines contained herein. On the other hand, I assure you that every employee of Raben Group, who is responsible for shaping relations with our subcontractors on a daily basis, will become familiar with the principles described in this document.



Ewald Raben
CEO Raben Group

Ewald Raben

OUR EXPECTATIONS OF SUBCONTRACTORS

*If you don't have the laws of morality in your heart,
you will not find them in books.*

Charles de Montesquieu

This Code sets out the basic, minimum and non-negotiable standards, rules of cooperation and conducting business activity which Raben Group expects from its subcontractors. We want to work with subcontractors for whom fair play, ethics, responsibility and sensitivity are at the heart of everyday business practice.

An incidental, selective shortcuts are not acceptable for us. We believe that in the 21st century, on the 70th anniversary of the proclamation of the Universal Declaration of Human Rights, there is no and there cannot be place for actions which are deemed unethical. Therefore, the Code of Ethics for Raben Group Subcontractors is a part of the agreement concluded with Raben Group and the commitment to conducting business in compliance with international standards. Principles binding for Raben Group subcontractors:

Legal compliance

Raben Group subcontractors comply with legal regulations and procedures implemented by Raben Group concerning compliance with regulations and international standards of ethics, in particular regarding smuggling of both people and goods. Conducting business activities on the basis of the provisions of applicable law is a non-negotiable and key value for undertaking and/or continuing business cooperation

Human rights

Raben Group subcontractors operate in accordance with the highest standards of human rights. Raben Group subcontractors respect and adhere to the UN Guiding Principles on Business and Human Rights and the International Declaration of Human Rights. As Raben Group, we strongly oppose all forms and violations of human rights at our subcontractors', their parent companies and subsidiaries.

Forced labour

Raben Group subcontractors do not use any form of forced labour. Raben Group subcontractors undertake not to use slave labour, forced labour, forced labour of prisoners, and the employment of employees shall be free of any forms and threats of coercion, blackmail, in particular seizure of personal documents or work permits. Raben Group subcontractors do not require their employees and associates to make pecuniary deposits or deposit documents, and employees and associates have the right to terminate their employment after an appropriate period of notice regulated by legislation and local law.

Child labour

Raben Group subcontractors undertake to comply with the requirements of the Convention of the International Labour Organisation (ILO) concerning not employing workers under 15 years of age (Convention 138) and child labour (Convention 182). Employment of juvenile workers is always carried out in accordance with the regulations and local law. In case of lawful employment juvenile workers, Raben Group subcontractors ensure appropriate working hours, wages and safety at work.

Decent pay and working hours

Raben Group subcontractors guarantee that work conditions, in particular wages, working hours and additional benefits for a standard working week meet the requirements of national legal and industry standards as well as international laws and regulations, whichever is applicable. Each employee of the subcontractor receives these conditions in writing, in an understandable form, before the commencement of employment or change of position and on a regular basis in accordance with local law requirements. Subcontractors do not use any deductions from remuneration as a disciplinary measure.

Freedom of association

Raben Group subcontractors give their employees the opportunity to associate, the right to collective negotiations on terms and conditions of employment and the opportunity to participate in an open dialogue with the Management Board, its proxy or a representative of the Management. Raben Group subcontractors represent that the dialogue is free of any form of discrimination and the employees' representatives, wherever possible, have been informed about the freedom to perform representative and organizational functions in the workplace.

Occupational health and safety

Raben Group subcontractors are obliged to ensure a safe working environment based on the Golden Safety Rules, technical inspections of equipment, regular identification, analysis and reduction of risk factors occurring in their working environment - it also applies to the infrastructure (including machines) made available to employees to perform their daily duties for Raben Group. Raben Group subcontractors provide their employees and associates with proper sanitary conditions i.e. access to drinking water, proper hygienic conditions in places where meals are prepared, proper quantity of clean toilets and washbasins and in case of providing employees and suppliers with accommodation: proper living space, safety, cleanliness, heating and ventilation. Subcontractors ensure that their employees do not use alcohol, psychoactive substances and narcotics at work or during a period of time that could cause the effects of these substances to persist until they perform their professional activities.

Non-discrimination and equal treatment

Raben Group subcontractors undertake to follow the policy of equal treatment and counteract all forms of discrimination. They do not accept any form of discrimination or unequal treatment, in particular based on age, gender, religion, disability, sexual orientation, skin colour, marital status, pregnancy, parental status, political opinion, nationality, ethnic origin, union membership or social status. Raben Group subcontractors do not condone and will make every effort to effectively respond to all forms of mobbing, harassment, violation of personal dignity and behaviours creating an intimidating, hostile, degrading, humiliating or offensive atmosphere in the workplace.

Confidentiality

Raben Group subcontractors undertake to use data obtained in their daily business activity only for its benefit and in its interest. Raben Group subcontractors protect information which is the property of Raben Group as well as that belonging to its employees, customers, partners, subcontractors and other cooperating entities.

Counteracting corruption

Raben Group subcontractors undertake to comply with the law, standards, regulations, guidelines on anti-corruption activities with respect to all activities related to everyday business practice and business ethics. Employees and partners of subcontractors shall not, in an unlawful or immoral manner, influence existing or potential counterparties or customers as well as public officials, through preferential treatment, giving presents and other personal gains.

Environmental protection

Raben Group subcontractors undertake to comply with international rules and legal regulations concerning protection of the natural environment. They also undertake to monitor and report, at the request of Raben Group, the level of impact of their activities on the natural environment, in particular: consumption of electricity, water, gas and fuel - diesel, petrol, CNG, LNG or other alternative energy sources. Raben Group subcontractors strive to use as little as possible and continuously reduce the level of consumption of natural resources. Raben Group expects effective implementation of solutions aimed at tangible reduction of natural resources consumption. Raben Group subcontractors encourage their employees to take actions to protect the environment and adopt pro-ecological attitudes.

WHISTLEBLOWING

Subcontractors are obliged to immediately report any problems and suspicions of legal violations where there is a reasonable circumstance that a serious violation of the rules and regulations contained in this Code may have occurred. The Whistleblowing Procedure, executed through a confidential tool for reporting unethical behaviours in the workplace called "EthicsPoint", is a guarantee of respect for the provisions contained in this document.

Reporting violations:

1) Submit notifications through the Whistleblowing platform at:

<https://alert.raben-group.com>

- a. Notifications can be anonymous
- b. Notifications can be made by telephone or by means of an electronic form

After submitting a notification, a unique code, i.e. a "notification key", is generated, with the possibility of defining an individual password. In case of an anonymous notification or lack of contact from the employees of Raben Management Services Audit Department, enter the "notification key" and a password on the Whistleblowing platform to check the status of the case, answer questions or see the resolution of the case.

2) Report the violations by post directly to the Raben Management Services Audit Department, with the annotation "Whistleblowing", to the address:

**Raben Management Services
Audit Department
ul. Zbożowa 1
62-023 Robakowo
Poland**

Please be advised that in case of notifications submitted by post, contact details are required. Anonymous notifications will not be processed.

Each notification is analysed and explained by the employees of the Raben Management Services Audit Department. In case of providing contact details and such a necessity, the employees of the Raben Management Services Audit Department may contact you in order to provide further explanations or answers.

Raben

WE PLAY FAIR

**PEOPLE
WITH DRIVE**

REPRESENTATIONS OF THE SUBCONTRACTOR

Raben Group subcontractors represent that wages, working hours and additional benefits for a standard working week meet the requirements of national legal and industry standards as well as international laws and regulations, whichever is applicable. Subcontractors do not use any deductions from remuneration as a disciplinary measure.

- 1) Raben Group subcontractors represent that they have read and accept the content of the Code for Subcontractors.
- 2) Raben Group subcontractors represent that they know the legal regulations of the countries in which they conduct their business activity.
- 3) Raben Group subcontractors represent that they understand that a violation of any of the contractual provisions entitle Raben Group to request an explanation within 7 days from the date of discovery of such a violation.
- 4) Suppliers of Raben Group acknowledge that companies of Raben Group* have the right to demand reports from audits carried out by independent organizations in order to confirm the compliance with ethical rules or to carry out in the Suppliers' facilities or facilities belonging to subcontractors of Raben Group's Suppliers the announced audits in the above described scope.
- 5) Raben Group subcontractors represent that they are aware of the fact that in the case of a justified discovery of a gross violation of any of the provisions of the Code, they can be subject to:
 - exclusion from ongoing tender proceedings for a period of 2 years,
 - exclusion from tender proceedings for a period 2 years,
 - contract termination.

Company name

Company address

Company tax identification number

Company statistical number

Company registration number

Name and surname of the person representing

.....

signature

.....

place and date

.....

company stamp

This document shall be signed by an authorized representative of the subcontractor and returned to the relevant organizational unit in the Raben Group company which cooperates with the subcontractor.

Subject to a situation in which the subcontractor has already undertaken to comply with this document, e.g. as an annex to the cooperation agreement.

*Raben Group Companies shall be understood as any and all companies - with their registered offices in Poland as well as abroad - whose shares are the property of Raben Group NV with its registered office in Oss in the Netherlands. In the understanding of this document, Raben Group companies are also companies which will be formed in the future and will meet at least one of the conditions indicated in the preceding sentence.