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RESPONSIBLE BUSINESS CONDUCT POLICY

Company’s value system, as well as principled approach in conducting business - are the most important factors which, in the long-term perspective, will provide to corporate sustainability and success.

All employees in the Venter companies are aware of responsible, sustainable and transparent business activities. Therefore, we have implemented into strategies, policies and procedures - fundamental responsibilities in the fields of labour, human rights, anti-corruption, data privacy & protection, environment, social and governance (ESG), as well as in ethics principle.

In practise, it means:

1. Guiding principles

- Compliance with human and labor laws, EU regulations (including data privacy and protection - GDPR), as well as Labor Inspection Authority procedures (including Arbeidstilsynet regulations for staffing enterprise).
- Compliance with Collective Agreements (including Norwegian Trade Unions Fellesforbundet, LO).
- Respect for UN Global Compact, ILO, and OECD Guidelines.
- Alignment with the Transparency Act (Åpenhetsloven), as well as Due Dilligence.

2. Human and labor rights

- Ensure equal treatment principles and non-discrimination principles.
- Respect for UN Global Compact and ILO conventions
- Zero tolerance for forced labor, child labor, harassment, and exploitation.

3. Health, safety and environment (HSE)

- Safe working places in line with regulations (including Working Environment Act for staffing enterprise, AML).
- HSE training, risk assessments, safety job analysis, as well as preventive measures.
- Promotion a culture of safety and well-being (by cyclist “Topics of the Months”, educational campaigns in social media).

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4. Environmental responsibility (ESG – E)

- Reduce CO₂e emissions according to GHG Protocol, by participation in carbon capture and storage (CCS) projects and by providing qualified personnel, contributing to the development of technologies that reduce greenhouse gas emissions.
- Efficient use of energy and resources.
- Minimalization (reduction) of wastes, recycling and segregation of municipal waste.

5. Social responsibility (ESG – S)

- Respect for diversity, equality, and inclusion.
- Involvement in charitable, sports activities and local-initiatives.
- Job creation and personal skills development, by participating in our business partners projects (hire-in employees), as well as by participating in regular training and educational programs for employees.
- Contribution to SDGs **8** (Decent Work and economic growth), **12** (Responsible consumption and production) , **13** (Climate action).

6. Governance and ethics (ESG – G)

- Anti-corruption and anti-bribery measures.
- Transparency in reporting.

7. Accountability and continuous improvement

- The Company's Management Board is responsible for policy implementation.
- Annual review and continuous improvement process.
- Confidential whistleblowing channel available.

8. Due diligence and transparency act

- Compliance with the Transparency Act (Åpenhetsloven).
- Annual reporting of Due Diligence and Transparency assessments.

9. Compliance with collective agreements

- Respect for labor law and collective agreements with trade unions (including Norwegian Trade Unions Fellesforbundet, LO).
- Guarantee of equal pay and conditions as per agreements.
- Right of employees to union representation and collective bargaining.

The **principal value** in the Vantor companies are **people**, that is the reason why we do our best to provide and ensure our employees adequate legal protection and good working conditions.

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Dębica, 14th May 2025

President of the Management Board – Janusz Urbanik

President of the Management Board – Piotr Urbanik