

Code of Ethics of Arlen S.A.

Introduction

The Code of Ethics of Arlen S.A. is the overarching document defining the principles of honest, responsible and transparent conduct of business. It applies to all employees, members of management bodies, suppliers, contractors and business partners.

The Code complements the Sustainable Development and Corporate Social Responsibility Policy and specific policies (m.in. Anti-Corruption Policy, Environmental Policy, Diversity and Inclusion Policy, Whistleblowing Policy).

In matters related to this Code of Ethics of ARLEN S.A., please contact the Ethics Ombudsman of ARLEN S.A. at the e-mail address: etyka@arlen.com.pl or the Legal Department of ARLEN S.A. at the e-mail address: prawny@arlen.com.pl or by letter or in person at the following address: Office of the Management Board of ARLEN S.A., 17 Adama Branickiego Street, 02-972 Warsaw.

I. ARLEN and the environment

1. We take full responsibility for the environmental impact of our operations. We comply with the applicable environmental law regulations and focus on eliminating negative effects at the source.
2. We invest in research, development and technologies that support sustainable development and reduce the impact on the environment, guided by the principles set out in **the Environmental and Climate Policy**.
3. We maintain an environmental management system compliant with **ISO 14001**, which is an integral part of the corporate management system. Thanks to this, we monitor key processes and ensure their compliance with international standards.
4. Before starting any new activity or investment, we assess its potential impact on the environment. The results of this assessment are taken into account when making strategic business and design decisions.
5. We focus on implementing and promoting environmentally friendly technologies. We take a life-cycle approach to looking for new eco-friendly solutions. In this area, we conduct our own research and cooperate with scientific institutions and research centers.
6. Our priority is resource efficiency and emission reduction. We implement a program to optimize the use of raw materials, use recycled materials, recover post-production waste and operate installations that allow for water reuse. At the same time, we implement measures to reduce the energy demand of our processes.
7. We commit all employees to the economical use of energy, water, raw materials and materials. Each of us has a duty to take action to support the company's environmental goals and contribute to reducing our ecological footprint.
8. Every new project and investment in Arlen S.A. is subject to an environmental assessment. We analyze the potential effects of our actions and take them into account in the process of planning and implementing projects.
9. Our relationships with suppliers and contractors are based on environmental criteria. We only work with partners who adhere to the principles of environmental responsibility and are in line with the company's environmental policies.

II. ARLEN and the market

1. We make sure that relations with contractors are based on professionalism, reliability and mutual trust. We make all decisions regarding cooperation solely on the basis of objective criteria and provide information about our products and services in a factual manner.
2. Arlen S.A. categorically opposes all forms of corruption, abuse and conflicts of interest. These principles are reflected in the **Anti-Corruption Policy** and the **Conflict of Interest Policy**, which apply to all employees and business partners of the Company.
3. As part of the anti-corruption system, we maintain a transparent accounting system. It is unacceptable to conduct off-book transactions, record fictitious expenses, use false documents or prematurely destroy financial documentation.
4. We allow receiving and giving small gifts that fit into accepted customs and are officially handed over. However, it is unacceptable to accept or offer any material benefits that could affect the impartiality of business decisions.
5. We support fair and transparent competition. We do not accept actions aimed at restricting third-party access to the market or engaging in unfair advertising practices. In this respect, we apply the principles set out in the **Antitrust Policy**, which obliges us to avoid practices that may violate the principles of the free market.
6. We respect current and potential shareholders by providing all capital market participants with equal and broad access to relevant information regarding the company's current operations and its long-term development prospects.
7. Arlen S.A. provides reliable information to the capital market and strictly complies with stock exchange regulations, thus confirming its transparency and credibility towards investors.
8. We respect the intellectual property rights of our contractors and ensure the security of the personal data and confidential information entrusted to us, treating them in accordance with the highest standards of protection.
9. We do not cooperate with business partners who obviously violate the fundamental values for Arlen S.A., specified in this Code. In business relations, the **Supplier Code of Conduct is in force**, which imposes requirements on contractors to comply with our ethical and environmental standards.
10. We refuse to work with entities that violate human rights, business ethics or the law. In this respect, we apply the provisions of the **Human Rights Policy**, which sets standards that are not subject to compromise in relations with partners.

III. ARLEN and employees

1. The basic principle of our organization is respect for human rights, resulting m.in from the European Convention on Human Rights and national and international regulations. This principle is reflected in our **Human Rights Policy**.
2. Internal relations at Arlen S.A. are based on mutual respect, equality and responsibility. We are bound by the prohibition of discrimination, mobbing and any form of harassment, which is confirmed by the provisions **of the Anti-Mobbing and Anti-Discrimination Policy and the Diversity and Inclusion Policy**.
3. Each of us is responsible for building a positive image of the company and the entire capital group to which we belong. Our behaviour, appearance and communication – both in the workplace and in public space or social media – should reflect the organisational culture of Arlen S.A. and the ethical standards we follow.
4. Every employee has the right to a safe and hygienic working environment. We undertake to comply with the principles of **the Health and Safety Policy**, to use personal protective equipment and to report any situations that pose a threat to health or life. We strictly observe the prohibition of working under the influence of alcohol or drugs.
5. We provide our employees with decent working conditions and proper social facilities. We do not accept child labor or any form of forced labor, in accordance with our international standards and the provisions of **our Human Rights Policy**.
6. Arlen S.A. guarantees equal opportunities in terms of employment, remuneration, bonuses, promotion, as well as access to training and professional development. The evaluation and promotion criteria are transparent and based on competence, achievement and performance.
7. We respect employees' right to privacy and the protection of personal data. Any information collected by the company is used only for professional purposes, and employees have the right to access their data in accordance with applicable regulations.
8. Each employee is obliged to maintain the confidentiality of official information and protect the company's know-how. The knowledge gained at work cannot be used for private purposes or contrary to the company's interest.
9. All employees are required to avoid conflicts of interest. This applies, m.in, to links with customers, contractors or competitors that may affect the impartiality of decisions. The obligation to report such situations results from the provisions of **the Conflict of Interest Prevention Policy**.
10. We respect the right of employees to associate, to conclude collective agreements, as well as to rest and leisure. During working hours, we are all obliged to perform our assigned duties, taking care of the effective use of working time and company resources.

IV. Compliance with the Code

1. The Code of Ethics of Arlen S.A. is an integral part of the company's organizational culture and the basis for building the trust of our stakeholders – employees, customers, business partners and society.
2. Every employee of Arlen S.A., regardless of their place in the organizational structure, is obliged to familiarize themselves with the provisions of the Code and comply with them. The Code of Ethics is also available on [the www.arlen.com.pl's website](http://www.arlen.com.pl), on the company's internal server and at the supervisor's.
3. The principles contained in the Code of Ethics also apply to consultants, associates, contractors and all other persons who act on behalf of ARLEN S.A. Violation of the Code of Ethics may result in the termination of further cooperation or termination of contracts concluded with them.
4. An employee of ARLEN S.A. has the right to receive an explanation of unclear provisions or doubts related to the content of the Code of Ethics, to submit comments and to initiate changes and additions to its provisions. An employee has the right and should propose their own solutions to difficult problems, ideas for eliminating ineffective procedures or inappropriate behaviour occurring in the Company. Any such request should be addressed to the Ethics Ombudsman. This application will be registered and considered in terms of improving corporate culture.
5. Managers are obliged to set an example with their conduct, support employees in solving ethical dilemmas and react to any irregularities. The responsibility for promoting an ethical culture in an organization lies in particular with persons performing managerial functions.
6. The Ethics Ombudsman is responsible for compliance with the provisions of the Code of Ethics. He is a person of universal trust, elected for a 3-year term of office by the Management Board and the Human Resources Director. The main tasks of the Ombudsman are: educating and promoting models of ethical attitudes and building a corporate culture based on the highest standards of ethics. In addition, the Ethics Ombudsman:
 - a) develops, together with the Management Board, a coherent strategy for corporate culture and ethical policy in the Company;
 - b) monitors compliance with the principles of ethics;
 - c) undertakes intervention actions against persons who violate the adopted provisions of the Code of Ethics;
 - d) initiates activities related to the popularization of the Code of Ethics and ethical attitudes: organizes trainings, information meetings, supports superiors in the communication process, publishes articles, etc.;

e) maintains close contact with employees, constantly monitors the current problems of the Company.

7. Each employee has the right and obligation to report suspected violations of the Code, other internal regulations or legal provisions.
8. In the event of a violation of the Code of Ethics, the employee should turn to his supervisor, who is obliged to listen to the employee and start explaining the reported irregularities. If an employee does not have full confidence in their supervisor, they can report the violation directly to the Ethics Officer.
9. Any person outside the Company who notices irregularities in the conduct of employees or in the applicable procedures of the Company may report their objections to the Ethics Ombudsman – in person, by e-mail, by post or by phone.
10. Arlen S.A. has an "Open Doors" policy, which means the availability of superiors for employees, the possibility of open, honest conversation, with guaranteed protection of their content and the provision of constructive support. Implementing these principles is the responsibility of managers at all levels. Each supervisor is obliged to listen to the employee and decide together with him or her to take action if there are reasonable suspicions indicating a violation of the Code of Ethics. Employees may ask for an interview with the President of the Management Board, as part of the "Open Doors" operating in the Company. Information about individual meetings with the President of the Management Board can be obtained from the Office of the Management Board of ARLEN S.A.
11. Applications can be submitted:
 - a) to a supervisor or a higher-level supervisor (in the case of reports made by employees or associates of ARLEN S.A.),
 - b) directly to the Ethics Ombudsman (in each case) at: etyka@arlen.com.pl or: Arlen S.A. Management Board Office, 17 A. Branickiego Street, 02-972 Warsaw,
 - c) In cases requiring legal interpretation, support is provided by the Legal Department of Arlen S.A. at prawny@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw.
12. Reports of violations are treated confidentially, with full respect for the dignity of the whistleblower. Arlen S.A. does not allow retaliation against persons who report irregularities in good faith. An employee reporting a case of violation of the law is guaranteed full anonymity. The process of clarifying the case, considering the complaint, is conducted with complete discretion regarding the source of information.
13. Violation of the principles of the Code may lead to disciplinary liability and, in serious cases, legal liability. Each incident is analysed individually, taking into account the circumstances and labour law regulations.

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14. This Code is an integral element of the ethics management system at Arlen S.A. and is consistent with other documents, in particular: **the Anti-Corruption Policy, the Antitrust Policy, the Human Rights Policy, the Health and Safety Policy, the Supplier Code of Conduct** and other specific policies.
 15. This Code of Ethics enters into force on 1 October 2025 and is in force until it is repealed or replaced by a new document.
 16. The Management Board of Arlen S.A. together with its subordinate organizational units of the Company is responsible for supervising the implementation and effectiveness of the application of the provisions of this Policy.

Code of Ethics of Arlen S.A.

-abbreviation-

Below we present 10 basic ethical principles that apply to all employees, managers, members of the management board and business partners of Arlen S.A.

1. We act responsibly towards the environment – we reduce the consumption of resources, take care of energy efficiency and minimize emissions, in accordance with **the Environmental Policy**.
2. We comply with the law – every business decision must comply with the company's laws and regulations.
3. We are honest on the market – we cooperate only on transparent terms, with respect for competition and partners.
4. Zero tolerance for corruption – we do not offer, accept or tolerate any unjustified benefits (**Anti-Corruption Policy**).
5. We care about equality and respect – all employees are treated fairly and with respect for dignity (**Anti-Mobbing** and **Anti-Discrimination Policy, Diversity Policy**).
6. Safety is a priority – we provide a hygienic and safe working environment and comply with health and safety rules.
7. We protect information – confidential data, know-how and intellectual property are always properly secured.
8. We avoid conflicts of interest – private interests must not interfere with professional duties (**Conflict of Interest Prevention Policy**).
9. We react to irregularities – we report any violations in accordance with **the Whistleblowing Policy**; whistleblowers are protected.
10. We set an example – each of us is responsible for building an ethical culture, and managers have a special role in promoting the principles of the Code.

The Arlen S.A. Code of Ethics is the foundation of our organizational culture – it applies anytime and anywhere, regardless of the position or function.