

Code of Ethics in Effect at ADAMS Sp. z o.o. as of 30-03-2023

Preamble

ADAMS Sp. z o.o. conducts its business responsibly and based on mutual trust toward clients, employees, and business partners.

ADAMS Sp. z o.o. aims to be perceived as a partner who communicates its values and principles of conduct openly and accurately.

The approach and manner of operation presented by ADAMS Sp. z o.o. are regulated in this Code, particularly regarding the behavior of ADAMS Sp. z o.o. employees and the manner of building relationships with its surrounding environment.

ADAMS Sp. z o.o. treats the provisions of the Code as a commitment, which it implements in its daily activities, specifically by:

- I. Expecting employees to act in accordance with the Code, regardless of their position, length of service, type of contract, employment terms, and scope of responsibilities;*
- II. Making the Code available to all its partners, especially clients, suppliers, and other contractors, with the conviction that the principles outlined in the Code, which guide ADAMS Sp. z o.o., will be fully respected by them.*

§ 1 Values Recognized by ADAMS Sp. z o.o.

[1] The values mentioned in this section form the foundation of ADAMS Sp. z o.o.'s operations, underpinning its development, organizational culture, and ethical dimension.

[2] In its activities, ADAMS Sp. z o.o. upholds the following values:

- Frugality – responsibly managing both tangible and intangible assets.
- Professionalism – in managing ADAMS Sp. z o.o., setting high operational standards, and developing control systems to effectively execute its business strategy, fully utilizing the expertise and competencies of its staff.
- Collaboration – by focusing on reaching agreements, building trust, and achieving common goals with ADAMS employees, clients, and partners.
- Respect – avoiding actions or omissions that infringe on another's dignity or lead to discriminatory treatment based on nationality, race, gender, age, disability, religion, political views, or sexual orientation.
- Transparency – maintaining open communication and justifying decisions across all areas of activity at ADAMS Sp. z o.o., except where trade secrets, personal data, or other protected information are involved.
- Responsibility – conducting business according to principles of sustainable development and social responsibility, particularly by minimizing negative environmental impacts.

§ 2 Law-Adherence Approach

[1] ADAMS Sp. z o.o. complies with national laws, EU regulations, and international laws across all areas of its business.

[2] ADAMS Sp. z o.o. also adheres to industry regulations applicable to its operations.

§ 3 Client-Oriented Approach

[1] Clients are among the key business partners with whom ADAMS Sp. z o.o. creates value.

[2] ADAMS Sp. z o.o.:

- aligns its business objectives with clients' goals, particularly by ensuring all employees prioritize each client's well-being;
- operates in line with client expectations regarding products, services, service quality, and their objectives;
- adapts to continuously changing market conditions to maintain partnerships and strengthen client trust;
- keeps its word in commercial relations;
- provides clients with products and services that meet the highest quality standards;
- Responds to clients' needs, adjusting offerings to support them in addressing business challenges;
- provides complete, accurate, and factual information about products and services, barring trade secrets or legally protected data;
- ensures efficient and timely client service;
- resolves complaints and issues in good faith, keeping clients' interests in mind, while identifying and addressing problem causes to prevent recurrence.

§ 4 Supplier-Based Approach

[1] ADAMS Sp. z o.o. recognizes the importance of maintaining high standards for products and services provided to clients.

[2] Considering this, ADAMS Sp. z o.o.:

- complies with applicable laws, internal regulations, social and environmental standards when selecting suppliers, bearing in mind client expectations;
- ensures utmost care in protecting information shared by suppliers and other partners;
- assesses suppliers solely on substantive and business grounds and provides feedback in good faith;
- maintains an open, collaborative attitude;
- seeks solutions in conflicts that respect the legitimate interests of all parties.

§ 5 Environment-Oriented Approach

[1] ADAMS Sp. z o.o. cares for the natural environment as a commitment to clients, employees, local communities, and future generations.

[2] In its activities, ADAMS Sp. z o.o.:

- complies with environmental protection laws;
- develops and enhances an environmental management system;
- analyzes environmental risks and, when necessary, takes preventive actions;
- avoids discharging harmful substances into water and soil;
- maintains minimal emissions within allowable standards;
- practices rational resource management in production;
- implements eco-friendly technological solutions;
- strives to minimize waste generation;
- ensures environmental care at the workplace;
- raises employee awareness of environmental impact;
- protects nearby land and natural animal habitats.

§ 6 Trust-Based Approach

[1] Privacy, confidentiality, and business secrecy are central to ADAMS Sp. z o.o.'s operations.

[2] ADAMS Sp. z o.o. processes information about employees, clients, suppliers, and other partners only to the extent necessary for collaboration.

[3] ADAMS Sp. z o.o. protects privacy and confidential information by:

- complying with privacy protection regulations and principles for employees and partners;
- sharing confidential information only with authorized individuals;
- promptly reporting observed weaknesses in confidentiality protection systems;
- securing any accessed data if obtained accidentally or through employee error.

§ 7 Conflict of Interest Elimination Approach

[1] ADAMS Sp. z o.o. respects employees' rights to make independent personal, financial, or political decisions but does not accept employee actions that benefit themselves or another person/entity with familial or business ties if they harm ADAMS Sp. z o.o.'s interests.

[2] Each employee is obliged to act in ADAMS Sp. z o.o.'s best interests, with corruption in any form strictly prohibited.

§ 8 Safety-Based Approach

[1] ADAMS Sp. z o.o. prioritizes employee safety by enhancing workplace safety through technology, employee training, best safety practices, and safety monitoring.

[2] Ensuring health and safety in the workplace, ADAMS Sp. z o.o.:

- complies with established health and safety standards;
- provides access to clean restrooms, drinking water, and hygienic dining areas;
- follows safety procedures in hazardous situations;
- ensures the safety of third parties at work premises;
- reports observed health and safety risks.

§ 9 Employment Protection Approach

[1] ADAMS Sp. z o.o. prohibits forced, slave, prison, or child labor.

[2] ADAMS Sp. z o.o. ensures a workplace free of hostile or inhumane treatment, such as discrimination, sexual harassment, physical punishment, psychological pressure, or verbal abuse.

[3] Fair, regular wages comply with national norms, meeting basic needs and discretionary income without unauthorized deductions.

[4] Employees receive understandable wage component information.

[5] No deposits or identity documents are required from employees.

[6] Disciplinary actions respect national law and human rights, prohibiting unjustified actions, like withholding wages or benefits, confiscating documents, or confining employees.

[7] Work hours comply with legal limits and statutory rest days are honored.

[8] Employment termination rights, including contract termination and freedom of movement, are respected.

[9] ADAMS Sp. z o.o. guarantees employees' right to association.

§ 10 Dissemination of Code Principles

[1] All ADAMS Sp. z o.o. employees are obligated to familiarize themselves with and comply with the Code.

[2] The ADAMS Sp. z o.o. Management Board oversees Code implementation and problem resolution.

[3] Employees, clients, and suppliers may request clarifications if Code provisions are unclear or suggest revisions.

[4] Employees must adhere to the Code and report violations using ADAMS Sp. z o.o.'s established complaint and suggestion procedures. All reported ethical violations will be handled with due care.

[5] Employees violating the Code may face consequences under the Work Regulations, Labor Code, and other regulations.

[6] The Code is available to employees, clients, and suppliers upon request.

[7] The Code becomes effective upon Management Board approval, replacing the previous version dated 17 June 2021.