
	<b>Code of ethics</b>		<b>Code</b>	<b>K 01 01</b>
	Elaborated:	Board Representative for the Integrated Management System	Issue no:	<b>4</b>
<b>Supervised copy</b>	Checked/Approved:	President of the Management Board	Date:	19.01.2024
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## 1. Code of Conduct


- 1.1. This Code of Ethics contains the principles and ethical values that set the standards of conduct for employees of TFP sp. z o.o., and defines the rules of cooperation with our business partners. The Code comes into force on 01.03.2024.
- 1.2. The Code of Conduct is based on national laws and regulations, and international treaties and conventions such as the UN Universal Declaration of Human Rights, the Rights of the Child and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.
- 1.3. We expect both our business partners and employees to comply with all relevant laws and regulations, and the requirements set out in the standards.

## 2. Purpose

- 2.1 The aim of the code is to oblige the employees of TFP sp. z o.o. as well as business partners to behave ethically in business, and to behave ethically during business meetings with external organisations, offices and local government units. All employees and suppliers are expected to understand and comply with the basic principles contained in the code of ethics. TFP sp. z o.o. is committed to conducting its business in a responsible manner and in compliance with all applicable laws and regulations governing the conduct of business. The code is intended to assist all employees and business partners.

## 3. Values

- 3.1 TFP sp. z o.o. considers as its core values:
  - a) integrity and respect for every individual
  - b) friendly cooperation
  - c) high personal culture
  - d) solution-oriented approach
  - e) enthusiasm
  - f) development
  - g) responsibility
  - h) loyalty and humility
  - i) transparency in the pursuit of a common goal

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- j) trust
- k) occupational safety and zero tolerance for unsafe behaviour
- l) acting in accordance with the law
- m) caring for the environment
- n) supporting pro-social initiatives

## 4. Mission

4.1 Our mission is to provide the highest quality of customer service and support at every stage of cooperation in the design and manufacture of corrugated board and corrugated board packaging.

## 5. Vision

5.1 Our vision is:


- a) To provide the best quality cardboard and packaging with the utmost concern for customer welfare.
- b) To build a strong market position through high personal culture, respect for each individual and business ethics.
- c) To be an effective, modern, inspiring and safe company that is passionate and committed to achieving its goals in the spirit of sustainability.

## 6. Ethics

6.1 Ethics is an orientation towards optimal business performance, in line with the principles contained in the Code of Ethics. The basic premise is the requirement to make a conscious and unequivocal commitment to do the right thing in every situation, to be open and to act with honesty, integrity and fairness. Respect for these values and adherence to the principles serves to build an effective, honest and friendly working atmosphere and, through this, to shape the right relations between employees, as well as suppliers and customers of TFP Sp. z o.o.

## 7. Basic principles- legislation

7.1 Meeting legal requirements and ensuring the fair conduct of business is fundamental to achieving compliance with the Code of Ethics. The tasks entrusted must be carried out on the basis of the applicable legislation, taking care of the entrusted fixed assets owned by the company.

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7.2 In addition, we adhere to basic principles at all levels of our work, i.e. we are committed to being fair to each other, our business partners, neighbours, competitors and society as a whole. In return, we expect ethical behaviour from our suppliers, customers and subcontractors.

7.3 The code of ethics describes the specific requirements we place on our business partners in terms of ethics throughout the period of cooperation.

## 8. Basic definitions

8.1 **Business Partner** A company or organisation with which TFP sp. z o.o. has an agreement, as well as all subcontractors to that agreement, providing products, services, materials or components. For the purposes of this document, the term supplier refers to suppliers, service providers and other contracting parties.

8.2 **Employee** A person who performs work on a full-time or part-time basis. This includes pieceworkers, trainees and probationary employees, as well as subcontractor employees working on site for eighteen (18) or more hours per week.


## 9. Cooperation between employees, business partners (customers, suppliers, subcontractors, etc.).

9.1 Collaboration between employees and with business partners or local government units and offices should be based on:

- a) mutual trust,
- b) jointly solving current problems,
- c) mutual assistance to ensure the achievement of a common goal,
- d) the veracity of information and the principles of sound marketing and advertising,
- e) respect for intellectual property rights,
- f) adherence to rules on the preservation of confidential and proprietary information or business secrets,
- g) treating customers, suppliers, competitors and other associates impartially without taking undue advantage of them,
- h) applicable fair-play principles in business negotiations.

9.2 During day-to-day cooperation you should not:

- a) impose onerous contractual conditions that unreasonably benefit one of the parties,
- b) discuss matters concerning individual employees, competitors or current projects, production or tenders,
- c) comment on any rumours.

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9.3 When working with employees and with business partners or local government units and authorities, you should:

- a) observe reliability in payment of obligations and expect the same from your co-operators,
- b) treat customers, suppliers, competitors and other associates impartially without taking unjustified self-interest through unethical behaviour towards others,
- c) act ethically and with integrity, including in situations that give rise to potential or real conflicts of interest,
- d) present a clearly defined position on all issues to third parties,
- e) not, as a rule, provide any information on customer relations,
- f) comply with the principles of fair business practices, fair promotion and advertising, and fair competition,
- g) comply with the relevant antitrust legislation.

## 10. Competition

10.1 Competition should be based on fairness and not undermining the reputation of competitors. In dealings with competitors, employees should avoid situations that allow them to pass on confidential company information.


10.2 Do not:

- a) attempt to obtain competitive information by illegal means,
- b) use restrictive trade practices that are not in line with the law.

10.3 Internal and external relations should be guided by respect, understanding and kindness. Employees should demonstrate a willingness to cooperate and openness towards others. When any conflict arises, agreement should be sought, respecting the right to express one's views.

## 11. Gifts and entertainment

- a) In some countries it is common practice to give gifts or entertainment to customers, suppliers or other business partners.
- b) Under no circumstances should gifts be demanded.
- c) Gifts and other forms of gratitude that are part of the expected hospitality must not be contrary to local customs and must comply with local laws.
- d) Where entertainment is proposed by customers, suppliers or other business counterparties for the purpose of building general business relationships, the prior approval of the relevant internal bodies is required.
- e) On the same principle, employees of TFP sp. z o.o. should not offer costly gifts or entertainment, or any form of personal benefit to contractors.

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- f) No employee of the company shall provide impermissible benefits to contractors, local government units, the offices or their employees and agents or other third parties, or demand or allow himself or herself to be promised or accept such benefits.
- g) The use of third parties (e.g. advisers, banks, brokers, lobbyists, sponsors, agents or other intermediaries) to circumvent this rule is also unacceptable. Violation of this rule will be punished in accordance with the TFP sp. z o.o. work regulations.
- h) It is unacceptable to accept or require anything in return, or to perform something as part of an agreement, in return for a material or personal benefit.
- i) It is unacceptable to participate in forms of entertainment that are distasteful, of an erotic nature, or that otherwise violate our commitment to show respect and observe good manners, as well as negatively affect our corporate image.
- j) Any gifts should be limited to low-value promotional items and entertainment to standard signs of hospitality in conjunction with business meetings or training activities.

## 12. Conflicts of interest

- 12.1. All employees are obliged to take actions and decisions that are in the best interests of TFP sp. z o.o. This means that everyone in their position is obliged to perform their duties to the best of their ability. Employees may not carry out competing business activities in addition to their duties within our company. We refer to a conflict of interest when an employee's private activity conflicts with or affects the interests of TFP (is in competition with TFP, affects the employee's working hours or negotiated prices, etc.). For example, an employee who negotiates or approves transactions carried out with a company owned by a person related to him or her has a conflict of interest. Employees of TFP sp. z o.o should make every effort to avoid this type of situation.
- 12.2. If a conflict of interest situation arises, the employee HAS THE OBLIGATION to report it in writing to his/her superior. The superior is then obliged to take action to protect the interests of TFP sp. z o.o. in the best possible way. The superior must also inform the Management Board of TFP sp. z o.o. of the potential conflict of interest and the action taken.

## 13. Respect for human rights, dignity of the individual and forced labour

- 13.1. You should behave professionally in the workplace, showing due respect to everyone - from top managers to people who have just joined the workforce. Everyone contributes to the success of the company by:
  - a) respecting the rights, dignity and individuality of each person,
  - b) ensuring courtesy, professionalism and respect for others in interpersonal relations,

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- c) avoiding all forms of bullying and harassment,
- d) having a sense of responsibility for one's own actions and decisions.

13.2. The supervisor is obliged to resolve problem situations in a factual manner, approaching the persons who are the subject of the conflict in question with respect and deference.

13.3. Respecting human rights also means respecting the fundamental rights of workers by:


- a) helping employees improve their skills and supporting their careers within the company,
- b) fair and timely payment of wages in accordance with legal requirements and contractual terms,
- c) sound working and rest conditions,
- d) ensuring that employees are not charged with fees and costs related to the recruitment process,
- e) ensuring that no forced, bonded or prison labour is used,
- f) ensuring that the employer's actions take into account the rights and needs of the employees and their compliance with the law regarding the employment relationship, working hours, working conditions and remuneration,
- g) avoiding any action or behaviour that could damage the company's reputation,
- h) profiteering from human rights violations, which shall not be tolerated
- i) ensuring that forced labour, slave labour, unpaid labour or human trafficking is not accepted at any stage of the supply chain,
- j) ensuring that participation in practices or acts of physical, mental, verbal, sexual or any other form of harassment, or inhumane or degrading treatment is prohibited,
- k) ensuring that any form of harassment: bullying, threats and incidents of harassment are prohibited,
- l) recognising that it is prohibited to treat another human being in an object-like manner,
- m) accepting the fact that the use of corporal punishment, threats, violence, shouting or other forms of mental or physical abuse is prohibited,
- n) ensuring that the health and safety of employees is protected,
- o) ensuring that non-work-related health tests such as pregnancy and HIV are not performed.

## 14. Discrimination

14.1. All employees have the right to be treated fairly, with dignity, courtesy and respect. All forms of discrimination, inappropriate remarks or teasing jokes in daily work should be avoided both to colleagues and to contractors.

14.2. This refers to discriminating against people on the basis of their:

- a) class,
- b) racial and ethnic origin,
- c) national or social origin,
- d) skin colour,
- e) cultural differences and associated different customs,
- f) gender,

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- g) religious beliefs,
- h) sexual orientation,
- i) gender identity,
- j) political views,
- k) age,
- l) appearance,
- m) pregnancy,
- n) disability,
- o) health status,
- p) and all other forms of discrimination covered by EU regulations and national law.

14.3. Hiring decisions should be based on business requirements and the qualifications of individual applicants. Recruitment decisions should take into account the principle of equal opportunities for job applicants. Recruitment needs should be analysed against current resources and opportunities for advancement, and should be provided to employed staff where possible before external recruitment is undertaken.

14.4. The following rules apply:

- a) employees communicate both among themselves and with company management in an open manner, free from fear of retaliation, harassment, intimidation or violence,
- b) the use of: forced labour, human trafficking, slave labour, child labour and prison labour shall not be used or encouraged,
- c) no employee starting work shall be required to deposit identity documents,
- d) employees may choose to terminate their relationship at any time in accordance with applicable law and freely dispose of their identification documents,
- e) employees should strive to ensure the fullest possible communication with each other in a calm atmosphere,
- f) the employee is responsible for his or her decisions,
- g) the involvement of employees in any form of unlawful or criminal activity is not accepted,
- h) relations of the employer, supervisors with employees and between employees are based on cooperation free from bullying, discrimination, violence, vulgarity, harassment or repression,
- i) the company's managers are expected to set an example to the rest of the workforce through their ethically impeccable behaviour, and by being fair, impartial and respectful,
- j) knowledge of the guidelines, orders of procedures and common company practices at the various levels of operation and their meticulous implementation,
- k) discussing problems and intervening in cases of violation of standards of conduct,
- l) engaging in teamwork and working effectively to achieve set goals together,
- m) contributing to a working atmosphere in which trust, professionalism, efficiency, respect and self-respect are overriding factors,
- n) acting in good faith, responsibly, with due care and competence, and not presenting facts in a distorting mirror,
- o) objective action, but without subordinating actions to one own judgements,
- p) protecting the company's assets and resources and contributing to their efficient use.



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## 15. Employment of minors


- 15.1. Particular emphasis is placed on the prohibition of the employment of minors.
- 15.2. A child is any person under the age of fifteen.
- 15.3. Children are protected, and conditions are created for them to take up work, study and lead a family life.

## 16. Freedom of assembly

- 16.1. The right of all workers to freedom of association and to elect their representatives is recognised.
- 16.2. The company's management should strive to establish a transparent and collaborative relationship with employees on matters that affect them.
- 16.3. All employees have the right to represent their interests in their relationship with their employer to the full extent provided by law, including the right to form or join trade unions. Management should also strive for transparent relations with employees and to keep them informed about company activities.

## 17. Health and safety at work

- 17.1. Standards and safety regulations must be observed.
- 17.2. Provisions must be made to protect the safety and health of employees and visitors to the workplace. It is the company's duty to provide a safe and healthy workplace, as this is the only way to ensure that its values are realised.
- 17.3. Management is responsible for implementing health and safety procedures in the various departments.
- 17.4. All employees are required to familiarise themselves with and comply with health and safety procedures in order to protect themselves and those around them.
- 17.5. The company's employees are responsible for:
  - a) understanding the hazards of the job,
  - b) understanding health and safety procedures in the workplace,
  - c) applying the required group and individual safety measures in the workplace,
  - d) regular participation in training to raise awareness and knowledge of hazards and appropriate countermeasures in the workplace,
  - e) prevention of accidents and avoidance of accident-prone situations while performing work,
  - f) reporting any potentially hazardous situations observed to management or the Health and Safety Department,
  - g) cooperating with those carrying out inspections and investigations related to accidents by providing them with all possible assistance.

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## 18. Accidents, hazards and health and safety at work


- 18.1. The health and ergonomics of employees should be taken care of, as well as the application of health and safety rules, preventing accidents at work, organising periodic training in pre-medical first aid, providing well-equipped welfare facilities and enabling the use of additional medical care and sports cards.
- 18.2. The aim is to avoid accidents. However, once a serious accident or near miss has occurred, the priority is to keep people safe and eliminate the hazard. Once this has been done, the incident data should be collected and retained for analysis so that the causes of the problems can be identified and dealt with accordingly. During an accident investigation, the objective is not to determine WHO made the mistake or is responsible for the situation, but rather WHY the mistake occurred.
- 18.3. Management, with the support of the Health and Safety department, is responsible for ensuring an efficient and well-functioning system for reporting and investigating accidents, injuries and near misses in the workplace. Management is responsible for putting procedures in place and improving them as necessary, and for training employees in the use of such procedures.

## 19. Drugs, alcohol, stimulants

- 19.1. There should be an absolute company-wide ban on bringing in drugs and being under the influence of:
  - a) alcohol,
  - b) illegal or intoxicating substances,
  - c) stimulants and drugs.
- 19.2. Smoking is prohibited on company premises in non-designated areas.

## 20. Environment and sustainability

- 20.1. You are expected to conduct your activities in accordance with applicable environmental laws, regulations, and permits issued in accordance with applicable national legislation. Please remember about:
  - a) responsibility for continuously improving products and ensuring that they are as environmentally friendly as possible,
  - b) being guided by the principle of best available techniques in decision-making and production processes,
  - c) integrating sustainability principles into the company's development plans,

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- d) using advanced and environmentally-friendly technologies,
- e) anticipating and mitigating the potentially negative environmental impact of company processes,
- f) promoting new solutions with a positive impact on the environment
- g) knowledge of water sources and reducing excessive water consumption,
- h) prudent management of raw materials used in production, energy raw materials and utilities such as natural gas, compressed air, electricity and others necessary for the operation of the plant,
- i) rational planning of the production process to limit the amount of waste generated,
- j) waste segregation at source and the identification and possibility of reusing or recycling waste,
- k) verification of the eligibility of waste recipients,
- l) reducing consumption of energy and raw materials, and identifying opportunities to switch to renewable energy,
- m) verification of the sources from which raw materials purchased are sourced to ensure that they are used sustainably,
- n) the implementation of new investments respecting the principles of environmental protection based on the legislation in force.

## 21. Social responsibility

- 21.1. TFP sp. z o. o. is aware of its social responsibility and makes every effort to play an active role in society, based on partnership. Therefore, it has been supporting local institutions and social initiatives for a long time. The activities of TFP sp. z o.o. are consistent with the Global Compact, in which the United Nations defined the principles of fair labour relations and responsible corporate action.
- 21.2. TFP sp. z o. o. places emphasis on compliance with legislation that relates to environmental protection and the environmentally conscious impact of the local community.
- 21.3. Business partners are expected to be open to the needs of the local community through various sustainability activities. (Providing education, outreach activities, promoting environmental protection, providing internship or apprenticeship opportunities, etc.).

## 22. Confidentiality

- 22.1. Business and trade secrets are to be treated confidentially. Such information should not be disclosed to unauthorised persons without the prior consent of the person entitled to revoke the confidentiality clause. This obligation shall remain in force after the termination of the employment relationship or any other contractual relationship.


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## 23. Protection of personal data

- 23.1. Comply with the rights relating to privacy and data protection in accordance with the GDPR. You must comply with the protection of personal data and sensitive data arising from provisions in contracts with suppliers and recipients of goods or services and data collected internally concerning TFP sp. z o.o. directly, the disclosure of which could impair the security and competitiveness of the company or its sub-contractors.
- 23.2. Protect the data used to access the computer network, including usernames, passwords, access codes and building access cards.
- 23.3. The use of the company's electronic communication system inappropriately for the dissemination of copyrighted material, licensed material or proprietary information is not permitted.
- 23.4. The documentation is the property of the company and must not be copied or transferred outside the company without the consent of the Management Board.
- 23.5. It is not permitted to take photographs of objects, machinery, documents, etc. on company premises without the prior consent of the Management Board.
- 23.6. Protect the data used to access the computer network, including usernames, passwords, access codes and building access cards.
- 23.7. The use of the company's electronic communication system inappropriately for the dissemination of copyrighted material, licensed material or proprietary information is not permitted.
- 23.8. Theft or use of competitors' trade secrets is not permitted.

## 24. Reporting complaints

- 24.1. Any employee may report suspected violations of the law and the Code of Ethics. Violations must be reported using the company's existing procedure.  
The procedure should include the following steps:
  - a conversation with a supervisor,
  - a report of a problem should be submitted in a sealed envelope by dropping it in the complaints box.
- 24.1. Any reported problem is forwarded to the CEO, who decides how to resolve it. TFP sp. z o.o. strictly prohibits retaliation against any employee who reports a suspected violation of the law or the above code. If retaliation does occur, it must be reported immediately using the above channels.
- 24.2. Employees must be given the opportunity to communicate with the company's management in an open manner, free from fear of retaliation or deterioration of the relationship.
- 24.3. The filing of complaints at TFP sp. z o.o. is carried out in accordance with procedure [P 18 02 Procedure for counteracting bullying and filing complaints.doc](#)

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## 25. Remuneration and fringe benefits


- 25.1. The legal requirements for the minimum wage must be respected, and detailed salary information must be made available to employees.
- 25.2. Salaries and fringe benefits are calculated and paid in accordance with applicable law, including minimum wage legislation, and within the deadlines.
- 25.3. Remuneration at TFP is calculated in accordance with the TFP Remuneration Regulations.

## 26. Working time

- 26.1. At least the minimum legal requirements for maximum permissible working hours are respected. The number of working hours, including overtime, is complied with in accordance with the applicable legislation governing permissible working hours. Applicable laws and standards regarding public holidays are applied, and a transparent and reliable system of time and pay records is maintained.

## 27. Responsibility of employees

- 27.1. This Code contains the principles and ethical values which are the reference point for the actions of the employees of TFP sp. z o.o. and also for the business partners of TFP sp. z o.o.
- 27.2. Based on the principles and values indicated, the Code sets standards of conduct and serves to develop TFP as a trustworthy group that continuously improves the way in which it carries out the tasks entrusted to it.
- 27.3. As an employee of TFP sp. z o.o. as well as a business partner, we are obliged to accept and comply with the Code of Ethics, regardless of the nature of the work or the place where it is carried out. Managers must ensure that all employees reporting to them receive the necessary instruction. They are also responsible for providing guidance to employees in the context of applying the Code of Conduct in specific situations.
- 27.4. All employees and business partners embrace the values and principles of conduct contained in the code of ethics and commit to adhering to them in their daily work.
- 27.5. Each party should make every effort to ensure that its actions are seen as a good example and role model for others.
- 27.6. Based on the code, each employee or subcontractor is responsible for the company's entrusted assets of machinery tools and other goods, e.g.: machines, forklifts, company cars, computers, etc.
- 27.7. All also recognise that any dishonest, unethical or illegal conduct will constitute a breach of the Code of Ethics.
- 27.8. TFP sp. z o.o. will not tolerate any illegal or unethical activities.
- 27.9. In the event of non-compliance with the rules of conduct in force at TFP sp. z o.o. and with legal regulations, appropriate internal mechanisms and legal disciplinary measures (also resulting

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from labour law regulations) will be triggered - ranging from warning to dismissal - in order to respond adequately to this type of behaviour without regard to criminal consequences and to prevent similar situations in the future.

- 27.10. All employees and business partners are obliged to act in accordance with the ethical principles and the rules described in this document.

## 28. Concluding remarks and contact

Employees of TFP sp. z o.o. who have questions concerning the Code of Ethics of TFP sp. z o.o. may address their concerns at any time to the following e-mail address: **compliance@tfp.com.pl**.

**Activities inconsistent with the Code of Ethics should be reported to the following e-mail address: [compliance@tfp.com.pl](mailto:compliance@tfp.com.pl)**