



 **electrum** Group

Code of Conduct



morethan  
energy

morethan  
business

# Mission and Values of the **Electrum Group**

**Mission:** Affordable and emission-free energy available to everyone,  
provided by the **Alternative Energy System**.

## Values:



Continuous  
Development



Honesty and Sincerity  
in Daily Relationships



Transparency  
of Actions



Workplace Safety



Paving Development Paths  
and Leading by Example



Openness  
and Tolerance



Sustainable Development  
on Multiple Levels

**Our Employees:** We treat each other with honesty and respect.

**Our Clients and Partners:** We offer innovative, safe, high-quality solutions in the energy and information sectors, simultaneously ensuring ethical relationships and beneficial joint initiatives.

**Our Communities:** We responsibly utilize natural resources, build social and environmental awareness, and support local communities.

# Electrum Group more than **Business**

**Nikola Tesla** once said that it was only a matter of time before man connected devices to the wheelwork of nature. Today, this vision seems even more realistic, especially in the context of utilizing alternative energy and atomic power. This has increased our responsibility for peaceful coexistence with nature and the prudent management of available resources. It is this symbiosis of innovation, business, and ecology that allows for stable growth without fear of exhausting natural resources while maintaining economic rationality and the ambitions of exploratory ventures.

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**Electrum** is a business operating under the model of an **Alternative Power Creator**. We think comprehensively and offer creative business, technological, and engineering solutions. We create solutions for investment projects across the entire value chain and take care of the entire lifecycle of energy assets. Our competencies grow along with the expansion of the group's portfolio of prestigious projects.

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**From the beginning** of our operations, we have taken responsibility not only for creating new energy solutions but also for having a positive impact on the environment. For this reason, many of our actions and projects address these issues practically. On the one hand, as part of our daily operations, we implement contracts in the renewable energy sector – to date, we have connected nearly **3 GW of green power** to the high-voltage and top-level grids. On the other hand, we regularly participate in research and development initiatives aimed at defining and adapting new trends in the energy and information sectors to our realities. We place great emphasis on educational and charitable activities. To this end, we strive to cooperate with business partners who share our values and work standards.

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**As a member of the United Nations Global Compact**, the Electrum Group is committed to adhering to the highest standards of human rights, environmental protection, and ethical conduct. Our suppliers and subcontractors are also obligated to provide safe working conditions, treat employees with dignity and respect, and follow environmentally friendly practices.

*Through cooperation with non-governmental organizations, event organizations, and employee volunteering, Electrum brings lasting changes both at the local community level and globally.*



**At Electrum, we believe** that the change necessary to save the climate must occur at a systemic level, and its success depends on the ethical and consistent conduct of each of our employees. The Electrum Group Code of Conduct was created as a starting point for these actions and contains the fundamental rules and guidelines applicable within our organization, as well as in our relationships with our business partners.



# Our Principles

## 1. We Comply with Laws and Ethical Standards

The Electrum Group places great importance on the legal awareness of our employees and promotes ethical conduct. We strive to ensure that everyone understands that adherence to established laws and the internal rules of the Electrum Group is in the interest of both the organization and its employees, facilitating the creation of a healthy, growth-friendly workplace. We implement internal whistleblower procedures to allow the safe reporting of irregularities, and those who make such reports are protected by law. As the Electrum Group grows, we build partnerships with entities from Poland and the European Union. We select contractors who comply with high standards and share our values. We believe that fair competition and adherence to ethical rules on the market are essential.

## 2. Human Rights

We know that human rights protection is fundamental to any organization, so we respect the human rights of our employees, supervisors, and business partners. The company does not employ children or engage in partnerships with entities that exploit child labor. Work-life balance is a key factor in an organization that cares not only about a safe working environment but also about balancing work and private life. At the center of everything is the individual.

## 3. We Provide Equal Opportunities

Every company employee deserves to be treated equally regardless of age, gender, social affiliation, origin, religion, political beliefs, disability, or sexual orientation. We do not tolerate discrimination in recruitment or employment processes and strive to provide an inclusive work environment. We support employees in their daily work by creating a healthy work environment free of discrimination.

## 4. We Ensure Safety

We actively work to ensure a safe working environment for all employees – in offices, on construction sites, and during business trips. We comply with health and safety regulations and our quality standards. Our employees are equipped with modern protective equipment and tools. They undergo health and safety training, including specialist training aimed at preventing accidents.



## 5. We Prevent Corruption, Fraud, and Money Laundering (AML)

We do not tolerate corruption at any stage of our operations. The company has anti-corruption and AML (Anti Money Laundering) procedures. Employees do not accept or offer material or personal benefits during the execution of contracts. Employees are trained on the company's policy regarding the acceptance and offering of customary gifts, holding meetings, and conducting business trips. We check entities with which we start cooperation and do not cooperate with entities whose financing raises our doubts about legality. Our investments come only from legal sources.

## 6. We Avoid Conflicts of Interest

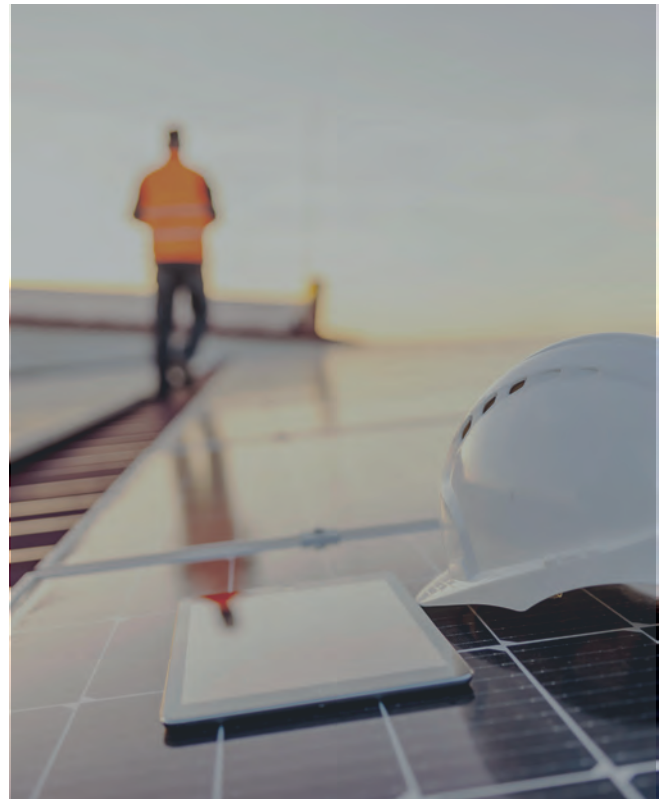
We pay particular attention to avoiding conflicts of interest that could impede the impartial performance of duties. Employees are responsible for identifying and reporting potential conflicts of interest, including family ties or other relationships, which could impact their decisions. Any conflicts of interest must be reported to supervisors or managers.

## 7. We Ensure Skill Development

High employee qualifications translate into the company's growth. Therefore, we regularly invest in expanding competencies by organizing internal and external training sessions.

## 8. We Respect Privacy and Information Confidentiality

We are aware of the importance and value of information – our employees are obliged to maintain confidentiality regarding legally protected secrets. Simultaneously, we remember our duty to respect the confidentiality of information concerning employees and the company's image. The company operates in accordance with the European General Data Protection Regulation (GDPR) and has developed procedures compliant with the requirements imposed by the GDPR and the national regulations on personal data protection. We secure personal data such as names, addresses, and health information of employees with the utmost care and diligence to ensure it is protected.



## 9. We Represent Our Brand

Our employees are the best ambassadors of the Electrum brand – that's why we encourage them to remember this in all business, social, and media situations. However, we never deny them the right to be members of any religious or political group, as long as they remember to clearly separate their personal views from the values represented by the brand.

## 10. We Respect Our Resources

We respect and value the company's material and intellectual resources. Each of us is responsible for proper management of these resources and for safeguarding them with the highest care – both when using them for business purposes and in private situations.

## 11. We Promote Physical Activity

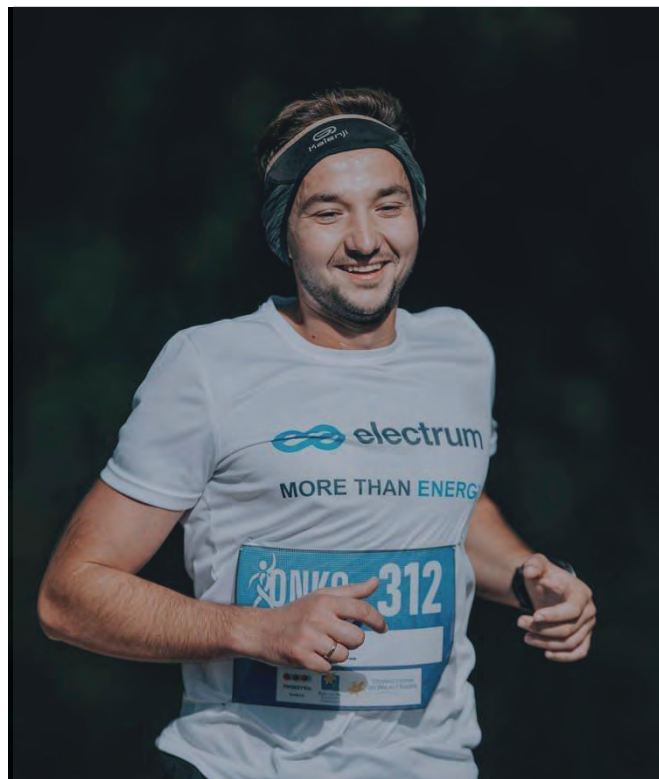
We believe that physical activity, promoted in a work environment, significantly supports the physical and mental development of our employees. That is why we have implemented a comprehensive physical activity program within the company. We encourage regular exercise and physical fitness by providing access to a fitness academy and offering benefits through our Benefit card program.

## 12. We Support the Local Community

We are a company that hires employees from the local market – almost all Electrum employees are graduates of Białystok universities. As a business organization, we financially and substantively support interesting projects that promote knowledge and sports. Therefore, we have become a sponsor of athletes – among them are individuals from both inside and outside our company.

## 13. We Care for the Environment

We are an environmentally friendly company in every aspect of our operations. From waste segregation at our headquarters to our investments in various regions of Poland. We build photovoltaic and wind farms in accordance with applicable regulations and also in harmony with the natural environment.





## 14. Ensuring Compliance with the Code

All employees, associates, and contractors of the Electrum Group are required to adhere to the principles set forth in the Electrum Group Code of Conduct. To ensure compliance with the Code, a system of internal controls has been established, organized into three independent and mutually reinforcing levels (lines of defense):

- 1. First Line of Defense** – Risk management in the operational activities of the Electrum Group. The Operational Departments ensure compliance with applicable laws, the Code of Conduct, and other rules collected in the Internal Rules of Electrum Holding. At this level, organizational units within their functions are responsible for risk identification and the implementation of control mechanisms.
- 2. Second Line of Defense** – Risk management by employees in specially appointed units/divisions/departments (independent of risk management in the first line). These units are responsible for identifying, controlling, monitoring, and reporting risks, as well as supporting the implementation of control mechanisms within the first line. The second line ensures business continuity and protects the income of the Electrum Group through anti-money laundering procedures, anti-corruption measures, whistleblower support, and prevention of other irregularities. The heads of the Electrum Group include the Risk Manager, QHSSE Director, Compliance Officer, Assistant, and Controller.
- 3. Third Line of Defense** – The actions of the Internal Audit Department, which ensures the adequacy, effectiveness, and efficiency of the internal control system and the risk management system within the Electrum Group.

### Reports of observed irregularities can be made:

- Via a dedicated whistleblower platform available at <https://electrum.whiblo.pl>
- To a special email address: **incydent@electrum.pl**  
(all reports will be treated as confidential)
- Directly by traditional mail to: Watykańska 13, 15-638 Białystok, Risk Manager,
- To your **supervisor** or to the **Audit and Risk Department** at the company's headquarters.
- To ensure compliance with the above regulations within the Electrum Group, the position of **Risk Manager** has been established.





With **Humility and Power**  
**One Megawatt** at a Time



We Take  
Responsibility  
for the **World**

We Help  
**Create**