

Code of Conduct (Corporate Social Responsibility and Business Ethics)

1. General rules

Scope

The Code of Conduct (the "Code") defines the fundamental rules of conduct that employees and members of the administrative bodies of the companies belonging to the ARC Europe Group (collectively referred to as the "Personnel") are required to observe. The ARC Europe Group also requires third parties acting on their behalf (service providers, consultants, suppliers, agents, etc.) to comply with the principles contained in this Code. The rules of the supplier code have to be clearly communicated to all internal and external employees, suppliers, sub-suppliers and other commissioned companies which give their assurance that all necessary measures for compliance with this code of conduct will be properly implemented and promoted.

2. Rules of Conduct

2.1. Correctness in Business Behaviour

ARC Europe Group performs its activity in compliance with the law, internal regulations and professional ethics. The Service Provider is required to act with fairness and honesty, in compliance with the law, the internal regulations, this Code. Those who hold positions of responsibility are required to take exemplary conduct and promote the culture of ethical behaviour and conforming to the rules also with third parties (service providers, consultants, suppliers, sub-suppliers, agents)

2.2. Social Responsibility

ARC Europe Group wants to contribute to economic and social development based on respect for fundamental human and labour rights and environmental protection. ARC Europe Group promotes the culture of sustainability within all its spheres of influence, especially at the Personnel, customers and suppliers.

ARC Europe Group's Service Provider is therefore committed to:

- valorising people working inside, promoting their development and recognizing their individual contribution to the organisation's success;
- invest assets in management, taking also into account the social, environmental and governance behaviours of the companies they invest;
- contribute to the protection of the environment by promoting the reduction of the direct and indirect environmental impacts of their activities.

The Service Provider is required to act in compliance with these commitments and in pursuit of the sustainability initiatives promoted by ARC Europe Group.

2.3. Working environment, diversity and inclusion

ARC Europe Group guarantees a stimulating work environment, free from any form of discrimination or harassment, and promotes diversity, equal opportunities, and inclusion among all its collaborators, believing that cooperation between people carrying different cultures, skills, perspectives and experiences is a key element in attracting talents and ensuring entrepreneurial growth and innovation.

The Service Provider is required to behave respectfully, refraining from assuming attitudes that may offend the dignity of others.

Those in positions of responsibility must create and promote a friendly and solid working environment in which integrity, respect, collaboration, diversity and inclusion are values that are effectively pursued.

Any decision regarding staff, including selection, recruitment, training, appraisal and professional growth, is based on merit and performance and cannot be influenced by factors such as race, ethnicity, religion / beliefs, sexual orientation, civil status, or political opinions.

ARC Europe Group encourages the development of individual attitudes and competencies by providing adequate training programs, which are part of the widest system of human resources development and growth.

ARC Europe Group recognizes the freedom of association and collective bargaining for its employees.

Any form of irregular work or exploitation is strictly forbidden, as well as any kind of compulsory or forced labour as well as child labour.

ARC Europe Group opposes any form of harassment, intimidation or mobbing.

All parties shall pay their employees remuneration in line with the currently relevant national laws and concluded collective bargaining agreements. In particular the provisions of law on the minimum wage must be strictly complied with and overserved with regard to the payments of employees.

2.4. Workplace

ARC Europe Group ensures that workplaces are healthy, safe and secure.

ARC Europe Group ensures decent working conditions in safe and healthy environments.

Service Provider is required to abstain from taking actions that may endanger the health or safety of others.

The Service Provider supports ARC Europe Group in its commitment to protecting the environment and minimising the environmental impact of work.

These guidelines should also apply to suppliers and sub-suppliers.

2.5. Conflicts of interest

Acting on behalf of ARC Europe Group means pursuing its interests.

A situation of conflict of interest occurs when people acting on behalf of ARC Europe Group are involved in activities or personal relationships that may influence their ability to act in the interests of ARC Europe Group.

As a general rule, conflicts of interest should be avoided. .

2.6. Fight against corruption and bribery

ARC Europe Group condemns and opposes corruption and bribery in every form.

The Service Provider is required to behave honestly and with respect to professional ethics.

ARC Europe Group does not tolerate any form of corruption. The Service Provider must therefore refrain from offering or accepting unpaid payments, as well as gifts, forms of entertainment or other undue benefits.

It is always forbidden to promise, offer or accept cash or equivalent payment instruments, as well as in tradable securities of any category.

Gifts, forms of entertainment or other benefits may only be offered or accepted if they are related to work and if they are considered as ordinary and appropriate in circumstances (that is, when they appear reasonable and comply with local law). Their value should not normally exceed the sum of € 50.

2.7. Customer Relationships

Customer satisfaction is a key factor in the strategic vision of ARC Europe Group as it enables the strengthening and improvement of its leadership position.

Anyone who practices customer relationships is required to behave in a correct, honest, fair and professional way and to refrain from misleading or misleading practices.

The Service Provider must always take into account customer interest, providing appropriate solutions to their needs. Conflicts of interest must be avoided

When proposing ARC Europe Group's products and services, Service Provider should avoid making claims that are not fact-based, truthful, and completely accurate.

Customer satisfaction must be constantly monitored.

2.8. Free competition and antitrust

ARC Europe Group recognises free competition as a key factor in the development of business and business outcomes.

ARC Europe Group exercises competition by relying on the superiority of the products and services that it can offer to its customers through proper business practices.

The Service Provider is prohibited from discrediting competitors or the products or services they offer, as well as manipulating, concealing or providing a distorted view of reality in order to obtain unlawful gains.

Any practice or behaviour that has the purpose of limiting free and fair competition is forbidden.

It is necessary for the Service Provider to be aware of and to comply with competition and antitrust regulations when dealing with competitors and in order to avoid sanctions.

2.9. Supplier Selection

ARC Europe Group guarantees fairness, transparency and frankness in dealing with its suppliers.

In dealing with subcontractors, Service Provider is required to behave in a correct, transparent and frank manner and to avoid conflicts of interest.

The selection of suppliers must be based on the principles of the quality of the products and services offered and delivery performance offered.

Suppliers must exhibit the desire to continuously improve the specification, delivery and cost of the products and services they supply and be capable of demonstrating good operational and process control practices that ensure compliance with all relevant legislation and regulations.

The quality of services should be evaluated taking into account the observance of international ethical principles on labour and human rights and considering the environmental impact determined by the supply methods used.

2.10. Anti-money laundering, combating terrorism financing and international sanctions

ARC Europe Group is committed to the international fight against money laundering and terrorist financing, countering any behaviour that can be interpreted as supporting these criminal phenomena.

The Service Provider, due to its activities, must obtain and keep up-to-date adequate knowledge of the client and source of funds that this makes available for transactions subject to Group regulation or law.

If the suspect is found that the counterparty is attempting to use ARC Europe Group's products or services for illicit purposes such as money laundering or terrorist financing, the Service Provider must inform the designated coordinator without delay.

Service Providers, due to their activity, must have full and updated knowledge of the main restrictive measures taken by local authorities and international organizations against certain states, people, goods or services.

2.11. Environmental and climate protection

1. All business partners undertake to contribute to environmental and climate protection and to pursue in all their business activities a sustainable approach with respect to their impact on the environment and climate. In this context they must comply with all relevant national and international environmental laws and regulations and hold all the necessary permits and/or licences.

All parties and business partners are required to drive forward the development of climate-friendly products, processes and procedures both in their own company and at their suppliers.

2. Resource and energy consumption

All Parties and business partners shall ensure energy-efficient and environmentally-friendly use of resources.

3. Ensuring quality of life

All Parties and business partners shall ensure for all their products safe and environmentally-friendly development, production, transportation and disposal. They shall avoid or reduce all burdens with negative effects on the health of people and/or the environment and climate.

4. Waste and wastewater management

All Partners and business partners shall ensure that all waste and wastewater is disposed of or discharged in a safe and environmentally sound manner, in accordance with the relevant regulations.

5. Chemicals

All Parties and business partners must not supply ARC Europe with any products that contain chemicals as defined in Article 3(1)(a) and Annex A of the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001.

6. Mercury

All parties and business partners shall ensure either that products that they supply to ARC Europe are not produced with mercury or mercury compounds or that mercury waste is appropriately handled. The business partners must comply with the applicable Minamata Convention.

3. Final provisions

This Code has been approved by the Board of Directors of ARC Europe SA, holding of ARC Europe Group and CEO of ARC Europe Polska sp. z o.o.



The Code supersedes any other Code of Conduct existing within ARC Europe Group. All corporate regulations must comply with its provisions.

If conflicts arise between the Code and local law, such conflicts should be reported promptly to Group Compliance to ensure their effective resolution.

All parties undertake to act responsibly and apply the principles / requirements in this code of conduct to themselves and their employees, officers and business partners.

Reports of breaches against the provisions of the code of conduct may be submitted to compliance@arceurope.pl (also anonymously).