

ETHICAL CODE

APPLICABLE IN THE COMPANY

**BRODNICKIE ZAKŁADY ŻELATYNY SPÓŁKA Z OGRANICZONĄ
ODPOWIEDZIALNOŚCIĄ Z SIEDZIBĄ W BRODNICY
(LIMITED LIABILITY COMPANY BASED IN BRODNICA)**





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03 INTRODUCTION

MARZENA HILDEBRANDT-BOROWSKA
CEO



Ethics and responsibility are not slogans - they are values that we translate into concrete actions in our company every day. I believe that the trust our customers, partners and associates place in us stems from our reliability, transparency and consistency in action.

Brodnickie Zakłady Żelatyny Sp. z o.o is a company with **tradition** and history, but also with the ambition of a modern, honest and socially responsible business.

We operate in accordance with the law in force and our production meets international quality standards, confirmed by certificates such as BRC, ISO 9001 or ISO 22000.

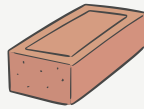
This code is **not only** a document - it is our commitment to each other, to our **customers** and to the entire environment. It is also an expression of the responsibility we take for our impact on people, the environment and partners throughout the value chain.

Our principles are in line with recognised international standards.

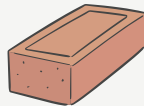
I hope it will be a signpost for all of us and a reminder that honesty, respect and responsibility always pay off - not only in business relationships, but also in long-term sustainability.

OUR FOUNDATIONS

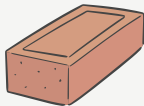
We share knowledge, skills and experience in order to collectively achieve goals that are impossible to achieve alone.



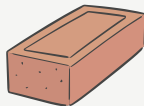
Everyone has a set of unique talents, skills and knowledge - which are the core value of our company.



In our company, respect and demands go hand in hand, which is why we believe that respect is the foundation of a healthy relationship.



Each of us is responsible for our actions and words.



It is only through ambitious goals and a consistent drive to achieve them that we can achieve real success.

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WHY, THAT IS OUR MISSION

Why do exist?

For years, we have been **creating** the natural raw material that is the basis for exceptional products enhancing the **health**, quality and enjoyment of life **around the world**.



WHO IS THE ETHICAL CODE DIRECTED TO?

Our Code of Conduct is addressed to all employees of **Brodnickie Zakłady Żelatyny Sp. z o.o.**, irrespective of which function they perform or what their full-time position is, as well as to contractors, suppliers and all persons with whom our company cooperates.

**EMPLOYEES
BRODNICKIE ZAKŁADY
ŻELATYNY SP. Z O.O**

**CONTRACTORS,
SUPPLIERS,
SUBCONTRACTORS**

**ALL PEOPLE
WHO COOPERATE
WITH BRODNICKIE
ZAKŁADY ŻELATYNY
SP. Z O.O**

REFERENCE TO THE LEGAL FRAMEWORK

Our activities are guided by international corporate responsibility standards and national and EU regulations. We comply with, among others:

**UN GUIDELINES ON
BUSINESS AND
HUMAN RIGHTS**

**ACT ON
DUE DILIGENCE IN THE
SUPPLY CHAIN**

**OECD GUIDELINES
FOR MULTINATIONALS**

**CONVENTIONS MOP,
RATIFIED
BY POLAND**

HUMAN AND WORKERS' RIGHTS

Modern business cannot function in isolation from the **core values** of dignity, freedom and equality of every human being.

Protecting **human rights** and complying with international labour standards is not only a legal obligation, but also an expression of our respect for the people we work with - both within the organisation and throughout the **supply chain**.

At **Brodnicke Zakłady Żelatyny sp. z o.o** we actively implement the principles stemming from the conventions of the International Labour Organisation (ILO), the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs), treating them as an integral part of our social responsibility strategy.

Injustice anywhere
threatens
justice everywhere

MARTIN LUTHER KING JR

WE COMMIT TO:

To respect human rights as recognised in international and national law.

Against child labour and forced labour.

Ensure freedom of association and the right to collective bargaining.

Guarantee equal treatment, prohibit any form of discrimination and respect diversity.

Ensure decent working conditions, including health and safety and fair remuneration.

Provide reliable, clear product information, adhering to global principles for marketing to children such as the IFBA and the EU Pledge.

Audits and sanctions

We reserve the right to:

Conduct regular internal and external audits of suppliers, subcontractors and other business partners.

Request documents and information necessary to assess compliance with the principles of the Code.

Organise inspection visits and review meetings at the partner's place of business.

Implement remediation plans when irregularities are identified.

Refuse further cooperation with entities that do not show a willingness to improve or commit gross violations of ethical and legal standards.

*These provisions also apply to downstream links in the supply chain (subcontractors), for whose actions our direct partners are responsible.

*The provisions of this chapter have been developed in accordance with Section 6 of the Supply Chain Due Diligence Act (LkSG).

At **Brodnickie Zakłady Żelatyny Sp. z o.o** we believe that our employees are our most valuable resource. Their commitment, skills and dedication are the foundation on which we build our success.

We strive to create a working **environment** that is safe, fair and inspiring.

An environment where every employee has the opportunity to develop their potential.

Our employee policies are based on respect, integrity and collaboration, which fosters **positive relationships** and the achievement of common goals. We strive to ensure that every member of our team feels valued and supported in their work, contributing to our mission and vision.

”

**Great things in business
are never done by one person.
They are done by a team of people.**

S. JOBS

“

communication and information flow

We require that:

Employees communicated with each other and with those outside the company in a professional and substantive manner. A culture of expression is in place.

Employees did not disclose confidential data and acted in accordance with applicable regulations.

The flow of information within the company was clear and confidential data went only to those concerned.

Employees were aware that their statements about the company affect its perception and image.

We are committed to:

Employees had access to current information about the Company, to the extent that they needed it to function.

company assets

We require that:

Employees protected all company property, from damage, theft.
They did not waste company resources.

Employees used their working time in an efficient manner.

Employees used service equipment thoughtfully.

Employees were sensible with their funds during business trips and
were able to document expenses.

We expect that:

Employees will relate respectfully to other cultures and nationalities.

Employees will treat everyone fairly, regardless of their political, religious, age, gender, nationality or social position.

We commit to:

The company's procedures, policies and criteria will be clear and aimed at ensuring equality. In addition, we will support ethical recruitment in line with the Employer Pays Principle.

Employees will always have the opportunity to report symptoms of discrimination, bullying or harassment.

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atmosphere

We expect that:

Employees will have a shared respect and trust.

Employees will be kind to each other.

We commit to:

maintaining Employees' work-life balance,
complying with regulations on working hours and paid leave.

disapproval of behaviour that violates personal rights.

disagreement with the unjustified use of their professional position.

We expect that:

Employees reported any violations to their supervisors.

Employees kept their position in order and were responsible for their own and others' safety.

Workers knew and followed health, safety and fire safety rules.

We commit to:

provide a safe and hygienic workplace for Employees.

conflict of interests

We require that:

Employees acted for the benefit of the company and were loyal to it.

Employees did not undertake extra work that interfered with the performance of their duties.

any employment outside the company, did not constitute competition.

Employees did not accept or give gifts, unless they are gifts of negligible value that do not have a commercial impact.

Employees made all business decisions impartially and reported any potential for conflicts of interest to their superiors.

Customers are at the **heart** of the business of Brodnickie Zakłady Żelatyny Sp. z o.o.

Their satisfaction, trust and loyalty are of paramount importance to us.

We are committed to providing the **highest quality** products that meet their expectations and needs. In our relations with customers, we are guided by the principles of honesty, transparency and **respect**.

We expect our clients to respect **ethical principles**, to respect human rights and to conduct their business in accordance with applicable laws and good commercial practices.

We promote open and **responsible** communication with our clients, based on mutual trust and transparency.

We expect customers not to engage our company in unethical activities, including illegal commercial practices or unfair forms of influencing purchasing decisions.

We also expect customers to be sensitive to **environmental** and social issues and to support the development of responsible supply chains.

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YOU DON'T HAVE TO BE A MIND READER-
FOCUS ON YOUR CLIENTS, KNOW THEIR NEEDS
AND PREFERENCES, AND YOU WILL BE
SURPRISED HOW OFTEN YOU KNOW WHAT THEY
WANT BEFORE THEY GET A CHANCE TO TELL YOU.

UNKNOWN AUTHOR
“

Our company provides reliable product information.

At Brodnickie Zakłady Żelatyny Sp. z o.o we are constantly improving the quality of our products.

Our company regularly undergoes external and internal audits and is open to audits at the request of clients.

The commercial proposals of Brodnickie Zakłady Żelatyny Sp. z o.o are legible and clear.

Our company strives to adapt to customer requirements.

20 SUPPLIERS

Suppliers play a key role in the value chain of Brodnickie Zakłady Żelatyny Sp. z o.o

We strive to work with suppliers who share our ethical values and commitments to conduct our business responsibly and to the highest quality standards.

We believe that strong and trusting relationships with our suppliers are fundamental to our success. We expect our suppliers, to comply with applicable legislation.

We expect our suppliers to fully comply with ethical principles, human rights and to conduct their business in a transparent, honest and legally compliant manner.

We seek to build relationships with partners who share our values and apply due diligence throughout their supply chain.

We expect suppliers not to engage our company in illegal, corrupt activities or practices that threaten the environment, health or safety.

We believe that cooperation based on mutual respect, transparency and responsibility is the foundation for sustainable success - and we expect the same from all our business partners.

**WE CAN DO SO LITTLE BY
OURSELVES; TOGETHER
WE CAN DO SO MUCH**

H. KELLER

	Brodnickie Zakłady Żelatyny Sp. z o.o verifies the reliability and credibility of its suppliers.
	Our company informs suppliers about the standards and requirements that apply at Brodnickie Zakłady Żelatyny Sp. z o.o.
	We expect our suppliers to communicate and enforce the principles of this Code to their subcontractors. All activities of supply chain partners must comply with our ethical, environmental and human rights standards.
	Our company expects suppliers to conduct their business with integrity. It is not acceptable to mislead Brodnickie Zakłady Żelatyny Sp. z o.o and their customers.

At **Brodnickie Zakłady Żelatyny Sp. z o.o** we believe that healthy and fair competition is a fundamental element of a dynamic and innovative marketplace.

We operate according to the principles of fair play, striving to achieve success through excellence in our products and services, rather than through actions that harm our competitors.

Our **aim** is not only to exceed industry standards, but also to promote ethical business practices, across the sector.

We **believe** that fair competition contributes to innovation, quality improvements and consumer benefits, and strengthens confidence in the market as a whole.

”
THE ABILITY TO LEARN FASTER THAN YOUR
COMPETITION MAY BE THE ONLY SUSTAINABLE
ADVANTAGE YOU HAVE OVER THEM.

A. DE GAUS
“

	Brodnickie Zakłady Żelatyny Sp. z o.o obtains competitive information in a lawful manner.
	Our company does not take actions that would affect the reputation of competitors.
	Our company competes in the market with integrity and fair play.
	Brodnickie Zakłady Żelatyny Sp. z o.o cooperates with competitors on industry initiatives that serve the common good.

ENVIRONMENTAL PROTECTION

At **Brodnickie Zakłady Żelatyny Sp. z o.o** we recognise that caring for the environment is an integral part of our business responsibility.

As a company that strives for sustainable development, we are committed to minimising the impact of our operations on the **world around us**.

Our **environmental** performance is in line with international frameworks, including the Basel Convention and the Paris Agreement. We aim to reduce our climate impact by optimising resource consumption, reducing CO₂ emissions and supporting solutions in line with a closed-loop economy.

“
WE HAVE ONLY ONE EARTH, AND ITS FUTURE
DEPENDS ON EACH SEEMINGLY SMALL HUMAN
ACTION, DEPENDS ON EACH OF US.

F.PLIT
”

We expect that:

all Employees will reduce the amount of waste generated through responsible management of raw materials and materials. The company takes steps to recycle and recover raw materials where possible.

We undertake that:

Brodnickie Zakłady Żelatyny Sp. z o.o will continuously monitor and optimise production processes to reduce resource consumption and emissions.

our company will comply with all applicable environmental laws and regulations. Our operations will comply with the highest environmental standards.

in our company, we will reuse materials where possible. This will reduce our impact on the environment by reducing the amount of waste generated.

we will be committed to developing technologies and production processes that are environmentally friendly. Sustainability will be a priority for us.

Reporting irregularities

Employees, co-workers, suppliers, contractors and customers have the right, and in many cases the obligation, to report suspected violations of the law, ethics or company procedures.

Reporting individuals are fully protected - the company does not tolerate any form of retaliation.

Notifications may include, but are not limited to, breaches of the law, unethical behaviour, financial irregularities, activities that threaten health, the environment, safety or product compliance.

The whistleblower may report:

- to the dedicated e-mail address: sygnalista@zelatyna.pl
- by letter to the address of the Company's registered office with the note 'to the person accepting the whistleblower's report' forwarding the report directly to that person;
- orally at the dedicated telephone number: +48 506 520 770
The conversation may be documented with the whistleblower's consent in the form of a recording; in the case of lack of consent, a protocol is drawn up reproducing the conversation;
- personally - upon the whistleblower's request, a direct meeting may be held, organised within 14 days of receiving such a request;
- if the report concerns the person accepting the report - the report may be addressed directly to the President of the Management Board (by e-mail, letter or in person).

- **Problem:** An employee is offered a part-time job with a competitor, which may affect his loyalty to his current employer.
- **Solution:** The employee is obliged to report the situation immediately to his/her supervisor and to resign from the offer if it may lead to a conflict of interest.

- **Problem:** The supplier that the company works with starts to supply lower quality raw materials, which negatively affects the final product.
- **Solution:** The company is obliged to carry out a quality audit with the supplier. If the problem is not solved, the company should consider terminating the cooperation and finding a new supplier who meets the quality requirements.

- **Problem:** The employee uses company equipment for private purposes, leading to its failure.
- **Solution:** An employee who notices a problem is obliged to report the failure immediately to his/her supervisor or the IT department.

- **Problem:** An employee inadvertently discloses confidential information when talking to someone outside the company.
- **Solution:** The employee should immediately realise the potential consequences of disclosing confidential information and stop discussing the data. It is important to realise that further discussion of confidential matters may aggravate the situation. It is the employee's responsibility to immediately inform his or her immediate supervisor of the incident. Disclosure of information, even inadvertently, can put the company at risk, so prompt reporting is essential.

- **Problem:** An employee notices that their manager regularly pressures them to perform tasks that are not in line with their job scope or exceed their competencies.
- **Solution:** The employee should first try to speak directly to the manager, expressing his or her concerns and explaining what tasks are outside his or her job description. If the problem is not resolved, the employee should report the situation to HR or directly to a senior manager to ensure that his or her responsibilities are properly defined and respected.

- **Problem:** The employee gets a gift from the supplier, but expects to accept the supplier's offer in return.
- **Solution:** The employee must refuse and immediately inform his/her immediate supervisor of the situation.

29 SUMMARY

The Ethical Code of **Brodnickie Zakłady Żelatyny Sp. z o.o** is not only a set of principles, but also an expression of our commitment to conduct our business in a responsible and transparent manner. It serves as a compass that guides our decisions and actions, ensuring that all members of the organisation act in accordance with values that build trust and respect with our stakeholders.

Every Employee in our company is an **ambassador** of these values. We strive to make our organisational culture a role model, promoting ethical behaviour in every aspect of our work. We **encourage** everyone to actively apply the principles contained in the code, enabling us to work together to build a strong, sustainable and responsible organisation.

Together, we are creating a company that not only meets expectations, but also sets standards by acting respectfully and ethically. Each of us has an impact on how we are perceived by others – let our daily actions demonstrate our commitment to conducting business in a trustworthy manner.

MARZENA HILDEBRANDT-BOROWSKA
CEO