**SUPPLIER CODE OF ETHICS OF THE PCPM FOUNDATION**

**A. INTRODUCTION**

One of the fundamental principles of the PCPM Foundation is to act in an open, transparent and accountable manner at all times, towards all of our staff and partners. In line with this principle, the PCPM Foundation and its employees strive to uphold the highest ethical standards in the course of the Foundation’s activities, including procurement as well as the acquisition and use of grants and donor funds.

This “Supplier Code of Ethics of the PCPM Foundation” sets out the principles that our Suppliers are expected to follow in their cooperation with us and within their own supply chains. We expect Suppliers to ensure that the principles adopted by us and indicated in this Code are respected and applied.

**B. Standards and Requirements.**

**COMPLIANCE WITH THE LAW**

1. Suppliers comply with the statutory and regulatory requirements of the countries in which they conduct business. The PCPM Foundation does not tolerate any practices that are contrary to the law.
2. The PCPM Foundation expects Suppliers to comply with all applicable export-control laws and trade, economic and financial sanctions regimes imposed under domestic and international law or by regulations of institutions such as governments, the European Union, EU Member States or other legislative bodies.

**HUMAN RIGHTS**

1. Suppliers are required to treat all persons with dignity and respect, to uphold the principles of fundamental and inalienable human rights, and to support their protection.

**LABOUR STANDARDS**

1. Employment is voluntary and lawful. Any form of forced or compulsory labour, including practices akin to slavery, is prohibited.
2. Workers are ensured freedom of employment and the ability to terminate employment upon notice in accordance with applicable law.
3. Employment, remuneration, other benefits and working time comply with the applicable statutory and regulatory provisions in the country where business is conducted, in particular those concerning minimum wage, maximum daily working time, overtime and days off.
4. Freedom of association and the right not to associate, as well as collective bargaining, are respected.
5. The use of child labour is prohibited. Employment of juveniles is permissible only in accordance with the law. The Polish Labour Code is treated as a baseline standard; therefore, the use of child labour is prohibited even where such practices are legally permissible in the country of operation.

**FAIR TREATMENT**

1. Employees are provided with an open and supportive working environment. Every employee has the right to equal treatment, respect and respect for diversity.
2. Discrimination on the grounds of sex, age, disability, culture, race, religion, nationality, political opinion, trade‑union membership, ethnic origin, creed, marital status, sexual orientation, type of employment or working time is not accepted. Equal access to employment, remuneration, promotion and professional development is ensured.
3. There is zero tolerance for sexual violence or any other forms of abuse and harassment, including verbal abuse, intimidation, bullying, and cruel or inhuman treatment.

**HEALTH AND SAFETY**

1. Every employee is provided with safe, healthy and hygienic working conditions in accordance with applicable regulations and with due regard to industry specifics.
2. The obligation to comply with health and safety regulations also includes training and raising employees’ awareness, implementing all necessary measures to prevent occupational accidents and diseases, and to respond to and mitigate them.

**ENVIRONMENT AND SUSTAINABILITY**

1. Suppliers should conduct their operations with due regard for the protection of the natural environment.
2. Suppliers comply with all applicable national and international environmental norms, standards and regulations.
3. Suppliers should implement measures to minimise negative environmental impacts, including by:
4. efficient energy and water management,
5. minimising waste and ensuring its transport, storage and handling in a way that prevents contamination of soil, air or water and avoids harm to people and animals,
6. minimising air emissions,
7. recycling waste and using recycled materials,
8. refraining from the use of materials commonly recognised as harmful to the natural environment.
9. In conducting their activities, Suppliers should act for the benefit of the local community and undertake initiatives that support its development.

**BUSINESS ETHICS**

1. Suppliers undertake to act honestly and to comply with both the law and generally accepted rules of conduct in business relations.
2. The PCPM Foundation applies a zero‑tolerance approach to corruption, trading in influence, support and financing of terrorism, and money‑laundering, and expects the same approach from its Suppliers.
3. Suppliers have an absolute obligation to comply with anti‑corruption regulations and to exercise due diligence to detect and prevent any acts of corruption and trading in influence in business relations.
4. All situations that may constitute a conflict of interest must be avoided.

**CONFIDENTIALITY**

1. The Supplier undertakes to protect against disclosure to third parties any data and information obtained in the course of cooperation with the PCPM Foundation, and to comply with statutory and regulatory provisions such as the General Data Protection Regulation (GDPR). Data and information shall not be disclosed to third parties without the written consent of the PCPM Foundation.

**C. COMPLIANCE WITH THE CODE**

1. Every Supplier cooperating with the PCPM Foundation is responsible for implementing and complying with this Code throughout its operations, including by having procedures in place to ensure that these provisions are respected by its staff, contractors and partners.
2. The Supplier must inform the PCPM Foundation of any breaches of this Code, including non‑compliance arising from the activities of contractors and partners, as part of monitoring and controlling its own operations. Any retaliatory actions against persons reporting breaches are unacceptable.
3. Any behaviour or situation that violates this Code must be reported without delay via the Whistleblowing Questionnaire available on the PCPM Foundation’s website (https://pcpm.org.pl/) or in writing to the address of the PCPM Foundation.
4. The PCPM Foundation reserves the right to monitor compliance with the provisions of this Code and requires the Supplier to provide, upon request, all necessary information and documents.
5. In the event of non‑acceptance, breach or violation of the “Supplier Code of Ethics of the PCPM Foundation”, cooperation may be terminated, and any ongoing contracts concluded with the Supplier may be terminated.