



CODE OF ETHICS

**"MALOW" Spółka z ograniczoną odpowiedzialnością
with its registered office in Suwałki**

TABLE OF CONTENTS

PREAMBLE	3
I. OUR VALUES	5
II. CUSTOMER RELATIONSHIPS.....	5
III. EMPLOYEES	7
IV. RULES OF COOPERATION AND COMMUNICATION	9
V. RELATIONS WITH SUPPLIERS	9
VI. CONFLICTS OF INTEREST	10
VII.PROTECTION OF CONFIDENTIAL INFORMATION.....	11
VIII.COMPETITION	12
IX. OCCUPATIONAL HEALTH AND SAFETY	12
X. SUPPORTING COMMUNITY DEVELOPMENT AND ENVIRONMENTAL PROTECTION	13
XI. RELATIONS WITH THE COMPANY'S SHAREHOLDERS	14
XII.ENSURING COMPLIANCE WITH ETHICAL STANDARDS	14

PREAMBLE

The Code of Ethics of MALOW Spółka z ograniczoną odpowiedzialnością (hereinafter referred to as the "Company") is a set of key principles and standards of conduct that apply to all persons associated with the Company, regardless of their position or form of cooperation. It applies to employees, members of the Management Board and Supervisory Board, as well as business partners and contractors. The Code reflects the values that guide our activities and our commitment to conducting business in accordance with applicable law, ethical principles, fair competition, and respect for human rights, the environment and society.

Since its establishment, the Company has been guided by principles that have enabled it to become one of the leaders in the metal furniture industry. By consistently nurturing our values and traditions, as well as being open to innovation, we have built a strong brand based on the trust of our customers, partners and the local community.

The Company's goal is to become a strategic partner for customers and the business environment by providing a comprehensive range of products and services of the highest quality in the field of metal furniture. In pursuing this goal, **MALOW** creates space for employee development, generates benefits for shareholders, while ensuring the highest ethical standards and social responsibility.

The Code of Ethics was created to ensure uniform standards of conduct for every person associated with the Company. Compliance with the principles contained in the Code supports the building of a strong, effective organisational culture that enables the further creation of value for the Company and its sustainable development.

Violation of the provisions of the Code of Ethics may have a negative impact on the reputation of MALOW, which we have built over many years. Therefore, compliance with the rules contained therein is not only a formal obligation, but also an expression of our shared commitment to the development of the Company. Every employee is required to familiarise themselves with the content of the Code and to comply with its rules in their daily work. Failure to comply with the rules set out in the Code of Ethics may constitute a breach of professional duties.

The Code of Ethics is an expression of the values that shape the Company's community, cooperation and approach to daily professional duties. The Company's Management Board obliges the entire **MALOW** community, regardless of their position, to actively support our values and our shared vision of achieving a leading position in the European metal furniture industry, operating in accordance with the principles of responsible business.

*Management Board of **Malow Sp. z o.o.***

I. OUR VALUES

The company therefore bases its business activities on the following values:

- **Trust**

It is the foundation on which we build the future of the Company. We promote open and honest communication and cooperation, flexibility and openness to change. The trust placed in us by our customers, contractors and employees is crucial to us.

- **Responsibility**

We build the company's success on the pillars of sustainable development. We act in the interests of the company, looking at the business in the context of long-term returns rather than short-term profits. We are aware of the impact of our business on the environment and build value for future generations.

- **Safety**

We believe that people are our greatest asset, which is why we invest in our employees, give them opportunities for development and provide safe and decent working conditions.

II. CUSTOMER RELATIONS

1. The company manufactures furniture and other metal products with the utmost care, ensuring their quality, compliance with applicable standards and safety of use.
2. The company strives to build long-term relationships with customers based on trust and mutual respect, as well as openness to customer needs and expectations.
3. The company operates in an open and transparent manner, building its reputation on the domestic and foreign markets through honesty, reliability and consistent adherence to the principles of business ethics.
4. The company introduces modern design and functional solutions aimed at continuously increasing customer satisfaction. When introducing innovative solutions, the company is guided by user safety and care for the natural environment.
5. The company ensures the protection of customers' personal data in accordance with generally applicable regulations, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council (EU) 2016/679 of 27 April 2016 on the protection of natural persons with

regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation

on data protection)

6. The Company is guided by the principles of business ethics, clearly defining its production capabilities and prospects for cooperation, as well as honestly informing about commercial terms, delivery times and possible restrictions.
7. As part of its customer relations, the Company may give non-monetary corporate gifts. We do so openly, in such a way that the customer knows that they are receiving a gift from the company, and not from a specific employee, in compliance with applicable laws and ethical standards.
8. If a customer reports problems, in particular regarding product defects, the Company takes immediate, prompt and timely action to resolve them, providing professional support and communication at every stage of the complaint process.
9. The Company adheres to the principles of fair marketing and advertising, ensuring that communications to customers are clear, unambiguous and not misleading. All promotional activities comply with applicable law, including the Competition and Consumer Protection Act and other generally applicable laws.
10. The Company provides customers with full information about the Company's products, services and activities, with the exception of information constituting technical, technological, commercial or organisational secrets, the disclosure of which could expose the Company to damage.
11. In its advertising and information materials, the Company provides honest, competent and comprehensive information about its products and activities to both business partners and consumers. The Company takes all measures to ensure that its promotional and information materials are produced in the least environmentally damaging way possible.

III. EMPLOYEES

1. EMPLOYEE RIGHTS

- 1.1. The company undertakes to respect the personal rights of its employees by ensuring equal treatment, regardless of gender, age, origin, religion, race, sexual orientation, nationality, political views, social status or any other personal characteristics of each employee.
- 1.2. As part of its commitment to equality among its employees, the Company provides equal opportunities for all in terms of recruitment, promotions, pay rises and training.
- 1.3. The Company creates a working environment that offers opportunities for promotion and development, giving priority to internal recruitment for vacant positions.
- 1.4. The Company cares about the development of its employees, providing them with opportunities for personal development and improving their skills through internal and external training and work in task and project teams.
- 1.5. The company provides its employees with safe and hygienic working conditions, recognising life and health as the highest values requiring special protection.
- 1.6. Every employee has the right to professional development within the structure of the Company and to equal opportunities for promotion and improvement of qualifications.
- 1.7. Employees have the right to fair remuneration for their work, commensurate with their duties and performance.
- 1.8. The Company takes measures to meet the living, social and cultural needs of its employees by offering appropriate benefits and support programmes.
- 1.9. Employees are entitled to take their due leave in accordance with the applicable labour law provisions.
- 1.10. Every employee has the right to express their opinions, make requests and suggestions on professional matters, while respecting the dignity and diversity of views, as well as the hierarchy and rules in force at the Company.
- 1.11. Every employee has the right to obtain up-to-date and accurate information necessary to perform their duties and represent the Company before its contractors and customers.

2. EMPLOYEE OBLIGATIONS

- 2.1. Employees are required to perform their duties with due care and diligence, in accordance with the highest professional standards, observing the principles of professionalism and professional ethics, and avoiding conflicts of interest.
- 2.2. Employees should maintain a good working atmosphere based on ethical principles and high personal culture, observing generally accepted rules of proper behaviour and respect for human rights.
- 2.3. Employees are required to care for the reputation of the **MALOW** brand and to represent the Company in a dignified manner, both in internal and external contacts.
- 2.4. Office employees are also required to care for the Company's image by dressing appropriately while performing their duties. Clothing should be neat, professional and appropriate to the nature of the work performed, avoiding elements that may distract other employees.
- 2.5. Company employees are required to remain politically neutral in the workplace, which means that they are prohibited from expressing their political views to colleagues and contractors.
- 2.6. Employees are required to maintain good manners in their dealings with customers, contractors and colleagues. Appropriate behaviour, courtesy and respect in relations with others are the foundation for building a positive image of the company and influence the effectiveness of cooperation.
- 2.7. The professional activities of employees should be focused on the customer's well-being in order to ensure that products meet the quality standards applicable in the Company.
- 2.8. Employees are required to be punctual and timely in the performance of their professional duties.
- 2.9. Employees should strive to improve their qualifications, knowledge and competences, which is the foundation for the Company's development.
- 2.10. Employees are required to take care of the Company's tangible and intangible property. It is the responsibility of every employee to protect the Company's property from loss, theft, damage, waste or misuse.

IV. RULES OF COOPERATION AND COMMUNICATION

1. The Company undertakes to ensure the efficient flow of information and high-quality communication at all levels of the organisation, using available internal communication tools, such as the internet or team meetings, to provide employees with ongoing access to relevant information.
2. Internal contacts between colleagues are based on professionalism and mutual kindness, which fosters a positive working atmosphere and effective cooperation.
3. In conflict situations, the Company is guided by the principles of objectivity and respect for different views, striving to resolve disputes amicably through open dialogue and mediation, taking into account the interests of all parties.
4. Colleagues support each other in correcting mistakes, analysing their causes and jointly seeking solutions. Any situation that threatens the company's image, quality or product safety should be reported immediately to a superior, so that appropriate corrective action can be taken quickly.
5. Each employee has the right to submit suggestions, comments and reservations aimed at improving the organisation of the Company's work. Supervisors are required to carefully consider the proposals submitted and respond within a reasonable time, promoting a culture of openness and continuous improvement.
6. In the event of a reasonable suspicion or knowledge of a violation of generally applicable regulations or the provisions of this Code, the employee is obliged to inform their supervisor or send a report to the Company's email address - hr@malow.com.pl
The Company ensures the protection of the identity of persons reporting violations and takes measures to clarify and, if necessary, remedy any irregularities found.

V. RELATIONS WITH SUPPLIERS

1. The Company strives to build long-term and honest business relationships with its suppliers, based on the exchange of experiences and the search for ever better solutions to achieve mutual benefits.

2. Cooperation with suppliers and partners is characterised by a high level of personal and organisational culture, which aims to build a good image and reputation for the **MALOW** brand.
3. The company defines the terms of cooperation precisely, striving to obtain the best price conditions and the highest quality of products or services offered.
4. All suppliers are treated equally, in accordance with the accepted rules of cooperation. The selection of suppliers is characterised by objectivity and compliance with the principles of competitiveness.
5. The Company attaches particular importance to protecting the intellectual property rights of its partners and expects the same approach from them.
6. The company has developed the Malow Supplier Code of Conduct, which is a set of detailed rules for cooperation between the company and its business partners. The aim of this Code is to build a sustainable supply chain based on the idea of mutual responsibility for ethical, environmental and social issues.
7. The Company expects its suppliers to comply with applicable laws, including those relating to human rights, working conditions, environmental protection and anti-corruption.
8. In the event of a breach of the principles set out in the Supplier Code of Conduct, the Company reserves the right to take appropriate action, including terminating its cooperation with the supplier in question.

VI. CONFLICTS OF INTEREST

1. Employees may not engage in activities competitive to the Company or provide their services to an entity conducting such activities.
2. Every employee is obliged to avoid situations that may lead to a conflict of interest. A conflict of interest is understood as a situation in which the personal interest of an employee or an entity for which the employee works conflicts with the legitimate interest of the Company.
3. In connection with the performance of their professional duties, Company employees are prohibited from accepting gifts in the form of any financial or personal benefits from any of the Company's stakeholders, including customers and suppliers.

4. Any form of gratification for actions contrary to the Company's interests is an act contrary to the principles of the Code of Ethics and generally applicable laws.
5. Employees are required to disclose any situation that could potentially constitute a conflict of interest in writing to their immediate supervisor or the person responsible for HR matters at the Company (hr@malow.com.pl)
6. If an employee may be involved in activities that may constitute an actual or potential conflict with the Company's interests, they are required to immediately submit a written statement to that effect and obtain the consent of the Management Board.

VII. PROTECTION OF CONFIDENTIAL INFORMATION

1. The Company collects, processes and discloses personal data only to the extent necessary to achieve its business objectives, in accordance with generally applicable laws and the Personal Data Protection Act on the protection of personal data.
2. The Company's employees are obliged to keep all confidential information strictly confidential, treating it as a trade secret within the meaning of the Act on Combating Unfair Competition.
3. Confidential information includes all non-public information concerning the Company, including : business strategies, *know-how*, technical, financial, operational, commercial and marketing information, as well as information concerning customers and contractors.
4. The obligation of confidentiality applies to employees both during and after the termination of their employment relationship.
5. Employees are required to keep order in the documentation related to the performance of their professional duties and to return all documents and data carriers upon termination of their employment relationship.
6. In order to ensure information security, employees are required to comply with internal procedures and policies regarding data protection and to immediately report any incidents related to information security breaches to their superiors.
7. Employees are required to comply with all rules and instructions issued by persons responsible for IT security in the Company.

VIII. COMPETITION

1. The Company conducts its business in accordance with the principles of fair competition and respect for good practices and the legitimate interests of other entities.
2. The Company undertakes to avoid entering into any agreements or arrangements with competitors that would aim at or could lead to a restriction of free trade or violations of competition and consumer protection laws.
3. The Company does not exchange information with other entities regarding prices, offers, costs, terms and conditions of sale, market share or other data that could violate the Company's interests or generally applicable laws.
4. All of the Company's activities in the area of competition are in accordance with generally applicable laws, including those concerning competition and consumer protection.
5. The Company competes on the market with other business entities while respecting the rights of its competitors and the highest ethical business standards. It does not take any actions that could affect the reputation of its competitors through insinuations or unfair advertising practices.

IX. OCCUPATIONAL HEALTH AND SAFETY

1. The company carries out activities to maintain occupational safety and health protection in accordance with applicable laws and internal standards.
2. The Company provides regular health and safety training for all employees.
3. In order to protect the health of its employees, the Company may adjust the working conditions of young employees, pregnant or breastfeeding women and persons with disabilities, with a view to protecting their health.
4. Employees are required to perform their work in accordance with occupational health and safety regulations and rules and hygiene regulations and to follow the recommendations and instructions of their superiors in this regard.
5. Employees shall take care of the technical condition of machines, equipment and tools, as well as maintain order and tidiness in the workplace. They are obliged to use collective protective equipment and to

use the assigned personal protective equipment, work clothing and footwear in accordance with their intended purpose.

6. Every employee is obliged to immediately report to their superiors or designated persons in the Company any violations of health and safety regulations and rules, accidents, injuries, occupational diseases and situations threatening the health, life or property of the Company.
7. An employee has the right to refrain from performing work if the conditions of its performance do not comply with health and safety regulations and pose a direct threat to the health or life of the employee or other employees. In such situations, the employee is obliged to immediately notify their supervisor. Exceptions are situations related to saving human life or health and the Company's property.
8. The Company has a total ban on the consumption of alcohol and substances similar to alcohol.
9. In order to protect the life and health of employees, other persons or property, the Company introduces the possibility of checking the sobriety of employees or checking for the presence of substances similar to alcohol in their bodies in accordance with the rules described in the Work Regulations.
10. Smoking tobacco products, including innovative tobacco products or electronic cigarettes, is strictly prohibited on the Company's premises, except in areas designated for this purpose by appropriate verbal and graphic signs indicating the designated smoking area. The Company may impose disciplinary penalties provided for in the Work Regulations for violating this ban.

X. SUPPORTING COMMUNITY DEVELOPMENT AND ENVIRONMENTAL PROTECTION

1. The Company conducts its business in accordance with the principles of sustainable development, caring for the natural environment, responsible resource management and the implementation of innovative and environmentally friendly solutions.
2. The Company supports all activities aimed at implementing the principles of the Circular Economy (CE) and other activities aimed at protecting the natural environment.

3. The company is involved in the development of the local community by supporting social, educational and cultural initiatives, working for the development of the local community and the region.
4. The company promotes charitable activities as an important aspect of social responsibility, supporting philanthropic attitudes among its employees.
5. The company supports the development of sport by sponsoring local sports organisations and promoting the city at national and international sporting events.
6. The company minimises the negative impact of its activities on the environment by reducing pollution and noise emissions and maintaining harmonious relations with its neighbours.
7. The company is involved in providing assistance in the event of natural disasters and catastrophes, participating in charitable campaigns and helping those in need.
8. The company minimises waste by reusing packaging, sorting waste and modern waste disposal.
9. The company supports educational activities aimed at increasing the environmental awareness of its employees and their active involvement in sustainable development projects.

XI. RELATIONS WITH THE COMPANY'S SHAREHOLDERS

1. The Company's business activities are focused on ensuring that shareholders have the right to share in profits in the long term.
2. The Company's Management Board makes investment decisions within the limits of reasonable economic risk, taking into account the stability and development of the company.
3. The Company's Management Board provides the owners and the Supervisory Board with complete, reliable and timely information on the Company's operations, its results and strategic plans.
4. The Company's Management Board prepares financial and non-financial reports reliably and with due diligence, applying the highest standards in communication with the Company's shareholders.

XII. ENSURING COMPLIANCE WITH ETHICAL STANDARDS

1. This Code confirms the highest standards of integrity and reliability in our mutual relations. The Company's Management Board is obliged to ensure

that all employees and associates of the Company comply with the provisions of this Code.

2. The Company is guided by the principle of full transparency with regard to the applicable ethical standards, which form the foundation of its operations. These standards are universal and apply to all members of the Company's community, regardless of their position.
3. Every employee has free access to the content of the Code and should familiarise themselves with it thoroughly. Supervisors are required to discuss its content with their subordinates at least once every two years and, if necessary, after any changes to its content.
4. Each employee is responsible for ensuring that their conduct and the conduct of their direct subordinates is fully compliant with the Code of Ethics.
5. In the event of violations of the Code, the Company may apply sanctions resulting from the provisions of the Labour Code, including termination of the employment contract without notice. In justified cases, it may also initiate civil or criminal proceedings.
6. The Company regularly reviews compliance with ethical standards and implements necessary corrective measures where necessary.

Any violation or suspected violation of the Code of Ethics should be reported immediately to the following e-mail address: (hr@malow.com.pl)

Questions regarding this Code of Conduct can be sent to the following e-mail address: (hr@malow.com.pl)