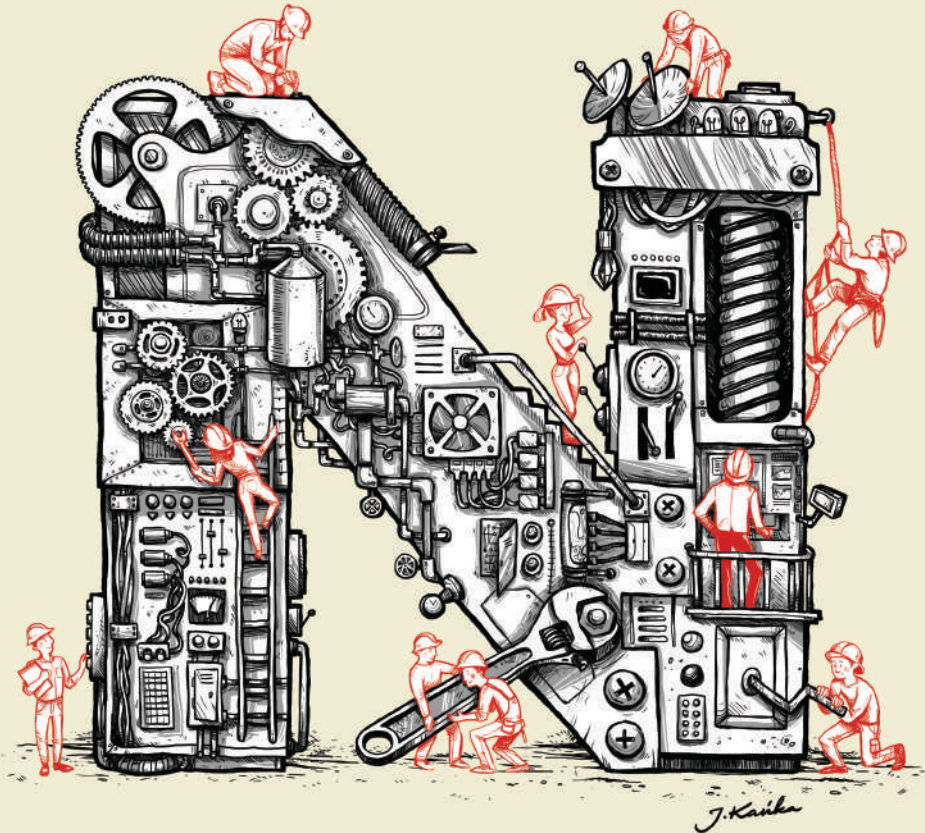




CODE OF CONDUCT

NOMAX



Introduction

Nomax Trading is aware that the growth of a company is correlated with the development of its employees, which is possible through the creation of an appropriate environment for learning and working. For such an environment, it is essential to have clear and transparent rules of cooperation, based on respect for fundamental values.

However, Nomax Trading should not be associated only with high professional qualifications and constant striving for their improvement. The way the employees treat each other and their business partners is an equally important part of the company's corporate identity. The employees, customers and partners evaluate the company in terms of performance. Ethics, transparency and making decisions based on facts are the basis of the business success of Nomax Trading. The principles of fair conduct contained in the code of the company apply both to the management and employees. Those principles are also an indication and a guarantee for the customers and partners that the cooperation with the company is based on clear rules, and the measure of success is not only the financial result but also the way of achieving it, in accordance with the adopted ethical principles, which the company follows within the organisation and in cooperation with external entities.

Compliance with the law

The business activity of the company is conducted in accordance with applicable laws and regulations. Relevant departments of the organisation (Legal, HR, Quality) monitor legislative changes on an ongoing basis, so that everything that the company does and plans is adapted to current legal standards at the national and the European Union level. Moreover, the company expects its suppliers to have up-to-date knowledge with regards to applicable national and international regulations.





Respect towards others

Equal treatment and non-discrimination

In Nomax Trading we believe that the success of the company depends on the full commitment of its employees. The company provides equal opportunities to all employees with regards to recruitment, training and promotion. All employees are treated as individuals, according to their capabilities and competencies.

The company has a procedure to counteract mobbing and discrimination, the purpose of which is to create favourable conditions for building positive relations between employees and the employer.



Occupational health and safety

In Nomax Trading we take care of the health, safety and well-being of its employees, regardless of their position. The company observes the principles of occupational health and safety and ensures decent working conditions for all employees.



Working hours

In Nomax Trading we promote a work-life balance approach among the employees.



Child labour and forced labour

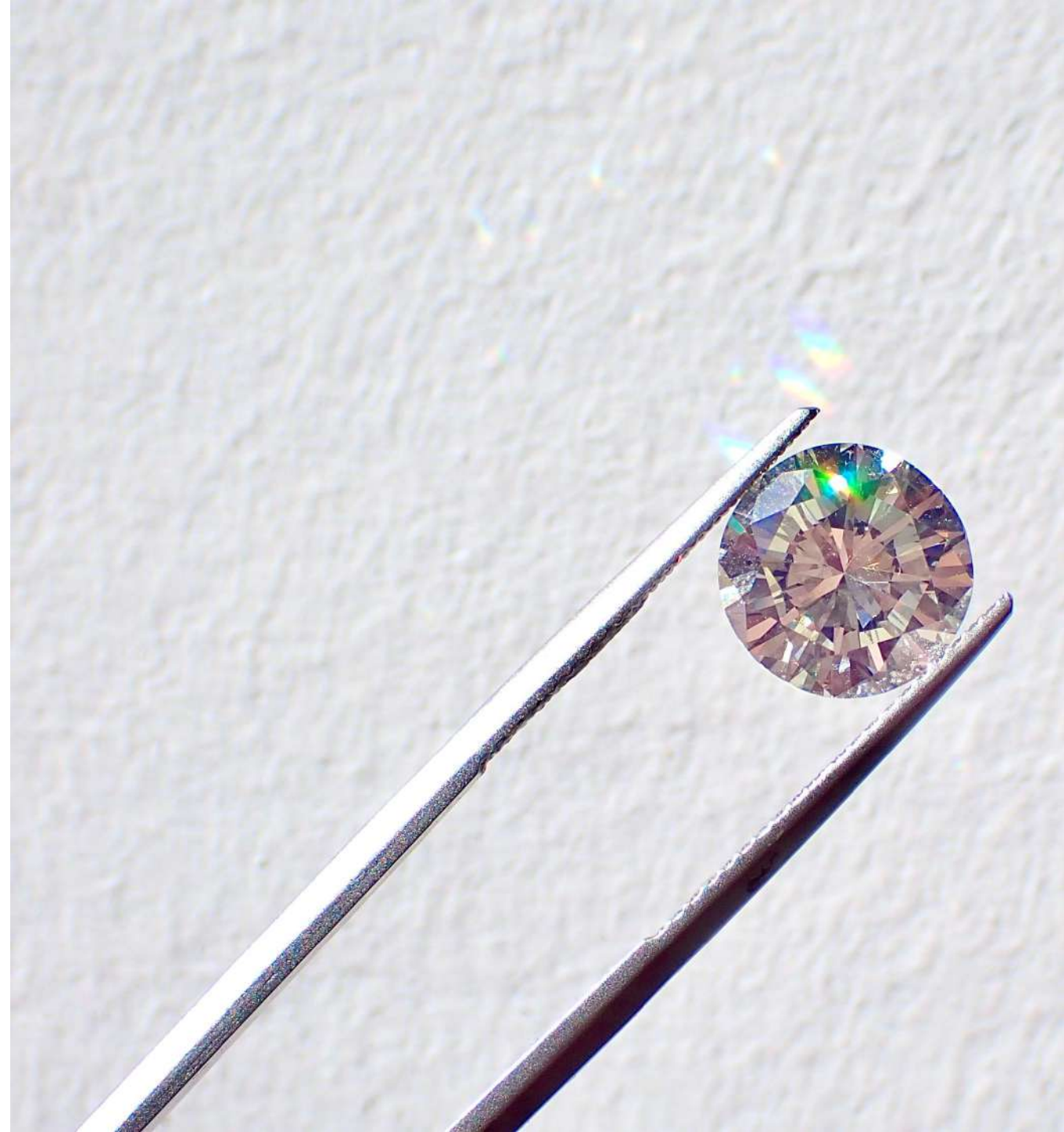
In Nomax Trading we do not participate in or benefit from child labour. The minimum age criterion for recruitment is the age of completion of compulsory education and may not be less than 16 years old, under any circumstances. We do not entrust young employees (under 18 years old) with duties that would pose a risk to their health or safety.

Product quality and safety

Taking into consideration the safety of the products sold by Nomax, we make every effort to ensure their proper quality. The Food Safety Management System is constantly improved and developed, based on international norms and standards. The safety of the products is ensured through compliance with GHP and GMP principles, constant monitoring and assessment of hazards as well as spreading the food safety culture among the employees.

The principle of the greatest care with regards to the selection of raw materials for the production is applied, the products meet the high standards of quality, health and safety and comply with environmental requirements adopted by the company.

The employees attend regular training to ensure proper quality of production, repeatability and product safety. The operations of the company are confirmed by the implemented and certified quality standard FSSC 22000.





Fair business

In Nomax Trading we make every effort to present its products accurately and to comply with all requirements of applicable law. Thanks to the above, the products delivered to customers are of appropriate quality and safe for end users, which is additionally confirmed by accompanying documents (specifications, certificates and attestation).

With regards to market activity, the company is competitive, however, at the same time, it makes sure that the competitive activities are fair and conducted in accordance with the law. Communication with partners and customers is based on clear and ethical principles, and the goal is to achieve mutually beneficial business results. Moreover, the company introduces appropriate measures to protect customer information and the scope of business relationships.

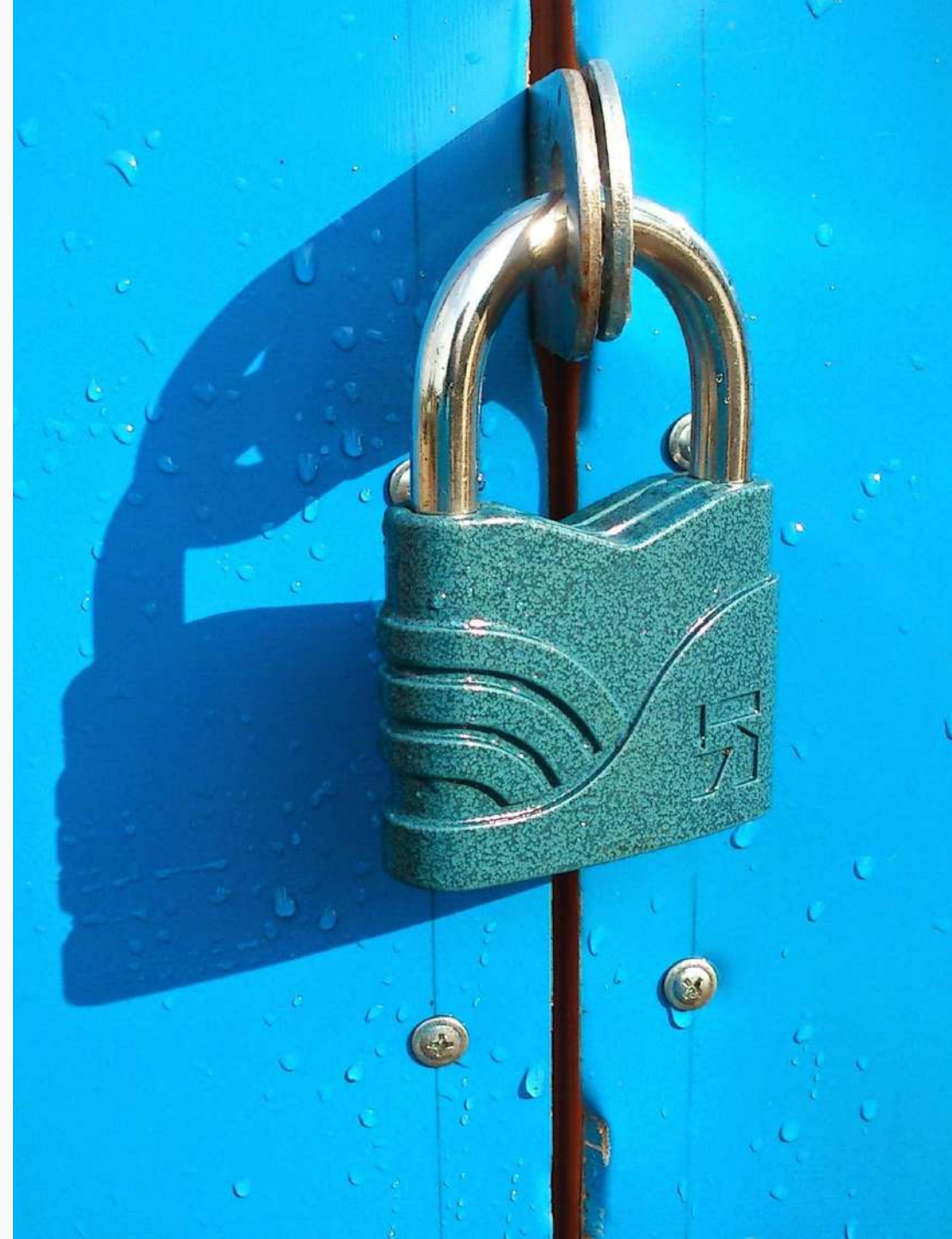
Business decisions that are made in each area of the organisation are based on the best interests of the company. Therefore, in Nomax Trading we avoid conflicts of interest and corruption as well as situations in which a private interest of a business partner or activities conducted outside of the company are in conflict with the interest of the company. Any unclear situation on that matter (whether actual or potential) is immediately disclosed and corrected so that there is no doubt that individual employees are able to make objective decisions in the areas of their responsibility.

Information protection

Confidential information

In Nomax Trading we are aware of the importance of protecting confidential information and the company constantly strives to maintain the highest standards in this respect. The company ensures that confidential information inside the organisation as well as information provided by business partners is processed only to the extent necessary to achieve the goals of Nomax Trading and its business partners.

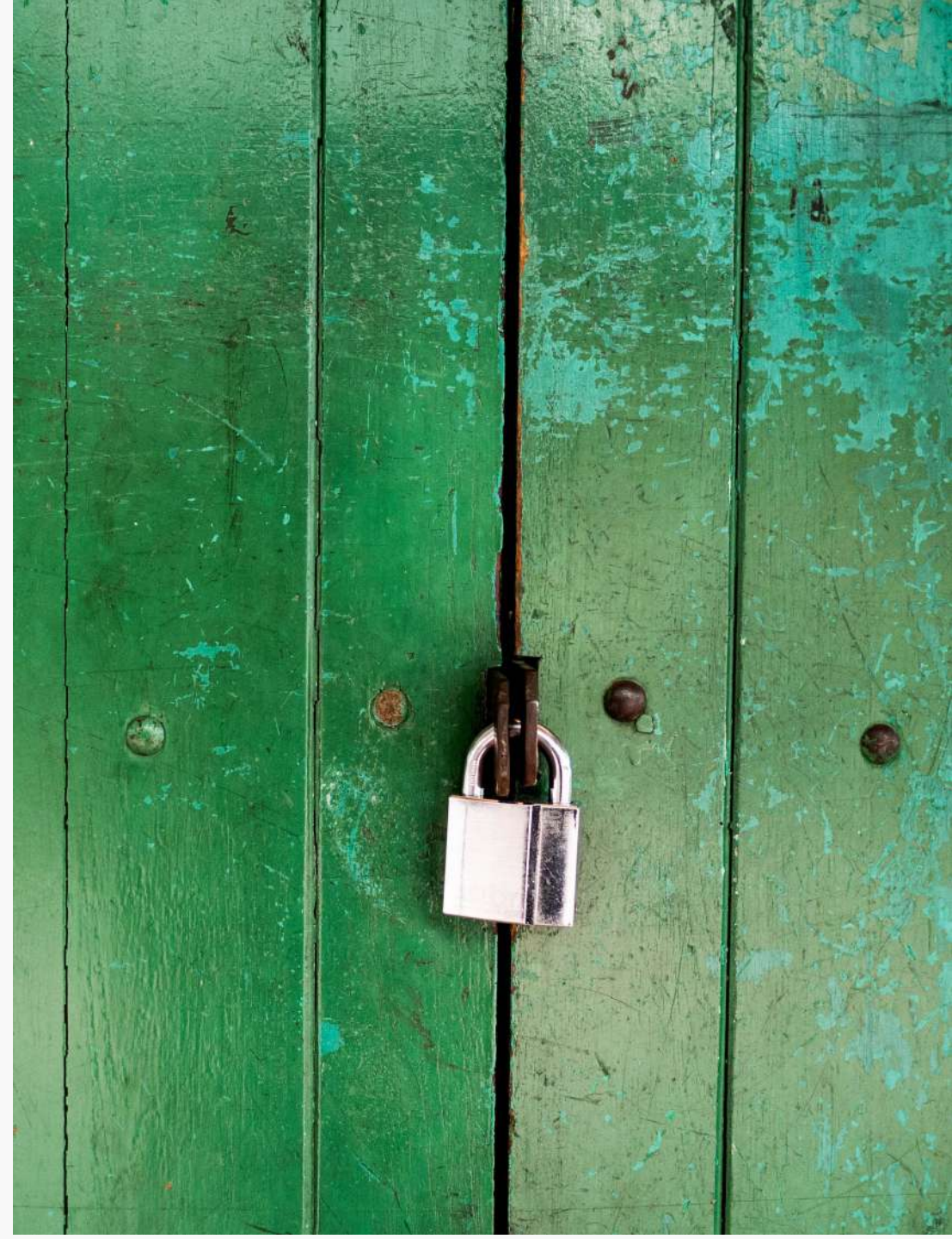
The company grants access to confidential information only to relevant persons and to such extent that the above-mentioned purposes can be achieved. The company takes the utmost care to comply with the law and contractual obligations that regulate the protection of confidential information, which is reflected in constantly monitored and updated internal procedures that define the principles and measures related to the protection of confidential information and rules of access to such data. Furthermore, access to confidential information is protected by advanced IT tools that are used to constantly monitor the IT environment of the company, at the same time, the qualified staff ensures that the tools are updated and developed on a regular basis.



Intellectual property information

As a creative leader in the food packaging industry, the company places particular emphasis on protecting intellectual property, including: patents, trademarks, copyrights, trade secrets and inventions, which are among the most valuable assets and are of critical importance in terms of designing innovative products. Moreover, aware of the importance of respecting intellectual property, the employees protect information related to property rights of Nomax Trading against loss, misuse, improper use or unauthorised or inadvertent disclosure.

At the same time, as a company for which fair competition is one of the key values, in Nomax Trading we fully respect patents, trademarks, copyrights and other intellectual property rights of other entities, including direct market competitors of the company.

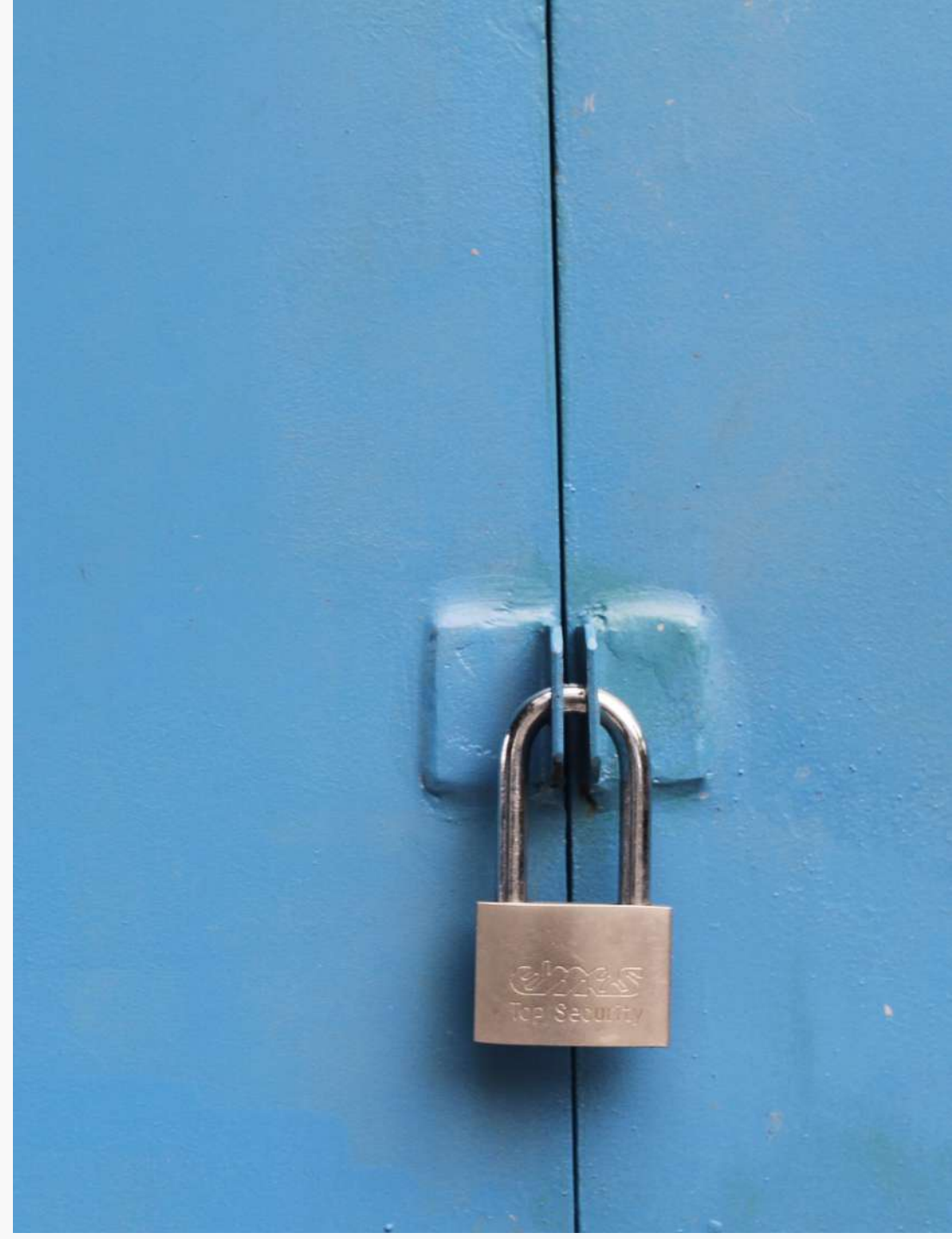


Personal data protection

In Nomax Trading we protect the privacy of its employees, business partners and other persons, therefore personal data is processed only for purposes compatible with business operations of the company and in compliance with all applicable data protection laws, in particular GDPR.

Personnel who have access to personal data stored by the company are constantly trained on applicable laws with regards to data protection and on company regulations in that area.

In Nomax Trading we never process personal data without the consent of the data subjects, if such consent is required by law, and never uses such data in a way that violates such regulations.





Natural environment

In Nomax Trading we strive to reduce the impact of its operations on the natural environment by introducing measures to reduce waste generated during production processes.

Also, to achieve the above-mentioned goal, the resources of Nomax Trading are properly managed, selective waste management is supported and other activities are carried out to reduce the negative impact of operations of the company on the environment. All new investment and development projects are evaluated in terms of environmental protection, and new operations and processes are modelled taking into account the use of pro-environmental solutions.