

# Vitrintec Sp. z o.o. purchasing policy



Vitrintec Sp. z o.o. (hereinafter: Vitrintec) aspires to be a leader in the field of comprehensive architectural solutions for office spaces and public utility places.

We want to operate on a large scale and have a strong impact on the market. We strive to act ethically and in accordance with the law with full responsibility. This commitment includes respect for this law, taking into account all persons involved in the services provided by Vitrintec.

The approach of Vitrintec Sp. z o.o. and its affiliated companies to the protection of human rights and social justice is based on the Eight Fundamental Conventions of the International Labor Organization, the Universal Declaration of Human Rights and the International Bill of Human Rights, as well as on legal acts at the national level that oblige us to respect other people. The purpose of this Vitrintec Purchasing Policy (hereinafter: Policy) is to ensure that the above principles are also observed in the supply chain created with cooperators.

Vitrintec Sp. z o.o. and related companies expect their suppliers to familiarize themselves with this document and will require the same from their suppliers and subcontractors. This policy may be amended from time to time at Vitrintec's sole discretion. The latest version of the document is available on the company's website.

Vitrintec Sp. z o.o. Purchasing Policy is a universal document that applies to all of the company's suppliers. Compliance with the standards specified in it is one of the evaluation criteria in the supplier selection process.

We believe that deviations from the content of this document or its violations are unacceptable, because they concern cardinal matters in both our daily lives and in business. Our customers or suppliers should freely report to us potential non-compliance with the content of the policy, without fear of repercussions or discrimination. Kielce, 27.08.2024 r.

*Janusz Rybka*



# Requirements

Vitrintec Sp. Suppliers z o. o. undertake to comply with the following practices and principles, as amended.

## Employees

At Vitrintec Sp. z o.o. we believe that building lasting relationships with people is the basis of our company's market success. The foundation of these activities is compliance with the provisions of the International Bill of Human Rights, fundamental rights defined in the declaration of the International Labor Organization and respect for the provisions of national labor law. We implement our approach by providing working conditions that do not violate the dignity and personal freedom of employees.

Vitrintec wants to create working conditions that are conducive to personal and professional development: we require a similar approach from our suppliers.

## Freedom of employment

Vitrintec suppliers do not use child labor, forced labor, bonded labor, involuntary labor, illegal prison labor or other forms of forced labor and do not restrict the freedom of movement of people.

Suppliers employ in accordance with the policy of equal opportunities. In the companies they manage, discriminatory practices based on race, skin color, gender, sexual orientation, disability, marital status, nationality, religion, ethnic origin or other distinguishing features of a given person are unacceptable.

Vitrintec Sp. z o.o. promotes diversity, which is an obvious source of innovation.

Suppliers are obliged to provide employees with working conditions free from any abuses and forms of inhumane treatment, including in particular sexual harassment and abuse, corporal punishment, mental or physical coercion.

Suppliers pay work in accordance with the legislation in force in a given country regulating the minimum wage, overtime rules and other employee benefits.







## Employee safety

The safety of each member of the organization is an absolute priority for Vitrintec and no compromises are accepted in this area. Suppliers are obliged to provide employees with safe and hygienic working conditions in both the physical and organizational sense. This means protection against potentially hazardous chemical or physical factors, as well as not exposing people to excessive physical strain and ensuring their safety while performing their work. Suppliers must inform employees about any hazards in the workplace and educate them on how to proceed in emergency situations.

## Diversity, equality and inclusion

Suppliers are committed to respecting diversity and ensuring an inclusive work environment. They also ensure equal employment opportunities and refrain from discrimination in the workplace, unless national law expressly provides for selection criteria. Discrimination in the workplace on the basis of age, gender, sexual orientation, race, disability, veteran status, nationality, social status, political or other beliefs, religion, union membership or other distinguishing criteria is prohibited. This applies to all aspects of human resources management, including recruitment, employment, training, pay policies and promotion. They should be based only on lawful and fair criteria.

## Freedom of association

Where required by law, suppliers shall ensure freedom of assembly and association in trade unions or other forms of employee representation.

# Environmental responsibility

By basing our operations on production and using natural resources, we set ourselves high standards for minimizing our negative impact on the environment and forms of protecting the environment. In order to maintain a sustainable supply chain, we require the same from our suppliers of raw materials and semi-finished products and other business partners. Suppliers are obliged to conduct their business in an efficient and environmentally responsible manner. They must protect natural resources, avoid the use of hazardous materials and conduct sustainable waste management, using recycling and correctly segregating waste. In particular, suppliers must comply with legal regulations and other regulations regarding the impact on the natural environment that apply to them. They should also have all the necessary documentation: permits, legalization documents, licenses and administrative decisions regarding the impact on the environment and meet the legal requirements contained in these documents. By cooperating with

us, they undertake to manage their activities, products and services in such a way as to minimize the impact on the quality of soil, water and air, as well as on biodiversity. We strongly encourage suppliers to include in their environmental activities the handling of accidents and unforeseen events, the prevention of pollution (including noise), the reduction of the consumption of natural resources and the generation of waste, and the reduction of greenhouse gas emissions into the atmosphere. Suppliers must respect the legal or customary rights of local communities to own and use land, as well as their rights to give or refuse free, prior and informed consent to activities that affect their land or natural resources, including forests and water. Suppliers undertake to avoid the use of raw materials whose acquisition directly or indirectly finances armed groups or organizations that violate human rights or threaten biodiversity and protected species.

# Management Systems

Vitrintec Sp. z o.o. has implemented and certified management system, in which international standards ISO 9001 and ISO 14001 have been integrated. We make every effort to ensure that services and products offered by Vitrintec meet quality requirements, and at the same time are manufactured with respect for nature and care for the environment, the condition of which is always close to our heart. Suppliers with whom we cooperate should have implemented management systems monitoring their development and compliance with applicable law, their own adopted policies in the area of quality, environment and health and safety, and other procedures and documents in this area. Additionally, these processes should be implemented not only in the areas of suppliers’ own activities, but also in their supply chain. As a result of introducing the above, the highest quality materials will be delivered while taking care of the natural environment and maintaining the highest standards of occupational health and safety. This is the effect that we care about most at Vitrintec.

# Fair practices

We operate in accordance with applicable national and international law, as well as signed agreements. We require the same from our suppliers.

# Conflict of interest

A conflict of interest arises when a person has private/personal interests that influence their business decisions. Situations of conflict of interest include blood or marriage ties, partnerships, business partnerships or investments. Suppliers should disclose any actual or potential conflicts of interest with Vitrintec employees and their companies. We encourage suppliers to educate employees on how to avoid conflicts of interest and explain how to respond if they occur.

# Anti-corruption

We do not accept any violations of impartial business decision-making. Vitrintec employees may not accept material benefits resulting from the functions they perform or tasks they perform. We do not accept corruption or bribery, and we expect full transparency in relations with other companies, the public sector or non-governmental organizations. Suppliers are obliged not to accept or offer, directly or through third parties, any material benefits not due to individuals/entities, resulting from the functions they perform or tasks they perform, in order to induce them to act for their own benefit or the benefit of the entity they represent. These issues are regulated in detail in the ‘Vitrintec Anti-Corruption Policy”, the provisions of which apply to both employees and suppliers cooperating with the company.

# Competition

We do not allow unfair competition, including cartel agreements and other agreements that affect prices, conditions, strategies or customer relationships, especially regarding tenders, as well as the exchange of sensitive information about other entities that may limit competition and are regulated in detail by law.

# Transparent accounting

Suppliers are obliged to keep transparent accounting, in accordance with the applicable law, on the basis of and within the framework of which they operate, and to pay taxes in the amount resulting from the legal regulations adopted in a given country.

# Avoiding contractual risk

Suppliers are obliged to comply with all regulations regarding the import and export of goods, the provision of services and the exchange of information. They are also obliged to comply with guidelines on combating international terrorism.

# Data protection

Suppliers must have technical and organizational solutions that ensure the protection of personal, financial and commercial data to the extent regulated by applicable national and international law, with a view to the safety of persons and minimizing business risk for their own organization and the companies of contractors.

# Ethics

Suppliers should have a specific set of principles and rules regarding ethics. The values and characteristics of the organizational culture, as well as all ethical principles of Vitrintec, including in relations with suppliers, are included in the document Code of Ethics and Business Conduct of Vitrintec Sp. z o.o.

# Human rights

Vitrintec strongly condemns and avoids all forms of modern slavery: forced labor, child labor, human trafficking, exploitation. They constitute a gross violation of human rights and workers’ rights. In addition to ensuring employment standards in accordance with the standards provided for by law, at Vitrintec we also ensure that employees have mutual respect and trust and do not face any form of direct or indirect discrimination.

The organization manages employees so that they can maintain a balance between private and professional life. We require the same approach to the above values from our suppliers, who are also obliged to promote them in their supply chains.

# Compliance with the suppliers’ code of conduct and this policy

Vitrintec Sp. z o.o. has introduced the Vitrintec Sp. z o.o. Supplier Code of Conduct. Its compliance is verified both continuously and after an appropriate period of time. Suppliers are required to demonstrate compliance with the principles set out in the code and to cooperate in proving that they continue to be complied with during ongoing cooperation.

In the event of detection of violations, a Verification Committee is appointed to decide on potential sanctions and/or terms of further cooperation with a given supplier. Minor failures to comply with the Code or this policy are sanctioned by the need to implement corrective actions and additional verification of data. Serious irregularities, including in particular actions that

constitute a prohibited act, may be the basis for terminating the contract with the supplier, with immediate effect.

We oblige suppliers to require their sub-suppliers to meet the standards described in this Policy and in the Vitrintec Sp. z o.o. Supplier Code of Conduct, or to comply with similar principles in the above areas, in proportion to the strength of their influence. Supplier representatives may also report any discrepancies with this document directly to the ESG Manager at Vitrintec Sp. z o.o. at the following address: [k.matalowska@vitrintec.pl](mailto:k.matalowska@vitrintec.pl). We ensure confidentiality of the report.



The Vitrintec Sp. z o.o. purchasing policy was adopted on  
September 2, 2024.

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Publications of Vitrintec Sp. z o.o.

# Reporting a violation of the regulations

Have you witnessed a situation that, in your opinion, constitutes a violation of the principles of the Vitrintec Sp. z o.o. Supplier Code of Conduct? Describe a potential or actual incident that violates the principles of the Code:

Name and surname and contact details:

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Please send your notification to the e-mail address: [k.matalowska@vitrintec.pl](mailto:k.matalowska@vitrintec.pl), or by post to Vitrintec Sp. z o.o. ul. Olszewskiego 23, 25-663 Kielce, with the note „Supplier Code”.

Vitrntec Sp. z o.o. undertakes to protect the personal data of entities submitting notifications. Information on their protection can be obtained in the Personal Data Protection Policy at Vitrintec (<https://vitrntec.pl/library/2024/06/24/polityka-ochrony-danych.pdf>) you will obtain information on the principles of their protection.



# DECLARATION OF COMPLIANCE

## of compliance with the Vitrintec Sp. z o.o. Supplier Code of Conduct

We, the undersigned, as persons authorized to represent the Supplier Vitrintec Sp. z o.o., hereby confirm that:

1. We have received and acknowledged the Vitrintec Sp. z o.o. Supplier Code of Conduct and the Vitrintec Sp. z o.o. Purchasing Policy and undertake, in addition to our usual obligations specified in the cooperation agreements with Vitrintec Sp. z o.o., to fully comply with the principles and requirements contained therein.
2. We will effectively familiarize our employees, collaborators and subcontractors with the content of these documents and oblige them to comply with their provisions.
3. In order to verify compliance with the provisions of the Vitrintec Sp. z o.o. Supplier Code of Conduct and the Vitrintec Sp. z o.o. Purchasing Policy we will verify their compliance by completing a questionnaire sent by Vitrintec Sp. z o.o..

Company name:	
Company address:	
Name, surname and position of the authorized person signing the Declaration of Conformity:	
Name, surname and position of the authorized person signing the Declaration of Conformity:	

Legible signatures of authorized persons:

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