



CODE OF ETHICS

EXTRAL
ALUMINIUM

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Introduction

Sustainable development is the foundation on which we build our business.

This Code of Ethics is a benchmark for our actions and decisions and aims to support the responsible development of EXTRAL by indicating patterns and ethical principles regarding the conducted business

We are aware that it is difficult to indicate detailed rules that could apply in every situation, therefore the Code of Ethics is implemented to such an extent that the values indicated in it are applied as widely as possible

At EXTRAL, we trust all employees and believe that they are fully committed to upholding the values and principles that underpin our contribution to society and our common success.

When conducting business activity, EXTRAL undertakes actions aimed at responsible behaviour towards: clients, contractors, employees and associates, investors, relevant authorities, society and the environment.



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Our values

The Code of Ethics has been developed based on the EXTRAL values, which are:



Cooperation

By which we understand the transparent structure of the company, which guarantees quick and quality decision-making, a friendly and family atmosphere, building positive relations both outside and inside the company, remembering about employees and their families.

Innovation



By which we understand the implementation of innovative solutions related to production, technology, quality and environmental protection.



Respect

By which we understand an individual approach to the client, respect for other people and care for the natural environment.



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Employees

A good working atmosphere built on cooperation enables a fuller use of skills and the personal development of each employee.



EXTRAL strives to provide all employees with friendly working conditions through a clear and transparent decision-making process, preparation and communication of clear and effective regulations and promotion of the provisions of the Code by the managers of organizational units.

Employees

Activities aimed at shaping a good working atmosphere include:

- building a positive work environment that enabled employees to use and develop their competences,
- non-acceptance of any form of harassment, discrimination and mobbing or other behaviour that is considered degrading,
- enabling employees to be represented,
- precise formulation of the scope of duties and reliable assessment of work,
- dialogue with employees,
- the use of tools that enable the reporting of irregularities.



Activities aimed at supporting professional development and improvement include:

- supporting professional development,
- ensuring participation in training and courses,
- enabling internal promotion,
- sharing knowledge.



Employees

Activities aimed at caring for a safe workplace and health protection include:

- ensuring a safe work environment by complying with the relevant legal regulations in the field of occupational health and safety,
- continuous first aid training,
- appropriate equipment with medical equipment,
- the use of solutions aimed at constant improvement of work safety,
- providing access to private medical care.



Activities aimed at caring for the employee consist of:

- respecting the proportionality of free time to working time,
- protection of personal data,
- compliance with the provisions on the possibility of employing minors,
- providing a wide package of benefits addressed to employees and their families,
- sensitivity in the case of individual random events.



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Employees

Remember if:

- you have doubts as to whether a given action is legal, moral or ethical,
- whether the action complies with the rules and principles of Extral
- whether the action is in accordance with the law
- you see a violation of the Code of Ethics.



Contact the Compliance & ESG Manager



Employees

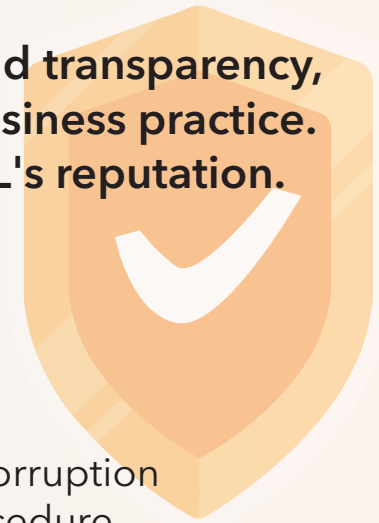
Responsibilities of the superiors:

- talk to your team about the Code of Ethics,
- never influence employees in order to achieve a business goal at the expense of acting in violation of the Code of Ethics,
- make ethical decisions by setting an example for employees.



Business relations

At EXTRAL, we have a policy of openness and transparency, which is the key to credibility and trust in business practice. All employees should take care of EXTRAL's reputation.



Our activities aimed at striving for high-quality business relations consist of:

- ensuring adequate protection of the trade secrets of the company and our contractors,
- protection of property, assets, patents and know-how, including the non-acceptance of the use of counterfeit parts or materials,
- protection of property, property, assets, patents and know-how,
- taking care of the company's tangible and intangible assets,
- compliance with procedures regarding relations with contractors, including conducting a reliable classification of key suppliers and support in their development,
- compliance with regulations regarding fair competition and anti-trust laws,
- exercising due diligence in concluding contracts and their performance,
- building relationships with both global and local partners,
- basing business relationships on transparent and partner-like principles that enable quick clarification of doubts and conflicts,
- implementation and compliance with the rules on conflicts of interest,
- lack of tolerance for any form of corruption
- clear and transparent rules of procedure for accepting and giving gifts,
- professional approach to business, in particular the use of appropriate product liability policies,
- implementation of export control processes and compliance with economic sanctions,
- compliance with the regulations and product safety requirements.



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Environment

EXTRAL is significantly committed to environmental and climate protection, which results in the following activities:

- adopting a strategy and taking environmental measures to reduce the carbon footprint,
- implementation of innovative solutions based on the latest available technologies to reduce the consumption of raw materials and utilities,
- care for the environment in the workplace,
- raising environmental awareness in the company and its external environment,
- continuous improvement of the product life cycle,
- use of recycled material (post and pre consumer)
- implementation and continuous improvement of ISO 14001 environmental management systems and ISO 50001 energy management system,



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Society

EXTRAL carries out a number of activities related to activities for the benefit of the society, including the local community.

The principles that guide us in this area are:

- No tolerance for forced labour, slavery or human trafficking,
- Conducting charity activities,
- Conducting sponsorship activities in the field of support for amateur and professional sports,
- Sharing apprenticeships and internships,
- Co-creating the PSA trade association aimed at increasing public awareness of the possibility of using aluminium,
- Cooperation with universities and research and development institutes, including co-financing and conducting joint projects, aimed at creating innovative solutions or new applications of aluminium.



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Functioning of the Code

The Code of Ethics contains guidelines that constitute the foundations of conduct and applies to all EXTRAL employees and associates, regardless of their position or type of tasks performed.



EXTRAL enables all employees and associates to read the content of the Code. Employees and associates may submit comments regarding the provisions of the Code to the e-mail address: esg@extral.pl

In terms of contacts with suppliers, EXTRAL has a Supplier Code of Conduct.



EXTRAL has appointed a Compliance and ESG Manager whose task is to support employees in case of doubts regarding the compliance of attitudes or behaviour with the Code



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