



# **POLICY TOWARDS SUPPLIERS AND THE SUPPLY CHAIN REGARDING RESPECT FOR HUMAN RIGHTS, ETHICAL AND ENVIRONMENTAL ISSUES IN GPW GROUP**

## **Table of contents**

---

1. Purpose and scope of the document .....	2
2. Definitions and abbreviations.....	2
3. Expectations of the GPW Group towards Suppliers and Subcontractors regarding respect for Human Rights .....	3
4. Expectations of the GPW Group towards Suppliers and Subcontractors regarding ethical conduct	3
5. Expectations of the GPW Group towards Suppliers and Subcontractors regarding responsible environmental impact management.....	4
6. GPW Group's commitments to Suppliers .....	4
7. Principles for the implementation of the document .....	4

## 1. Purpose and scope of the document

---

- 1.1. The companies of the GPW Group (the "GPW Group" or the "Group") conduct their operations in compliance with the highest business standards and with a view to social, ethical and environmental concerns. This includes responsible management of the Supply Chain and relations with Suppliers of the GPW Group Companies.
- 1.2. The purpose of this Policy is to integrate responsible business and sustainable development issues/criteria into the management of the GPW Group Companies' Supply Chains. The Policy confirms the fundamental principles of best practice followed by the GPW Group Companies in relations with their Suppliers. The introduction of this Policy is an element of ethical and transparent management of the GPW Group as a responsible group of companies which addresses the challenges of sustainable development.
- 1.3. This Policy shall be applied by all the GPW Group Companies. The Policy sets out general and universal rules applicable to all Suppliers with whom the GPW Group Companies co-operate: suppliers of materials, services, tangible and intangible assets.
- 1.4. Every employee of organisational units handling relations with Suppliers in the GPW Group Companies shall be required to read this Policy and apply it accordingly.
- 1.5. For the avoidance of any doubt, a Supplier's failure to declare its compliance with the standards set out in this Policy or to apply them is not a factor precluding the GPW Group Companies from entering into relations with such Supplier. However, this factor will be taken into account as a negative in the decision-making process aimed at selection of a Supplier.

## 2. Definitions and abbreviations

---

- 2.1. **Supplier** – an entity which supplies goods or services under a written agreement entered into with a GPW Group company.
- 2.2. **GPW Group** – Warsaw Stock Exchange Group.
- 2.3. **Supply Chain** – the sequence of activities of Supplier(s) and/or Subcontractor(s) for the GPW Group Companies resulting in the delivery of ordered products and services to the GPW Group Companies.
- 2.4. **Subcontractor** – an entity which performs work for the GPW Group Companies on behalf of and under the responsibility of the Supplier.
- 2.5. **Supplier's Employee** – any natural person performing paid work for the Supplier or Subcontractor, irrespective of the form of employment or the number of working hours.
- 2.6. **Human Rights** – the fundamental, inalienable, inviolable and universal rights of every human being without regard to race, colour, sex, language, religion, opinion, national or social origin, property, birth, health or any other irrelevant criterion of distinction. The responsibility to respect Human Rights is a global standard of conduct expected of all businesses.
- 2.7. **Procurement Procedure** – an internal procedure setting out the rules for the purchase of materials, services, tangible and intangible assets by all organisational units of the GPW Group. The purpose of the procurement procedure is to ensure the most favourable financial

## POLICY TOWARDS SUPPLIERS AND THE SUPPLY CHAIN REGARDING RESPECT FOR HUMAN RIGHTS, ETHICAL AND ENVIRONMENTAL ISSUES IN GPW GROUP

and quality conditions for the purchase of goods and services in compliance with the principles of fair competition and equal treatment of Suppliers.

- 2.8. **Company** – a Company which is part of the GPW Group.
- 2.9. **GPW Procurement Team** – an organisational unit responsible for central co-ordination of procurement processes in the GPW Group.
- 2.10. **Sustainable Development** – development which meets the needs of the present without compromising the ability of future generations to meet their own needs. It aims to ensure that economic development takes place while protecting the environment whose good health underpins the overarching objective of sustainable development, namely a good quality of life for people now and in the future.

### **3. Expectations of the GPW Group towards Suppliers and Subcontractors regarding respect for Human Rights**

---

- 3.1. The GPW Group does not accept any Human Rights violations in its Supply Chain. This applies to the practices of Suppliers and Subcontractors towards their Employees (including respect for the dignity of persons employed, their right to privacy and other Human Rights).
- 3.2. The GPW Group expects Suppliers and Subcontractors to comply with applicable labour law, including standards protecting employees against discrimination and mobbing in the workplace, as well as respecting Employees' right of association.
- 3.3. Suppliers and Subcontractors of the GPW Group are obliged not to tolerate any form of slave or forced labour in their operations.
- 3.4. Suppliers and Subcontractors of the GPW Group are obliged not to tolerate in their operations any child labour which violates generally applicable laws and Human Rights.
- 3.5. In accordance with applicable laws, the GPW Group expects Suppliers and Subcontractors to provide safe and healthy working conditions and to make efforts to prevent situations that pose a threat to the life and health of Employees at the workplace.

### **4. Expectations of the GPW Group towards Suppliers and Subcontractors regarding ethical conduct**

---

- 4.1. The GPW Group expects Suppliers and Subcontractors to comply with generally applicable laws and to act in accordance with the business ethics standards set out in the Ten Principles of the UN Global Compact:
  - a) Support and respect the protection of internationally proclaimed Human Rights.
  - b) Make sure that the company is not complicit in Human Rights abuses.
  - c) Uphold the freedom of association and the effective recognition of the right to collective bargaining.
  - d) Uphold the elimination of all forms of forced and compulsory labour.
  - e) Uphold the effective abolition of child labour.
  - f) Uphold the elimination of discrimination in respect of employment.

## POLICY TOWARDS SUPPLIERS AND THE SUPPLY CHAIN REGARDING RESPECT FOR HUMAN RIGHTS, ETHICAL AND ENVIRONMENTAL ISSUES IN GPW GROUP

- g) Support a precautionary approach to environmental challenges.
  - h) Undertake initiatives to promote greater environmental responsibility.
  - i) Encourage the development and diffusion of environmentally friendly technologies.
  - j) Work against corruption in all its forms, including extortion and bribery.
- 4.2. Suppliers and Subcontractors of the GPW Group are under an obligation not to practice or tolerate any form of corruption, extortion or embezzlement. The GPW Group does not accept any such practices in its relations with Suppliers.
- 4.3. The GPW Group expects Suppliers and Subcontractors to implement internal policies or procedures to prevent corruption, extortion and embezzlement.

### **5. Expectations of the GPW Group towards Suppliers and Subcontractors regarding responsible environmental impact management**

---

- 5.1. The GPW Group expects Suppliers and Subcontractors to comply with generally applicable environmental legislation and to responsibly manage the environmental impact of their business activities.
- 5.2. The GPW Group expects Suppliers and Subcontractors to take actions aimed at minimising their negative impact on the environment, including optimising and reducing the consumption of natural resources, using resources including water and energy in an efficient manner, and striving to monitor and reduce greenhouse gas emissions arising from the activities of Suppliers and Subcontractors.

### **6. GPW Group's commitments to Suppliers**

---

- 6.1. The GPW Group is committed to ethical conduct in its relations with Suppliers, including transparent communication with Suppliers in accordance with the Procurement Procedure.
- 6.2. The GPW Group will endeavour to provide Suppliers with the necessary knowledge on its expectations regarding ethical, social and environmental issues.

### **7. Principles for the implementation of the document**

---

- 7.1. The content of the Policy is made available to Suppliers and Subcontractors in procurement proceedings. Information on the application of the Policy is also included in the annual ESG reporting in publicly available reports of the GPW Group.
- 7.2. The GPW Group expects that each potential Supplier of the GPW Group Companies which enters into a written agreement will review this GPW Group Policy. Where a Supplier co-operates with a Subcontractor for the purpose of performing an agreement with a GPW Group Company, the Supplier is expected to undertake to familiarise its Subcontractor with this Policy and to ensure that the Subcontractor is obliged to comply with its principles.

POLICY TOWARDS SUPPLIERS AND THE SUPPLY CHAIN REGARDING RESPECT FOR HUMAN RIGHTS, ETHICAL AND ENVIRONMENTAL ISSUES IN GPW GROUP

- 7.3. The GPW Group expects Suppliers selected by the GPW Group Companies as suppliers of services or products to comply with the provisions of this Policy and to sign a declaration of compliance with the principles set out herein; such declaration should be included in each agreement under which a Supplier provides services or products to the GPW Group Companies. The declaration is valid for the period of the performance of the agreement.
- 7.4. If Suppliers have any questions or concerns regarding the provisions of this Policy, they should contact the GPW Procurement Team at: [zakupy@gpw.pl](mailto:zakupy@gpw.pl).

**Declaration of familiarity with the document "Policy towards Suppliers and the Supply Chain regarding respect for Human Rights, ethical and environmental issues"**

.....

(Place/date)

.....  
(Full name of the duly authorised representative/position)

DECLARATION

I, the undersigned .....,  
acting on behalf of .....,  
declare that I have read and [as Supplier] undertake to comply with the principles contained in the document **Policy towards Suppliers and the Supply Chain regarding respect for Human Rights, ethical and environmental issues.**

I further declare that [as Supplier]:

1. I do not practice or tolerate any violation of the above Policy; and
2. in the case of co-operation with a Subcontractor, I will familiarise the Subcontractor with the content of the "Policy towards Suppliers and the Supply Chain regarding respect for Human Rights, ethical and environmental issues" and make sure that the Subcontractor is obliged to comply with the principles set out in this Policy; and
3. I have adequate and effective policies or internal procedures in place to comply with the provisions referred to in the Policy.

.....

signature