

Code of Business Conduct



INTRODUCTION

Mueller Fabryka Świec S.A. is a leading European candle manufacturer with over 275 years of experience.

Code of business conduct determines minimal standards of behavior and principles of cooperation between Mueller Fabryka Świec S.A. (hereinafter "Company"), and contractors, suppliers, and business partners of the Company (hereinafter "Contractors").

It is also aimed at promoting integrity, ethics, and responsibility in business relations, focusing on observing law and provisions, counteracting corruption and bribery, observing social and working conditions, employee rights and respecting the environment.

COMPLIANCE WITH LAW AND PROVISIONS

Contractors are obliged to observe all valid domestic and international provisions of law and regulations, including provisions of the International Labor Organization (hereinafter: "ILO") and UN Universal Declaration of Human Rights, industry norms and any other relevant statutory requirements, irrespective of which of those impose the highest standards of conduct.

CONTINUOUS IMPROVEMENT

Mueller Fabryka Świec S.A. understands that achieving the standards set out by the provisions of this Code is not a one-off action and encourages suppliers to efforts aiming at quality improvement of their activities.

INTEGRITY IN BUSINESS

Company contractors are obliged to run their activities according to the highest ethical standards. They should observe all valid laws and provisions concerning corruption, bribery, frauds, and dishonest and forbidden business practices, which are described in a separate document of Anticorruption policy made available to Contractors.

SOCIAL AND WORKING CONDITIONS

Contractors acknowledge and engage in observing human rights of their employees, and they treat them with dignity and respect in the meaning in which these issues are seen by the international community. Company contractors observe the following standards:

FREEDOM TO CHOOSE EMPLOYMENT

Using forced, bonded labor or forced prison labor is strictly forbidden. Employment is always voluntary.

NO CHILD EMPLOYMENT

Company contractors cannot, under any circumstances, use child labor according to the ILO definition and UN convention and/or domestic law, depending on which one is more rigorous.

REMUNERATION

Company contractors are obliged to observe all valid provisions of law, regulations, and industry standards, concerning remuneration and benefits. Remuneration and benefits paid for a standard working week should at least reflect legal or industry, minimal standards and should always suffice to fulfil basic needs of employees and their families. Deductions from remunerations as a disciplinary measure are not allowed.

WORKING HOURS

Company contractors are obliged to observe all valid provisions of law, regulations and industry standards concerning working hours. Unless valid provisions of law, regulations or industry standards are more restrictive, maximum weekly work time should not regularly exceed 48 hours, and the maximum number of overtime in a single week should not exceed 12 hours. Working overtime should be voluntary, and the employer should provide at least one day off in every seven-day period.

PROHIBITION OF DISCRIMINATION, MOBBING AND VIOLENCE

Company contractors are obliged to observe all valid provisions of law and regulations that prohibit discrimination in employment and work due to race, religion, age, nationality, skin color, gender,

sexual orientation, physical ability, health condition, political views, faith or any other forbidden by law.

Company contractors are obliged to pursue a policy of equal opportunities and treatment in terms of employment and performing profession, in order to eliminate any discrimination in this area.

Company contractors do not tolerate molesting, including sexual harassment and threats, physical and psychological violence, punishments and stalking employees.

WORKING CONDITIONS, HEALTH AND SAFETY

Company contractors are obliged to provide their employees with a safe and healthy workplace, according to the valid law, regulations and industry norms.

Company contractors are obliged to provide their employees with proper working conditions that at least guarantee access to drinking water and sanitary facilities, fire safety, access to medical care in urgent instances, as well as proper heating, lighting and ventilation.

Company contractors are obliged to prevent accidents and damages to health, resulting from the work performed, connected with work or occurring in the process of work, or regularly train their employees on occupational health and safety, as well as provide proper protective clothing.

Company contractors monitor the impact of working conditions on employees, identify threats of occupational diseases and take actions aiming at protecting employee health.

Company contractors continuously improve their qualifications in terms of OHS of all employees, including obligatory and additional trainings, and they take actions, aiming at continuous improvements of OHS, treating care for employee safety as a superior value.

ENVIRONMENT

Company contractors acknowledge that caring for natural environments is an integral part of manufacturing good of high-quality, and they will observe all valid laws, provisions and industry norms concerning environmental protection, such as requirements on cleaning and removing industrial waste, controlling emission to air, recycling, managing and disposal of chemicals and waste, environmental permits and environmental reporting.

Company contractors aim at continuous improvement of environmental management system, respecting natural resources of the environment, and eliminate risk of creating a serious, environmental pollution.

INFORMATION SECURITY

Mueller Fabryka Świec S.A. attaches great importance to issues connected with information security, specifically to trade secrets, whose disclosure could damage the Company

Company contractors are obliged to maintain the highest standard of protection of shared information, which in practice means primarily that such information cannot be transferred or shared to third parties and it must be protected against unauthorized use, specifically against gaining access from the outside. Confidential information can be disclosed only when it is required by law or when it was approved for business reasons. Company contractors are obliged to observe provisions concerning personal data processing. All personal data shared by Mueller Fabryka Świec S.A., specifically personal data of our employees and co-employees are always properly secured by the Contractor. It concerns specifically IT systems used that should guarantee the proper level of cybersecurity protection.

INTERNAL ASSESSMENTS AND POTENTIAL IMPACT ON BUSINESS RELATIONS

Company contractors are obliged to conduct regular internal assessments in order to provide compliance with this Code. Mueller Fabryka Świec S.A. also reserves the right to conduct (or commission to designated persons or entities) announced audits at business partners and their facility to verify compliance with the Code.

Failure to observe this Code may result in end of the cooperation.