



 **electrum** Group
Code of Conduct



morethan
energy

morethan
business

Mission and Values of the **Electrum Group**

Mission: Affordable and zero-emission energy accessible to everyone,
delivered through the **Alternative Energy System**

Values:



Equal opportunities
and respect
for human rights



Supporting education, culture,
and sports within communities



Investing in intellectual
capital



Health and safety
in the workplace



Job creation and employee
professional development



Technological support
for social activation

Our Employees: We treat one another with honesty and respect.

Our Clients and Partners: We offer innovative, safe, high-quality solutions in the energy and information sectors, while maintaining ethical relationships and supporting meaningful joint initiatives.

Our Communities: We use natural resources responsibly, 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 humankind would connect devices to the very core of nature. Today, this vision seems even more realistic – especially in the context of using alternative energy sources and nuclear power. As a result, our responsibility to coexist with nature and to manage resources wisely has significantly grown. This symbiosis of innovation, business, and ecology enables sustainable development – free from fears of depleting natural resources – while maintaining a rational economic approach grounded in ambition and entrepreneurial spirit.

Electrum Group is a leading Polish Climate Tech business, offering comprehensive solutions based on proprietary innovations in integrated energy and power systems. We are experts in managing large-scale projects supported by a broad portfolio of in-house engineering, design, and analytical capabilities based on AI and big data. Thanks to this, we deliver measurable value by delivering infrastructure, products, and services that help clients make better decisions and reduce risk – while achieving business goals in harmony with sustainable transformation.

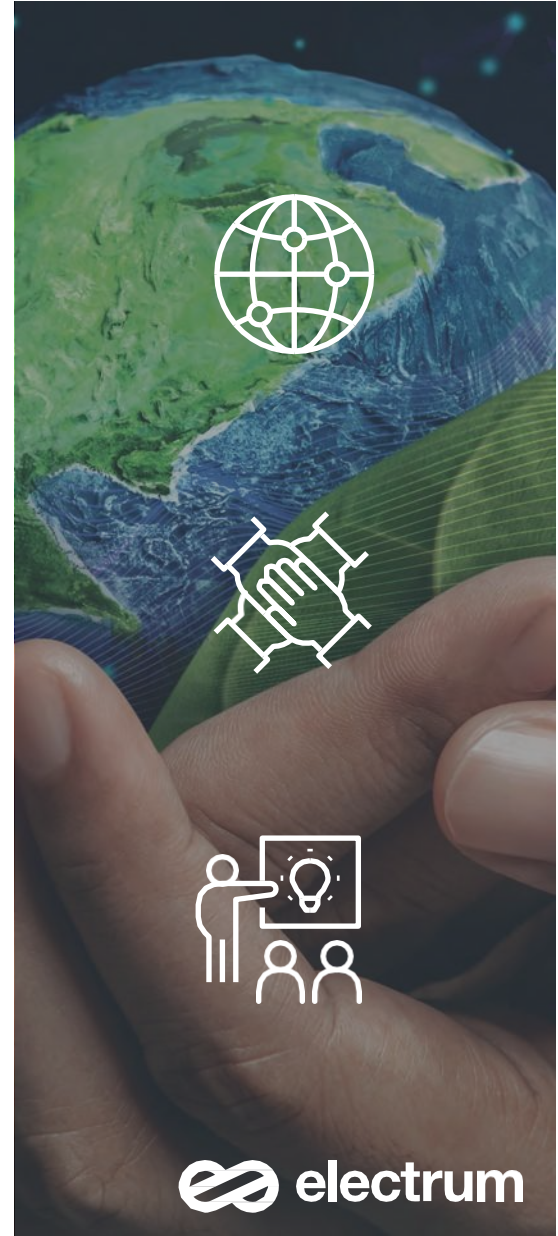
From the very beginning, our mission has been rooted in a deep sense of responsibility – not only for creating breakthrough solutions for the energy sector but also for the positive social impact of our actions. We are proud of our practical contribution to this mission. For years, we have been implementing contracts in renewable energy, connecting large-scale projects to high-voltage grids including over 3 GW of green power. This is our contribution to a cleaner, more sustainable future. At the same time, we constantly invest in research and development, setting new paths and standards across the most critical fields of the energy and information transition.

We believe innovation is driven by people. That's why we support education, social projects, and charity initiatives, while also building partnerships with businesses that share our values and work standards. Together, we're building a better world – step by step.

Through collaboration with non-governmental organizations, cultural events, and educational activities, Electrum brings lasting change both at the local community level and on a global scale.

At Electrum, we firmly believe that the change necessary to save the climate must occur at a systemic level. The key condition for its success is the ethical and consistent conduct of each of our employees. The Electrum Group Code of Conduct was created as the foundation for new actions and includes key regulations and guidelines binding within our organization, as well as in our relations with business partners.

Our commitment to ethical practices and sustainable development is not just a declaration, but a daily reality – one that inspires us to act for a better tomorrow.



Our Principles

1. We Follow Laws and Ethical Standards

Electrum Group places strong emphasis on the legal awareness of our employees and promotes ethical conduct. We want everyone to understand that compliance with the applicable laws and the internal rules of Electrum Group is in the best interest of both the organization and its employees. This approach allows us to create a healthy and growth-conducive work environment. We have implemented internal whistleblowing procedures that ensure safe reporting of irregularities, and individuals who submit such reports are protected by law. As the Electrum Group continues to grow, we establish relationships with entities outside Poland and the European Union. We choose business partners who uphold the same standards and share our values. We believe that good interpersonal relations are the foundation of good business cooperation. At the same time, we adhere to the principles of fair competition and conduct on the market.

2. Human Rights

We recognize that people are the foundation of every company, which is why we respect human and labor rights—both within the organization and in relationships between employees and supervisors. These same values guide our cooperation with business partners. The company does not employ children and does not work with entities that exploit child labor. Work-life balance is an essential aspect of our organization. We care not only about creating a safe workplace but also about maintaining a healthy balance between professional and private life. At the center of everything is the human being.

3. We Provide Equal Opportunities

Every employee deserves to be treated equally, regardless of age, gender, social background, origin, religion, political views, disability, or sexual orientation. We do not accept discrimination in the recruitment process or during employment, which is why we have adopted an anti-mobbing procedure. We support employees in their daily work by fostering a healthy work environment free from discrimination.

4. We Ensure Safety

We are actively committed to ensuring a safe working environment for all employees—whether in offices, on construction sites, or during business travel. We follow occupational health and safety regulations as well as our own internal quality standards. Our employees are equipped with modern tools and personal protective equipment. They receive occupational safety training and are sent to specialist courses designed to prevent accidents.

5. Combating Corruption, Abuse, and Money Laundering (AML)

We do not tolerate corruption at any stage of our operations. The company has implemented anti-corruption and AML (Anti Money Laundering) procedures. Employees do not accept or offer material or personal benefits during the execution of contracts. Employees receive training on the company's policy regarding the acceptance and offering of customary gifts, business meetings, and trips. We verify entities we begin working with, and we do not cooperate with those whose funding raises legitimate concerns. Our investments are made only with legal funds.

6. Avoiding Conflicts of Interest

We emphasize the importance of avoiding situations that may compromise impartial job performance. Employees are obliged to recognize situations where potential conflicts of interest may arise – especially those involving family ties, personal or financial relationships. Employees may request an interpretation of ambiguous situations from their supervisors.

7. Supporting Skills Development

The high qualifications of our employees contribute directly to the company's growth. That's why we regularly invest in expanding the competencies of our teams by organizing internal and external training programs.

8. Respecting Privacy and Confidentiality

We understand the value of information and its importance – that's why our employees are obliged to maintain the confidentiality of legally protected secrets. At the same time, we remember our responsibility to respect the privacy of employees and their image. The company complies with the requirements introduced by the EU General Data Protection Regulation (GDPR) and has developed its own internal Personal Data Protection procedures. The responsibility for safeguarding entrusted data – such as names, photographs, and health information of employees – lies with the Compliance Team and is governed by national legislation.

9. Representing the Brand

Our employees are the best ambassadors of the Electrum brand – which is why we encourage them to remember this in all business, social, and media situations. However, we never take away anyone's right to be a member of any religious or political group, as long as they clearly distinguish their personal beliefs 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 managing these resources properly and taking the utmost care of them – whether using them for professional purposes or privately.

11. We Promote Physical Activity

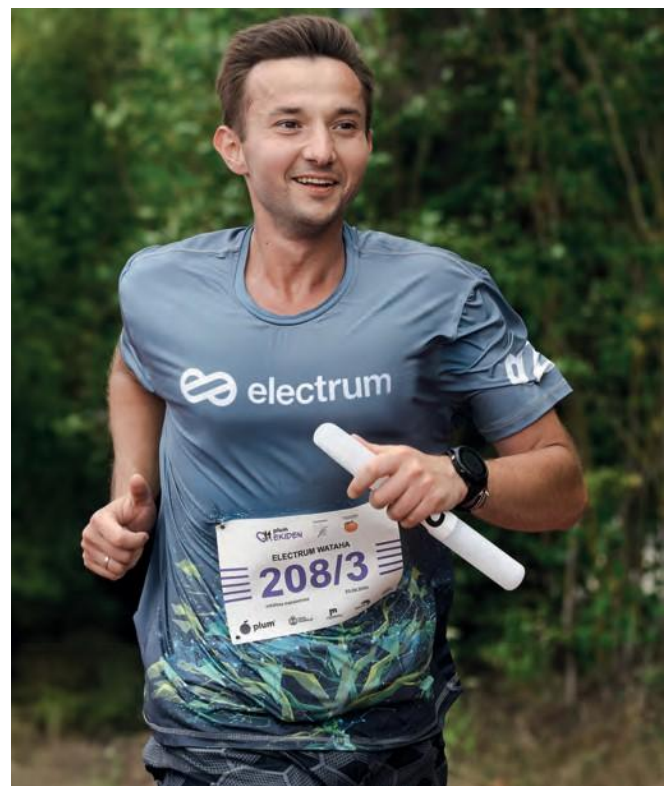
We believe that good physical fitness and a workplace culture that promotes sports have a positive impact on our employees' development and mental well-being. That's why, for several years now, we have been organizing general fitness training at the company (including skiing sessions with an instructor in the winter season), company-wide sports competitions, and we encourage employees to take advantage of sports benefits such as the Benefit card.

12. We Support the Local Community

As we grow across the country, we remember our roots – that's why we support initiatives that, like us, originated in Podlasie. Our collaboration with the Up To Date Festival is not only a chance to engage with the local community and the arts, but also an opportunity to promote sustainable practices and ecological solutions. In 2024, we decided to deepen this partnership, believing that with our support as the festival's title sponsor, the event could serve as a model for sustainable event organization. Together with the organizers, we designed a range of actions to show how to show respect and support for our planet – we chose local suppliers, limited the number of artist flights, and opted out of producing new festival merchandise. We also ensured the availability of water in returnable glass bottles and encouraged participants to use public transport or bicycles – all to minimize the environmental impact of the event. Alongside the festival's foundation, we also participate in campaigns promoting mental health, such as "Don't worry be yourself," and support cultural initiatives including the Białystok Ambient Park and the Ambient Salon in Białystok and Warsaw.

13. We Care for the Environment

At Electrum, we care about the environment in every aspect of our operations. From careful waste separation at our headquarters to ambitious investments across various regions of Poland, our actions are thoughtful and responsible. In building photovoltaic and wind farms, we not only comply with legal requirements, but also strive to protect the natural environment, keeping in mind the future of our planet.



14. How We Ensure Compliance with the Code

All employees, collaborators, and contractors of the Electrum Group are required to comply with the rules set out in the Electrum Code of Conduct. To ensure this compliance, we have established an internal control system organized into three independent yet complementary levels (lines of defense):

- 1. First Line of Defense** – risk management in the operational activities of the Electrum Group. Operational departments ensure compliance with applicable laws, the Code of Conduct, and other principles outlined in the Internal Rules of Electrum Holding. At this level, organizational units are responsible for identifying risks and implementing control mechanisms within their functional roles.
- 2. Second Line of Defense** – risk management by employees in designated positions or organizational units (independent of the first line of defense), through the identification, assessment, monitoring, control, and reporting of risks, as well as implementing and improving control mechanisms within their own line. The second line oversees activities aimed at protecting the Electrum Group, conducts investigations related to whistleblower reports, and counteracts corruption and money laundering. The second line includes roles such as the Compliance Specialist, QHSSE Department, Audit & Compliance, Financial Controllers, and Business Controllers.
- 3. Third Line of Defense** – within the QHSSE, Audit & Compliance Department, the Internal Audit function has been established to provide an independent assessment of the objectivity, adequacy, and effectiveness of the control mechanisms within the Electrum Group's management system.

Reporting Observed Irregularities may be reported through:

- a dedicated email address for whistleblowers:
<https://electrum.whiblo.pl>
- a special email address: **rodo@electrum.pl**
(all reports will be treated as confidential),
- by traditional mail to: Watykańska 13, 15-638 Białystok, to the attention of the Audit & Compliance Specialist,
- directly to your **supervisor** or to the QHSSE, **Audit & Compliance Department** at the company's headquarters,
- to ensure compliance with the above provisions, the role of **Compliance Specialist** has been established within the Electrum Group.



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



We Take
Responsibility
for the **World**

We Help
Create