



COMP S.A. SUPPLIER CODE.

Adopted by Resolution of the Board of Directors of Comp S.A. No. 1 dated March 8, 2023.

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I. INTRODUCTION

1. General information

Comp S.A., based in Warsaw, operates on the basis of a catalog of values included in the Comp Code of Ethics

S.A. adopted by the company's Board of Directors by Resolution dated March 8, 2023 (as amended) and available on the company's website at: www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/

We are a responsible company and follow norms and principles based on ethical benchmarks. The source of the norms and principles to which we adhere is a system of values common to all of us, based on our tradition and culture. Thanks to the adopted values, we are building the position of Comp S.A. for the benefit of the environment, Comp S.A. employees themselves and the company's other stakeholders.

The declaration of ethical conduct contained in our Code of Ethics, which you can find on our website www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/, is our motivation and influences the direction and shape of our decisions and actions. For our customers and our partners, this declaration is an assurance of fair and socially acceptable principles for the conduct of our business.

Our values as defined in the Code of Ethics cover the following areas in particular:

- ❖ **Customer** - to understand the **customer's** perspective and provide them with the best products and/or services.
- ❖ **People** - creating a culture of commitment and responsibility through collaboration and development in the work environment.
- ❖ **Innovation** - seeking and implementing new solutions.

The above are also the impetus for supply chain oversight activities and building lasting relationships with our suppliers, and form the basis for the implementation of this Supplier Code.

We are committed to working with suppliers who share our value system and corporate social responsibility (ESG) principles. We expect our suppliers to conduct business in an honest and ethical manner and to operate in full compliance with international, national and local laws and regulations.

In this Supplier Code, we have set out the principles that should guide every supplier (both direct and indirect) working with us, our corporate social responsibility (CSR) requirements, and how we will enforce compliance. Adherence to them is a good basis for a good joint business relationship.

This Supplier Code has been developed in compliance with the European Sustainability Reporting Standards (ESRS).



We expect our Suppliers to promote compliance with the requirements of this Code and to exercise due diligence in their supply chain to their new and existing suppliers.

The Comp S.A. Supplier Code is addressed to suppliers of goods or services ("Suppliers"), their employees and stakeholders. Suppliers shall familiarize themselves with the Code and declare their compliance with the requirements described therein in a separate statement of familiarization with the Comp S.A. Supplier Code.

2. Objectives of introducing the code

The objectives behind the introduction of this Supplier Code are:

- 1) Ensuring knowledge of supplier relationship management and Comp S.A. manages the procurement process, including fair behavior toward suppliers,
- 2) Unification of standards of cooperation with Comp S.A. suppliers,
- 3) Implementation of Comp S.A.'s social responsibility principles throughout the supply chain,
- 4) Minimize the risk of ethical, environmental and social conflict associated with suppliers' activities,
- 5) Implementation of good conduct practices among suppliers,
- 6) Developing lasting, trusting and mutually beneficial relationships with suppliers who share our values and are equally committed to acting responsibly and ethically in all aspects of the business.

3. Addressees of the Supplier Code

The Supplier Code applies to suppliers of goods and services, in particular, associates, vendors, contractors, subcontractors, intermediaries, consultants, agents, professional advisors who work with Comp S.A. and their employees. Employees of Suppliers are understood to be those who work on the premises or in the area of their operations, or who use work methods adopted by these Suppliers or who are obligated to use them, as well as any persons involved in the activities of suppliers of goods and services.

4. Supply chain reference

Comp S.A. is committed to managing its supply chain in an ethical, legal and socially responsible manner.

Each of our suppliers is required to communicate the practices and policies described in the Supplier Code to all their employees. Comp S.A. requires its Suppliers to have a specific procedure for communicating the requirements of the Supplier Code within their chain of

supplies, and required suppliers to adopt management systems and practices consistent with this Supplier Code or requirements substantively consistent with this Code. Upon Comp S.A.'s request, Supplier shall provide evidence of efforts to this Supplier Code or requirements substantively consistent with this Supplier Code through its supply chains.

Each of our Suppliers is committed to ensuring that the principles described in the Code are communicated throughout the relevant supply chain.

If there is an obligation to report on the supply chain, the Supplier shall inform Comp S.A. about it. Suppliers are required to have all cooperation and dialogue with Comp S.A. in managing, sourcing and minimizing the disruption of the relevant supply chain.

The Supplier Code applies to every Supplier regardless of the type of business, size of supplier, method of order processing or place of business.

In the case of a Supplier outside the territory of the Republic of Poland, if the laws of the Supplier's home country or internal regulations regarding the issues addressed in the Code are more restrictive, we expect compliance with the more restrictive regulations.

A supplier's declaration of knowledge of and commitment to the Code of Conduct is a requirement of Comp S.A.'s cooperation with each supplier.

5. Value chain reference

Comp S.A. sees itself as part of a value chain that extends from suppliers to end customers. As such, each Supplier is obliged to ensure that Comp S.A.'s own suppliers also comply with the principles and requirements of Comp S.A.'s Code of Ethics. It is important for Comp S.A. to adhere to the principles and values that create an image of an ethical, professional, safe business, and one that is aware of its responsibility for the role it plays in economic and social terms.

6. Scope of issues covered by the Supplier Code

Comp S.A. performs due diligence on the following key issues in our relations with suppliers:

- a) Environmental impact (greenhouse gas emissions), ESRS E1-6,
- b) Human Rights, ESRS S1-1,
- c) labor rights (including, but not limited to, provisions on worker safety, precarious employment, human trafficking, use of forced labor or child labor), ESRS S1-S2,

- d) concern for consumers and end-users society (social criteria), ESRS S4, and local communities ESRS S3,
- e) Regulatory compliance (including: use of fair tax practices), ESRS G1,
- f) Countering all forms of corruption, ESRS G1,
- g) Countering anti-competitive practices, ESRS G1,
- h) Use of fair tax practices, ESRS G1.

II. ENVIRONMENTAL PROTECTION

Comp S.A. takes environmental criteria into account when selecting suppliers.

We conduct our business in accordance with applicable environmental laws and regulations and the principles of sustainable development. We support employees' environmental attitudes and create awareness of the importance of environmental protection in our environment.

What do we expect from the Supplier in particular?

- 1) The supplier's compliance with the applicable law in the scope of its business activities, in particular, the possession of current environmental permits and certificates, including in the field of waste management, as well as striving to reduce the amount of waste from its operations and ensuring sound management.
- 2) Take realistic measures to both assess its operations in terms of negative environmental impact and reduce the negative impact of its operations on the environment and climate change.
Take measures to reduce the consumption of raw materials and natural resources and manage them rationally.
- 3) Take measures to reduce energy consumption and measures to optimize waste management and prevent waste generation.
- 4) Take measures to minimize greenhouse gas emissions, to the extent appropriate to the scale and type of the supplier's operations.
- 5) Provide greenhouse gas emissions data for products and services where possible.
- 6) Avoid negative impacts on biodiversity and ecosystems.
- 7) Take measures to monitor water and wastewater consumption.
- 8) Take steps to use "green" technologies and environmental responsibility.

Suppliers should have a response plan in place for emergency or crisis situations in case an event is identified, directly or indirectly related to the Supplier's operations, that affects the environment or the continuity of services or supplies to Comp S.A.

III. RESPECT FOR HUMAN AND WORKER'S RIGHTS

1. Human rights

Respect for the dignity of others is one of the pillars of Comp S.A.'s business and values.

We adhere to international human rights standards, taking care to ensure a safe working environment both legally and ethically or emotionally.

2. Employee rights

At Comp S.A., we do not attitudes that violate the dignity of employees such as mocking, discriminatory, abusive behavior that harms their personal rights. We do not tolerate any manifestation of harassment or intimidation of employees aimed at lowering their self-esteem, isolation or exclusion from the team. All work must be performed voluntarily. No form of forced labor or work involving any form of threat or punishment is permitted.

We conduct business responsibly, and in doing so we adhere to the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization's Declaration on Fundamental Principles and Labor Rights.

What do we expect from the Supplier?

- 1) Comply with international standards for the protection of human and worker's rights in accordance with international regulations, particularly the prohibition of forced labor, slavery, human trafficking, child labor under the age of 15, debt labor, compulsory labor, and the provision of special care for workers under the age of 18.
- 2) Against any discrimination including on the basis of gender, racial and ethnic affiliation, age, religion, psychosexual orientation, worldview, disability and type of employment.
- 3) Adhere to the principles of equality, fairness, inclusion and respect during the recruitment and selection process.
- 4) Anti-bullying and harassment.
- 5) Respect workers' right to .
- 6) Provide employees with tools to signal violations of applicable laws as well as this Supplier Code.
- 7) Transparency and transparency in personnel operations.
- 8) Ensure friendly and dignified employment conditions, including pay transparency and ensuring that working hours are in accordance with relevant national laws.

- 9) Formal regulation of labor relations with employees, as well as subcontractors.
- 10) Provide employees with a safe working environment, understood as minimizing practices that create a sense of precarious employment in an employee (such as the use of workers on short-term or limited-hour contracts, workers hired through third parties, subcontracting to third parties, or hiring workers informally).
- 11) Eliminate any violations of human rights by the Supplier and its subcontractors, and take measures related to ensuring compliance with the above principles by all entities involved in the value chain in the Supplier's business area.

More information for Suppliers can be found in Comp S.A. documents:

- 1) Comp S.A.'s internal anti-discrimination policy,
- 2) Internal anti-bullying policy in effect at Comp S.A.,
- 3) Conflict of interest management policy in effect at Comp S.A.

which are available at www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/

3. Occupational safety, health protection

We pay special attention to providing our employees with safe and healthy working conditions. Occupational safety and health protection of our employees and those who work with us are crucial to us. In a continuous system, we take measures to improve working conditions.

What do we expect from the Supplier?

- 1) Continuous improvement of occupational health and safety.
- 2) Provide appropriate protective measures for its employees, in particular, access to safe and efficient machinery, tools, equipment necessary to perform the work, as well as materials and means of collective and individual protection.
- 3) Actively cooperate with employees in the process of creating safe working conditions.
- 4) Improve skills through regular training related to occupational health and safety.
- 5) Implement procedures and practices to minimize the risk of accidents and injuries at work.
- 6) Promote the active participation of its employees in the provision of safe working conditions and health-promoting prophylaxis as part of the prevention of harmful factors at individual workplaces.
- 7) Respond to the needs for ensuring safety and adjust the measures taken to improve the existing level of protection of workers' health and life, taking into account the changing conditions of work.

IV. IMPACT ON COMMUNITIES

Comp S.A. takes social criteria into account when selecting suppliers.

Suppliers are committed to avoiding any negative physical, social and environmental impacts and risks to local communities and local people. Suppliers shall recognize the special living conditions and rights of the local population and take into account the concerns and expectations of the communities in which they work and live.

What do we expect from the Supplier?

- 1) To be treated with respect by the community in which they function.
- 2) Demonstrate social responsibility.
- 3) Actively work on issues that are important from the perspective of the local community.
- 4) Respect the views, interests and rights of affected communities and consider the community in its operations and with the appropriate value chain.

V. INFORMATION PROTECTION

At Comp S.A., we protect and safeguard confidential information provided to us by our customers and business partners.

We do not use confidential information for which we do not have the appropriate rights or permissions. We protect and safeguard against the possibility of unauthorized access to or use of information of a commercial, technical or scientific nature, particularly where intellectual property is involved, the disclosure of which could expose Comp, its customers and/or partners to harm.

In order to protect and ensure information security, Comp S.A. has implemented an information security management system based on ISO 27001:2017-6.

In connection with the implementation of the Comp S.A. Information Security Management System (hereinafter

"SZBI") based on the ISO 27001-2017 standard, prior to the Supplier's performance of activities covered by the agreement concluded with it, the Supplier shall, at Comp S.A.'s request, undergo training on the principles of protection of company secrets and principles of personal data protection in force at Comp S.A.'s enterprise, and confirm by a written statement, signed by an appropriate person on the Supplier's side, that it has undergone training and acquired knowledge of the principles of protection resulting from SZBI. A model statement is attached to the contract in each case.

What do we expect from the Supplier?

- 1) Non-abuse of confidential information.
- 2) Ensure confidentiality as to all business-sensitive and intellectual property information and assert its due protection.
- 3) Ensure that personal data is duly protected in accordance with applicable laws and regulations and that it is processed in accordance with respect for privacy.
- 4) Exercise at least due diligence in protecting confidential information to which the supplier has gained access in connection with its cooperation with Comp S.A.

VI. REGULATORY COMPLIANCE

Comp S.A.'s compliance requirements and ethical standards go well beyond compliance with the law.

Violations can lead to criminal prosecution, heavy fines, exclusion from public procurement procedures and private tenders, as well as claims for damages and loss of reputation. For a business such as Comp S.A.'s, since much of its revenue is based on cooperation with government customers, violations in this area can be very costly in both the tangible and intangible spheres.

We pay tax dues on time and in accordance with applicable regulations. We provide the competent authorities with the necessary information to correctly determine the amount of taxes and do not transfer profits / losses abroad to reduce the tax burden.

If local regulations or other applicable standards (e.g., collective bargaining agreements) provide for higher standards than those contained in this Code, the standards establishing the higher standards shall take precedence. In case of any contradiction between the provisions of this Supplier Code and national regulations or other applicable standards, suppliers should immediately inform Comp S.A. of such cases.

What do we expect from the Supplier?

- 1) Keep accounts in accordance with applicable laws.
- 2) Submission to Comp S.A., Supplier's statement regarding its status as a small, medium or large entrepreneur.
- 3) Use payment practices that do not conflict with Comp S.A. practices
- 4) Fulfill properly and fully all obligations in the conduct of business, including the timely and appropriate payment of taxes and other public and legal fees.

- 5) Fulfill properly and fully all obligations to business partners, including payment terms.
- 6) Demonstrate to Comp S.A., if necessary, the source of primary origin (including country of origin) associated with materials supplied Comp S.A. Comp S.A. may request suppliers of selected materials to identify the supply chain of these suppliers to the primary origin, in order to facilitate downstream compliance assessment.
- 7) Inform Comp S.A. of any risk of supply chain disruptions, e.g. production interruptions, problems with ensuring adequate stock levels, and take measures to minimize the impact of supply chain disruptions, including through training of Supplier's employees.
- 8) Ensure the security of personal data and confidential information.
- 9) Transparency on activities and commitments related to political influence, including lobbying activities.
- 10) Ensure that there is no retaliation of any kind against those who report any kind of violation or misconduct or suspicion of such behavior in good faith.

VII. ANTI-CORRUPTION

We are aware that regardless of the country or continent, the phenomenon of corruption entails disastrous consequences for both individuals and the community at large. That is why we fight corruption, and thanks to our transparent rules, we even avoid situations where even the appearance of corrupt behavior would arise. Hence, in light of Our principles, it is unacceptable to request, accept, offer or give bribes, whether directly or indirectly.

Each Comp S.A. Supplier shall fully eliminate corruption from any business transactions. Suppliers will not engage in corrupt activities such as bribery or any form of illegal payment, regardless of the circumstances, including financial fraud, money laundering, extortion or facilitation payments. Activities related to the elimination of corruption include raising awareness among the Supplier's employees about corruption, bribery and other fraud, implementing anti-corruption policies and procedures, and encouraging the Supplier's employees and associates to report violations in accordance with the Supplier's internal whistleblower policy.

Each Supplier shall ensure that personal relationships do not influence business, and shall not grant or promise gratuities to government officials or private sector contractors for the purpose of influencing official actions or gaining an unfair advantage. This includes refraining from granting or accepting acceleration of payments beyond the originally agreed upon payment date.

What do we expect from the Supplier?

- 1) Prohibit giving employees or representatives of Comp S.A. or other suppliers gifts or offering them entertainment that may create a conflict of interest or give the appearance of a conflict.
- 2) Ban the acceptance of cash and cash equivalents such as gift cards and gift checks.
- 3) Counteract any form of corruption and comply with the rules on countering terrorist financing and money laundering.
- 4) Avoiding conflicts of interest.
- 5) Identify functions and positions at risk of corruption and bribery by conducting internal training.

Suppliers will find more information in the following documents:

- 1) Policy for giving and accepting gifts (presents), the use of other forms of hospitality and the procedure for granting donations in force with Comp S.A.
- 2) Anti-corruption policy in effect at Comp S.A.

which are available at www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/

VIII. COUNTERING UNFAIR MARKET PRACTICES

Comp adheres to the principle of fair competition. We categorically oppose unacceptable agreements and arrangements that lead to a restriction of competition.

Suppliers should comply with applicable antitrust laws. Comp S.A. expects its suppliers to promote free competition and transparent markets and to combat unfair, non-transparent and restricted competition. To this end, they shall take appropriate preventive measures and not participate in price, market or supply collusion, or the allocation of markets or customers.

What do we expect from the Supplier?

- 1) Not to participate in price collusion, customer or market allocation and exchange of confidential information with competitors' representatives.
- 2) Combating unfair and limited competition.
- 3) Refusal to participate in collusive supply, market or customer allocation.
- 4) To be guided by the principles of competition based on price, quality and level of service, and to strive for competitive advantage through legal means only.
- 5) Adhere to the principles of fair competition.

IX. IMPACT ON CONSUMERS AND END USERS

We expect Suppliers to provide COMP S.A. with high quality products, components and services that meet our specifications and comply with all applicable laws.

Suppliers of raw materials, auxiliary materials, components, food-contact packaging materials or products intended for direct consumption must demonstrate that they apply appropriate management systems for food safety and quality, based on HACCP principles, and that they have implemented an effective traceability and recall system for non-compliant products.

What do we expect from the Supplier?

- 1) Promptly report to us any possible product safety risks;
- 2) Verify the sources of raw materials used in production.
- 3) Caring for the safety of consumers and end users of products and services, in particular, taking into account the need to protect their personal health and safety, child protection, or non-discrimination.
- 4) Collaborate on consumer and end-user impacts with stakeholders.

X. REPORTING OF VIOLATIONS AND PROTECTION OF THE REPORTING PERSON

1. Reporting violations

We make it possible for our employees, co-workers, Suppliers, business partners and others to comment on existing or potential irregularities.

Comp S.A. has a Compliance Officer in place. The Compliance Officer takes an independent stance on violations of internal procedures and regulations, laws and ethics adopted at Comp S.A. and under the Supplier Code ("**violations**").

Employees may report violations of internal procedures and , laws or the Code of Ethics to their immediate superiors, and if this is not possible or, due to the nature of the matter, is not advisable, they should contact the Compliance Officer directly, who will take investigative action. If violations are reported to the direct supervisor, that supervisor is obliged to forward the report to the Compliance Officer.

A report regarding a violation may also be made by an external stakeholder of Comp S.A. Cases of any irregularities, incidents or violations of the Supplier Code should be reported

to the Compliance Officer, who oversees the application of the above rules at Comp S.A. Both Suppliers and employees of Suppliers may raise concerns about compliance with the terms of the Supplier Code by Suppliers or Comp S.A.

Reporting to the Compliance Officer of a violation or suspected violation can be done:

- ❖ At a face-to-face meeting by appointment and location,
- ❖ In a telephone conversation at +48 508 047 240,
- ❖ send email to: compliance@comp.com.pl,
- ❖ the letter to: Compliance Officer, Comp S.A. 116 Jutrzenki St., 02-230 Warsaw with a note "Do not open. For personal use."

The violation does not have to directly affect the person who reports it.

Investigations are conducted by the Compliance Officer. Having determined that a violation has occurred, the Compliance Officer takes action to rectify situation and, in justified cases, also takes action aimed at imposing appropriate consequences on the violator.

The reporting person is kept informed of the outcome of the investigation.

Employees of Suppliers are encouraged to report their organization's internal problems related to unethical behavior first to the employer through the solutions provided by the Supplier.

Suppliers will find more information in the documents:

- ❖ Procedure for reporting violations at Comp S.A.,
- ❖ Comp S.A. Compliance Policy,

which are available at www.comp.com.pl/relacje-inwestorskie/dokumenty-spolki/

2. Identity protection and no retaliation

When conducting an investigation, we ensure the protection of the identity and discretion of the reporting party. Until the allegations are confirmed, the identity of the reported person is also protected. The above is intended protect the aforementioned persons from negative consequences arising from the mere fact of reporting a violation. The protection does not include the possibility of disclosing the reporting person's personal data only if the requirement is based on mandatory provisions of law.

We do not tolerate any retaliatory actions taken against reporters. If such actions are found to have occurred, the person committing them may be to separate disciplinary proceedings, which may result in termination of employment.

XI. Final Information

Implementation of the

Supplier Code

By signing the "Statement of Familiarity with the Supplier Code", Suppliers declare their readiness to undertake ethical business activities, in particular within the scope of cooperation with Comp S.A. and within the relevant supply chain, as well as to report any non-compliance with the Supplier Code in order to work out solutions to remove identified violations and obtain Comp S.A.'s support in their removal.

Submission by the Supplier of a statement of knowledge of and commitment to the principles of the Code of Conduct is a requirement for cooperation with Comp S.A. for each Supplier.

Comp S.A. may ask the Supplier to demonstrate that it is in compliance with the Supplier Code. Comp

S.A. may request supply chain or value chain data from the Supplier necessary to comply with its obligations under the European Sustainability Reporting Standards (ESRS) or other binding legislation.

Comp S.A. reserves the right to verify that its direct Suppliers comply with this Code. This verification may be carried out in various ways, such as self-assessment surveys, soliciting information from third parties, requiring the Supplier to provide relevant certificates, visits, surveys or audits (announced well in advance).

If the Supplier fails to comply with the provisions of the Supplier Code, Comp S.A. expects the Supplier to take immediate action to cease the state of non-compliance with the provisions of the Supplier Code and to implement an appropriate action plan, of which Comp S.A. will be informed.

If we become aware of irregularities, especially those that may have a negative impact on Comp S.A.'s image or the assessment of Comp S.A.'s compliance with the law, we reserve the right to terminate or suspend the execution of the agreement with the Supplier.

Comp S.A. selects and approves new Suppliers or new production facilities when they meet the requirements set forth in the Supplier Code compliance assessment process, which requires all Suppliers to apply the Supplier Code, and relevant Comp S.A. Suppliers to conduct an on-site assessment or audit.



If the Supplier is selected, the Code will be an integral part of the agreement between Comp S.A. and the Supplier. Signing of the contract is equivalent to the Supplier's commitment to implement the subject of the contract in accordance with the provisions of the Supplier's Code.

Comp S.A. periodically reviews the Supplier Code to ensure its adequacy and relevance to its business. The latest version of the Supplier Code shall apply in each case.

Subsidiaries of Comp S.A. may decide to apply the Comp S.A. Supplier Code as appropriate to their operations.