

Nr dokumentu: SPR-POL-002	<h1>Responsible sourcing policy</h1>	Obowiązuje w (obszar / proces): Ekoenergetyka - Polska S.A.
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1. Subject and purpose

Ekoenergetyka-Polska S.A. expects suppliers to meet minimum health, safety, human rights, ethics and environmental standards, encouraging suppliers to collaborate to identify and continuously seek improvements to their responsible sourcing program.

2. Scope of application

Responsible sourcing policy applies to all of our company's suppliers and contractors and their affiliates for any products and services purchased by Ekoenergetyka-Polska S.A.

We expect suppliers to cooperate with Ekoenergetyka Polska S.A. to identify additional opportunities to improve business practices in areas such as health and safety, human rights, ethics and environmental care at all stages of the supply chain. We strongly encourage our suppliers to implement the requirements of this Policy in their own supply chain, and we intend to reward those who do so.

3. Mission

Ekoenergetyka - Polska S.A. wants to produce the charging infrastructure for electric vehicles in a safe and sustainable manner. To achieve this goal, we want to cooperate with suppliers, striving to:

- obtaining an optimal supply chain supporting the Responsible Sourcing Policy adopted by our company,
- developing solutions for deliveries that meet the expectations and needs of our customers, regulatory authorities and the environment of our company,
- building long-term added value while limiting the risk to our business, suppliers and the environment of our company,

We want to achieve the above goals by introducing responsible sourcing standards, undertaking innovative projects and working with our suppliers to promote responsible sourcing in our business processes.

4. Introduction

Our Responsible Sourcing Policy indicates how we should work with suppliers and requires suppliers to comply with the following minimum health and safety, human rights, ethics and environmental standards. We encourage our suppliers to work together to identify and follow steps to identify issues and to improve our responsible sourcing program on an ongoing basis. Suppliers are encouraged to work together to identify and follow steps to identify issues and to improve our responsible sourcing program on an ongoing basis.

We hope that this Policy will contribute to promoting sustainable business practices in our suppliers.

Ekoenergetyka - Polska S.A. defines its supply chain as goods and services that are purchased and used in its operating activities. It includes input materials such as iron ore, solid fuels, metallic materials, alloys, base metals, as well as construction services and products, capital expenditure, industrial and specialized services and products, transport and logistics services. Responsible purchasing is the key principle of supply in Ekoenergetyka - Polska S.A., consistently taken into account alongside such factors as prices and quality.

5. Our Commitments to Suppliers

The implementation of the Policy will include the following activities on the part of Ekoenergetyka - Polska S.A.:

- **Cooperation:** work with suppliers to raise social (including health and safety and respect for human rights), environmental and ethical standards. The cooperation will include, inter alia, joint analyzes, e.g. as part of visits to plants, aimed at assessing the implementation of the Policy objectives.

- **Support:** assisting suppliers in identifying areas inconsistent with the requirements of the Policy and in efforts to quickly improve the existing situation.
- **Setting priorities:** focusing attention on those parts of the supply chain where the risk of non-compliance with the Policy is highest and where the greatest improvement can be achieved.
- **Respect :** conducting business cooperation with suppliers in an honest, objective, transparent and professional manner. The respect and dignity due to every human being are of particular importance to us. We do not accept any kind of discrimination and intolerance. It is important to us that every employee of our suppliers is treated equally and fairly.
- **Promotion:** acting as an advocate for the implementation of responsible practices and principles of conduct in the supply chain in our industry.
- **Information and training:** ensuring the knowledge of the provisions of the Policy by all our employees and appropriate training of employees responsible for purchases.
- **Improvement:** Regularly reviewing the program and practices in place to ensure that they contribute as much as possible to the responsible purchasing vision.

6. Our expectations towards suppliers

Ekoenergetyka – requires its suppliers to implement and enforce a corporate policy that obliges them to comply with ethical economic practices and to adopt the principles of the Policy and the Ekoenergetyka - Polska S.A. Code of Business Ethics and the Ekoenergetyka - Polska S.A. Anti-Corruption Guidelines.

Ekoenergetyka - Polska S.A. with determination uses reliable, ethical and transparent business practices in its activities. Ekoenergetyka - Polska S.A. undertakes to use raw materials from legal sources and produced in a sustainable manner, and does not obtain minerals from regions affected by armed conflicts, which would contribute to financing these conflicts and violating human rights. To fully comply with this obligation, Ekoenergetyka - Polska S.A. exercises due diligence in its operations and expects the full support of its suppliers.

We strongly encourage suppliers to cooperate with Ekoenergetyka - Polska S.A. to identify further opportunities for the improvement of responsible business practices along the supply chain in areas such as occupational health and safety, human rights, ethics and environmental responsibility.

7. Occupational Health and Safety

Ekoenergetyka - Polska S.A. aims to eliminate accidents and injuries completely and to ensure good conditions both inside and outside the workplace. This goal is confirmed by safety policies and procedures that promote our philosophy of producing charging infrastructure for electric vehicles in a safe and sustainable manner.

Ekoenergetyka - Polska S.A. requires suppliers to eliminate all work-related accidents related to employees and the community, and to adapt to the standards set out in the Ekoenergetyka - Polska S.A.

8. Human Rights

Ekoenergetyka - Polska S.A. respects all human rights, i.e. the rights of employees and local communities, and strongly promotes relevant regulations among suppliers in accordance with the provisions of this Policy.

Ekoenergetyka - Polska S.A. requires suppliers to prepare and implement regulations and procedures to ensure respect for human rights in their activities, as well as in their sub-suppliers.

The Supplier is obliged to always comply with the most stringent requirements contained in the applicable law or this Policy. If local law prevents a supplier from complying with certain provisions of the Policy, the supplier should then comply with local law while striving to respect human rights.

9. Society and local communities

In order to contribute to the effective implementation of this Policy, Ekoenergetyka - Polska S.A. is committed to improving economic, environmental and social conditions and creates a positive impact on the local communities in which it operates. Charitable donations, active involvement in the development of qualified staff and high quality of employment are key in the relations between Ekoenergetyka - Polska S.A. with local communities. Ekoenergetyka - Polska S.A. conducts constant dialogue with stakeholders and participates in various activities for the involvement of the community in pro-ecological activities.

10. Responsibility for the natural environment

Ekoenergetyka - Polska S.A. is making efforts to make the production of charging infrastructure for electric vehicles more sustainable. To this end, Ekoenergetyka - Polska S.A. uses its practice and experience in the field of production of charging infrastructure for electric vehicles and operations to develop cleaner processes and minimize the impact on the environment.

We strive to work with suppliers who share the same goals and adhere to best environmental management practices, including but not limited to energy and resource efficiency, biodiversity management, waste reduction and recycling. Ekoenergetyka - Polska S.A. requires its suppliers to implement effective regulations, processes and procedures for managing environmental impact and conduct business activities in a manner consistent with the standards of this Policy Ekoenergetyka - Polska S.A.

11. Conflict minerals

The term "Conflict Minerals" refers to certain minerals such as copper, tin, tantalum, tungsten and gold (3TG) and their derivatives which are mined in the eastern province of the Democratic Republic of the Congo ("DRC") and in neighbouring countries such as Congo, Central African Republic, South Sudan, Rwanda, Uganda, Zambia, Angola, Burundi and Tanzania. The proceeds of sales can be used directly or indirectly to finance armed groups involved in the civil war, resulting in serious social and environmental abuses.

Dodd-Frank Wall Street Reform and Customer Protection Act, Section 1502 and SEC regulations require disclosure of 3TG use cases and supply chain transparency. This is to put an end to armed conflicts and to adapt to international law.

In accordance with the requirements of the Dodd-Frank Act, Ekoenergetyka - Polska S.A. is aware of its responsibility and contributes at various levels to the lasting protection of human rights. Ekoenergetyka - Polska S.A. is committed to safeguarding the health, safety and security of those from whom products and services are sourced. Our task is also to require high social and environmental standards and to respect human rights also in the circle of our suppliers. Although the Dodd-Frank Act does not apply to Ekoenergetyka - Polska S.A. directly, compliance with its conflict minerals requirements is part of the Company's policy.

Ekoenergetyka – Polska S.A. is constantly working to increase supply chain transparency and ensure a conflict-free mining of the 3TG used in our products, and has taken the following actions:

- We have developed a policy setting out our principles and commitment to the use of minerals from outside areas of armed conflict
- We are currently implementing a Reasonable Country of Origin Inquiry (RCOI) process to identify the presence of 3TG minerals (Tantalum, Tin, Tungsten and Gold) in our supply chain and identify countries of origin for these metals. These activities are designed to identify those mills in our supply chain that are able to implement a due diligence system and facilitate our sourcing of raw materials from outside the conflict zone in the Democratic Republic of Congo.
- We introduce policies concerning conflict minerals to our procurement policy and in co-operation with suppliers implement measures to increase the transparency of our supply chain. We inform our suppliers of these principles and support relevant industry initiatives to halt possible conflict minerals sourcing to manufacture our products.

12. Documentation and monitoring

Upon request, we require our suppliers to:

- complete a self-assessment questionnaire based on the provisions of this Policy,
- transfer of Ekoenergetyka - Polska S.A. or to its representatives, copies of any relevant information, cooperation and reasonable efforts to ensure that their subcontractors do the same,
- demonstrate what efforts are made to meet the requirements of the Policy. Policy is an integral part of the supplier management and evaluation process. Ekoenergetyka - Polska S.A. evaluates suppliers' compliance with the requirements of this Code according to the level of risk. Monitoring can take the form of self-assessment questionnaires, site visits and verification of the implementation of recovery plans.

Ekoenergetyka - Polska S.A. works with suppliers to resolve identified deviations. Ekoenergetyka - Polska S.A. reserves the right to opt out of cooperation with suppliers who do not meet the requirements of this Policy or who are unable to present or undertake an improvement plan.

13. Overview

Ekoenergetyka - Polska S.A. intends to regularly review this Policy and the implementation program for their suitability and effectiveness.

14. Related documents

- zał. EKO-PRO-004 Kodeks etyczny

- zał. EKO-PRO-010 Kodeks Postępowania Dostawców Ekoenergetyka S.A.

15. Changelog

Lp.	Version	Date	Opis zmian / Przyczyna	Author
1	1	01-09-2020	Start-up process	Ireneusz Lechniak