

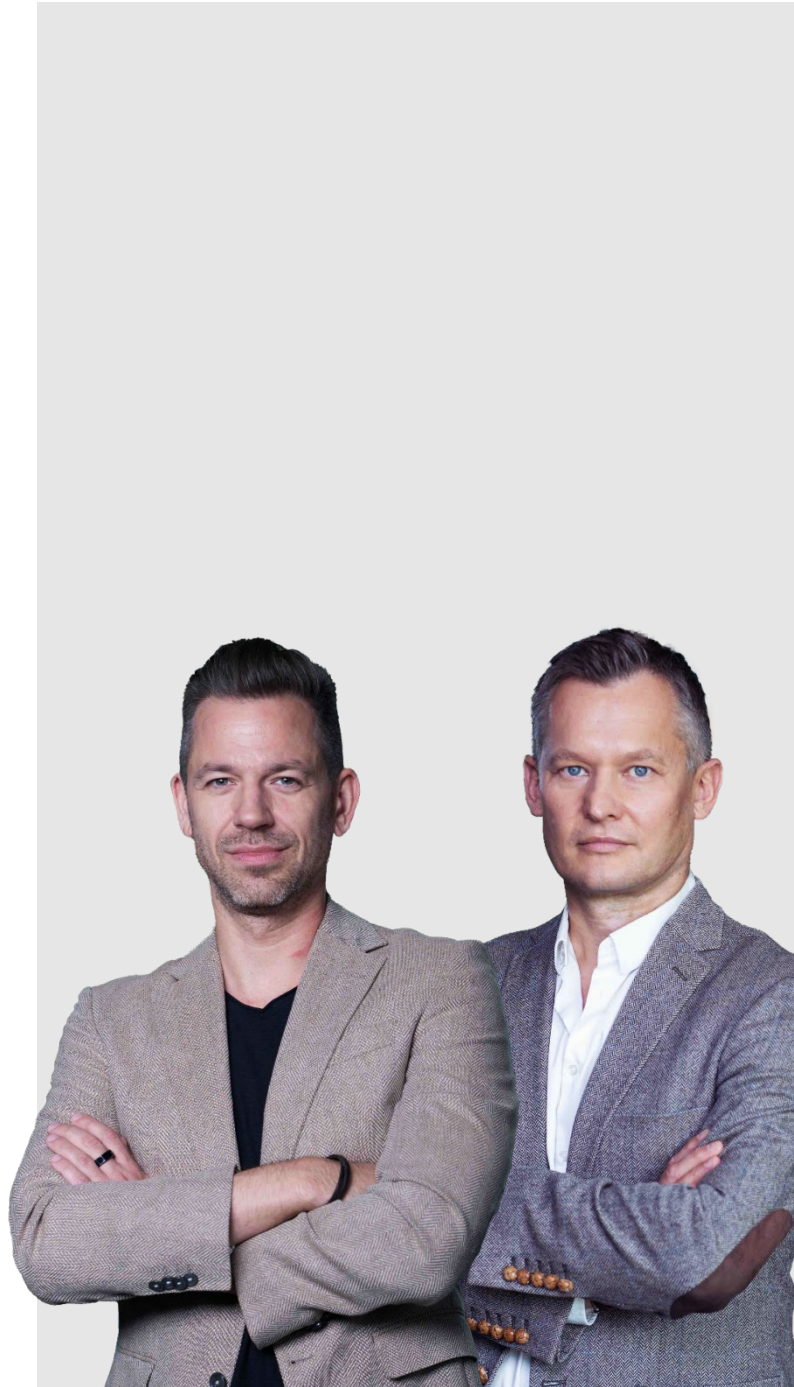


**CODE OF ETHICS
AND CONDUCT WITHIN
THE ORGANIZATION**
Glass System Technologies S.A.

CODE OF ETHICS AND CONDUCT WITHIN THE ORGANIZATION

Internal relations, the working atmosphere, and standards of conduct in daily interactions between employees are crucial to the functioning of any organization. At Glass System Technologies S.A., we strive to ensure that our workplace is not only professional but also safe, supportive, and based on mutual respect. This document sets out the rules that apply within the company—describing our expectations regarding cooperation, communication, development, and the prevention of unethical behavior. It has been created to clearly define the boundaries of responsibility and to foster an environment in which everyone feels respected and accepted, with room to act and develop, regardless of their position.

**Management Board
of Glass System Technologies S.A.**



§1. Human Rights

1. Glass System recognizes the absolute respect for human rights as a fundamental element of its organizational culture and social responsibility. All of the Company's activities comply with:
 - **The Universal Declaration of Human Rights of the United Nations,**
 - **The Conventions of the International Labour Organization (ILO),**
 - **The Charter of Fundamental Rights of the European Union,**
 - And national and international labor and individual rights laws.
2. The Company opposes all forms of human rights violations, including:
 - a) Discrimination, social exclusion, and prejudice;
 - b) Forced labor, child labor, and human trafficking;
 - c) Harassment, physical, psychological, or economic violence;
 - d) Restrictions on freedom of speech, religion, association, and beliefs.
3. Every employee, associate, and business partner has the right to:
 - a) Equal and fair treatment;
 - b) Work in an environment free from violence and fear;
 - c) Respect for their identity, dignity, and beliefs;
 - d) Report violations without fear of retaliation.
4. The Company does not cooperate with any entities that violate human rights or operate in a manner that undermines human dignity—either in Poland or abroad.
5. Glass System undertakes educational activities to raise human rights awareness among employees and implements policies to prevent their violation within the work environment and throughout the supply chain.

§2. Mutual Respect and Cooperation

1. The Company promotes an organizational culture based on respect, mutual trust, cooperation, and open communication.
2. All forms of the following are unacceptable:
 - a) Mobbing—systematic, prolonged harassment or intimidation of an employee;
 - b) Discrimination—on the basis of gender, age, nationality, religion, orientation, social status, health condition, beliefs, or other personal characteristics;
 - c) Sexual or psychological harassment;
 - d) Abuse of power or position for personal gain.
3. Every employee has the right to:
 - a) Respect for personal dignity;
 - b) A healthy, safe, and pressure-free work environment;
 - c) Express opinions and report irregularities without fear of retaliation.
4. All team members are expected to:
 - a) Be courteous and open in their interactions with others;
 - b) Provide constructive feedback;
 - c) Share responsibility for the organizational climate and the quality of cooperation.
5. Supervisors bear particular responsibility for creating a work environment based on integrity, supporting development, and resolving conflicts ethically and transparently.

§3. Professional Development and Skills Enhancement

1. Glass System treats skills development as an investment in the future of the company and an essential part of each employee's professional responsibility.
2. The Company provides development opportunities through:
 - a) Access to internal and external training;
 - b) Mentoring, coaching, and substantive support in the workplace;
 - c) Openness to promotions and internal job changes.

3. Employees are expected to:
 - a) Take initiative in seeking learning and development opportunities;
 - b) Be willing to share knowledge with the team;
 - c) Engage in activities that improve processes and work quality.
4. We support a culture of continuous improvement—believing that every person has the potential to grow, and that the organization should create conditions that unlock and effectively utilize this potential.

§4. Internal Communication and Knowledge Sharing

1. Transparent and regular communication is the foundation of effective collaboration and trust within the organization.
2. The Company encourages:
 - a) Open expression of opinions, doubts, and suggestions;
 - b) Sharing experience and knowledge across departments;
 - c) Reporting risks, errors, and potential improvements without fear of consequences.
3. The following are unacceptable:
 - a) Concealing information that affects task completion;
 - b) Deliberately misleading others;
 - c) Spreading false or harmful opinions.
4. Internal communication should be based on:
 - a) Clear and precise messaging;
 - b) Active listening;
 - c) A culture of respect for diverse perspectives and viewpoints.

§5. Response to Irregularities

1. Every employee has both a moral and organizational duty to respond to situations that violate applicable law, company policies, or the principles described in this Code.
2. The Company provides safe and confidential channels to report:
 - a) Ethical violations;
 - b) Abuses and irregularities;
 - c) Conflicts of interest.
3. Reports are handled with due diligence, respecting impartiality, confidentiality, and the protection of the reporting party.
4. Any form of retaliation against individuals acting in good faith is strictly prohibited, even if the report is not ultimately confirmed.

§6. Core Values and Ethical Principles

1. The operations of Glass System are based on the following fundamental values, which serve as a moral and operational compass for all actions undertaken by employees, management, and associates of the Company:

a) Integrity and Transparency

– We operate openly, reliably, and truthfully—towards clients, business partners, and colleagues alike. All our communications, documents, and actions are fact-based, clear, and devoid of any intention to mislead. Integrity builds trust, and transparency is a standard of our organizational culture.

b) Social and Professional Responsibility

– Each of us takes responsibility for assigned tasks, decisions, and their consequences. We act with awareness, respect for others, and care for the company, society, and the natural environment. Responsibility also includes countering unethical practices and readiness to address any irregularities.

c) Respect for Individuals and Diversity

– We create a work environment free from discrimination, prejudice, and inequality. We treat others with dignity, embracing and respecting diversity of opinions, experiences, backgrounds, gender, faith, age, and other personal traits. We believe that openness and empathy foster better relationships and more integrated teams.

d) Excellence and Quality

– We strive for the highest standards in every aspect of our work. Quality is not just a goal but a mindset. We continuously improve processes, products, customer service, and competencies to meet—and exceed—market expectations.

e) Innovation and Growth

– We seek modern technological, organizational, and environmental solutions. We are open to change and willing to learn. Every employee can contribute to the company's growth by sharing ideas, observations, and initiatives that improve organizational functioning.

2. These values form the basis of all business decisions and employee behavior. Every person acting on behalf of the Company should adhere to them, regardless of the situation, place, or context in which they perform their duties.

§7. Personal and Professional Ethics

1. All employees, associates, members of management bodies, and company representatives are expected to uphold the highest ethical standards, including:

a) Compliance with laws, internal regulations, and industry standards

– We act in accordance with applicable national and EU laws, industry regulations, technical standards, and the Company's internal policies and procedures. There is no place for shortcuts or disregarding regulations in the name of profit.

b) Loyalty to the Company

– We protect the Company's reputation, strategic interests, and image. We do not disclose confidential information, engage in competing activities, or abuse the Company's trust for personal gain.

c) Avoiding actions that could damage the Company's reputation or legal standing

– We make decisions and take actions thoughtfully, assessing their potential impact on the Company's reputation, information security, legal compliance, and stakeholder responses. We exercise caution and discretion in external contacts, public statements, and social media use. We do not tolerate hate speech and will firmly counteract it and hold its authors accountable.

d) Maintaining an organizational culture based on mutual respect, equality, and fairness

– In our internal relations, we act with empathy, personal culture, and openness. We oppose mobbing, exclusion, and prejudice. We foster an atmosphere of collaboration, transparent communication, and knowledge sharing, recognizing that the organization's success is a shared responsibility of all its members.

2. Every person employed by the Company, regardless of their position or experience, is an ambassador of Glass System's values. Any actions that violate ethics, the law, or the principles described in this Code will be treated as a serious breach of employee duties or the terms of cooperation.

