



# KEA Code of Ethical Conduct

Effective as of 02-03-2026



# KEA Code of Ethical Conduct

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# KEA Code of Ethical Conduct

## Introduction

Our goal is to meet the expectations of even the most demanding Customers by building long-term relationships based on trust, quality, and a proper understanding of Clients' needs. Cooperation based on ongoing dialogue enables us to propose solutions that support our Partners in their effective development and in strengthening their market position. We carry out our investments based on the latest technologies, as well as thorough analyses of market trends and the directions of development in the printing industry.

**When partnership matters** – this is the principle that defines how we cooperate with Clients, Employees, and business Partners, building relationships based on trust, responsibility, and long-term development.

We have been present on the market since 1990, continuously deepening our experience and investing in the development of the company. Numerous certificates, awards, and distinctions confirm our commitment to maintaining high quality standards and conducting business responsibly. Our priority is to operate with respect for human rights and in compliance with regulations concerning products, environmental protection, and occupational health and safety. These principles define the framework for cooperation with stakeholders, including Suppliers of raw materials, materials, and services.

In our daily operations, we are guided by **five values** that form the foundation of KEA's organizational culture: **safety, quality, cooperation, respect, and continuous improvement**. These values support responsible decision-making and define the way we act towards Employees, Clients, and business Partners.

This KEA Code of Ethical Conduct constitutes the foundation of relationships based on integrity, transparency, and responsibility. It defines the rules of conduct applicable to Employees, Associates, Subcontractors, and Suppliers, and serves as an important criterion in the selection of business Partners. We expect entities cooperating with KEA to adhere to equally high ethical standards and to promote them throughout the entire supply chain.

**The Policy is made available to business Partners as a reference point for cooperation based on shared values and a responsible approach to conducting business.**

KEA identifies four pillars of ethical conduct:

1. Ethics and responsibility in conducting business
2. Labour standards and interpersonal relations
3. Occupational safety, quality, and environmental protection
4. Responsible relationships within the supply chain

# KEA Code of Ethical Conduct

## Ethics and Responsibility in Conducting Business

KEA conducts its business in a fair, transparent manner and in compliance with applicable laws and adopted ethical standards. The principles described below define expectations towards employees and business partners in terms of responsible decision-making, building trust, and protecting the interests of the company, Clients, and stakeholders.

### Compliance with Laws and Internal Regulations

We conduct our business in accordance with applicable laws, internal regulations, concluded agreements, and generally accepted ethical standards. We expect all Employees and cooperating individuals to act in compliance with the applicable rules and to take responsibility for the decisions they make.

### Integrity in Business Relationships

We do not practice or tolerate any forms of corruption, fraud, or embezzlement. Business cooperation is conducted in a transparent manner and in compliance with applicable laws. The giving or accepting of bribes, including illegal commissions, discounts, or any other forms of inducements aimed at obtaining or maintaining an unfair competitive advantage, is strictly prohibited.

### Conflict of Interest and Acceptance of Benefits

We avoid situations in which an employee's private interests could influence the impartiality of business decisions. Any potential conflicts of interest must be disclosed without delay to a supervisor or the appropriate organizational unit. The acceptance of material or personal benefits that may affect the objectivity of actions is prohibited.

### Fair Competition

We conduct our business in accordance with the principles of fair competition and applicable antitrust regulations, ensuring transparency in market activities and respect for the principles of fair play.

### Confidentiality, Data and Information Protection

We treat information obtained during business cooperation with due confidentiality. It is not disclosed to third parties without appropriate consent. The organization ensures the protection of privacy, personal data, and the intellectual property of Employees and business Partners.

### Protection of Intellectual Property and Client Information

We ensure the proper safeguarding of information entrusted by Clients and the protection of copyrights, designs, and solutions constituting intellectual property.

### Reporting Irregularities and Incidents

We enable Employees to report concerns or potentially unlawful acts in the workplace, either openly or anonymously. All such reports are treated as confidential. We review them diligently and, where necessary, take corrective actions. Reports may also be submitted through the violation reporting system in place at KEA (whistleblowing system), in accordance with the applicable procedure. Individuals making reports in good faith are protected against retaliatory actions.

# KEA Code of Ethical Conduct

## Responsibility for Breaches of the Principles

A breach of the principles set out in this Policy may result in disciplinary action or other consequences arising from applicable laws and KEA's internal regulations.

## Labour Standards and Interpersonal Relations

KEA treats Employees with respect and is committed to creating a work environment based on mutual trust, responsibility, and respect for human rights. The principles described below define standards of cooperation, equal treatment, and the development of a safe and supportive organizational culture that fosters employee growth and the stability of professional relationships.

### Respect for Human Rights

In our operations, we are guided by the principles of respect for dignity, freedom, and human rights, both towards Employees and business Partners.

### Voluntary Employment

We do not tolerate any forms of forced or bonded labour, or human trafficking. Employment is based solely on voluntariness and in compliance with applicable laws.

### Minors and Young Workers

In our operations, we avoid all forms of child labour and do not tolerate child labour in our supply chain.

### Diversity, Inclusion and Equal Treatment

We create a work environment free from discrimination and exclusion. We respect diversity and ensure equal treatment regardless of personal characteristics, beliefs, or social status.

### Prevention of Discrimination and Harassment

We do not tolerate physical or psychological violence, harassment, intimidation, or any other forms of inhumane treatment.

### Working Hours, Remuneration and Benefits

Employment conditions, including working hours and remuneration, are in compliance with applicable laws and the principles of fair treatment of Employees.

### Freedom of Association

We respect Employees' right to social dialogue, freedom of association, and participation in collective bargaining in accordance with applicable regulations.

### Competence Development and Training

We support Employees' professional development through training, upskilling, and knowledge sharing.

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## Culture of Cooperation and Employee Responsibility

We build a culture based on mutual respect, responsibility for shared goals, and open communication. We value Employees' engagement and active participation in organizational improvement.

## Occupational Safety, Quality and Environmental Protection

KEA conducts its operations with respect for occupational safety principles, process quality, and environmental responsibility, ensuring the reduction of operational risks and impact on the surroundings. The principles described below define expectations towards employees and business partners in terms of safe work performance, care for product quality, and protection of the natural environment, remaining consistent with KEA's Sustainability Policy.

### Product and Process Quality

We deliver products that meet the requirements specified in technical specifications, quality agreements, and contracts. A certified quality management system compliant with ISO 9001 confirms the maintenance of high quality standards and the continuous improvement of processes.

### Product Safety and Environmental Responsibility

The products we supply meet defined safety standards, confirmed by appropriate testing and declarations. We conduct our operations with consideration of the product life cycle and strive to reduce environmental impact through the efficient management of energy, water, waste, and emissions. A certified environmental management system compliant with ISO 14001 confirms the maintenance of high environmental standards and the continuous improvement of processes.

### Occupational Health and Safety

We ensure safe and healthy working conditions in compliance with applicable regulations and OHS standards. This includes, among others, appropriate working environment conditions, signage and evacuation routes, access to first aid and personal protective equipment, as well as proper handling of hazardous materials.

### Process Safety

We ensure the safety of machinery, equipment, and production infrastructure by applying modern technical solutions and preventive measures that reduce the risk of failures and hazards to Employees. A certified occupational health and safety management system compliant with ISO 45001 confirms the maintenance of high OHS standards and the continuous improvement of processes.

### Environmental Protection

We responsibly manage the impact of our operations on the natural environment by reducing emissions, using resources efficiently, recovering materials, and properly managing water and wastewater.

### Climate Protection and Natural Resources

We take actions to reduce the impact of our operations on climate change by lowering emissions and increasing the efficiency of energy and resource use. We monitor our carbon footprint, calculate CO<sub>2</sub> emissions across Scopes 1, 2, and 3, and take measures to reduce them. We use 100% renewable energy sources.

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## Waste and Emissions

We strive to minimize the volume and negative impact of generated waste and emissions, supporting the reuse of materials and the development of a circular economy in cooperation with business partners.

## Emergency Preparedness and Training

We ensure appropriate preparedness for emergency situations through training, instruction, and the maintenance of safety infrastructure, so that individuals on the company's premises can perform their duties safely.

## Responsible Relationships in the Supply Chain

KEA builds relationships with Suppliers and business Partners based on transparency, responsibility, and adherence to shared ethical and quality standards. The principles described below define expectations towards cooperating entities in terms of compliance with applicable laws, respect for human rights, care for the environment, and conducting business in a responsible and transparent manner.

## Compliance with Legal Requirements

We expect Suppliers to comply with applicable laws and the requirements arising from business cooperation, to be familiar with current regulations relevant to their activities, and to periodically assess the extent of their compliance.

## Sustainable Development in the Supply Chain

In our relationships with Suppliers, we take into account environmental, social, and organizational criteria. We expect responsible treatment of Employees, respect for human rights, the provision of safe working conditions, and conducting business in a way that minimizes environmental impact while maintaining business stability.

## Risk Management

Risk is a natural element of business activity; therefore, we expect Suppliers to adopt a conscious approach to identifying, assessing, and mitigating risks related to their operations. We prefer to cooperate with entities that implement a systematic approach to risk management.

## Document Control

We expect Suppliers to properly control documentation so that it is up to date, approved, traceable, and available at the point of use. Standardized and documented activities support process repeatability and ensure organizational continuity.

## Engagement and Responsibility

We encourage Suppliers to implement principles of responsible and ethical conduct towards all stakeholders and to build relationships based on transparency and mutual trust.

## Employee Competence and Development

Suppliers should develop the competencies of their Employees by planning training, assessing development needs, and improving the qualifications necessary for the proper execution of processes.

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## Continuous Improvement

We expect Suppliers to adopt an approach based on the continuous improvement of products, services, and processes, including the use of audit results, data analysis, and management reviews to implement improvement actions.

## Monitoring the Implementation of the Policy

The implementation of the principles set out in this Policy is subject to periodic monitoring based on available management data and the results of supervisory activities. Monitoring includes, in particular:

- reports of irregularities and actions taken within the violation reporting system,
- results of internal and external audits,
- incidents related to occupational safety, quality, and the environment,
- assessment of cooperation with Suppliers and risks in the supply chain,
- the level of Suppliers' acknowledgements confirming familiarity with the KEA Code of Ethical Conduct.

The conclusions from monitoring are used to improve the principles of conduct and to develop an organizational culture based on responsibility and transparency.

## Responsibility for Compliance with the Policy

All KEA Employees and individuals acting on behalf of the organization are responsible for complying with this Policy, regardless of their role or scope of duties. This responsibility includes applying the provisions of the document in daily work and making decisions in accordance with the principles of integrity, transparency, and respect for applicable standards.

Each individual involved in business processes is obliged to:

- act in accordance with the principles set out in the Policy,
- exercise due diligence and responsibility when making decisions,
- conduct activities in a transparent manner and in compliance with applicable regulations,
- report non-compliance, risks, and breaches of ethical principles.

Managers of organizational units support the implementation of the Policy by fostering a culture of responsibility, setting an example of appropriate conduct, and ensuring that the principles described in the document are applied in practice.

## Method of Reporting Irregularities

Any individual acting on behalf of KEA is obliged to respond to situations that may constitute a breach of ethical principles, legal regulations, or internal policies. This applies in particular to unfair practices, conflicts of interest, abuses, quality issues, and risks related to business cooperation.

Reports may be submitted:

- directly to a supervisor,
- to the appropriate organizational unit,
- through the violation reporting system in place at KEA (whistleblowing system), in accordance with the applicable procedure.

# KEA Code of Ethical Conduct

## Update and Review of the Document

The Policy is subject to periodic reviews and updates to ensure its compliance with applicable regulations, organizational standards, and KEA's development directions. The document is reviewed on a regular basis by designated individuals responsible for overseeing the Policy.

Prepared by:

Administrative Director

Approved by:

President of the Management Board

ISO Representative