



Code of Ethics of Dr. Miele Cosmed Group Capital Group



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Introduction.

For our organisation, adherence to ethical principles and culture is an inseparable element of conducting business. We perceive trust – built through honest and reliable work – as the right approach to managing the company in every aspect and as one of the key paths to success. The Code of Ethics is our compass and a message to our business partners about the values we follow and respect we expect in all areas in all areas.

We are a cohesive, ambitious and effective team that values professional challenges. We treat others the way we want to be treated ourselves: fairly, justly, and with mutual respect and tolerance. Our strength lies in the fact that we work in a family-owned company – the owners know the employees personally, address them informally, and work alongside them at the same desk.

By adopting this Code of Ethics, we aim to facilitate everyday decisions and actions. I trust that every current and future Employee will know it and identify with its principles.

As the basis for developing the Code, we adopted globally recognised standards defining human rights and labour rights. We strive to grow in a responsible and sustainable manner; therefore, we commit to acting in accordance with the Universal Declaration of Human Rights, and respect for ethical principles is one of the Management Board's priority areas of interest.

Management is obliged to promote – through its own behaviour – the values and norms defined in the Code. To this end, it is advisable to encourage Employees to openly report ambiguities or breaches of the Code's rules and to ask questions about its content and application.

The Code of Ethics is available from the Ethics Officer, in the HR Department, and on the official website **www.dr-miele.eu**

We encourage employees to submit their own ideas that may improve the functioning of the Code and help solve existing issues.



How was the Code of Ethics developed?

During the development of the Code of Ethics, a review was carried out of the applicable legal regulations concerning human rights and their protection, as well as an analysis of the risks of breaches and the impact such breaches could have on the organisation. A review of best practices was also conducted – procedures used by enterprises conducting business activities that ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions indicated in the ILO Declaration on Fundamental Principles and Rights at Work, as well as the principles and rights included in the International Bill of Human Rights.

The risk analysis was conducted separately for each group of stakeholders.

When discussing risks, the attitudes presented by the Company in its relations with particular stakeholders were identified. These attitudes are aligned with the Company's values and ensure respect for the rights of the Company's Employees and all its Stakeholders.

An analysis was also conducted of the internal regulations currently in force within the Company that concern human rights, their protection, and ethical issues (including the Respect for Human Rights Policy in the Dr. Miele Cosmed Group Capital Group).

These activities ensure that this Code of Ethics is a "tailor-made" document, adapted to our organisation. It was developed in close cooperation with the Management Board, thereby implementing the principle of "tone from the top" and providing the best confirmation and guarantee of the relevance and validity of the content developed herein. Management-level staff were actively involved in its development ("tone from the middle"), and during workshops, all employees – both administrative and production – were asked for input to support the creation of the document. This enabled a multi-perspective view of the issues discussed.

Who does the Code of Ethics apply to?

The Code of Ethics applies to and is binding on all of us – Employees and members of the governing bodies of all companies forming the Dr. Miele Cosmed Group Capital Group, regardless of the basis of employment. One ethical standard also means that the principles contained in the Code apply to all our relationships with our stakeholders. Every Employee is obliged to familiarise themselves with its content and to comply with the principles contained herein.

About us

Our mission

Our mission is to deliver top quality products, created by people - for people, using state-of-the-art technology and with care for the environment.

Our vision

MieLove values, a safe world for generations.

The "Mielove" logo, where "Miel" is in a dark blue font, "love" is in a lighter blue font, and a pink heart symbol replaces the letter "o" in "love".

Our values

Quality

Quality is the sum of processes that deliver a consistent, high-class product with the best formulation, thoroughly verified for compliance with the highest standards at every stage of the product life cycle, and prepared by a professional Team.

Innovation

We seek competitive advantages built through curiosity, ambition, knowledge, innovation, creativity, awareness of market trends, and understanding customer expectations.

People

We believe that a stable, diverse, passionate Team has the power to build an organisational culture based on respect and cooperation, where everyone plays a role in achieving common goals.

Sustainable development

We act so that every business decision aligns with global environmental, social and corporate governance goals and practices.

Our attitudes

#kindness #respect #responsibility #growth

Relations with customers and consumers.

1. We deliver valuable, high-quality, well-crafted products that are safe to use. We offer products that comply with national and international standards or, in the absence of such standards, we conduct appropriate safety tests in accordance with internally implemented quality standards.

#respect #responsibility

2. We provide only complete information and non-misleading descriptions regarding the products and services offered, as well as their impact on users and the environment.

#respect #responsibility

3. We always strive to ensure a high standard of service support.

#respect #responsibility

4. We maintain open communication to best meet the needs of our customers. In marketing, advertising, and external communication, we provide complete, truthful and reliable information only.

#respect #responsibility

5. We design products to be accessible to the widest possible group of users, regardless of age or type and degree of disability.

#respect #responsibility

6. We do not give or accept any gifts from customers, except for marketing gifts bearing the customer's logo or ours. In this regard, we apply the provisions of the Anti-Corruption Policy of the Global Cosmed Capital Group.

#respect #responsibility

7. We do not engage in practices aimed at increasing sales through any marketing activities that are unlawful.

#respect #responsibility

8. We keep confidential all proprietary information obtained from customers. We do not disclose confidential information about the Company to customers, except for what is necessary to carry out cooperation.

#respect #responsibility

Relations with shareholders, stakeholders and other investors.

1. We protect the interests of shareholders, stakeholders and other investors. We do not favour one group of investors over another.

#respect #responsibility

2. We strive to achieve an attractive long-term return on equity.

#respect #responsibility #growth

3. We conduct an open and comprehensive information policy with our stakeholders. We provide honest information regarding our business strategy, its implementation, and development prospects.

#respect #responsibility

Workplace relations.

1. We make every effort to embody the values and attitudes promoted by the organisation. We are all its ambassadors.
#respect #responsibility
2. We hire and promote Employees based solely on their competencies, achievements and attitude.
#respect #responsibility #growth
3. Employees are reliably informed about the company's objectives, tasks, and the conditions and prospects of employment in individual job positions.
#respect #responsibility
4. We apply transparent and clear remuneration policies. The rules of the remuneration system are structured to reflect the individual contribution of each Employee.
#respect #responsibility
5. The Employer helps Employees enhance their qualifications, supports their career and professional and personal development, and self-improvement should be a daily habit of Employees.
#responsibility #growth
6. We value diversity in the workplace because it motivates us to grow. We are open to the exchange of views, ideas and initiatives. We set ambitious goals.
#respect #responsibility #growth
7. Kinship and close relationships existing in our company as a family business have no impact on the professional decisions we make. We immediately inform our supervisor of any risk of a conflict of interest.
#responsibility #respect
8. We are one Team, where everyone acts for the development of the entire company. We take care of the company as if we were its owners, and when making decisions, we consider both their short-term and long-term effects for the entire company, as well as the opinions and needs of different stakeholders. We are not afraid to admit mistakes. We know that mistakes are lessons that support our professional and personal development. We can accept another person's mistake and support them in corrective actions.
#responsibility #respect
9. Relations between the Employer and Employees, as well as among Employees themselves, are based on mutual respect and kindness. We try first to listen and understand one another. We listen to all Employees—we know that Employees are a wealth of knowledge on how to build work efficiency. We respect everyone's work.
#kindness #respect
10. We take full responsibility for the tasks we perform, which we complete with engagement, perseverance and a comprehensive approach. We present a proactive attitude. We are disciplined and reliable in performing our tasks, which builds the trust of colleagues and supervisors.
#responsibility

11. We strive to ensure open and comprehensive communication among Employees within teams and across the entire organisation. We support the exchange of information and consultation of activities within the Teams in which we work, as well as between Teams. We make sure to provide feedback to Employees, supervisors, and colleagues, as it helps us grow and reinforces makes us feel that our work contributes significantly to achieving the organisation's goals.

#respect #responsibility

12. We support horizontal promotions so that our Employees may perform work that aligns as closely as possible with their personality type and talents.

#respect #responsibility

13. We respect the personal and property rights of colleagues and the company (equipment, company-owned items, company cars, intellectual property, etc.).

#respect #responsibility

14. We care about the balance between private and professional life. It guarantees good health, well-being, and effective work. Therefore, we respect the right to digital disconnection outside working hours.

#respect #responsibility

15. We comply with legal regulations, including human rights, and we categorically do not accept their violation. We respect the right to freedom of association and do not accept forced labour, child labour, or working conditions that do not meet occupational health and safety standards. We do not accept any form of mobbing, discrimination, or harassment. If such incidents are confirmed, we apply strict consequences. Procedures for preventing discrimination and mobbing, as well as procedures for reporting and handling breaches and complaints, are regulated internally within labour law policies.

#respect #responsibility

16. We avoid situations that may pose a risk of violating the Anti-Corruption Policy of Companies within the Dr. Miele Cosmed Group Capital Group, particularly conflicts of interest.

#respect #responsibility

17. We ensure a clean, healthy, and safe working environment, in accordance with standards, legal regulations, and principles of office etiquette. Employees also take due care to avoid accidents, injuries to themselves, colleagues, or third parties. Every Employee has the right and obligation to immediately report to their supervisor or the OHS Department Manager any identified safety hazards, work-related accidents, or potentially dangerous situations. Reporting such cases must not result in any negative consequences for the Employee.

#respect #responsibility

18. We ensure the confidentiality of personal data provided to the Employer by Employees. Personal data is processed in accordance with the principles of lawfulness, fairness, transparency, minimisation and integrity, as defined in the General Data Protection Regulation (GDPR) and in the Personal Data Protection Policy of the Dr. Miele Cosmed Group Capital Group. Each Employee is obliged to protect personal data they access in connection with the performance of their duties.

#respect #responsibility

19. Confidential information obtained from Employees during work will not be used for any purpose other than the one for which it was provided.

#respect #responsibility

20. We respect each person's right to hold different political views; however, we do not accept political agitation or election campaigning within the company. Our company remains politically neutral.

#respect

21. We strive to maintain collegial relationships with current and former employees.

#kindness

22. Supervisors represent the interests of their Employees in dialogue with individuals performing managerial duties and key managers.

#respect #responsibility

23. We develop procedures for dispute resolution and do everything possible to resolve disputes without allowing conflicts to escalate.

#responsibility

Relations with Suppliers.

1. We aim to base our relationships with suppliers on mutual trust, honesty and respect.

#respect

2. We apply transparent procurement policies.

#respect #responsibility

3. We expect our suppliers to conduct business ethically, including respecting human rights and the natural environment. Our approach and rules of conduct in relations with suppliers are defined in internal regulations, in particular the ESG-Compliant Sustainable Supply Chain Management Policy.

#respect #responsibility

4. We strive to make payments for delivered goods or services within the agreed time limit and in accordance with the contract.

#respect #responsibility

5. We do not exploit the Company's position as a large enterprise.

#respect #responsibility

6. We avoid events that carry a risk of breaching the Anti-Corruption Policy of the Dr. Miele Cosmed Group Capital Group. We do not accept any form of corruption or bribery. All forms of hospitality, gifts, donations and sponsorship exceeding the established limit must be reported in advance and recorded in the Gift Register maintained by the Compliance Officer. The purpose of keeping the register is to ensure transparency and protect against corruption risks or the appearance of unethical conduct. We are aware that gifts, hospitality, donations and other similar benefits may be perceived by third parties (e.g. competitors, the press, public officials, business partners, law enforcement authorities, courts etc.) as serving a corrupt purpose, even if neither the giver nor the receiver views them that way. We avoid any gifts, hospitality, donations and other material or personal benefits that could reasonably be perceived by third parties as corruption.

#respect #responsibility

7. We avoid conflicts of interest and any irregularities related to them.
#respect #responsibility
8. Information concerning relations between the company and contractors is treated as confidential.
#respect #responsibility

Relations with Competitors.

1. We compete fairly with our competitors and do not undermine their reputation.
#respect #responsibility
2. We do not disclose confidential company information to competitors.
#szacunek #odpowiedzialność
3. We do not obtain information about competitors through illegal means.
#respect #responsibility

Relations with authorities and local communities.

1. We want to be a good neighbour to the communities in which we operate. We strive to serve the community through activities that are beneficial both for the company and for the community, as well as by creating favourable job opportunities and good working conditions.
#kindness #responsibility
2. We consider the interests of the wider environment, taking into account local, national and global interests in our operations.
#kindness #responsibility
3. Where possible, we support the local community through donations for social and charitable purposes.
#kindness #responsibility

Approach to the natural environment.

1. In our operations, we are guided by a high degree of responsibility for the natural environment.
#respect #responsibility
2. We care for the protection of the natural environment in accordance with best industry practices and use natural resources responsibly.
#responsibility #respect
3. We develop positive habits in saving water and energy resources and minimising waste emissions.
#responsibility #respect
4. We do not conduct animal testing.
#responsibility #respect

Relations with the political environment.

1. We operate with full respect for the law enacted by competent local, regional, national and EU authorities.
#respect #responsibility
2. We oppose political activities that promote hatred, prejudice or discrimination against certain groups or individuals.
#respect #responsibility
3. We do not grant preferential treatment to politicians, public officials or their families.
#respect #responsibility

Public procurement.

If we decide to participate in public procurement processes:

1. We avoid situations that carry a risk of breaching the Anti-Corruption Policy of the Dr. Miele Cosmed Group Capital Group, particularly conflicts of interest.
2. We include in our offer only substantive conditions that we are genuinely able to meet.
3. We present our achievements and experience reliably.
4. We do not take actions that discredit competitors.
#respect #responsibility

Relations with international business.

1. We respect the laws and customs of other countries and the people who live there.
2. We respect the traditions and culture of each country.
3. We act responsibly in the field of international trade, in accordance with agreements recognised by Poland.
#respect #responsibility

Relations with the media and public opinion.

1. We always provide complete and reliable information about the company and its activities.
2. We try to respond promptly to all questions regarding the company and its products.
3. We are open to constructive criticism and discussion that inspires further development.
4. External communication is handled only by the Management Board, the person responsible for external communication and PR, or individuals authorised by the Management Board.
#respect #responsibility

Sanctions for non-compliance with the Code of Ethics.

1. Failure by an Employee to comply with the rules of the Code of Ethics may result in the imposition of disciplinary sanctions provided for under labour law or under civil law contracts binding the Employee with a company of the Dr. Miele Cosmed Group Capital Group. Non-compliance with the Code of Ethics may constitute grounds for terminating the civil law contract forming the basis of cooperation with a company of the Dr. Miele Cosmed Group Capital Group, as well as grounds for terminating the employment in the cases provided for in the Labour Code.
2. Non-compliance with the rules of the Code of Ethics by Suppliers and Customers may result in the termination of business relations.
3. The severity of sanctions should be proportionate to the gravity and nature of the breach, taking into account mitigating circumstances. A person subject to a sanction has the right to appeal against the decision.

Reporting breaches of the Code of Ethics.

1. Cases of suspected breaches of the Code of Ethics in the activities of the Dr. Miele Cosmed Group Capital Group or in the activities of Business Partners, or in connection with the activities of the Dr. Miele Cosmed Group Capital Group or its Business Partners, may be reported by Employees to the Ethics Officer or the Whistleblowing Compliance Officer.
2. Methods of reporting irregularities:
 - direct conversation with the supervisor,
 - telephone conversation with the supervisor,
 - email report sent to the supervisor,
 - conversation with the Ethics Officer,
 - conversation with the Whistleblowing Compliance Officer,,
 - telephone conversation with the Ethics Officer,
 - telephone conversation with the Whistleblowing Compliance Officer,
 - email report sent to: **naruszenia@dr-miele.eu**,
 - email report sent directly to the Ethics Officer,
 - email report sent directly to the Whistleblowing Compliance Officer,,
 - report submitted via traditional mail to:
Ethics Officer or Whistleblowing Compliance Officer
Dr. Miele Cosmed Group S.A.
ul. Wielkopolska 3
26-600 Radom
 - report submitted via the active form on the website:
www.dr-miele.eu,
 - report submitted using a paper form placed in one of the Whistleblowing Boxes.

The Company ensures full protection for the person reporting a breach of the Code's rules, including protection against any retaliatory actions, discrimination or adverse treatment. Protection also extends to individuals assisting in making the report. All reports are reviewed confidentially, in accordance with applicable laws and regulations.

3. Procedure for handling reported irregularities, in accordance with the Internal Reporting Procedure in Dr. Miele Cosmed Group S.A.:



Implementation and verification of the Code of Ethics.

1. Employees undergo training on the ethical principles in force within the Dr. Miele Cosmed Group Capital Group at least once every two years.
2. The Ethics Officer is responsible for raising Employee awareness of ethical principles, including providing training referred to in point 1.
3. In case of any doubts regarding the interpretation of the provisions of the Code of Ethics, the Employee should clarify these doubts with their Supervisor or the Ethics Officer.

4. The Code of Ethics is subject to a mandatory review and, if necessary, update at least once every two years, carried out by the Ethics Officer. The Ethics Officer prepares an internal memo documenting the review and informs the Management Board member responsible for compliance supervision of any need to update the Code of Ethics.
5. The Supervisory Board, acting through its Committees, oversees compliance with ethical principles within the Dr. Miele Cosmed Group Capital Group. The Supervisory Board Committees review, at least once a year, the reports of the Ethics Officer and Compliance Officers on the functioning of the Code and recommendations for improvements.
6. Monitoring compliance with the provisions of this Code of Ethics is carried out in accordance with applicable internal control regulations.
7. This Code of Ethics enters into force on the date of its adoption and announcement by each company within the Dr. Miele Cosmed Group Capital Group.
8. Managers of the relevant organisational units within the companies of the Dr. Miele Cosmed Group Capital Group are responsible for ensuring that their Employees are familiar with this Code of Ethics.
9. The content and any amendments to the Code of Ethics are communicated in documentary form or via email. Information provided in this way becomes binding on the Employee from the moment they could have become acquainted with it, without the need to confirm it in writing. However, in some cases, an Employee may be required to submit a written statement confirming this fact. The template statement of the person obliged to comply with the Code of Ethics constitutes Attachment No. 1 hereto.
10. The content of the Code of Ethics, or its summary, will be published on the website of Dr. Miele Cosmed Group S.A.
11. The content of the Code of Ethics will be provided to Suppliers and Customers together with an obligation to comply with it.
12. The Code of Ethics constitutes an integral part of the compliance management system within the Dr. Miele Cosmed Group Capital Group. Implementation of its provisions is supervised by the Compliance Officers, who cooperate with the Ethics Officer in monitoring adherence to ethical principles and reporting to the Management Board and the Supervisory Board and its Committees.


Management Board of Dr. Miele Cosmed Group S.A.



Magdalena Miele
President
of the Management Board



Arthur Mielimonka
Member
of the Management Board



Kamil Szlaga
Member
of the Management Board



Michał Czajka
Member
of the Management Board

Attachment No. 1 to the Code of Ethics of the Dr. Miele Cosmed Group Capital Group

Template statement of the person obliged to comply with the Code of Ethics of the Dr. Miele Cosmed Group Capital Group

.....
place and date

Statement of Acknowledgement of the Code of Ethics of the CG Dr. Miele Cosmed Group

I, the undersigned,
hereby declare that I have read the Code of Ethics of the Dr. Miele Cosmed Group Capital Group
and I undertake to comply with its provisions

.....
signature