



ALPHA TECHNOLOGY spółka z ograniczoną odpowiedzialnością

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# Code of Conduct

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## **Introduction**

Our priority is to conduct business in a responsible and trustworthy manner. We want our environment to perceive us in this way. Our ambition is to be a company that communicates its values and rules of conduct in an open and precise manner.

We have decided to include the attitudes and methods we desire in this Code. This document defines the direction of our activities aimed at developing of employee attitudes, as well as influencing the way of building relationships with the environment in which our company operates. First of all, it is our commitment that we want to remember every day.

In this document, we emphasize what can be expected from us and our employees. We treat all declarations contained in it with the utmost seriousness and assume the obligation to ensure, that the way we operate corresponds fully to what is provided for in the Code. The Code is addressed to all employees in our company, regardless of their position, length of service, form of the concluded contract, scope of job and entrusted responsibility. We expect special diligence from managers who, by their own example, are to promote the principles of the Code among employees and create conditions for employees to act in accordance with this Code.

Our values are to develop the culture of good cooperation and help to create an individual style of action - both in the field of business and in interpersonal relationships. The values presented below should guide our Employees in all activities related to their professional life.

### **I. COMPLIANCE WITH LAW AND SOCIAL NORMS**

We comply with applicable law in all areas of our business. Working with business partners from various countries, we try to comply with the provisions of the legal systems of our business partners' countries.

We are committed to the idea of preventing human rights violations. We do not accept any discrimination based on gender, nationality, race, religion, social origin, disability or sexual orientation. We are convinced that mutual respect is the basis for successful cooperation.

### **II. VALUES AND ETHICAL RULES IN THE WORK ENVIRONMENT**

#### **1. EQUAL OPPORTUNITY**

We provide everyone with equal opportunities in the recruitment processes, while assessing the effects of work, determining career paths, making decisions about promotion or changing the amount of employee remuneration. Our intention is to use transparent criteria in our relationships with employees, based on their experience, performance, potential or values, that guide them in the workplace.

We obey the following rules:

- employees and job applicants are assessed fairly, taking into account only merit-based criteria;
- we inform in a transparent and understandable manner about the scope of duties and expectations related to individual positions;

- we give all employees the opportunity to develop and improve their professional skills;
- decisions regarding the professional promotion of employees are reliably justified and taken with special care;
- We treat each other with respect, regardless of the position held, period of service or experience.

## **2. RESPECT**

Being aware of the importance of a positive working atmosphere, we follow the following rules:

- we build relationships within the company based on mutual respect and high personal culture;
- we oppose behaviour that leads to conflicts and disrupts the work atmosphere;
- we do not engage in any behaviour that constitutes racial, ethnic, religious, sexual, age-related or gender-based discrimination;
- we oppose and do not commit any forms of harassment and mobbing;
- we do not accept the use of an employee's professional position to gain unauthorized personal benefits, both material and non-material, or in a way that violates the personal rights of other employees;
- we do not agree to disseminating untrue information about employees or violating their dignity or good name;
- we require that our workplace be alcohol and drug-free;
- we expect every employee, regardless of their position, to set a good example of applying the company's values in practice.

## **3. CHILD LABOUR**

In our business as well as our business partners, suppliers and subcontractors, we do not tolerate the employment of people who, in accordance with applicable law, have not reached the national minimum age for economic activity.

## **4. FORCED LABOUR**

We respect freedom of employment and do not agree to the use of forced labor in the course of any of our company's activities. We also strive to ensure that labor standards are respected by our business partners, suppliers and subcontractors.

## **5. FREEDOM OF ASSOCIATION**

We respect the right of our employees to associate in accordance with applicable law. We are open to constructive dialogue with employees and their representatives.

## **6. WORKING HOURS, REMUNERATION AND BENEFITS**

When remunerating employees, we comply with all legal provisions relating to employment conditions, including remuneration, working hours and other employee benefits.

## **7. CONFIDENTIALITY OF PERSONAL DATA**

We ensure that all activities on personal data, such as their collection, registration, comparison, storage and deletion, are carried out in accordance with applicable regulations. We respect the right of every person to the protection of their personal data. We make sure,

that only people who need it in order to perform their official duties have access to personal data. We ensure, that all persons who gain access to personal data take appropriate measures to protect it. We ensure, that personal data is not kept for longer than required to achieve the purpose for which it was collected.

In order to effectively fulfil these obligations, we have implemented a Privacy Policy.

## **8. USE OF ALHA TECHNOLOGY RESOURCES**

We make every effort to ensure, that the property of the company serves the employees to carry out the tasks entrusted to them, and the company to achieve the adopted business goals. It is the responsibility of every employee to care for its protection and proper use. Negligence, waste or theft of a company's resources have a direct impact on its results. An important asset of our company is also intellectual property and information developed by our employees, that is not generally known (i.e. trade secret / know-how), as well as technologies and other information that are valuable and important. Protecting these assets is critical to building and maintaining our position in the marketplace.

Bearing in mind the importance of the company's property, its intellectual property and information constituting company secrets, we apply the following principles:

- we take care of the company's property, protect it against damage, loss of value or theft. Each employee, using the company's property made available to him, takes care of them with the utmost care;
- we do not agree to use the entrusted resources of the enterprise for purposes other than business purposes and deviation from this rule is allowed only after obtaining the consent of the authorized authorities of the enterprise;
- we do not accept any use of company assets for personal gain;
- we require confidential treatment of all internal information concerning our company and its contractors, for which no express consent has been given for their public disclosure;
- we require compliance with procedures aimed at protecting our company's intellectual property;
- we use the logo of our company and its other trademarks only to the authorized extent;
- we ensure that the intellectual property rights of other entities are respected, and our use of someone else's intellectual property is preceded by obtaining the consent of authorized entities.

## **9. RISK OF CORRUPTION**

We expect the entire team of our company to adhere to the highest ethical standards. Any attempt at corruption, extortion or other means of improperly gaining advantage is unacceptable. We run our business successfully thanks to the quality of our products. We strive to develop our business avoiding all forms of corruption. We strictly adhere to the prohibition of influencing the performance of official duties by public officials by offering, promising, delivering or approving any undue advantage.

In order to effectively fulfil these obligations, we have implemented the "Anti-Corruption Policy".

## **10. AVOIDING CONFLICTS OF INTEREST**

The honesty and loyalty of employees guarantee the success of any organization. Therefore, each of our employees should avoid any situation, that could lead to a conflict between his private interest and the interest of the company. This type of conflict of interest may arise when you do business, or joint activities with other companies, with friends or family members. We are sensitive to all situations of this nature because even the appearance of a conflict of interest may harm our good name as well as the relations between our employees.

## **11. HEALTH AND SAFETY AT WORK**

In the interests of our employees, we strive to provide the best working conditions. We take actions to prevent threats, that may affect their health and safety of employees.

Our working methods and procedures are regularly checked and updated. We oblige employees at all levels to take responsibility for health protection and the prevention of accidents in the workplace. We provide our employees with appropriate health and safety training. We make sure, that employees of companies providing services to us are properly trained and equipped with equipment and tools, that allow them to work safely.

We comply with health and safety standards and take measures to ensure safety and good working conditions by implementing the "Health and Safety Policy".

## **12. CONFIDENTIALITY OF INFORMATION AND TRADE SECRET**

Our business activities require the collection and storage of information relating to employees, customers, suppliers and other business partners. The basic obligation of each employee is their absolute protection and use only for clearly defined and authorized purposes. Failure to comply with the confidentiality requirements of information entrusted to employees is associated not only with business consequences, but also poses the risk of initiating legal actions against the company. Therefore, we have implemented the "Information Security Policy" based on the established Information Security Management System.

# **III. VALUES AND ETHICAL PRINCIPLES OF CONDUCTING A BUSINESS**

## **1. ENVIRONMENTAL POLICY**

We use many materials and production techniques, that are necessary for the effective service of all contractors. The modern economy and market realities require, that this efficiency increase and that particular services are provided faster and better. Any activity, that increases production capacity, performed in an incompetent way, may contribute to the production of negative environmental effects.

A not threatened ecosystem is very important to us, that is why we comply with all regulations relating to this sphere of functioning. We also promote activities contributing to environmental protection and use materials and production processes, that are socially and legally acceptable, friendly to the natural environment.

Our employees, while performing their daily duties, should remember about the shared responsibility for environmental protection. Their activities should concern, in particular, the

reduction of the amount of waste, the saving of natural resources and the recycling of materials, at every stage of the production process. The rational use of natural resources such as energy and fuel helps prevent pollution and reduces waste. We minimize the negative impact of products and services on the environment throughout the entire product life cycle: at the concept stage, development, production, transport, use and recycling. We support regional activities for environmental protection and periodically implement innovative production technologies that help optimize production costs and minimize the impact of production processes on the environment.

In order to effectively fulfil these obligations, we have implemented the "Environmental Policy".

## **2. QUALITY OF PRODUCTS**

We make every effort to ensure the highest level of quality of products, that will meet the expectations of even the most demanding contractors. We make sure, that our products are the best.

We carry out process controls and make sure, that high quality is a feature of all our activities. Therefore we work based on the ISO 9001 and IATF 16949 quality management system in the automotive industry.

## **3. BUSINESS PARTNERS**

Relationships with contractors have a significant impact on the success of our company and must be consistent with the principles of honesty, openness and mutual satisfaction. We refuse to cooperate with anyone, who participates in illegal activities. Therefore, before establishing commercial cooperation, we check the reliability and market reputation of a potential business partner.

We expect our business partner to comply with the rules set out in the Code of conduct for our company's business partners.

## **4. REQUIREMENTS TOWARDS BUSINESS PARTNERS**

Clients are among the our most important business partners. Together with them, we create the value of our enterprise, while enabling the implementation of business goals set by our clients. Knowing how important they are for our functioning in the short and long term, we expect from all our employees to care for the welfare of each client. We want to build our relationships on the basis of partnership.

Our approach to customer relations is based on the following principles:

- we keep our promises in business relations;
- we provide our clients with access to products, that meet the highest quality standards, taking into account the fair prices giving the benefits to each party;
- we actively learn about the needs of our clients;
- we place emphasis on building transparent and professional relationships;
- we provide efficient and timely service to our clients all over the world;
- we always explain complaints and critical comments from clients in good faith, bearing in mind their legitimate interest. Each time, we analyse their causes, we initiate and implement solutions to eliminate similar situations in the future.

## **5. COMPETITION**

Recognizing the value of competition and the importance of its protection for market development, we adhere to the principles of fair competition and support the ideas of free market and fair trade. We try to conduct our business in full compliance with the law. We strive for success through the innovation of our solutions and the high quality of our products and services.

## **6. ACCURACY AND RELIABILITY OF DOCUMENTATION**

All transactions carried out by our enterprise are fully and precisely documented, which guarantees, that our records and financial statements present the actual condition of our enterprise. We also make sure that non-financial documentation regarding, for example, the quality of our products, safety, health, environment, human resources, working time and training is carried out precisely.

## **7. SOCIAL ENGAGEMENT**

We are a socially responsible company. By operating in various locations, we try to engage in the life of local communities. We strive to find new ways to reduce the environmental impact of our operations. We support various social institutions financially and materially.

We appreciate the involvement of our employees in social activities, that serve generally recognized and legally permitted purposes. Such commitment, however, must not affect the reputation of our company.

# **IV. APPLICATION OF THE CODE OF CONDUCT**

We want our employees and associates to read the content of the Code and comply with its provisions. Therefore, the Code is available on the website [www.alpha.krakow.pl](http://www.alpha.krakow.pl), and for our employees it is also available from his or her immediate supervisor.

Employees have the right to receive explanations if the provisions of the Code are incomprehensible to them, or if they have doubts as to the scope of its application. In order to obtain such explanations, the employee may contact his immediate supervisor or send an inquiry to the e-mail address: [etyka@alpha.krakow.pl](mailto:etyka@alpha.krakow.pl)

We enable our employees, associates, business partners and other people to submit comments regarding existing or potential irregularities. Such behaviour may be reported by e-mail to the following address: [etyka@alpha.krakow.pl](mailto:etyka@alpha.krakow.pl) or to the postal address of Alpha Technology with the annotation "Code of Conduct".

All employees are required to report any breach or reasonable suspicion of a breach of the Code. In the event of a breach of the provisions of the Code, the employee is obliged to report the breach to his immediate supervisor, and if this is not possible to a higher-level supervisor, and by e-mail [etyka@alpha.krakow.pl](mailto:etyka@alpha.krakow.pl)

Each notification will be clarified in accordance with the company's procedures. Reporting persons may request, that they be kept anonymous when reporting. This protection does not cover the disclosure of the reporting person's personal data in the event, that the disclosure requirement is required by applicable law.

We assure you, that no disciplinary measures will be taken or discriminated against persons, who acting in good faith and without malicious intent, report to authorized persons a violation of the law or a violation of the Code.

## **V. FINAL PROVISIONS**

If the content of the Code conflicts with the law, the law must be followed.  
Our Code may be updated in line with new challenges and issues, that arise constantly.