

CODE OF ETHICS FOR THE WB GROUP SUPPLIERS  
(consolidated text as at 18 March 2024)

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## 1. Introduction

The WB Group (i.e. WB Electronics S.A. and its subsidiaries, both current and future, within the meaning of provisions of the Act of 15 September 2000 on the Code of Commercial Companies and Partnerships or the Accounting Act of 29 September 1994) presents this Code of Ethics for the WB Group Suppliers (hereinafter the "Code"), which is intended to promote ethical practices among its suppliers. This Code is a set of principles that the suppliers should follow in the course of co-operation with the companies of the WB Group and within their own supply chains.

Suppliers of companies of the WB Group are expected to ensure that the principles laid down in this Code will be respected and applied for the benefit of all the interested parties, natural environment and the public.

The Code is the mandatory part of all contracts and agreements concluded between the companies of the WB Group and their suppliers. Upon approval of the Code, the suppliers shall comply with the requirements described therein.

The Supplier shall comply with provisions of this Code by members of its authorities, employees, contractors, representatives and sub-suppliers involved directly or indirectly in the performance of a contract/purchase order for the companies of the WB Group.

## 2. Compliance with laws

The WB Group operates in accordance with:

- our values set out in the Code of Ethics of the WB Group,
- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises,
- UN (United Nations) Guiding Principles on Business and Human Rights,
- the principles laid down in eight fundamental conventions mentioned in the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work,
- the principles laid down in the Universal Declaration of Human Rights.

Our goal is to ensure continuous development of business standards in accordance with the OECD Due Diligence Guidance for Responsible Business Conduct.

Suppliers of companies of the WB Group (including members of their authorities, employees, contractors, representatives and sub-suppliers involved directly or indirectly in the performance of a contract/purchase order for the companies of the WB Group) shall follow provisions of the governing national and international laws. They shall avoid all actions that might result in the WB Group breaching provisions of the applicable law or actions that would be punishable under the applicable law.

## 3. Respect for human rights

Suppliers of companies of the WB Group and their sub-suppliers involved directly or indirectly in the performance of a contract/purchase order for the companies of the WB Group shall respect human rights as prescribed in the UN Guiding Principles on Business and Human Rights and the International Declarations on Human Rights.

- No forced labour – forced labour under any form, slave labour and unpaid labour shall be prohibited. The Supplier and its sub-suppliers involved directly or indirectly in the performance of a contract/purchase order for the companies of the WB Group shall not become involved in the human trafficking practice nor derive any profits or benefits from such a practice;

- No child labour – the supplier assures that no children or adolescents work in the manufacturing and distribution process in breach of provisions of the Labour Code

#### 4. Respect for employee rights

Suppliers of companies of the WB Group shall follow the principles of the International Labour Organisation (ILO) and applicable provisions of the labour law with regard to their employees, and shall observe provisions on the minimum pay necessary for subsistence, the maximum working time, and respect human dignity and employee privacy.

##### 4.1 Non-discrimination

Suppliers of companies of the WB Group shall not discriminate against anyone on the grounds of age, gender, religion, disability, sexual orientation, colour, marital status, pregnancy, parental status, political opinion, nationality, ethnic origin, union membership or social status. Suppliers of companies of the WB Group shall not condone and shall address any forms of bullying, harassment, violation of personal dignity and behaviour that creates a hostile, degrading, humiliating or offensive atmosphere in the workplace.

##### 4.2 Freedom of association

Suppliers of companies of the WB Group shall permit their employees to associate in legal organizations. Honest relations at the supplier's are the grounds for dialogue between his employees and managerial staff

##### 4.3 Health and safety

Suppliers of companies of the WB Group shall provide their employees with safe and hygienic working conditions.

#### 5. Environmental protection

Suppliers of companies of the WB Group shall aim at minimizing environmental impact of their activities and shall take measures to improve the environment.

#### 6. No corruption

Suppliers of companies of the WB Group shall comply with provisions of the anti-corruption laws. Suppliers shall guarantee prevention of all forms of fraud and corruption in everyday business practice and economic activity. Suppliers shall conduct their business in an ethical and legal manner, in line with good customs.

#### 7. Conflicts of interest

Suppliers of companies of the WB Group should always avoid conflicts of interest and not become involved in any actions that are or may be viewed as affecting decisions that are unfavourable to the WB Group and the contract/purchase order being performed.

#### 8. Sub-suppliers

The WB Group expects the Supplier to obtain, from each of its sub-suppliers involved directly or indirectly in the performance of the contract/purchase order for the companies of the WB Group, acknowledgement that the sub-supplier respects the principles laid down in this Code. Companies of the WB Group may demand the Supplier to document such an acknowledgement.

## 9. Breaches of the Code

The Supplier shall immediately report issues and suspected cases of breaches of the law as well as any cases of reasonable suspicion of severe breach of principles and provisions of this Code.

All the breaches should be reported:

- 1) by mail to the relevant Ethics Commissions, to the registered office of the WB Group company;
- 2) to e-mail addresses of Ethics Commissions of companies of the WB Group listed on [www.wbgroup.pl](http://www.wbgroup.pl) or on the website of the relevant company of the WB Group;
- 3) report form available on [www.wbgroup.pl](http://www.wbgroup.pl), "Report a breach" tab, or on the website of the relevant company of the WB Group.

Each report shall be analysed and investigated by the relevant Ethics Commission of the WB Group company in accordance with the applicable rules of reporting breaches.

## 10. Implementation of the Code

This Code was adopted with a resolution of the Management Board of WB Electronics S.A. on 18 March 2024. All changes and/or updates shall be approved by the Management Board of WB Electronics S.A. and immediately communicated to the WB Group companies and interested parties.

WB Group companies adopt/update this Code by way of a resolution of the Management Board.

Upon its adoption by the companies of the WB Group, the Code will be available on the WB Group website ([www.wbgroup.pl](http://www.wbgroup.pl)), and on the websites of the WB Group companies.

Commitments of the Suppliers to follow the Code will be incorporated in the contracts/agreements concluded with the Suppliers or purchase orders accepted by Suppliers or in separate statements. A WB Group company may perform an initial or periodical verification of the Supplier's compliance with the Code.

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