



CODE OF CONDUCT

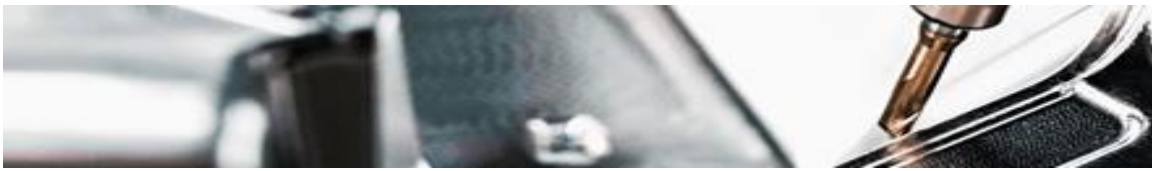
„Precision of operations in a changing world”



Kazimieruk
Precision Parts

OCTOBER 2025

ZAKŁADY MECHANICZNE KAZIMIERUK SP Z O.O. SP.K UL. POZNAŃSKA 8, 62-080 TARNOWO PODGÓRNE



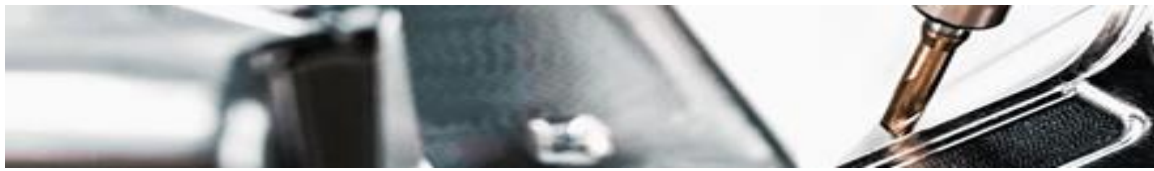
INTRO

Ensuring precision execution in a dynamically changing environment requires creating a secure organization in which the team can work and focus on their goals. Our Code of Conduct is our guiding principle, which aims to eliminate any "disruptive" factors that threaten the organization, its employees, and ultimately, its clients.

The ZMK Code of Conduct intertwines with our quality and environmental goals. The organization's primary goal is to build partnerships and lasting relationships with its clients. Lasting relationships are the result of long-term collaboration, mutual understanding, learning, and, above all, building trust.

At the beginning of a collaboration, you need to trust the image. Over time, you trust the experience and quality that comes with working with ZMK.

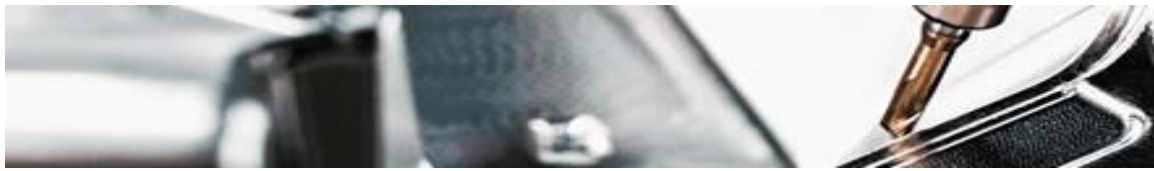
***„Image is what people
think we are; integrity is
what we really are”
— John C. Maxwell***



MILE STONES

- 1958 Józef Kazimieruk opens a professional workshop in his home garage. Within a few years, the facility expands and responds to the needs of the local and Polish markets
- 1982 Józef Kazimieruk hands over the company to his son Tadeusz Kazimieruk, who over the next few years develops the plant, invests in modern machines, acquires foreign clients and gives a new global direction to the organization
- 2001 The management board is establishing a certificate confirming its quality, which has been trusted by hundreds of customers over the years. ZMK undergoes an audit and receives the ISO 9001 Quality Certificate.
- 2012 A major move to a modern production facility in Tarnów Podgórne. This is where the company expands its reach into new industries and countries around the world.
- 2016 The Unique Tools brand enters the market. Specialized machining tools designed and manufactured by ZMK
- 2017 Implementation of the ISO 14001:2015 environmental standard. Integration with ISO 9001 – the moment when the organization confirmed its approach to environmental protection based on minimizing negative impacts. No significant environmental aspects were identified in ZMK's operations
- 2021 The family business is passing into the hands of the next generation. After many successful years, Tadeusz Kazimieruk hands the company over to his children. Anna Przewoźna becomes president, and together with her brother Piotr Kazimieruk, they expand the company into new markets and industries.
- 1958 do dzisiaj Throughout the entire period of operation, investments in machinery and measuring tools are made.





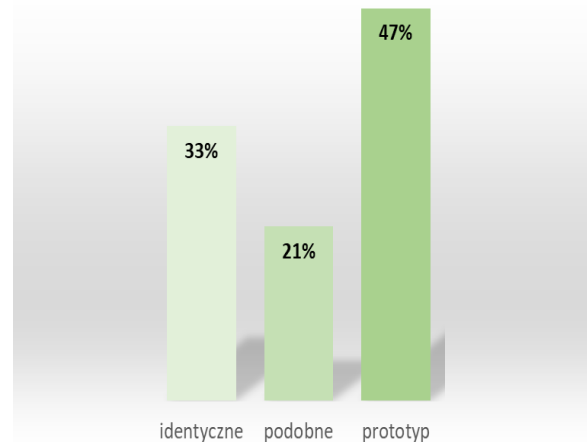
CONTEXT OF THE ORGANIZATION

The family-owned nature of the company, combined with the specific nature of the industry in which ZMK operates, gives it a unique character. Looking back, one sees growth and a commitment to new solutions, the management's investment in modern machinery, and an openness to new technological solutions. Looking forward, one sees an organization open to new industries and new products, adapting to their expectations, going far beyond simply processing materials according to drawings. ZMK seeks challenges and expects the same from its team: flexibility, openness, and a willingness to discuss solutions that benefit both customers and ZMK.

To fully understand the context, it's important to understand ZMK's core business. The company develops prototype projects with clients, performs reverse engineering tasks, and, thanks to its experienced team of engineers, undertakes numerous new tasks with high quality and functionality risks.

Risk management is embedded in our daily routine and relies on the knowledge and experience of our team. The structure of our services includes:

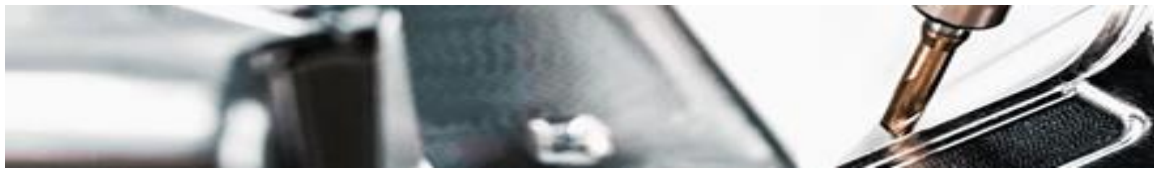
- 47-50% single unit prototype orders per year
- over 20% these are also prototypes, but they carry less risk due to similar features to the previous ones (similar)
- over 30% are repeat projects



This service structure is driven by customer needs and thanks to the competence and flexibility of the ZMK team and risk management, we can meet customer expectations.

We adapt to the ever-changing needs of our customers and become a partner in solving their problems. This is possible by adhering to the principles we share with you in this Code of Conduct.

We want to ensure precision in what we do, despite the rapidly changing world around us.



INTERESTED PARTIES

Strony zaangażowane w całe otoczenie organizacji. W kodeksie postępowania określamy się na tych krytycznych

1. Customers:

The Technical and Sales Department is responsible for customer communication within the Customer Service process. Participants in other internal processes and administration may only contact customers directly in consultation with the Project Engineer or upon request from the Management Board.

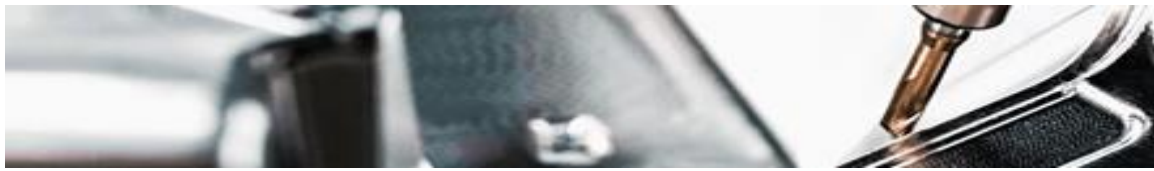
The purpose of such an organized flow of information is:

- a) ensuring the Project Engineer is aware of all client matters
- b) ensuring the confidentiality of content and control of the information provided
- c) avoiding information chaos
- d) customer protection against unjustified and unnecessary contacts

Protection of the Client's intellectual property

Organizational and Customer Data Protection – Non-competition Agreement. Employees are familiar with the full scope of this agreement upon commencement of employment at ZMK and confirm their commitment to comply with the rules by signing. Definition: EMPLOYER'S TRADE SECRET IS any information, data, or messages: technical, technological, production, commercial, marketing, economic, financial, know-how, personnel, investment, or organizational, in any way related to or connected with the Employer. Key Principles:

- a) The Employee undertakes to keep strictly confidential and not to transfer or disclose to third parties, as well as not to use (without the Employer's consent) for purposes other than directly related to the performance of official duties, any information related to the Employer's activities constituting the secret of its business, during the term of the employment relationship with the Employer and for a period of 5 (in words: five) years after the termination of this employment relationship.
- b) The Employee undertakes that during the period of the employment relationship between the Parties he/she will not conduct any activity competitive to the Employer



2. Suppliers:

Cooperation with Suppliers: ZMK obliges every supplier accepting an order to adhere to the 5 Principles of a Reliable Supplier. The document is available on the organization's website.

The rules are:

- On Time Delivery
- Compliance of delivery
- Environmental protection awareness i legal compliance (including 3TG)
- Respect of ethical behavior
- Respect of standards like ISO 9001:2015, 14001:2015 whenever confirmed ha supplier is certified
- Each supplier is obliged to comply with the 5 Principles of a Reliable Supplier available on the ZMK website

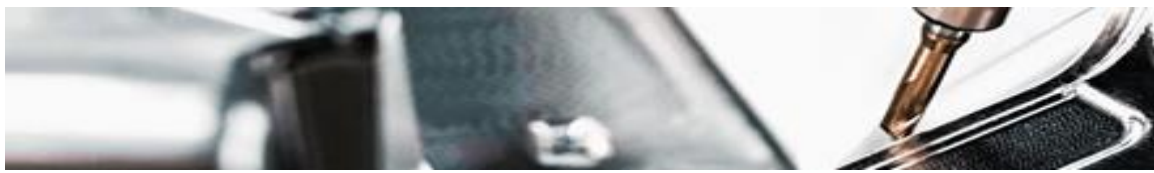
3. Employees:

ZMK employs all employees transparently, in accordance with regulations, pays required contributions, and acts as an intermediary in the transfer of income tax contributions. It provides employees with social facilities and makes every effort to ensure working conditions promote well-being both during winter and hot summer days. ZMK was one of the first production halls in the region to implement environmentally friendly cooling (evaporative cooling system).

The organization offers the opportunity to take advantage of private medical care at very attractive prices, sign up for group insurance, and offers interesting sports packages.

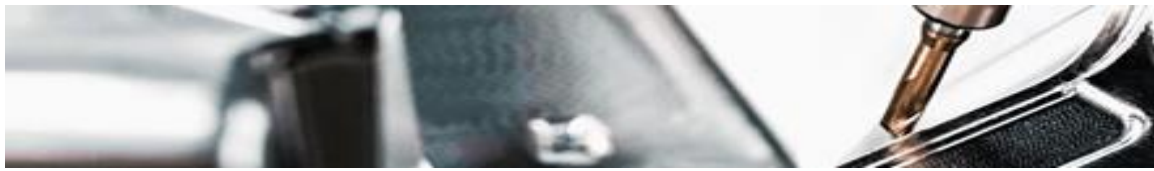
4. Other interested parties:

ZMK operates in constant interaction with its external environment. Communication and all collaboration are conducted within processes, appropriate to the specific subject matter. Process Owners and the Management Board are responsible for these contacts. The principles of respect, confidentiality, and maintaining ZMK's reputation are paramount.



HUMAN RIGHTS RESPECT

- **Personal dignity:** treating another person with respect, without violating their dignity and personal rights
- **Protection of personal rights:** protection of image, privacy, personal rights, confidentiality of correspondence, elimination of actions such as defamation or insult
- **Equal treatment:** Equal rights resulting from the equal performance of equal duties; this applies in particular to the equal treatment of men and women in employment. Any discrimination in employment, direct or indirect, in particular on the basis of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, denomination, sexual orientation, as well as employment for a fixed or indefinite period, or full-time or part-time, is unacceptable.
- **Health and Safety at work:** The employee is familiarized with the full scope of the employment relationship at ZMK and confirms with a signature the obligation to comply with the rules. Employee protection at the workplace is regulated by:
 - ✓ensuring safe working conditions for employees
 - ✓prevention of potential accidents, occupational accidents and occupational diseases
 - ✓minimizing or eliminating the causes of threats
 - ✓occupational risk assessment for young, expectant and breastfeeding mothers
- **Decent salary conditions:** work always with a contract, rates adequate to competences and work performed, in accordance with the regulations
- **Elimination of all forms of slavery and forced labor:** ZMK prohibits child labor, coercion, slavery, and uncontracted work. The company operates in the Polish market, subject to European standards that eliminate pathologies that may exist in other parts of the world.



- **Anti-mobbing policy and the fight against discrimination** Employees are familiar with the full scope of this policy upon commencement of employment at ZMK and confirm their commitment to comply with it by signing. The Internal Anti-Mobbing Policy (hereinafter referred to as the "MOP") governs the prevention of mobbing and discrimination at Zakłady Mechaniczne "Kazimieruk" Sp. z o.o.S.k (limited liability company limited partnership) based in Tarnów Podgórne and outlines the procedures to be followed in the event of any instances of mobbing or discrimination. It also outlines the complaint procedure and governs the work of the Anti-Mobbing Committee.

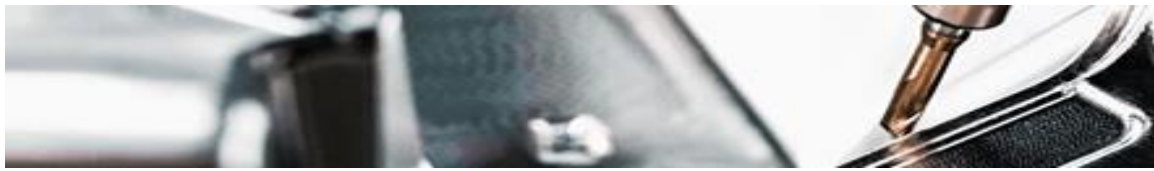
Whistleblower

In accordance with the requirements of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019, implemented in Poland in the Act of 23 May 2024 on the protection of persons reporting violations of the law, ZMK has also implemented appropriate regulations.

A whistleblower is a person who reports irregularities, violations of law or abuses in the workplace, based on facts and evidence, related to areas such as:

- Compliance with the law and regulations of the organization
- Health and safety protection
- Risks related to financial fraud
- Ethics in the organization, mobbing, discrimination, respect for employee rights

A person has been designated to whom Whistleblowers can submit forms in accordance with the implemented procedure.



BUSINESS ETHICS

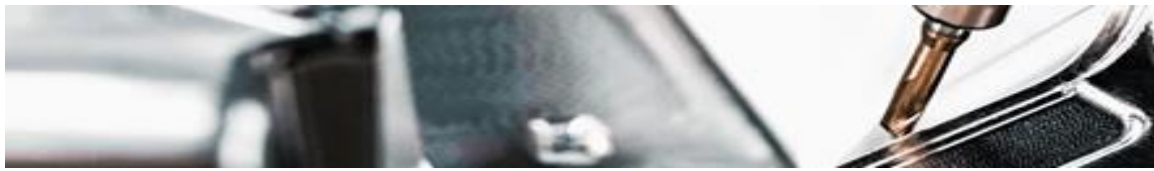
Ethical conduct builds organizational culture, improves daily work conditions and atmosphere, and strengthens relationships and trust. Ethical behavior is demonstrated by

- respect for others (respect for their dignity, beliefs, opinions),
- maintaining professional secrecy and confidentiality of data,
- honest performance of one's duties,
- taking care of a good atmosphere at work,
- intolerance of discrimination
- intolerance of corruption

Ethics in a company is the foundation for building a positive work atmosphere that fosters engagement and motivates employees to pursue a common goal for the benefit of their clients. The role of a supervisor (leader) is to create working conditions in which relationships between people are based on integrity, honesty, and cooperation.



„RESPECT”



CLIMATE AND ENVIRONMENTAL RESPONSIBILITY

In 2017, the organization implemented the 14001:2015 standard, thus confirming its approach to the principles of minimizing negative impacts on the environment and climate.

Cooperation has been initiated with a waste management company well-known in many industries. ZMK is actively participating in the circular economy, ensuring the proper sorting of post-production material waste according to steel types. Many measures have been implemented to reduce the amount of waste such as used coolant. Activities are underway to increase the efficiency of municipal waste segregation. Investments have been made in photovoltaics and lighting has been replaced with LED lighting, which minimizes the carbon footprint.

A lot of projects have been implemented, which you can read about in the Environmental and Social Responsibility of ZMK available on our website

☐ **Reach**

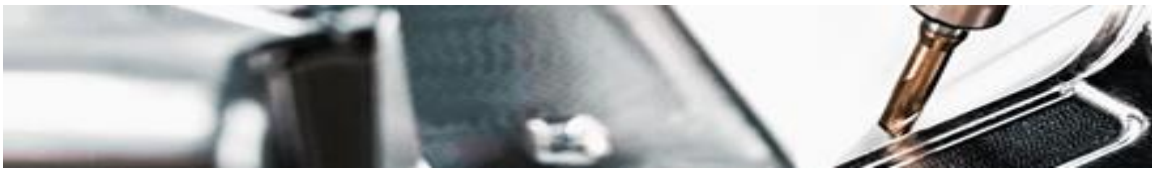
REACH Commission Regulation (EU) 2015/830 of 28 May 2015 amending Regulation (EC) No 1907/2006 of the European Parliament and of the Council on the Registration, Evaluation, Authorization and Restriction of Chemicals:

ZMK does not produce chemical substances or chemical mixtures. The chemicals used in ZMK are used only for subsidiary purposes and do not constitute the composition of the product (cooling to protect tools and machines, surface cleaning). We keep a register of Safety Data Sheets issued in accordance with REACH for these subsidiary substances, they are monitored and updated.

☐ **RosH**

DIRECTIVE 2002/95/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 January 2003 on the restriction of the use of certain hazardous substances in electrical and electronic equipment.

ZMK provides services in the field of metalworking, RoHS requirements do not apply in the day-to-day operations of the organization. ZMK does not produce electrical and electronic equipment, however, we are aware of the RoHS requirements and their consistency with the EU Declaration of Conformity, which we can issue depending on the service and construction needs of customers that may appear in the future.



IT SAFETY RESPONSABILITY

One of the threats in this changing environment is the increasingly frequent cyberattacks. ZMK is seriously addressing these risks and is implementing a range of measures to mitigate the risks associated with breaching the privacy and confidentiality of our IT systems.



The main security principles applied in the organization are related to

- Login access protection
- Increasing the traceability of users and data on the network
- Security management while working remotely
- Implementation of automated tools to protect customer and ZMK data
- Restrictions imposed on employees regarding access to the network and data

Risk awareness and the implementation of actions to eliminate or mitigate negative impacts are crucial. This is the most dynamic area and requires continuous monitoring and response to threats.