

Code of Ethical Conduct of TLC EU



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Foreword from the President of the Management Board of TLC

Everything we do at TLC is based on our fundamental values: responsibility, cooperation, and development. These values allow us to build not only our reputation but also a solid business position in the market. Our company is renowned for its high-performance culture, which includes both a responsible approach to business and attention to ethical working standards.

One of the key aspects of our business is sustainability. We can only meet our customers' expectations and take care of the planet by continuously improving the quality of the products and services we offer. Quality and reliability are the cornerstones of our operations, but protecting natural resources and the environment is equally important. We are committed to using technologies and solutions that minimize our impact on ecosystems and conserve resources for future generations.

We are committed to creating a free and open market, ensuring equal opportunities for all participants. We believe that fair competition fosters innovation and continuous improvement, so we always act ethically toward our customers and competitors.

Our priority is to ensure safe and healthy working conditions. As a socially responsible company, we care about our employees' safety, health, and comfort, creating a workplace based on mutual respect and ethics. In our company, we work together to create a space where everyone is treated with dignity, and human rights are a fundamental value.

Cooperation with partners is based on ethics and mutual trust. We choose reliable suppliers who share our quality standards, environmental protection, and care for employees' rights.

Our relationship with our partners is a long-term commitment to working together for ecology and sustainability.

Yours faithfully,
President of the Management Board of TLC sp. z o.o.



We provide secure solutions that give our clients peace of mind during the execution of an industrial or construction project.



Our values

Liability

Our relationship with our customers is based on complete trust and responsibility. We take full responsibility for every project entrusted to us and execute it to the highest standard of workmanship. We believe that responsibility means not only delivering products and services on time but also providing support at every stage of the cooperation. Our commitment and expertise make us a responsible partner you may rely on.

Cooperation

In our industry, we understand that effective cooperation is key to delivering projects on time and meeting investors' expectations. That is why we go beyond just providing products and solutions – we support our business partners at every stage. We are always ready to share knowledge, offer support, and adapt to our customers' needs, maintaining a flexible approach and close partnership.

Development

We are continually improving our products and systems under the leadership of our Construction, Technology and Research and Development departments. We respond to customers' feedback taking into consideration the latest technological trends and legal requirements. By expanding our production facilities and automating our processes, we are ensuring greater efficiency. In addition, we are opening new branches both in Poland and internationally to be closer to our customers. We are also expanding our range of services and products to offer comprehensive solutions and provide the best products on the market.

Mission

Our mission is to enhance the safety and comfort of people working in construction and industrial environments.

Our goal is to protect the health and well-being of workers during construction projects, in factories, and within industrial facilities.

Our solutions ensure smooth and efficient movement of people during work, enabling safe navigation of facilities, even in hard-to-reach areas or at great heights.





Vision

Our ambition is to become a global leader in steel stairs and platforms and security systems for the construction and industrial sectors.

We aspire for our brand to be a symbol of the highest-quality solutions that support safety, enhance work efficiency, and enable seamless communication in every facility.

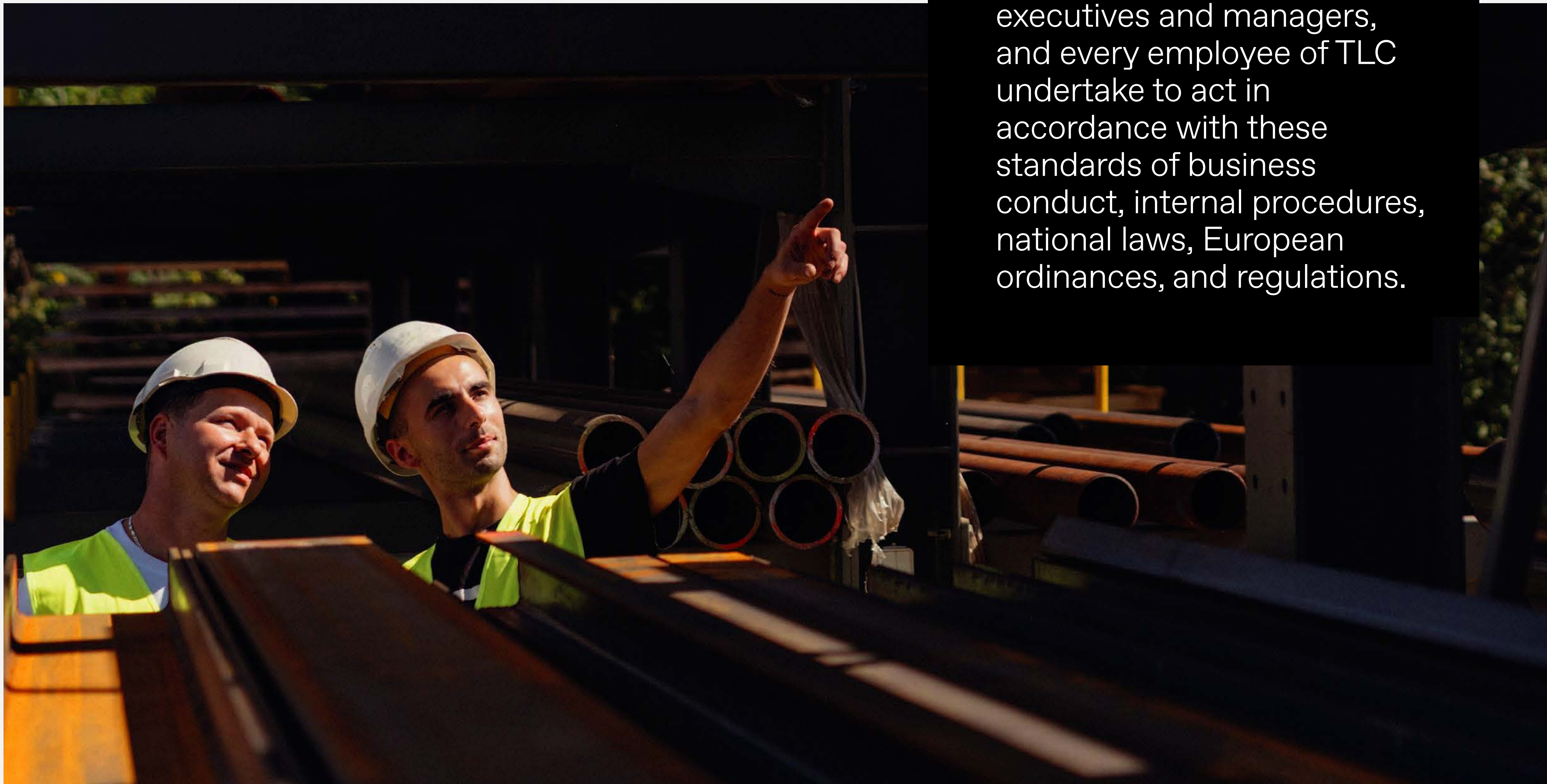
Our solutions are innovative and environmentally sustainable. We employ energy-efficient technologies, materials, and business practices, minimizing our impact on the planet.

We collaborate with our clients based on mutual respect and partnership, creating solutions that respond to their needs.

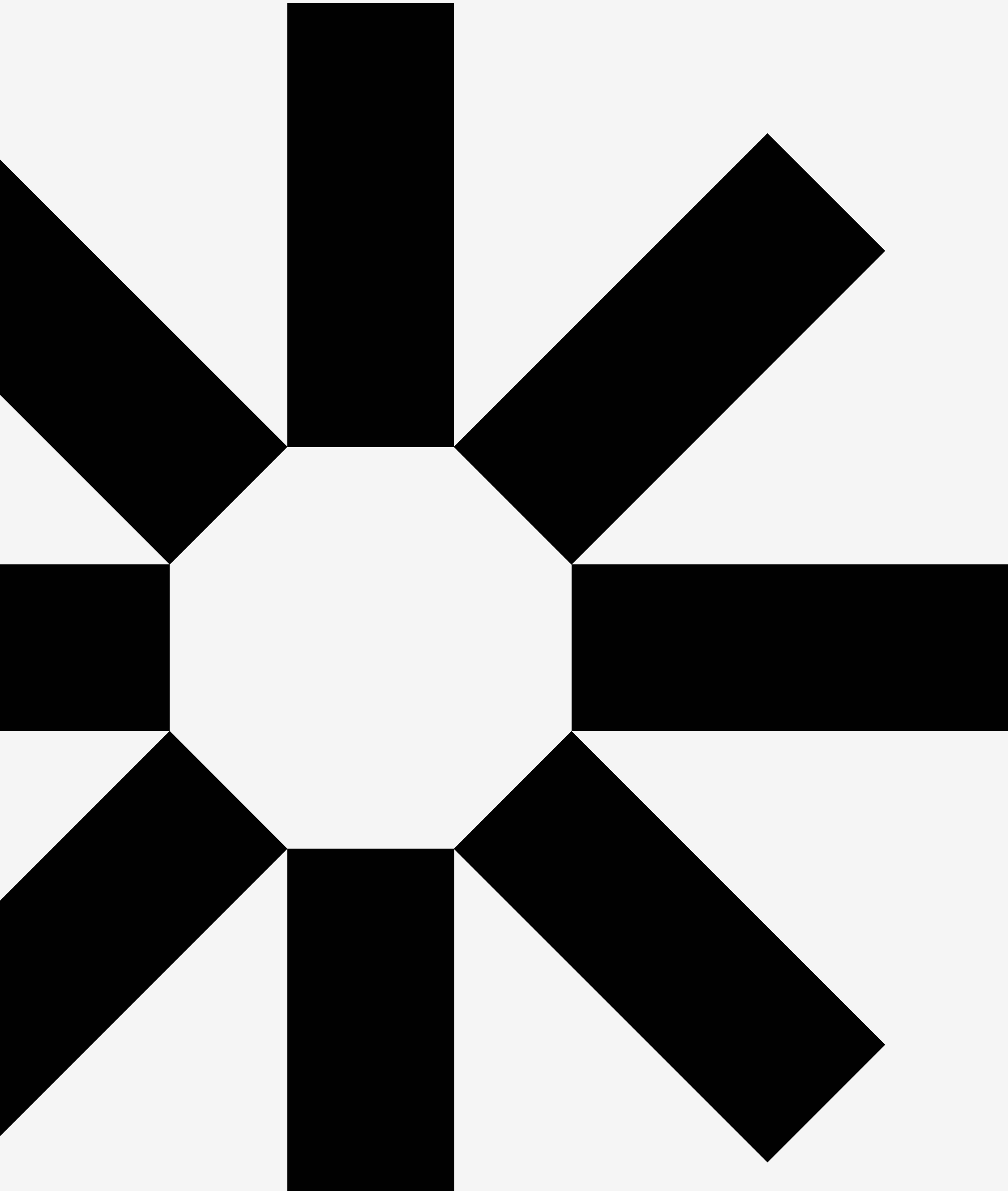
Our Principles and Guidelines for ethical business conduct

Our principles and guidelines provide the foundation for responsible decisions with consideration and care for society and environment, as well as the company's reputation. The Code of Business Conduct is the inherent responsibility of every team member, from employees to executives to the management board. It also applies to our subsidiaries and permanent subcontractors.

We declare that the management board, executives and managers, and every employee of TLC undertake to act in accordance with these standards of business conduct, internal procedures, national laws, European ordinances, and regulations.



Our company operates on the following principles:



1. Business integrity and acting in compliance with the law

Everything we do is based on trust and integrity. We comply with the law and always act according to our values. Our decisions are transparent, and every step we take is aimed at building long-term, trusting relationships with customers and partners. Our products, technology, software, and information are subject to international trade regulations. We comply with all regulations regarding export controls, sanctions, and customs duties.

We do not accept the manipulation of information, the falsification of documents, the deliberate concealment of facts, or illegal activities such as violating industry regulations or labor laws.

2. High-quality products and services

We strive to ensure that our products and services are safe, of the highest quality and meet our customers' expectations. Our quality procedures exceed industry standards, and reliability along with customer suitability are our priorities which are never neglected.

We do not accept the use of low-quality materials, the disregard for quality problems, or the delay in responding to problems reported by customers that may compromise product safety.

3. Ethical sales process and respect for customers

We are committed to ethics and transparency in our sales process. We earn and retain the trust of our customers by treating them with honesty, integrity, professionalism, and courtesy. We ensure that our products and services are presented honestly and with full disclosure. We never offer products or services for which the customer has no informed consent, and our approach to commissions and rankings is transparent and free from manipulation. In this way, we build lasting relationships based on trust and mutual respect. We respect our customers' privacy, protect their data, and secure their communications. We carry out sales and marketing activities based on our privacy policy and the law regarding the processing of personal data.

We do not accept unfair sales practices such as misleading, pressuring customers, or manipulating information about our products and services.

4. Care for the environment and sustainability

We strive to limit the negative impact of our activities on the environment, and we use nature-friendly technologies and materials. Our branches and factory broadly cover their energy needs from renewable sources, and employees use electric or hybrid cars. We support sustainability initiatives that help reduce our environmental footprint and conserve natural resources. All of us in the company strive to save energy and water in our day-to-day work and to apply sustainable practices in all aspects of our business.

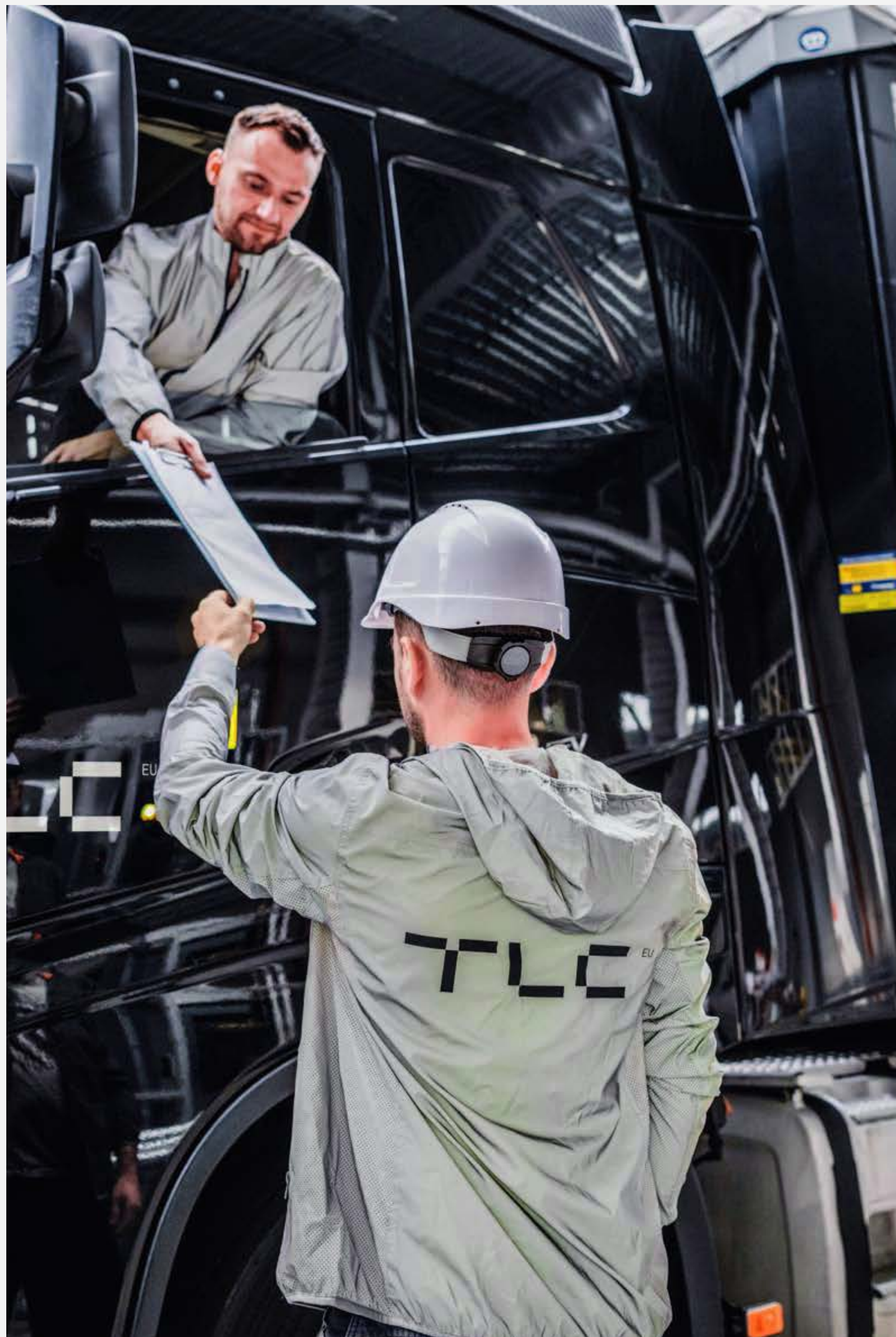
We do not accept resource waste, excessive emissions of harmful substances, non-compliance with environmental regulations, or the use of technologies that do not comply with the best environmental practices.

5. Responsible financial management and transparency

We all care about the company's financial stability and our jobs. The company's managers meet their role with integrity, ensuring the financial result, completeness, and meticulousness of our accounting reports, as well as timely payments to our partners and suppliers. We are committed to minimizing financial risks so that we can guarantee continued growth and a solid basis for long-term cooperation.

We do not accept non-transparent financial operations, falsification of financial statements, concealment of costs, manipulation of financial results, or late payments to counterparties.





6. Social responsibility and fiscal integrity

Together with our core values, TLC is committed to full social responsibility. One key element of this responsibility is our pledge to pay our taxes fairly and on time as a contribution to economic and social development. Our activities should support local communities, contributing to their well-being and development. Our commitments to society include paying attention to ethical business practices, offering fair wages, and protecting jobs. Responsibility for the future lies not only in the product we provide, but also in the way we conduct our business.

We do not accept activities that negatively affect the local community or non-payment of taxes and other company obligations towards Polish society.

7. Effective internal control

We regularly check that everything works as planned and that our business decisions comply with the law and internal standards. We aim to implement an effective internal control system that ensures authorization and accurate recording of transactions, the ability to verify the reliability of financial and management reporting, and that management actions comply with applicable legislation. Our audit processes are continuously improved to ensure efficiency and eliminate potential risks.

We do not accept skipping essential audit procedures, neglecting internal controls, or making decisions that may jeopardize the transparency of the company's operations.

8. Safe working conditions

We care about the personal safety and health of every employee. In our company, we have implemented mechanisms and measures to counteract any accidents at work and facilities that improve workflow and relieve the physical strain on our employees. We ensure that everyone has access to the right tools and technology to help minimize the risk of injury and support the ergonomics of the workplace.

To ensure our employees' highest level of health and safety, we strictly comply with all legal requirements, particularly in health and safety at work. In addition, we regularly train our team to be aware of the risks and to avoid potential risks in their daily work.



9. Openness to dialogue

We are cooperative and transparent in our actions internally and with customers and partners. We strive for dialogue and are keen to listen to feedback to help us improve our products and processes.

We do not accept ignoring the opinions of employees, customers, or business partners, acting in a closed manner, or failing to communicate important company and product developments.

10. Zero tolerance for corruption and money laundering

We comply with the laws prohibiting the illegal trading of funds and take all measures to prevent such practices. We do not tolerate any form of bribery or corruption. Integrity is at the heart of what we do. Every step we take is scrutinised to ensure that our practices are always ethical and in line with current legislation. As employees, we are wary of suspicious situations, act sensibly and do not engage in corrupt behaviour. It is forbidden to give customers any gratuities, unjustified benefits that could be considered a bribe.

We do not accept money, gifts, offers of unwarranted financial benefits, or actions that may be perceived as an attempt to influence business decisions.

11. Political neutrality

We do not get involved in politics or support any political parties. We focus on our work and values. Our neutrality allows us to focus solely on achieving our business goals and building independent relationships with our partners.

We do not accept favoritism of any political parties or their representatives, use of company resources for political purposes, or financial support of political campaigns.

12. Respect for competition and antitrust

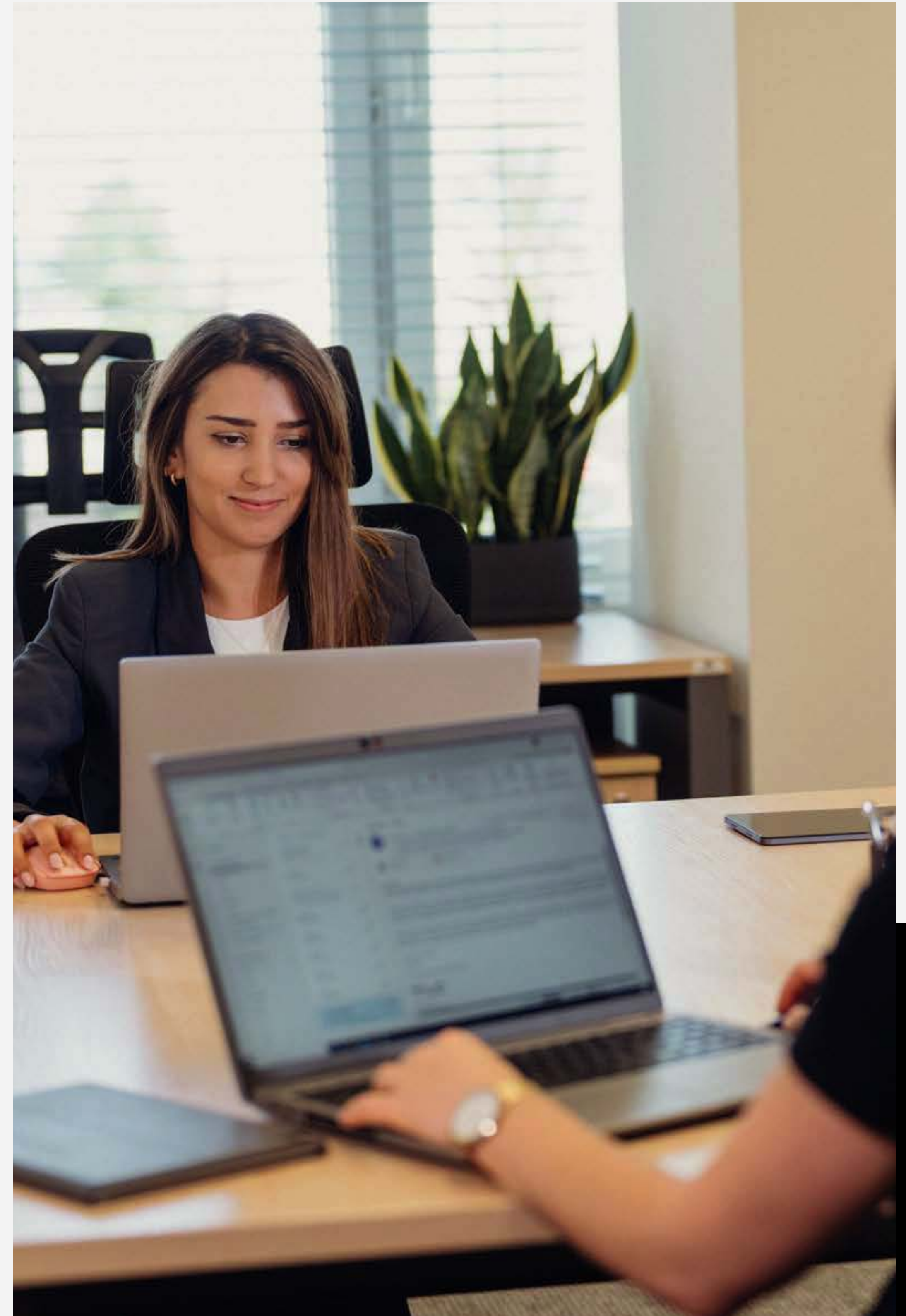
We maintain the principles of fair competition and ensure that our market is equal and open to all. Fair competition fosters the development of the entire industry, and we gain an edge by offering the highest quality and innovation.

We do not accept unfair practices such as collusive pricing, market manipulation, misinforming customers, or disparaging competitors. We do not disclose confidential information obtained during our customers' projects and work for previous employers.

13. Intellectual property protection

We respect other companies' copyrights and intellectual property, ensuring that all our activities comply with regulations. We cooperate with our innovation partners to develop new solutions while respecting all copyright and patent rights. We do not use software without a legal license, trademarks, or third-party patents in our work. We are responsible for the proper use of assets and the prevention of asset loss. This includes protecting ideas, research, and inventions for all our companies.

We do not accept: copying other people's solutions without permission, copyright infringement, illegal use of software or use of other person's intellectual property without the appropriate licences.



14. We respect human rights

We are committed to our employees' health, safety, and decent working conditions and require our suppliers to share this attitude. We expect them to work with third parties that comply with at least the minimum standards of the country of origin in terms of health, safety, working hours, wages, and conditions of employment.

We do not accept human rights violations, human trafficking, child labor, forced labor, violations of health and safety, and labor regulation.

15. Lack of acceptance of violence in the workplace

We ensure that our workplace is a safe and violence-free place, both from co-workers and supervisors. In the event of such situations, everyone has the right and the duty to report them to their supervisor or to Human Resources so that we may work together to ensure our safety.

We do not accept behavior such as threats, intimidation, physical and verbal aggression, mobbing, or harassment.



16. Equal opportunities in employment

Our business is based on the principles of equality and fairness. Recruitment processes are conducted so that everyone has equal opportunities for employment and development, regardless of race, gender, age, sexual orientation, origin, religion, or nationality. All that matters to us are qualifications, merits, and achievements.

We do not accept the consideration of criteria such as origin, race, age, sexual orientation, or religion in recruitment.

17. Non-discrimination

We do not tolerate any form of discrimination or harassment, including discrimination based on gender, race, religion, age, disability or sexual orientation. Each of us deserves respect and support. We value diversity, believe in the value of differing perspectives and our company supports employees in developing these attributes so that everyone feels fully accepted.

We do not accept discrimination and restriction of rights based on gender, race, age, religion, or orientation, and limiting access to work for people with disabilities.

18. Responsible sourcing of goods and cooperation with suppliers

We aim to work with partners and suppliers who share our values and adhere to ethical standards. We focus on transparency and communicate our mutual expectations. We assess suppliers from a financial, social, moral, and environmental perspective to ensure our operations are responsible and sustainable.

We do not accept cooperation with entities that tolerate slavery, child labor, unfair market practices, or fail to respect human and environmental rights. We do not undertake exports and imports to sanctioned countries or cooperate with companies that are subjected to restrictions

19. Right to decent wages and rest

We provide decent pay conditions and social and employee insurance. We also take care of work-life balance, as we value time spent with family and friends and developing personal passions. We respect the right to annual and parental leave and support our employees in reconciling work and private life.

We do not accept the non-payment of contributions, working hours without pay, forcing employees to work extra hours without their consent, or not being able to choose the employee's leave entitlement.





What do we expect from our employees?

1. Honest and reliable work

As TLC employees, we are committed to working with honesty and integrity, performing our duties with the utmost care and attention to quality. We avoid all forms of fraud, dishonesty, and falsification of our work's results. We operate in compliance with the current legislation and HSE rules, ensuring our own and other co-workers' safety. There are no shortcuts in our work. We do not expose the company to harm by failing to comply with any rules that may affect us.

2. Trust and respect for people and work

We expect our employees to work with integrity and follow these ethical principles. Relationships within the company are based on mutual respect, which builds a positive atmosphere and fosters cooperation. We combat mobbing and discrimination, ensuring everyone can work in an atmosphere of mutual respect and support.

3. Mutual support and cooperation

We respect and support each other in achieving goals and maintain a friendly working atmosphere. Supervisors should be role models and help their teams. We support the development of our employees by offering opportunities to improve skills and build careers in line with individual aspirations.

4. Prohibition of consuming intoxicating substances during work

The consumption of alcohol, use of drugs, or other substances in the workplace is strictly prohibited. Also, coming to work under the influence of these substances is not allowed, and the consequence may be the loss of employment. Employees struggling with addictions shall receive support and assistance.

5. Loyalty to the company

Each of us should look after the company's interests and avoid situations that could lead to a conflict of interest. Any conflict of private and professional interests should be disclosed and resolved in consultation with a supervisor or manager. Accountability for actions and transparency in decision-making are key to building internal and external trust.

6. Caring for company assets

We use company assets with respect and care as if they were our own. We respect what we have, preventing any situation that exposes company assets to damage, loss, or theft. We do not use company assets for private purposes without exceptional consent. We use our employer's resources responsibly: we do not waste or destroy them, and we do not deliberately reduce their value.

7. Protection of data and company secrets

We protect the personal and confidential information of our employees, customers, and partners. We comply with current legislation and ensure that our data is secure. At the same time, we respect the right to privacy of every person we work with and respect the right to delete data upon request.

8. Contributing to the company's principles and

As TLC employees, we work together to improve our workplace. We freely express our expectations and the opinions of others and make suggestions and proposals for changes that shall improve working conditions and the services provided. We support the company in its development and in meeting customer expectations.

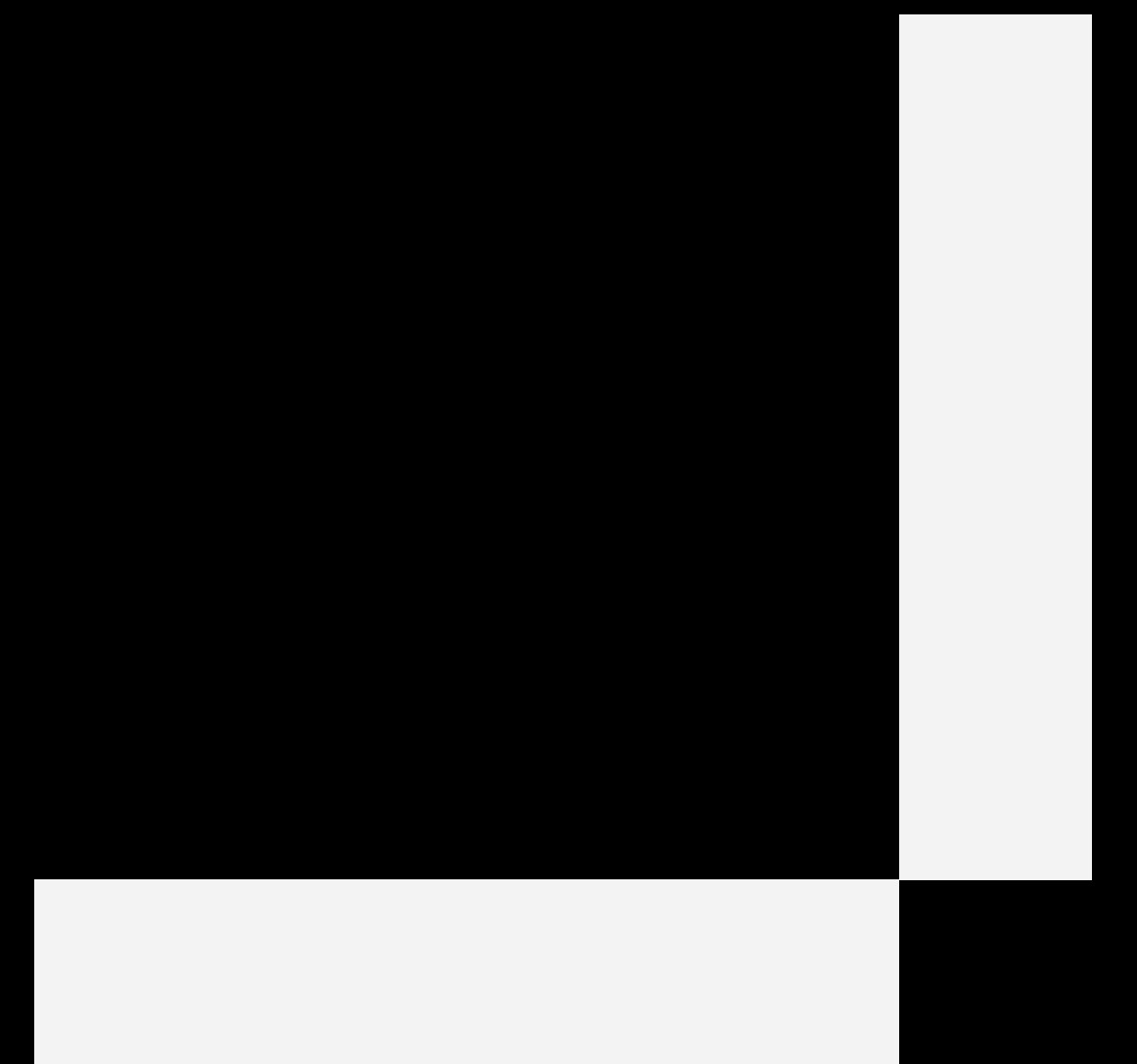


We, the TLC employees

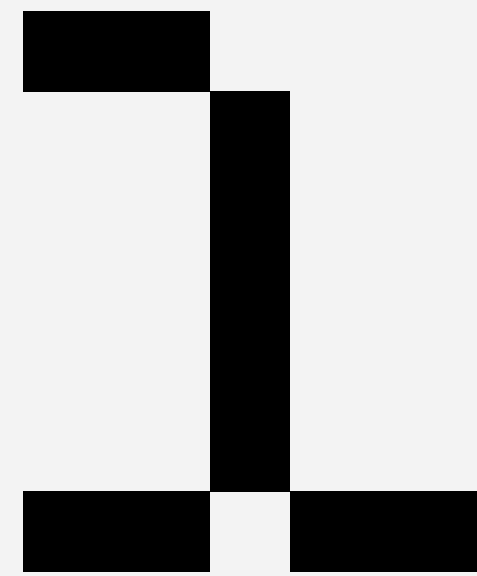
Each of us brings different viewpoints, experiences, and sensitivities to the workplace. This challenges us and allows us to think together more broadly. We are tolerant and open to dialogue and diversity in the workplace.



We are committed to upholding the principles set out in this Code of Conduct to jointly build an atmosphere of mutual trust and responsibility.

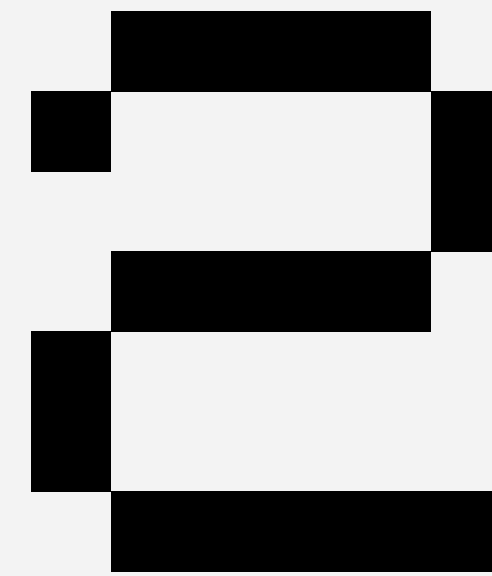


How do you act ethically? Signpost for ethical behavior.



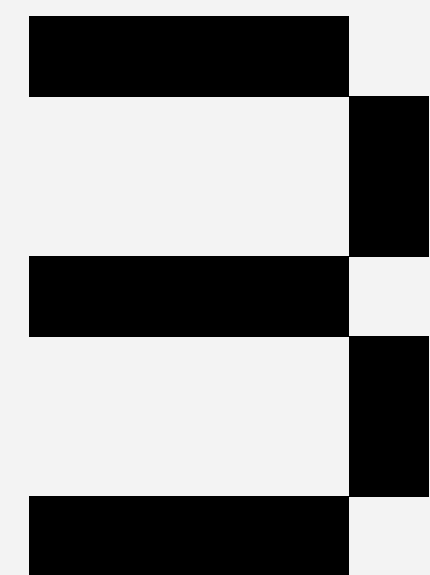
Policy

Does my decision comply with company policies, applicable laws, and regulations?



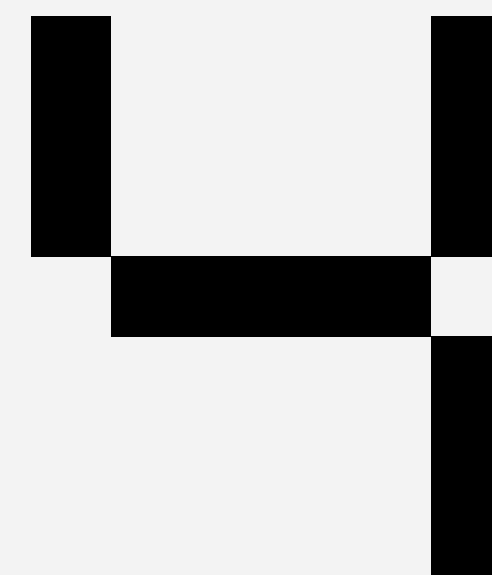
Company

Is my choice suitable for the company?



Employees

Does my decision benefit our employees?
Does it contribute to their well-being and respect for their dignity?



Planet

Is my decision good for the environment?
Does it minimize the impact on the planet and support sustainable activities?

Check your intuitive feeling!

Would you feel comfortable informing a loved one of your decision?

Implementing the principles of our Code of Conduct is key to maintaining high standards of ethics and responsibility in our company.

Our Code is the foundation of our operations, and adherence to it ensures that we act by our values, the law, and the expectations of our customers and partners. It is also essential to monitor the application of these principles regularly to ensure that they are followed at every level of our organization.

This allows us to detect potential violations in real time and take appropriate steps to improve our operations continuously.

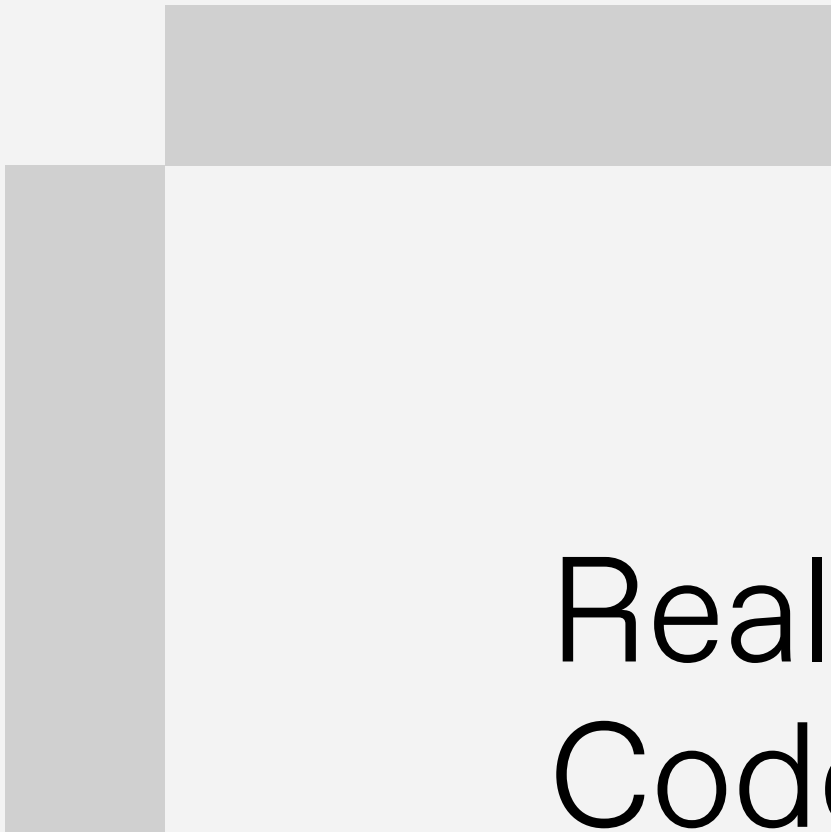


Reporting violations of the Code


Supervisors and designated employees must be informed of violations of these standards of business conduct or other unethical or illegal activity. We ensure that anyone reporting wrongdoing is protected from retaliation and that their safety and privacy are our priority.

Applications may be addressed to ethics@tlc.eu.





Realizing the consequences of violations of this Code Adherence to the Code of Conduct is crucial to maintaining our shared values and work culture. Any breaches shall be taken seriously.

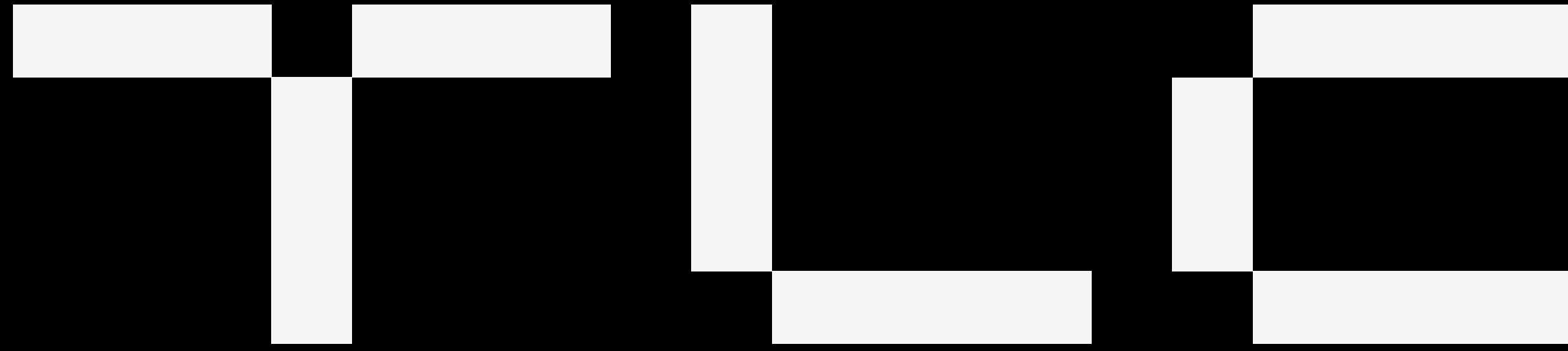


We are committed to solving problems together, but in exceptional cases, serious violations may lead to more decisive steps, including termination of cooperation.



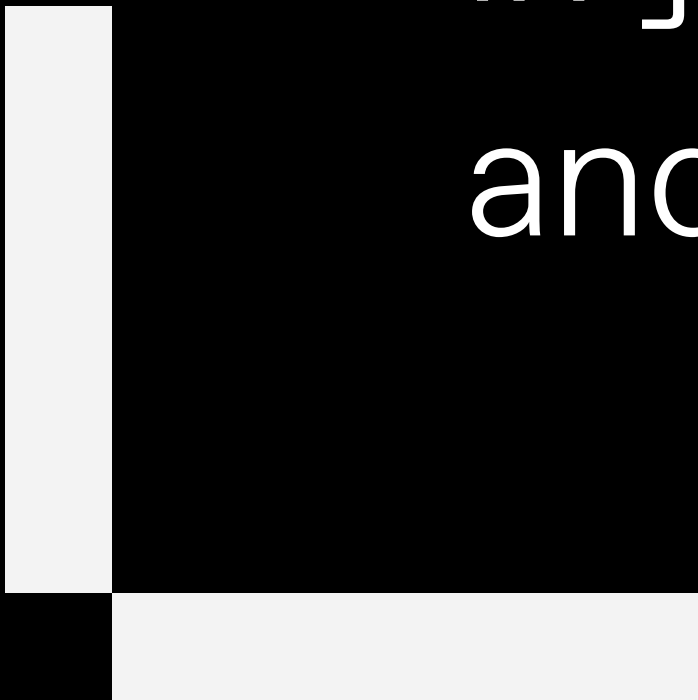
About TLC

We are a Swedish-Polish brand specialising in designing and producing solutions for the industrial and construction sectors. Our product range includes steel stairs, industrial footbridge systems, and mobile site security systems. With our global reach, thousands of completed projects confirm our reliability as a trusted business partner. Our key customers include leading companies in these sectors. We are a reliable partner, ensuring confidence and seamless execution in your industrial or construction project



EU

STEEL EQUIPMENT
DESIGN, PRODUCTION & RENTAL



We provide confidence
in your construction
and industrial projects.

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info@tlc.eu