

Code of Conduct



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Introduction

The priority for Kleen-Tex is to conduct business in a responsible and trustworthy manner. We want our surroundings to perceive us in this way – what does this mean. Our ambition is to be an entity that communicates the values and rules of conduct it adopts, in an open and precise manner.

We have chosen to include the attitude and the way we act in this Code. This document determines the direction of our employee attitudes and actions as well as our impact on the way of building relations with the environment in which our organization functions. Above all, however, it is our commitment, which we want to remember about every day.

In this document, we emphasize what to expect from the way Kleen-Tex and its employees act. We treat all declarations contained in it with the utmost seriousness and assume our commitment to ensure that we act fully in accordance with the code of ethical conduct of Kleen-Tex. We hereby make it available to all our stakeholders.

The Code of Conduct is addressed to all employees of Kleen-Tex, irrespective of their position, seniority, form of contract, part-time status and the scope of entrusted responsibilities. The provisions of the Code are also directed to our clients, business partners, shareholders and other stakeholders operating in the environment of our company. By indicating in the code the principles that guide us, we are also convinced that the external entities cooperating with us will fully respect the content and spirit of the Kleen-Tex Code of Conduct.

Kleen-Tex Values

The Kleen-Tex Code of Conduct defines the values of our organization. They have the nature of general rules of conduct, which are tightened to specific requirements set out later in this document. The Kleen-Tex values are for us the signpost in the case when the specific situation is not directly reflected in the provisions of the Code. We also treat them as a declaration towards our stakeholders, indicating what is important for Kleen-Tex and what we always remember when building relationships with our employees and the external environment. At the same time, they are our commitment to continuous development and active development of the organizational culture, including its ethical dimension

Kleen-Tex are:

DO THE RIGHT THING, ALWAYS. Demonstrate an unwavering commitment to doing the right thing in every action you take and in every decision you make, especially when no one's looking. Always tell the truth, no matter the consequences. If you make a mistake, acknowledge it and take responsibility for making it right.

DO WHATEVER IT TAKES. Take personal responsibility for making things happen. Respond to every situation by looking for how we can do it, rather than explaining why it can't be done. Show initiative and be resourceful. Don't make excuses or wait for others to solve the problem. Find a way.

MAKE QUALITY PERSONAL. Demonstrate a passion for excellence and take pride in the quality of everything you touch and everything you do. Pay attention to the details and be a fanatic about accuracy and precision. Good is not good enough. Always ask yourself, "Is this my best work? Can I do better?"

HONOR COMMITMENTS. Be reliable and do what you say you're going to do, when you say you're going to do it. This includes being on time for all phone calls, appointments, meetings, and any commitments you make. If a commitment can't be fulfilled, notify others early and agree on a new deliverable to be honored.

BE EASY TO DO BUSINESS WITH. Find ways to keep customers happy by being easier to work with. This includes both internal and external customers. Respond to questions and concerns quickly, and keep others updated on the status of outstanding issues. Continuously seek ways to streamline and simplify our processes. Be ridiculously helpful.

BRING YOUR BEST. Have a passion for what we do and be fully present and engaged. Despite the difficulties we each sometimes face, make the most of each day by approaching every task with energy, focus, purpose, and enthusiasm. A positive attitude is contagious!

PRACTICE BLAMELESS PROBLEM-SOLVING. Demonstrate a relentless focus on finding solutions, rather than pointing fingers or dwelling on problems. Identify lessons learned and use those lessons to improve ourselves and our processes so we don't make the same mistake twice. Learn from every experience.

GET CLEAR ON EXPECTATIONS. Create clarity and avoid misunderstandings by discussing expectations upfront. Set clear expectations for others and ask when you're not clear on what's expected of you. End all meetings with clarity about action items, responsibilities, and due dates.

LISTEN GENEROUSLY. Listening is more than simply "not speaking." Give others your undivided attention. Be present and engaged. Minimize the distractions and let go of the need to agree or disagree. Suspend your judgment and be curious to know more, rather than jumping to conclusions. Above all, listen to understand.

SPEAK STRAIGHT. Speak honestly in a way that helps to make progress. Say what you mean, and be willing to ask questions, share ideas, or raise issues that may cause conflict when you feel it's necessary for team success. Be courageous enough to say what needs to be said. Address issues directly with those who are involved or affected.

BE VIGILANT ABOUT SAFETY. Safety isn't just a word; it's our number one priority. Know and practice the safety procedures for your job. Watch out for the safety of your teammates as well, for we're all part of the Kleen-Tex family. Never take shortcuts that compromise your safety or that of your teammates.

THINK ONE KLEEN-TEX. What you do affects everyone else. Don't let your own ego or personal agenda get in the way of doing what's best for the team. Think beyond your division or location. Be willing to step into another role and help a co-worker whenever necessary. Set a good example and look for opportunities to coach, guide, teach, and mentor others. We win and lose as a team.

BE RELENTLESS ABOUT IMPROVEMENT. Seek ways to get things done better, faster, and more efficiently. Don't be satisfied with the status quo and never accept "This is the way we've always done it." Guard against complacency. Innovation, improvement, and success don't come from playing it safe. Be ready to try a new way. Think differently.

DELIVER RESULTS. While we appreciate effort, we reward and celebrate results. Follow-up on everything and take responsibility to ensure that tasks get completed. Set high goals, measure and track your progress, and hold yourself accountable for achieving those results.

BE CURIOUS. In the search for the best solutions, challenge and question what you don't understand. Ask probing questions to gain more information, and listen intently to the answers. Dig deeper to better understand the customer needs or circumstances. Ask the extra question.

EMBRACE CHANGE. What got us here is not the same as what will get us to the next level. Don't be afraid to go outside your comfort zone, rather than hang on to the old ways of doing things. Be excited by the possibilities that change brings. Be flexible and open-minded.

THINK AND ACT LIKE AN OWNER. We're all an essential part of making Kleen-Tex successful. Make decisions by asking yourself, "What would I do if this were my company? What would I do if this were my own money? How will this help my company to succeed?"

HAVE A STRONG BIAS FOR ACTION. Work with a sense of urgency to get things done so we can move on to the next priority. Gather the relevant facts and evaluate your options thoroughly, then take action. Avoid analysis paralysis. Act decisively.

GO THE EXTRA MILE. Be willing to do whatever it takes to accomplish the job . . . plus a little bit more. Whether it's starting early, staying late, or doing something that's not in your job description, it's the extra mile that separates the ordinary from the extraordinary. Don't limit yourself to only doing the obvious.

WORK SMART. Be organized and plan your work for maximum efficiency. Have all the tools necessary before starting your work. Be thoughtful about your schedule, and plan ahead for your calls, your tasks, and your workday. Know the priorities and take care of them first.

TREASURE, PROTECT, AND PROMOTE OUR REPUTATION. We're all responsible for, and benefit from, the Kleen-Tex image and reputation. Consider how your actions affect our collective reputation, and be a proud ambassador for the company.

SHOW GENUINE APPRECIATION. Recognizing people doing things right is more effective than pointing out when they do things wrong. Regularly extend meaningful acknowledgment and appreciation — in all directions throughout our organization.

BE TRANSPARENT. With appropriate respect for confidentiality, share important information throughout our organization. Share the good with the bad. The more people know, the better we can collaborate. Learn to ask yourself, "Who else needs to know this?" LOOK AHEAD. Capitalize on emerging opportunities and prevent problems by anticipating future issues and addressing them in advance. Work with appropriate lead times. Be proactive, rather than reactive. Preventing issues is always better than fixing them.

MAKE A DIFFERENCE. Be an active part of your community. Give back by contributing your time, effort, and where appropriate, your money, to make your community better. Every little bit matters. You can and do make a difference.

KEEP FAMILY FIRST. Take care of your family and your health. As hectic as work can be, never lose sight of family as a priority. Maintain a sense of work/life balance. The healthier we are, the happier and more productive we become as well.

KEEP THINGS FUN. Have fun and make achieving success a game. Not everything will go the way you want so don't take things personally or take yourself too seriously. Laugh every day and enjoy your work.

Chapter I

Values and ethical principles of doing business with Kleen-Tex

1. General principles and scope of application

The values and ethical principles of doing business adopted by Kleen-Tex are a catalog of key standards in the sphere of business and ethical behavior that refer to key stakeholders: employees, clients, shareholders, business partners, local communities.

The values and ethical principles of running Kleen-Tex also define a set of common values and goals that serve to strengthen the image of Kleen-Tex as a socially responsible entrepreneur operating on the basis of professionalism and high personal culture of employees, as well as respect for each other and the whole environment. They also set standards for all partners with whom Kleen-Tex maintains business relationships.

The fundamental of the business and element of the Kleen-Tex strategy is to conduct business in a responsible manner - in accordance with the principles of sustainable development and social responsibility. Kleen-Tex minimizes the impact on the environment, improves management systems, conducts an open information policy and dialogue with the local community, cares about the safety of employees and the company's environment.

2. Compliance with the law

Kleen-Tex applies in all areas of its activity to laws, regulations and other applicable provisions of national law, European Union law and international law. We comply with industry regulations and local regulations. We comply with decisions issued by authorized offices operating at the national, regional and local levels.

3. Dealing with stakeholders

We are an entity conducting large-scale business, hence one of our ambitions is to remain a good partner in relations with all entities that are involved in our chain of values.

3.1. Customer is our business partner

Customers are one of the most important Kleen-Tex business partners. Together with them, we create the value of our company, at the same time enabling the implementation of business goals set up by our clients. Knowing how important they are to our functioning in the short and long term, we put before all our employees the duty to care for the well-being of each client. We want to build our relations on a partnership basis. It should guide our conversations about the client's expectations regarding the products offered to them, the quality of service, as well as the goals they set for themselves and the directions of their development. We make efforts to get to know them as much as possible, to adapt to constantly changing market conditions and, consequently, to gain and strengthen their trust.

Our approach to customer relations is reflected in the following principles:

- ✓ We keep our word in business relations.
- ✓ We provide our clients with access to products that meet the highest quality standards, taking into account the prices that enable each party to gain benefits.
- ✓ We actively recognize the needs of our clients and meet them, adjusting our offer and trying to support them in solving problems they face as part of their business.
- ✓ We put emphasis on building transparent and professional relations of our employees, including in particular sales representatives, with clients.
- ✓ We provide full information about our products, their properties and purpose, with the exception of information constituting company secret or subject to protection in accordance with generally applicable laws.
- ✓ We provide only reliable and accurate information about our products.

- ✓ We educate and actively build our customers' knowledge and awareness of the optimal and economical use of our products.
- ✓ We provide efficient and timely service to our clients around the world.
- ✓ We will explain complaints and criticisms from customers in good faith, in view of their legitimate interest. Each time, we analyze their causes, initiate and implement solutions to eliminate similar situations in the future.

3.2. Suppliers and cooperating entities is a key element of the value chain.

We are fully aware of the importance we must apply to continually meeting the highest standards in terms of products and services provided to our clients. To make this possible, our relationships with suppliers and other business partners must be based on integrity, transparency, professionalism and mutual respect. We claim that cooperation based on these principles will allow all entities that create the value chain to develop in a sustainable manner, while ensuring that the expectations of the recipients of all our products are met.

We base our cooperation with business partners, including suppliers, on the following principles:

- ✓ When selecting the entity with whom we want to establish cooperation, we comply with the applicable provisions of universally binding law, internal regulations, as well as the need to meet the expectations of our clients.
- ✓ We provide access to reliable information to suppliers applying for cooperation.
- ✓ We strive to ensure the protection of information provided to us by our suppliers and other business partners.
- ✓ We take our declarations seriously. We keep our commitments, we comply with them on time and in accordance with agreed commercial terms.
- ✓ We judge only on the basis of substantive and business evidence, and we only provide comments regarding our cooperation in good faith.
- ✓ We make it possible to get acquainted with the policies we have adopted, as well as the requirements regarding the terms and conditions of cooperation. We expect a similar attitude from our business partners.

3.3. We are a good member of the community

We conduct our business in various locations, surrounded by many diverse communities. We are an inseparable element of their reality. We want our relations to be based on a mutual understanding of the conditions in which we operate and on full trust as to the intentions that guide each party. We focus on open and honest communication. We undertake efforts aimed at limiting the scale of our negative impacts, while increasing the positive effects of our activities.

As a member of local communities we are guided by the following principles:

- ✓ We present an open attitude and focused on cooperation.
- ✓ In our contacts with representatives of local communities, we strive to respect their dignity and good name.
- ✓ In conflict situations, we look for solutions that would ensure respect for the legitimate interests of each party.
- ✓ We are sensitive to the needs of our surroundings.
- ✓ We do not follow our political views.

3.4. We treat the natural environment responsibly

Our duty is to care for the condition of the natural environment. It is our commitment to shareholders, employees, local communities as well as future generations. With this in mind, we strive to develop in a sustainable manner, assuming full respect for the environment.

As an entity for which the natural environment is a significant asset, we follow the below principles:

- ✓ We comply with the generally applicable laws in the field of environmental protection.
- ✓ We have established and continuously improved management systems regarding environmental issues.

- ✓ We carry out analyzes of environmental threats related to our operations, and in justified cases we undertake preventive actions.
- ✓ We focus on rational resource management, which are used in production processes.
- ✓ We strive to apply environmentally friendly technological solutions.
- ✓ We care about the environment in the workplace.
- ✓ We undertake educational activities aimed at raising the level of ecological knowledge both within the organization and in its social environment.

4. Corporate responsibility

4.1. Legal responsibility

We actively manage the risk of non-compliance with the legal requirements relating to the Kleen-Tex business. Decisions of the Kleen-Tex authorities or the initiation of actions taken inside or outside our organization are preceded by legal consultations with the participation of legal departments or specialized external law firms.

We operate on markets around the world, so we have in mind the need to ensure compliance with the requirements of the law applicable on individual markets. We also comply with international law on Human Rights Declaration.

4.2. Privacy protection, confidentiality of information and company secret

The business activity conducted by Kleen-Tex requires the collection and storage of information concerning employees, customers, suppliers and other business partners. The basic duty of each of us is their absolute protection and use only in clearly defined and legitimate purposes. Failure to observe the confidentiality of information entrusted to Kleen-Tex employees is associated not only with business consequences but also raises the risk of legal action against entities included in Kleen-Tex.

Our approach to the protection of privacy and the confidentiality of information is expressed through the following principles:

- ✓ Compliance with all regulations and rules relating to the protection of employees 'and business partners' privacy.
- ✓ Providing confidential information only to authorized persons.
- ✓ Providing confidential information only to authorized persons.
- ✓ Securing any sensitive data in case of unauthorized access to them as a result of mistake or error of an employee.

4.3. Clear and transparent communication with the market environment

In external communication, we focus on providing reliable and reliable information. We apply this approach both in relations with shareholders, as well as the media, potential investors, financial analysts and other stakeholders. Contacts with the market environment take place only through authorized employees. In terms of communication, we always remember the good of the company, its shareholders, all employees and business partners.

The basic principles we follow in communicating with the market environment are:

- ✓ We only provide messages consistent with the facts, made available in a timely manner and in accordance with the principle of equal access to information.
- ✓ We communicate in a professional manner, presenting an attitude focused on substantive cooperation and building good relationships.

4.4. We manage the conflict of interest issue

We respect the right of our employees to make their own independent decisions in the personal, financial or political sphere. However, it is the duty of employees to avoid situations that may cause a conflict of interest. A conflict of interest occurs when an employee, when taking action to benefit him or another person or entity to whom he has family, business or business obligations, is at the same time detrimental to the interest of Kleen-Tex.

Each employee is obliged to carry out the tasks entrusted to him, taking into account the interests of Kleen-Tex, as well as observing the rules and procedures established in our organization. We take business decisions impartially, having in every case the good and interest of the company in mind. This means that all forms of corrupt behavior are strictly prohibited.

4.5. Health and safety at work

The health and safety of employees is our priority. We are constantly striving to raise the level of health protection for all people employed in our organization. We shape the attitudes of employees through training. We share best practices and monitor the safety at work. We want each of us to be a model of safe behavior for others, and any observed behavior that is an example of ignoring OHS rules was met with immediate reaction.

Taking care of health and safety in the workplace, we have the following principles in mind:

- ✓ We strictly comply with all established health and safety standards.
- ✓ In situations threatening our health or safety, we act in accordance with the adopted instructions.
- ✓ We participate in training and other forms of sharing knowledge in the field of health and safety.
- ✓ We care for the safety of third parties located in the premises occupied by Kleen-Tex.
- ✓ We report all observed cases that may pose a health and safety risk in the workplace

Chapter II

Values and ethical principles of conduct of Kleen-Tex employees

1. General principles and scope of application

The source of our success, in addition to the activities that ensure the highest quality of products and services, is honesty towards stakeholders, transparency of operations and care for employees and the environment. It's all about a responsible approach to managing Kleen-Tex. The introduction and operation of the Kleen-Tex Code of Conduct is to provide a sense of responsibility for the business.

The values and ethical principles of conduct of Kleen-Tex employees indicate the desired and undesirable attitudes and behavior of employees. The values and ethical principles of the Kleen-Tex employees' conduct apply to all its employees, regardless of the position held and the type of work performed, as well as the form of employment.

2. Compliance with the law

The possessions of the company serves each of us to carry out the tasks entrusted to us, and Kleen-Tex to achieve the adopted business goals. Care for its protection and proper use is our responsibility. Carelessness, waste or the theft of our resources have a direct impact on the company's results. Intellectual property is also an important asset of our company. Its protection is of key importance for building and maintaining a competitive advantage on the market. The scientific and technical knowledge of our employees as well as the experience acquired in connection with the conducted activity are an important factor in the market presence in the long-term.

Bearing in mind the importance of company property and its intellectual property, we apply the following principles:

- ✓ We care about the company's property, we protect it against damage, loss of value or theft.
- ✓ Using the shared property of the company, we take care of it with the utmost care.
- ✓ We use the entrusted resources of the enterprise for business purposes. We do not use the company's property to achieve personal benefits
- ✓ We protect the intellectual property of our company.
- ✓ We use the logo of our company and its trademarks only in an authorized manner.
- ✓ We respect the right to intellectual property of other entities. We do not use any intellectual property in an unauthorized or dishonest way.
- ✓ We only use the licensed software on business computers

3. The internal relations

3.1. We are ethical

In our mutual relations and in contacts with the external environment, all Kleen-Tex employees assume the obligation to comply with the following principles of ethical behavior:

- ✓ We keep our word.
- ✓ We are honest. What we say remains in line with how we operate.
- ✓ We treat everyone with full respect for their dignity.
- ✓ We only use the property and information provided to us in an authorized manner.

3.2. Work atmosphere

We spend many hours working each day. We all care about a good atmosphere here. We place emphasis on cooperation, mutual trust and respect. We want the atmosphere of work to serve the creative and effective functioning of our entire organization.

Being aware of the importance of a positive work atmosphere, we are guided by the following principles:

- ✓ We build relationships within the company based on mutual respect and high personal culture.
- ✓ We oppose actions that lead to conflicts and disrupt the atmosphere of work.
- ✓ We do not behave as discriminatory on the basis of race, ethnicity, religion, sex, age or gender.
- ✓ We oppose and do not commit any forms of harassment and mobbing.
- ✓ We do not use our position for the purpose or in a way that violates the personal rights of other employees.
- ✓ We do not distribute false information about other employees or about Kleen-Tex.

3.3. Equal opportunities for employment, promotion, development and professional development

One of the key ways to ensure achieving the business objectives of our organization is to provide everyone with equal opportunities as part of recruitment processes, when assessing the effects of work, determining career development paths, making decisions about promotion, or changing the remuneration of employees. Our intention is to apply transparent criteria in relations with employees, based on their experience, results of work, potential or values they guide in the workplace.

In Kleen-Tex we adhere to the following rules:

- ✓ Employed persons applying for employment are assessed fairly, taking into account only substantive criteria.
- ✓ We communicate in a transparent and understandable way about the scope of duties and expectations related to individual positions.
- ✓ We give all employees the opportunity to develop and improve their professional skills.
- ✓ Decisions regarding the professional advancement of employees are reliably justified and taken with particular care.
- ✓ We treat each other with respect regardless of their position, seniority or experience

4. Relations with customers and stakeholders

4.1. We manage the conflict of interest issue

Every Kleen-Tex employee is obliged to adhere to the following rules:

- ✓ Avoiding situations that may result in the presence or the possibility of finding yourself in a situation of conflict of interest.
- ✓ Making a critical analysis of the situation and its assessment from the point of view of the impact on the objectivity of our actions or decisions taken in the professional sphere.
- ✓ Inform immediate superiors or the Management Board immediately about situations that constitute or could lead to a conflict of interest

4.2. The risk of corruption

The rules we follow in response to the risk of corruption are::

- ✓ We do not offer, give or promise business partners gifts, cash benefits or services that could influence their business decisions.
- ✓ We do not accept any material benefits from our business partners that could raise doubts as to their impact on our business decisions.
- ✓ We report any suspicions of corrupt behavior to the direct supervisor or Management

5. Social responsibility

As Kleen-Tex employees, we are committed to complying with high standards of pro-ecological behavior and responsibility for protecting the natural environment. Social responsibility is understood by us broadly as a responsibility for all our activities that can have an impact on the immediate environment.

Due to the nature of our business, first and foremost:

- ✓ We take action to protect the environment and participate in activities for the benefit of the local community.
- ✓ For the sake of the environment, we use only friendly technologies that do not exceed the applicable standards in the field of environmental protection.
- ✓ We use our civil rights by engaging in social and political activities as individuals

Final Provisions

Knowledge of the provisions of the Code

We have developed the Code keeping in mind all employees as well as external entities who want to learn about our policies. This code applies to all Kleen-Tex locations and will be passed on to every employee. It is the duty of each employee to read the Code and comply with its rules.

Stakeholders and employees of Kleen-Tex have the right to receive clarifications if the provisions of the Code are incomprehensible to them or they have doubts as to the scope of its application. In Kleen-Tex, the principle was adopted that they also have the right to submit comments and propose amendments to the content of the code.

Our obligations

The establishment of this Code of Conduct creates a number of obligations for those employed in Kleen-Tex:

- ✓ Proceedings in a manner consistent with the provisions of the Code.
- ✓ Consultation with the supervisor and Management Board members about the requirements of the Code.
- ✓ Reporting violations of the Code to the manager or the Management Board.
- ✓ We all have the responsibility to influence positively, through our attitudes and actions, the shape of the ethical culture of our organization. When we see the need to regulate certain issues in the code or take measures to strengthen the organizational culture of Kleen-Tex, let's talk to the supervisor or the management board of the company

Special obligations are imposed on our management and managerial staff. It is a pattern of attitudes and behaviors for all people employed in Kleen-Tex. With this in mind, the Code imposes obligations on it:

- ✓ Promote the provisions of the Code.
- ✓ Give an example of proper behaviors and conduct.
- ✓ Inform subordinate and newly hired persons about established rules of conduct.
- ✓ Initiate actions to prevent violations of the Code

Reporting Code Violations

Each Kleen-Tex employee has the possibility to report an observed event or behavior in which he or she suspects that it is a violation of the provisions of the Code. If the violation is not serious, the employee can take action to remove it. However, if the case requires the involvement of persons with appropriate knowledge or competences, the suspicion of violation of the provisions of the Code should be reported to the direct superior or the Board of the company. Kleen-Tex employees may request their anonymity to report violations, provided that this is in accordance with the law.

Drawing consequences in the event of violations of the Code

There are consequences for employees who violate the provisions of the Code. The Management Board of the company supervises the functioning of the Code and solving emerging problems. The Code is available from the direct superior and HR department. All reports of violations of ethics will be dealt with due diligence. Any violation of the rules of this Code is treated as a breach of employee duties and may result in sanctions provided for in the Labor Regulations, the Labor Code and other regulations. The Code enters into force on the day of approval by the Kleen-Tex Management Board.