

Nowy Styl

*Supplier
Code of
Conduct*



Nowy Styl is a European leader in supplying comprehensive furniture solutions to offices and public spaces. This position reflects the feat of our business success and shows the influence our company exerts on the market. This obliges us to go on and do more. Thus, our goal is to become a leader of change, also in our business relations with Nowy Styl goods and services suppliers.

We have decided to implement *Nowy Styl Supplier Code of Conduct* in order to involve our suppliers, whose activity is a key element in our supply chain, in developing ethics standards as well as building social, economical and environmental responsibility. We truly believe that these actions are of highest importance. Such an attitude is also a result of being a member of the UN Global Compact initiatives, also it is required by *Guiding Principles on Business and Human Rights*. Only by adopting this kind of approach can we make our production processes sustainable and along with taking full responsibility for them. At the same time, we know that doing business in accordance with the highest standards is the key factor of long-lasting competitiveness and security of organisation. And this is what we wish both for ourselves and our suppliers.

Nowy Styl Supplier Code of Conduct is a document of global reach and applies to all of Nowy Styl suppliers. The observance of the standards described in the Code is one of the assessment criteria in the process of selecting a supplier.

The Code defines the ethics standards and business practices followed by Nowy Styl employees. It is in conformity with the values our company has implemented as the basis for its development and has been compiled with respect for the laws and cultures of the countries Nowy Styl operates in.

Employees

We truly believe that building and sustaining long-lasting relationships with people is the basis of Nowy Styl success on international markets. The key element of this initiative is the observance of the Universal Declaration of Human Rights, the fundamental rights defined by the International Labour Organisation and national rules. We express this approach by providing all employees with working conditions that do not violate their dignity and personal freedom. However for us, it is not enough – our aim is to create working conditions that will facilitate our employees’ personal and professional development. We do our utmost to achieve this on daily basis, therefore we expect the same attitude from our suppliers.

Freedom of employment

Suppliers must not employ people who are under the minimum legal age for employment or who are under the compulsory schooling age in a particular country.

Suppliers must not approve forced or slave labour, performed under pressure or any other forms of imposed work. Freedom of movement cannot be hampered in any way.

Employment shall be in line with policy of equal opportunities which means that discriminatory practices based on race, colour, gender, sexual orientation, disability, marital status, nationality, religion, ethnic origin or other distinctive features are strictly forbidden. The role of the company is to promote diversity that is a source of innovation.

Suppliers shall ensure that the working conditions of the employed are free from any forms of abuse or inhuman treatment, including harassment and sexual exploitation, corporal punishment or psychological or physical coercion.

Suppliers remunerate their employees in accordance with the legislation in force of a particular country determining the minimum wage, following the rules of overtime settlement and other employee benefits.

Freedom of association

As far as it is defined by the governing law, suppliers shall ensure their employees freedom of assembly and association with trade unions or other forms of employee representative units.

Occupational Health and Safety

The health and safety of each member of our organisation is top priority for us and we do not accept any compromises in this area. Our suppliers are obliged to provide their employees with safe and hygienic working conditions, both physically and organisationally. It means protecting people against potentially dangerous chemical or physical factors and securing them from excessive physical strain. Supplier duty is to inform employees of all hazards connected with their workplaces and educate on emergency procedures.

Fair business practices

Our company operates in accordance with binding national and international regulations along with signed agreement and contracts. We expect the same from our suppliers.

Corruption or bribery

No violations of the impartial procedure of making business decisions are acceptable.

Nowy Styl employees must not receive any material benefits regarding positions they occupy or tasks they perform. We accept neither corruption nor bribery. We expect full transparency in relationships with other enterprises, public sector as well as non-governmental organisations.

Suppliers shall neither accept nor offer, directly or through third parties, any material benefits to the not entitled persons/entities, arising from dictated functions or tasks, in order to incite actions in favor of themselves or the represented entity. These issues are governed in detail by the *Nowy Styl Anti-Corruption policy*, which applies to both; Nowy Styl employees and suppliers.

Conflict of interests

We strongly encourage our suppliers to educate their employees on how to avoid conflicts of interest and how to react in case they occur.

Unfair competition

We do not accept any actions of unfair competition character, including cartel agreements and other agreements that influence prices, trade conditions, strategies, relationships with customers, in particular those concerning tenders, and the exchange of confidential information on other subjects that can limit competition and that are precisely defined by law regulations which are binding in a particular country.

Transparency of books

Suppliers are obliged to keep the books in a transparent way and in accordance with binding law in country they operate in, as well as to pay taxes in conformity with law regulations.

Unfair competition

Suppliers are required to obey all the regulations concerning import and export of goods, services performance and information exchange. They also must follow the guidelines concerning fight against international terrorism.

Data protection

Suppliers must have implemented procedures and technical solutions ensuring personal, financial and commercial data protection, to the extent defined by a relevant national and international law regulations, in order to ensure maximal human safety and minimise the business risk connected with their own organisation and their contractors' companies.

Ethics

Suppliers shall implement and follow an identified set of ethical rules. The values, along with organisational culture and all Nowy Styl ethical principles, including business relationship with suppliers, are precisely described in *Nowy Styl Code of Ethics*.

Human rights

Nowy Styl condemns and guards against all forms of modern slavery – forced labour, child labour and human trafficking. These are blatant violations of human and labor rights. In addition, to ensure employment standards in accordance with legal norms, in Nowy Styl we care about that employees have mutual respect along with trust, and do not face any form of direct or indirect discrimination. The Organization manages employees so that they can maintain a work-life balance. We require a similar approach to the above-mentioned issues from our suppliers who are also obliged to promote them in their supply chains.

Environmental responsibility

Our business activity is based on production and natural resources – that’s why we set ourselves high requirements concerning the reduction of the negative influence our company exerts on the natural environment and other ways of its protection. In order to maintain a sustainable supply chain, we expect exactly the same from our suppliers of materials and intermediate products, who are key and the most significant elements of the chain, and from other business partners.

Suppliers are obliged to carry out their business activities in an effective and environmentally responsible way. They are required to protect natural resources, avoid using hazardous materials and realise sustainable waste management by recycling or reusing waste materials.

In particular, suppliers shall obey all the law regulations and other rules concerning their influence on the natural environment that are binding in the country in which they operate. They shall also obtain all the necessary licences and administrative decisions concerning their impact on the

natural environment and follow the operational and reporting requirements they define.

In order to minimise the risks posed by chemicals, suppliers of preparations, chemical mixtures or semi-finished products must provide statements confirming that they meet the requirements of Regulation (EC) No 1907/2006 (REACH), Regulation (EC) No 1272/2008 (CLP), Directive (EU) 2015/863 (RoHS III) and confirm that they do not use SVHC candidate substances in their production processes.



Management Systems

Nowy Styl has implemented and certified management systems based on international standards, such as, ISO 9001, ISO 14001, ISO 45001 or EMAS. Thus, we make every effort that Nowy Styl products are of highest quality, with respect for environment as well as OHS regulations.

Nowy Styl expects suppliers to implement effective management systems in order to monitor their development and comply with existing procedures, as well as conformity with applicable law, own accepted policies concerning quality, environment as well as health and safety, and other procedures covering these areas.

Nowy Styl requires that suppliers implement above mentioned processes associated with their business activities not only in the areas of their own field as a supplier, but also in relation to the activities of their own supply chain.

As a result of the mentioned procedures, highest quality of materials will be provided along with care of environment as well as maintaining the highest OHS standards – these are one of Nowy Styl priorities.

Detailed principles concerning cooperation between Nowy Styl and suppliers of goods and services are described in *Nowy Styl Procurement Policy* and *General Terms and Conditions of Purchase for Nowy Styl Suppliers*.

Observance of the Code

The observance of the Code can be verified in a continuous way and during audits. Suppliers are required to demonstrate that they respect all the rules described in this document and to provide Nowy Styl authorised person with all necessary documents immediately.

If violations occur, Category Manager initiates a verifying procedure and appoints Verifying Committee, consisting of him/her and a representative of Global Procurement Department, in order to make decisions regarding possible sanctions and/or a recovery plan.

Minor violations of the Code are being sanctioned by requiring the supplier to implement some recovery actions and with an additional audit. Significant violations including, in particular, actions that are considered forbidden, can lead to terminating the contract with supplier with immediate effect.

All suppliers, appropriately to the influence they exert, are obliged to require that their suppliers follow the rules defined by the Code or equivalent regulations

Suppliers' representatives may also report non-compliance directly to Nowy Styl Compliance Officer at: compliance@nowystyl.com. Confidentiality of the report is guaranteed.

Place and date

Signature (name, position), company stamp

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