

Code of Ethics

Dear Employees,

Reputation of our organization, trust of our customers, suppliers, employees and society, depends on proper behaviour of each NICROMET's employee. Each of us is obliged to follow rules, values and consequent responsibilities described below in order to keep good company image. Compliance with cultural principles is the base of our behaviour, which manifests itself in showing respect for colleagues and people outside our organization as well as mutual trust and respect for natural resources.

Each NICROMET's employee is obliged to read up and use in practice in daily work the rules described in this Code of Ethics. In case of any questions, unclear point or doubts, each employee may ask his supervisor for explanation, who deals with any policy violations and takes appropriate remedial action accordingly.

1. Obligation

NICROMET obligates itself to follow social responsibility by complying with the regulations in force in the countries in which it operates. He treats his business partners fairly and keeps the agreements taking into account the framework conditions.

2. Corruption

In cooperation with business partners (customers and suppliers) and government institutions, the interests of the company has to be strictly separated from private interests. Commercial activities and related decisions must be free from outside pressure and personal interests. The applicable anti-corruption law has to be used, including:

- **criminal acts in the form of bribing officials**

Giving personal benefits (monetary or gifts) by NICROMET's employees to officials, in order to obtain any benefits for NICROMET or for yourself or third parties is **strictly prohibited**.

- **accepting material benefits**

Offering, promising, accepting or providing any material or monetary benefits in exchange for favoring / privileges in commercial interests is **strictly prohibited**.

NICROMET's management and employees are prohibited from offering, promising, requesting or accepting any gifts or other financial benefits, invitations or services that may have adverse effects on business relations in business dealings. This does not apply to cases where such gifts or invitations are commercial hospitality, tradition or courtesy.

3. Competition

The NICROMET company complies fair competition by complying the law protecting and supporting the principles of competition and other provisions regulating competition policy.

4. Forced labor, child labor

- NICROMET rejects any form of forced labor
- NICROMET complies with the United Nations provisions on conventions on human rights and children's rights. The company undertakes in particular to comply with the conventions regarding the minimum age for admission of child employment (Convention 138 of the International Labor Organization) as well as the convention on prohibition and immediate action to eliminate the worst forms of child labor (Convention 182 of the International Labor Organization). If any other national regulation provides for more radical standards on employment and child labor, they should be used first.

5. Rules of social responsibility

- **Human Rights**
NICROMET respects and complies internationally recognized Human Rights.
- **Discrimination**

The company undertakes to comply with applicable laws and regulations prohibiting any discrimination. In particular, discrimination against employees based on sex, race, disability, origin, religion, belief, age or sexual orientation.


- **Healthcare**
NICROMET guarantees work safety and health protection at the workplace.
- **Fair working conditions**
NICROMET respects the right to associate its employees under applicable laws and regulations.

The company complies with environmental regulations and supports the activities of its employees for environmental protection for present and future generations.

- **Responsible sourcing of minerals**
NICROMET does not use in its production processes "Conflict minerals" (tin, tantalum, tungsten, gold), and therefore does not purchase these metals in conflict countries.
- **Confidentiality**

NICROMET obliges its employees to respect confidentiality. It is forbidden to transfer or disclose any company confidential information and documents to third parties in any way. The exceptions are authorizations and publicly available information issued for this purpose, as well as all control bodies authorized to obtain confidential information.

- **Compliance with the above principles**
NICROMET undertakes to familiarize its employees with the content of the Code of Ethics and its obligations.

Data wydania 2018-04-03	Wydanie 2	Zatwierdził:  Członek Zarządu Dawid Myciślik
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NICROMET S.A. Z O.O.