



P E R F E C T W A L L

Purchasing Policy of CreoConcept Sp. z o.o. Sp. k.





CreoConcept Sp. z o.o. Sp. k. (hereafter CreoConcept) aspires to be a leader in comprehensive architectural solutions for office spaces and public places.

We want to operate on a large scale and strongly impact the market. With full accountability, we strive to act ethically and legally. This commitment includes respecting the law and taking into account all persons involved in the services provided by CreoConcept.

CreoConcept Sp. z o.o. Sp. k. and related companies' approach to protecting human rights and social justice is based on the Eight Fundamental Conventions of the International Labour Organization, the United Nations Universal Declaration of Human Rights, and the International Bill of Human Rights, as well as country-level legislation that obliges us to respect the other person. This Purchasing Policy of CreoConcept (hereafter the Policy) ensures that the aforementioned principles are also observed in the supply chain created with collaborators.

CreoConcept and its related companies expect their suppliers to read this document and require the same from their suppliers and subcontractors. This Policy may be amended from time to time at the sole discretion of CreoConcept. The latest version can be found on the company's website.

Purchasing Policy of CreoConcept Sp. z o.o. is a universal document that applies to all suppliers of the company. Adherence to the standards it defines is one of the evaluation criteria in the supplier selection process.

We consider deviations from or violations of the Policy unacceptable, as they relate to matters of cardinal importance both in our everyday life and business practices. Our customers or suppliers should feel free to report potential non-compliance with the Policy to us without fear of repercussions or discrimination.

Tomáš Rybka

Requirements

CreoConcept suppliers agree to comply with the following practices and principles, as further amended.

Employees

At CreoConcept, we believe that building lasting relationships with people is fundamental to our company's market success. This is founded on respect for the provisions of the International Bill of Human Rights, the fundamental rights set out in the ILO Declaration and respect for national labour laws. We put this into practice by providing working conditions that do not violate our employees' dignity and personal freedom.

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

Freedom of employment

CreoConcept suppliers do not use child labour, nor do they use forced labour, slave labour, involuntary labour, illegal prison labour or other forms of imposed labour and do not restrict the freedom of movement of people.

Suppliers employ according to an equal opportunities policy. Discriminatory practices based on race, colour, gender, sexual orientation, disability, marital status, nationality, religion, ethnic origin, or other distinguishing characteristics of a person are not permitted in the companies they manage.

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

Suppliers are obliged to ensure that their employees have working conditions that are free from any abuse and inhuman treatment, including in particular sexual harassment and abuse, corporal punishment, mental or physical coercion.

Suppliers remunerate labour as required by state legislation governing minimum wages, overtime accounting rules and other employee benefits.

Employee safety

CreoConcept prioritises the safety of each organisation member and does not tolerate compromises in this area. Suppliers are obliged to provide their employees with safe and hygienic working conditions in physical and organisational terms. This means protecting people from potentially dangerous chemical or physical agents, preventing overexposure to physical stress, and ensuring their safety while on the job. Suppliers must inform employees of workplace hazards and educate them on how to deal with emergencies.





Diversity, equality and inclusivity

Suppliers are committed to respecting diversity and providing an inclusive working environment. In addition, they ensure equal employment opportunities and refrain from workplace discrimination unless national law explicitly provides for selection criteria. Workplace discrimination on the grounds of age, sex, sexual orientation, race, disability, veteran status, nationality, social status, political or other beliefs, religion, union membership or other distinguishing criteria is unacceptable. This applies to all aspects of human resource management, including recruitment, employment, training, pay and promotion policies. These should be based solely on lawful and fair criteria.

Freedom of association

Suppliers ensure freedom of assembly and association in trade unions or other forms of employee representation insofar as required by law.

Environmental responsibility

Basing our activities on production and the use of natural resources, we place high demands on reducing our negative impact on the environment and environmental protection. 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 conserve natural resources, avoid hazardous materials and conduct sustainable waste management by recycling and correctly separating waste.

In particular, suppliers are to comply with the regulations and other environmental impact laws that apply to them. They should also have all the necessary documentation, such as permits, legalisation documents, licences, and administrative decisions on environmental impact, and comply with the legal requirements contained in these documents. By working with us, they commit to managing their operations, products, and services to minimise the impact on soil, water, and air quality and biodiversity.

We strongly encourage suppliers to include emergency and contingency management, pollution prevention (including noise), reduction of natural resource consumption and waste generation, and reduction of greenhouse gas emissions into the atmosphere in their environmental practices.

Suppliers must respect the legal or customary property and land use rights of local communities and their rights to give or withhold voluntary, prior and informed consent to activities that affect their land or natural resources, including forests and water. Suppliers undertake to avoid using raw materials whose acquisition directly or indirectly funds armed groups or organisations that violate human rights or threaten biodiversity and protected species.

Management systems

CreoConcept Sp. z o.o. Sp. k. has introduced a certified management system integrating the international standards ISO 9001 and ISO 14001. We make every effort to ensure that CreoConcept's services and products meet quality requirements and are produced with respect for nature and care for the environment, which is of constant concern to us.

Our suppliers should have management systems in place to monitor their development and compliance with applicable legislation, their own quality, environmental, health and safety policies, and other procedures and documents in this area.

In addition, these processes should be implemented not only in the suppliers' business areas but also in their supply chains. The introduction of the above will result in the delivery of the highest-quality materials while protecting the environment and maintaining the highest health and safety standards. This is the result we care most about at CreoConcept.

Fair practices

We act in compliance with applicable national and international laws and signed agreements. We demand the same from our suppliers.

Conflict of interest

A conflict of interest arises when a person's private/personal interests influence their business decisions. Conflicts of interest include blood or marriage relationships, partnerships, business partnerships or investments.

Suppliers should disclose any actual or potential conflicts of interest with CreoConcept 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. CreoConcept employees must not accept material gain resulting from their functions or tasks. We do not accept corruption or bribery and expect full transparency in our relations with other companies, the public sector or NGOs. Suppliers are obliged not to accept or offer, directly or through third parties, any material gain not owed to persons/entities and arising from their functions or tasks to induce them to act to their own or their represented entity's advantage.

The Anti-Corruption Policy of CreoConcept regulates these issues in detail. Its provisions apply to both employees and suppliers collaborating with the company.

Competition

We do not allow unfair competition, including cartel agreements and other agreements affecting prices, terms and conditions, strategies or customer relations, especially regarding tenders, as well as the exchange of sensitive information about other entities that may restrict competition and which are specifically regulated by law.

Transparent accounting

Suppliers are obliged to keep transparent accounts in compliance with applicable laws under and within which they operate and pay taxes at the rate prescribed by the laws adopted in their country.

Avoidance of contractual risk

Suppliers are obliged to comply with all regulations concerning 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 organisational solutions in place to ensure the protection of personal, financial, and commercial data to the extent governed by applicable national and international law. This is to ensure the safety of individuals and the minimisation of business risks for their own organisation and that of their contractors.

Ethics

Suppliers should have a defined set of ethical principles and rules. The values and characteristics of CreoConcept's organisational culture and all ethical principles of CreoConcept, including those in its relations with suppliers, are contained in the Business Code of Ethics and Conduct of CreoConcept Sp. z o.o., Sp. k.

Human rights

CreoConcept strongly condemns and rejects all forms of modern slavery: forced labour, child labour, human trafficking, and exploitation. These constitute gross violations of human and labour rights. In addition to ensuring employment standards that comply with legal requirements, CreoConcept also ensures that employees have mutual respect and trust and do not face any form of direct or indirect discrimination.

The organisation manages employees so that they can maintain a balance between their private and professional lives. We require the same approach to the aforementioned values from our suppliers, who are obliged to promote them in their supply chains as well.

Compliance with the Supplier Code of Conduct and this Policy

CreoConcept Sp. z o.o. Sp. k. has introduced the Supplier Code of Conduct of CreoConcept Sp. z o.o. Sp. k. Its observance is reviewed both continuously and at appropriate intervals. Suppliers are required to demonstrate respect for the principles indicated in the Code and cooperate to prove that they continue to be respected in the course of continued collaboration.

Where breaches are found, a Verification Commission is set up to decide on possible sanctions and/or conditions for further collaboration with the supplier in question. Minor breaches of the Code or this Policy are sanctioned by the implementation of corrective measures and additional data verification. Serious irregularities, including acts that have the hallmarks of a crime, may be grounds for termination of the contract with the supplier with immediate effect.

In proportion to the strength of their influence, we oblige our suppliers to require their subsuppliers to meet the standards described in this Policy and the Supplier Code of Conduct of CreoConcept Sp. z o.o. Sp.k., or to comply with analogous rules in the mentioned areas. Supplier representatives may also report non-compliance with this document directly to the ESG Manager at CreoConcept Sp. z o.o. Sp. z o.o. Sp. k. at k.matalowska@creoconcept.pl. We ensure the confidentiality of such reports.



The Purchasing Policy of CreoConcept Sp. z o.o. Sp. k. was adopted on 2 September 2024.
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Notification of Infringement

Have you witnessed a situation that, in your opinion, constitutes a breach of the Supplier Code of Conduct of CreoConcept Sp. z o.o. Sp.k.? Describe the potential or actual incident contrary to the principles of the Code:

Full name and contact details:

Please send your notification to the following email address: k.matalowska@creoconcept.pl, or by post to CreoConcept Sp. z o.o. Sp.k. ul. Olszewskiego 23, 25-663 Kielce, with a note, 'Supplier Code of Conduct'.

CreoConcept Sp. z o.o. Sp. k. undertakes to protect the personal data of the notifiers. Please refer to the Data Protection Policy of CreoConcept (<https://creoconcept.pl/library/2024/06/11/Polityka-ochrony-danych-osobowcyh.pdf>) for information on data protection.

DECLARATION OF COMPLIANCE with the Supplier Code of Conduct of CreoConcept Sp. z o.o. Sp. k.

We, the undersigned, are authorised to represent the Supplier of CreoConcept Sp. z o.o. Sp. k., hereby confirm that:

1. We have received and acknowledged the Supplier Code of Conduct of CreoConcept

Sp. z o.o. Sp. k. and the Purchasing Policy of CreoConcept Sp. z o.o. Sp. k., and we undertake, in addition to our usual responsibilities, as specified in the cooperation agreements with CreoConcept Sp. z o.o. Sp. k., to fully comply with the principles and requirements contained therein.

2. We will effectively inform our employees, collaborators and subcontractors of the contents of these documents and oblige them to comply with their provisions.

3. To confirm the fulfilment of the provisions of the Supplier Code of Conduct of CreoConcept

Sp. z o.o. Sp. k. and Purchasing Policy of CreoConcept Sp. z o.o. Sp. k., we will submit to the verification of their compliance

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| Company name: | |
| Company address: | |
| Full name and position of the authorised person signing the Declaration of Compliance: | |
| Full name and position of the authorised person signing the Declaration of Compliance: | |

Legible signatures of authorised persons:
