

Code of Ethics in force at ADAMS Sp. z o.o. as of 6-10-2026**Preamble**

ADAMS Sp. z o.o. conducts its business activity responsibly and on the basis of mutual trust towards its customers, employees and business partners.

ADAMS Sp. z o.o. takes care to be perceived as a partner that communicates the values and rules of conduct it has adopted in an open and precise manner.

The approach and way of operating presented by ADAMS Sp. z o.o. are regulated in this Code, in particular with respect to shaping the attitudes of ADAMS Sp. z o.o. employees and influencing the way relationships are built with the environment in which ADAMS Sp. z o.o. operates.

ADAMS Sp. z o.o. treats the provisions of the Code as its commitment, which it implements in its day-to-day activity, in particular by:

I. expecting its employees to act in accordance with the Code, regardless of their position, length of service, form of contract concluded, working time and scope of responsibility entrusted;

II. making the Code available to all of its partners, in particular customers, suppliers and other business partners, in the belief that the principles set out in the Code, by which ADAMS Sp. z o.o. is guided, will be fully respected by them.

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

[1] The values listed in this paragraph constitute the basis of the activity of ADAMS Sp. z o.o. forming the foundation on which it builds its development and organisational culture, including its ethical dimension.

[2] In its activity, ADAMS Sp. z o.o. pursues the following values:

- Prudent management – through responsible management of the tangible and intangible assets in its possession.
- Professionalism – in the management of ADAMS Sp. z o.o., in the careful shaping of its operating standards and control system serving the effective implementation of its business strategy, making full use of the knowledge, skills and competences of its staff.
- Cooperation – through a focus on reaching agreement, building trust and pursuing the common goals of ADAMS, its employees, customers and business partners.
- Respect – consisting in refraining from actions or omissions that violate the dignity of another person or lead to their differential treatment on the grounds of any protected characteristic, in particular sex (including pregnancy, maternity and parenthood), gender identity, age, disability, race, ethnic origin, nationality, religion, belief or non-belief, political opinions, trade union membership, sexual orientation, marital status and family situation, as well as the form or extent of employment.

- Transparency – implemented through open communication and justification of the actions taken in all areas of activity at ADAMS Sp. z o.o., subject to the protection of trade secrets, personal data and other information protected under generally applicable law.
- Responsibility – for conducting business in accordance with the principles of sustainable development and social responsibility, in particular by minimising its negative impact on the environment.

§ 2 Approach based on compliance with the law

[1] In all areas of its activity, ADAMS Sp. z o.o. complies with statutes, regulations and other applicable provisions of national law, European Union law and international law.

[2] ADAMS Sp. z o.o. furthermore complies with industry regulations within the scope of its activity.

[3] ADAMS Sp. z o.o. conducts its business in accordance with the principles of fair competition and does not enter into agreements restricting competition, and also complies with international and national economic sanctions and with the provisions on counteracting money laundering and terrorist financing, on the terms set out in the Competition Law Compliance Policy and in the Policy on Counteracting Money Laundering, Terrorist Financing and Sanctions Compliance.

§ 3 Customer-oriented approach

[1] Customers are among the most important business partners of ADAMS Sp. z o.o., with whom it creates the value of the enterprise.

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

- at the same time enables the achievement of the business goals set by its customers, above all by requiring all of its employees to care for the wellbeing of every customer;
- conducts its business based on customers' expectations regarding the products and services offered to them, the quality of service, as well as the goals they set for themselves;
- adapts to constantly changing market conditions in order to continue partnership relations with customers and strengthen their trust;
- keeps its word in business relations;
- provides customers with access to products and services meeting the highest quality standards;
- responds to customers' needs and meets them halfway, adapting its offer to them and striving to support them in solving the problems they encounter in their business;
- provides complete, reliable and factually accurate information about products and services, their properties and intended use, with the exception of information constituting a trade secret or protected under generally applicable law;
- ensures efficient and timely customer service;

- handles complaints and problems reported by customers in good faith, having regard to the customer's interest, as well as diagnosing the causes of problems in order to eliminate similar situations in the future.

§ 4 Supplier-based approach

[1] ADAMS Sp. z o.o. is aware that it must make efforts to continuously maintain the highest standards with regard to the products and services supplied to its customers.

[2] In view of the above, ADAMS Sp. z o.o.:

- when selecting a supplier, complies with generally applicable law, internal regulations, social and environmental standards, and takes into account the need to meet the expectations of its customers;
- exercises the utmost diligence to ensure the protection of information provided to it by suppliers and other partners;
- assesses suppliers solely on the basis of substantive and business criteria, and communicates comments regarding cooperation to suppliers in good faith;
- treats suppliers equally and transparently, without unjustified barriers for smaller and local entities, in accordance with the Supply Chain Diversity Policy;
- presents an open and cooperative attitude;
- in conflict situations, seeks solutions that would ensure respect for the legitimate interests of each party.

§ 5 Approach based on environmental protection

[1] ADAMS Sp. z o.o. cares for the state of the natural environment, treating this as a commitment towards customers, employees, local communities and future generations.

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

- complies with generally applicable law in the field of environmental protection;
- creates and improves its management system with regard to environmental protection;
- carries out an analysis of environmental hazards related to its activity, taking appropriate remedial action in justified cases;
- does not emit harmful substances into water and soil;
- demonstrates a minimal level of emissions of harmful substances into the air, not exceeding permitted standards;
- focuses on the rational management of resources used in the production process;
- applies environmentally friendly technological solutions;
- takes action to minimise the amount of waste generated;
- cares for the natural environment in the workplace;
- raises employees' awareness of their impact on the environment;
- cares for nearby areas and natural animal habitats.

§ 6 Trust-based approach

[1] Protection of privacy, confidentiality of information and business secrecy constitute one of the foundations of the activity of ADAMS Sp. z o.o.

[2] ADAMS Sp. z o.o. processes information concerning employees, customers, suppliers and other business partners only to the extent necessary for the purposes of cooperation.

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

- complying with all regulations and rules relating to the protection of the privacy of employees and partners;
- disclosing confidential information only to authorised persons;
- promptly reporting any observed weaknesses in the information confidentiality protection system;
- securing all data in the event that we gain access to it as a result of a mistake or error by an employee.

[4] ADAMS Sp. z o.o. ensures the security of information and IT systems on the terms set out in the Cybersecurity Policy.

§ 7 Approach based on eliminating conflicts of interest

[1] ADAMS Sp. z o.o. respects the right of employees to make their own independent decisions in the personal, financial or political sphere, but does not accept actions by employees that bring benefit to them or to another person or entity towards which such employees have family, professional or business obligations, and which at the same time harm the interests of ADAMS Sp. z o.o.

[2] Every employee is obliged to perform the tasks entrusted to them, in each case having regard to the good and interest of ADAMS Sp. z o.o. This means that all forms of corrupt behaviour (active corruption, passive corruption, paid influence peddling, money laundering, fraud, etc.) are strictly prohibited.

[3] An employee who finds themselves in a situation that may affect their impartiality towards a business partner, in particular in connection with family, financial or business ties, shall promptly inform their superior or the Management Board thereof and, until the matter is resolved, shall not participate in making decisions concerning that partner. Where necessary, ADAMS Sp. z o.o. informs the business partner of such a situation

§ 8 Safety-based approach

[1] ADAMS Sp. z o.o. focuses on the safety of employees by raising the level of OHS protection based on the latest technological solutions, employee training, implementation of best OHS practices and monitoring of OHS conditions in the workplace.

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

- strictly complies with all established OHS standards and rules;
- provides access to clean toilets and drinking water as well as hygienic places for storing food and eating meals;

- in situations threatening health or safety, acts in accordance with the adopted instructions;
- cares for the safety of third parties present on the premises of the workplace;
- reports all observed cases that may pose a threat to health and safety in the workplace.

§ 9 Approach based on employment protection

[1] At ADAMS Sp. z o.o. there is no forced labour, slave labour, illegal prison labour or child labour.

[2] ADAMS Sp. z o.o. ensures that there is no hostile or inhumane treatment in the workplace, in particular: discrimination, sexual harassment, corporal punishment, psychological and physical coercion or verbal abuse of employees. Employees are also not permitted to engage in the above-mentioned behaviours.

[3] Clearly defined and regularly paid remuneration complies with national standards and legal regulations and ensures the satisfaction of basic needs and discretionary income. No unauthorised deductions are made from remuneration.

[4] Employees are provided, in an understandable form, with information regarding the components of their remuneration.

[5] Employees are not required to lodge "deposits" or to deposit their identity documents with the employer.

[6] Disciplinary measures taken are in accordance with national law and universally recognised human rights. Any unjustified disciplinary actions are prohibited, in particular withholding remuneration or social benefits, or retaining documents (e.g. identity cards), or confinement on the premises of the workplace and prohibiting leaving the workplace.

[7] Employees do not work longer than the statutory permissible working time. Statutory rest days are observed.

[8] Employees' rights related to the termination of the employment relationship are respected, including the right to terminate the employment contract and freedom of movement.

[9] ADAMS Sp. z o.o. guarantees the right of Employees to freedom of association in accordance with the relevant provisions.

[10] ADAMS Sp. z o.o. also applies the principles set out in sections [1]–[9], in particular the prohibition of forced labour, the prohibition of charging recruitment fees to employees and the prohibition of retaining identity documents, to the temporary employment agencies and subcontractors with which it cooperates, and verifies their compliance as part of the assessment of business partners.

§ 10 Approach based on disseminating the principles set out in the Code

[1] It is the duty of every employee of ADAMS Sp. z o.o. to become familiar with the content of the Code and to comply with its principles.

[2] The Management Board of ADAMS Sp. z o.o. oversees the functioning of the Code and the resolution of any problems that arise.

[3] Employees, customers and suppliers of ADAMS Sp. z o.o. have the right to receive explanations if the provisions of the Code are unclear to them or if they have doubts as to the scope of its application. Employees, customers and suppliers of ADAMS Sp. z o.o. also have the right to submit comments and propose changes to the content of the Code.

[4] Employees of ADAMS Sp. z o.o. are obliged to act in accordance with the provisions of the Code and to report cases of its violation using the channels specified in the Regulations together with the procedure for reporting breaches by whistleblowers, and in matters of mobbing and discrimination – also under the procedure of the Regulations on Counteracting Mobbing and Discrimination. All reports of violations of ethical principles will be examined with due diligence.

[5] ADAMS Sp. z o.o. draws consequences against employees who violate the provisions of the Code. Any violation of the principles of the Code is treated as a breach of employee duties and may result in sanctions provided for in the Work Regulations, the Labour Code and other provisions.

[6] The Code is made available to employees, customers and suppliers upon their request.

[7] The Code enters into force on the date of its approval by the Management Board of ADAMS Sp. z o.o. and replaces the version dated 30 March 2023.