



Sustainable Development
Code for Vendors
of Bank Handlowy
w Warszawie S.A.

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The purpose of the Sustainable Development Code for Vendors of Bank Handlowy w Warszawie S.A.

The Sustainable Development Code for Vendors of Bank Handlowy w Warszawie S.A. (“Code”) defines the standards and expectations for business partners regarding the responsible conduct of business activities. This document provides guidelines for responsible business practices aligned with international ESG (Environmental, Social, Governance) standards. We expect our Vendors not only to comply with all applicable laws and regulations but also to take proactive steps to minimize their impact on the environment and society.

The Code presents the principles that we ourselves follow. We expect our Vendors and partners to act in ac-

cordance with the same standards or to have their own equivalent or even more stringent standards in place. We believe that responsible cooperation with business partners contributes to the long-term success of all parties involved and has a tangible positive impact on social conditions and environmental protection. The principles of the Code are based on international legal standards, guidelines recognized as sources of best practices in the areas of sustainable development, social responsibility, and corporate governance, as well as widely adopted market practices, in particular:



Universal
Declaration
of Human Rights



10 principles
of the UN
Global
Compact



17 Sustainable
Development
Goals



OECD Guidelines
for Multinational
Enterprises



International Labor
Organization'
Declaration on
Fundamental
Principles and
Rights at Work



United Nations
Convention
against
Corruption



Rio Declaration
on Environment
and Development
- Agenda 21

The Code applies to all entities that are Vendors of the Bank. A Vendor is any entity that provides services or delivers products to the Bank based on a signed contract and/or a submitted purchase order. The Vendor undertakes to comply with the principles set out in the Code.

The Code is a binding document for all Vendors of the Bank. Compliance with the standards defined in the Code is one of the evaluation criteria in the vendor selection process.

Corporate Governance



The Bank strives to build long-term, trust-based relationships with Vendors, the key element of which should be adherence to the highest standards and principles of corporate governance. We expect all our Vendors to conduct their business activities in an honest, transparent, and responsible manner, in compliance with applicable legal regulations and best market practices. We declare that the Bank has internal regulations and principles governing the ethical conduct of its employees. The Bank includes ethical clauses in its contracts with Vendors. In addition, the Bank expects each Bidder to confirm the application of ethical standards already at the procurement stage.

The Bank applies a zero-tolerance policy towards corruption in all aspects of its operations. All Bank’s Vendors are evaluated in terms of corruption risk. Each Vendor is verified for negative information indicating the risk of corruption.

Bank Handlowy w Warszawie S.A. adheres to the principles of corporate governance, and the applicable “Best Practice for the Warsaw Stock Exchange (GPW) Listed Companies” is available on a dedicated website on corporate governance:

GPW Main Market - Best Practice 2021

By accepting the Code, the Vendor declares that they have familiarized themselves with:

the principles governing the Bank’s anti-corruption activities, available on the Bank’s website at:

[View](#)

information on the possibility of reporting breaches in accordance with the Act of 14 June 2024 on the Protection of Whistleblowers, which the Vendor undertakes to communicate, after entering into an agreement with the Bank, also to its employees performing services for the Bank:

[View](#)



Environmental Standards

The Bank declares its commitment to achieving climate neutrality in its own operations by 2030 and plans to fully transition to renewable energy sources and adapt to new pro-environmental requirements. This will enable the Bank to achieve the goal of zero greenhouse gas emissions in its own operations by 2030.

As a financial institution supporting sustainable development, the Bank attaches particular importance to environmental responsibility throughout the entire supply chain. We are aware of the necessity of responsible environmental management and the efficient use of resources. We strive to take actions in line with the principles of social responsibility so that our resources are used in a way that brings long-term social benefits. Our commitment to environmental protection and sustainable development is reflected in the Sustainability Statement of Bank Handlowy w Warszawie S.A. and the Capital Group of Bank Handlowy w Warszawie S.A. for 2024 and in the Citi Handlowy Strategy for 2025–2027. Accordingly, our external business partners are required to apply similar principles. We expect our Vendors to conduct their activities in accordance with the highest environmental standards, while minimizing their negative impact on the surroundings and complying with applicable laws and regulations.

Vendors, both in their own operations and commercial activities, should exercise due diligence, understood as a process through which companies can identify actual and potential adverse impacts, prevent them, mitigate them, and take responsibility for their actions as an integral part of business decision-making and risk management systems.

Vendors are required to comply with all legal regulations concerning environmental protection, including national and EU laws as well as international standards on sustainability and on climate change mitigation. We encourage our Vendors to implement actions aimed at reducing the environmental footprint of their operations and to monitor their emissions with a view to their reduction. The Bank's business partners should strive to reduce the amount of waste generated, increase the role of recycling and product reuse through responsible waste management. In addition, Vendors should properly handle hazardous waste and other materials that may pose a risk to people and the environment, in accordance with applicable legal regulations.

Vendors are required to manage natural resources responsibly and to minimize their environmental impact. We expect all business partners to undertake actions aimed at protecting ecosystems and to manage water, energy, and raw materials rationally. Furthermore, Vendors are obliged to minimize the risk of water pollution by properly managing chemicals and implementing effective control and leak prevention systems.

We encourage Vendors to promote a pro-environmental attitude within their organizations and in their relationships with business partners, thereby ensuring responsible environmental management at every stage of their operations.



The Bank recommends and encourages the active reporting of non-financial data, the disclosure of environmental information, and the reporting of carbon footprint emissions. Entities subject to the reporting obligation under the Corporate Sustainability Reporting Directive (CSRD) should make disclosures in accordance with applicable legal regulations. For small and medium-sized enterprises not covered by this obligation, voluntary reporting is recommended in line with recognized

standards such as VSME (Voluntary Sustainability Standards for Micro and Small Enterprises). The Bank reserves the right to periodically request Vendors to provide data related to environmental matters (including information on applied processes, pro-environmental practices, and data concerning the carbon footprint associated with the supplies of goods and provision of services to the Bank as well as within own operations).

Corporate Social Responsibility

We believe that social responsibility is the foundation for building fair and lasting relationships with both clients and business partners. The Bank promotes a culture of equality and social inclusion; therefore, we expect our Vendors to be guided by the principles of sustainability and ethical conduct toward the communities in which they operate.

Vendors cooperating with the Bank are required to respect human rights in accordance with international standards such as the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. Vendors are expected to eliminate all forms of discrimination in employment, to ensure decent working conditions and fair remuneration, to respect freedom of association, and to prevent forced and child labor.

The Bank's Vendors should ensure safe and hygienic working conditions in compliance with applicable regulations and best industry practice. This includes adhering to occupational health and safety standards,

providing appropriate personal protective equipment, safeguarding employees' mental and physical well-being, and promoting a work-life balance. We seek to cooperate with Vendors who provide equal opportunities and treat all employees fairly, while eliminating any form of discrimination based on gender, age, origin, religion, sexual orientation, disability, or any other characteristics protected by law. It is also essential to foster a work environment based on inclusion, mutual respect, and openness to diversity.

We encourage our business partners to create a positive impact on the local communities in which they operate by engaging in and promoting social initiatives.



An aerial photograph of a river flowing through a landscape. The river is a vibrant blue, contrasting with the surrounding green and brownish-yellow terrain. A bridge with a white railing spans the river in the upper middle of the frame. The overall scene is captured from a high angle, showing the meandering path of the river and the textures of the land.

Sustainable Procurement Practices

Responsible procurement, which takes into account environmental, social, and ethical aspects, is an integral part of our supply chain and has a significant impact on the achievement of sustainable development goals. Accordingly, we expect all our Vendors to conduct their commercial or service-related activities responsibly, with due regard for their impact on the environment and society.

A sustainable approach to procurement includes consideration of economic, environmental, and social aspects. In our procurement processes, we take actions aimed at achieving a balance between meeting financial requirements, minimizing negative environmental impacts, and improving social conditions.

The Bank applies a structured Vendor assessment process, both prior to establishing cooperation and throughout the course of business relations. The purpose of this process is to ensure that the selection of Vendors is based on transparent, objective, and fair criteria that support effective and responsible relationship management across the entire supply chain. The Bank's procurement processes take into account the creation of a sustainable and responsible chain of activities that supports the implementation of sustainability objectives and strengthens operational resilience. Our goal is to ensure that the Bank's Business Partners meet high quality, ethical, and sustainability standards.

Before commencing the Vendor selection process, every person involved on behalf of the Bank is required to sign a declaration confirming that there is no conflict of interest.

This declaration is intended to ensure that procurement decisions are made objectively and free from any influence of personal interests or external relationships that could distort the Vendor selection process.

We strive to ensure that communication with Bidders and Vendors is clear and transparent for both parties. We make every effort to ensure that all information regarding procurement procedures and contractual provisions is formulated precisely and comprehensibly.

As part of the Vendor selection process, the Bank applies a range of objective evaluation criteria, such as the quality of offered products and services, experience, and price. In every case, one of the evaluation criteria is an assessment of ESG factors. The ESG assessment includes, among other things, the Vendor's practices related to environmental protection, social responsibility, and corporate governance. These criteria are an integral part of the Vendor selection process and affect the final procurement decision. We encourage Vendors to disclose sustainable solutions implemented within their organizations.

Before establishing cooperation with a selected Vendor, the Bank conducts a Vendor verification process each time to ensure compliance with requirements relating, among other things, to sanctions restrictions or anti-money laundering regulations, and the absence of social security contribution arrears. The Bank only cooperates with entities whose verification results raise no concerns. When submitting offers to the Bank, Bidders are required to adhere to the fundamental principles of fair competition, to refrain from influencing decision-makers through non-substantive arguments, and to avoid taking actions that discredit competitors, especially those based on false or unsubstantiated claims not confirmed by final court judgments.

Bidders are also required to present their experience and achievements truthfully, to offer terms and commitments that can realistically be fulfilled, and to refrain from using dumping prices in their quotations.

As part of the Vendor selection process, the Bank requires that all participants read and comply with the principles of this Code, which is part of the Commitment Letter. That document forms an integral part of the Request for Proposal ("RFP") and the Request for Information ("RFI"). By signing the Commitment Letter, the Bidder confirms that they have obtained clear information regarding the purpose and course of the procedure and that all information obtained during the process will be treated as strictly confidential.

Acceptance of the Commitment Letter, attached as Appendix No. 1 to the RFP or RFI, is equivalent to the acceptance of the Sustainable Development Code for Vendors of Bank Handlowy w Warszawie S.A.

Acceptance of the Code is a prerequisite for concluding an agreement with the Bank.

By entering into the agreement and commencing the execution of an order, the Vendor undertakes to act in accordance with the principles of the Code.



Vendor Cooperation *Monitoring*

We aim for our cooperation with Vendors to be based not only on shared business objectives but also on social and environmental responsibility. Accordingly, we reserve the right to apply various methods to monitor and verify Vendor conduct, which help us check if the principles of the Code are put into practice. We consider it essential that responsibility for social and environmental impact is not merely declarative but reflected in real actions. Monitoring relationships with Vendors also helps us better understand the needs and challenges of our Partners and is treated as part of an ongoing dialogue and mutual development.

We may verify compliance with the Code using various tools, including:

- Vendor Questionnaire – an electronic survey through which we request individual Vendors to provide the required data and information regarding their business activities;
- Documentation Analysis – review of submitted documentation (certificates, reports, compliance statements) provided to the Bank for verification;
- Dialogue, collaboration and training – we recommend contact in case of problems, doubts, or difficulties related to fulfilling the obligations arising from the Code. In justified cases, we may also propose additional training and materials supporting the implementation of sustainability requirements.
- Audit – audits may be conducted either directly by the Bank or by external auditors, under an agreement with the Bank. These audits are carried out to ensure compliance with applicable laws and regulations (in particular, the Banking Law and the Statutory Auditors Act) and as part of ongoing monitoring and improvement of the Bank's operational effectiveness and safety.



If the Bank receives information about actions inconsistent with the Code, Vendors should, upon request of the Bank, demonstrate compliance with the principles of the Code. If the Bank identifies or suspects instances of non-compliance with this Code, it will inform the Vendor and expect the elimination of such irregularities within an agreed timeframe. The Vendor may also be asked to present a corrective action plan along with a schedule for its implementation.

The results of verification of the Vendor's activities are documented in the Bank's internal records. The frequency of Vendor monitoring activities will be adjusted according to the ESG risk level determined based on the type of cooperation. Monitoring results, including data provided by Vendors, may be included in internal reporting as well as in non-financial reporting, and may be disclosed as part of the Bank's sustainability reporting, provided that data supplied by Vendors will only be disclosed to the extent required by applicable laws and regulations and

sustainability reporting standards. The Vendor monitoring process will be subject to regular reviews and updates to ensure compliance with regulatory changes.

To ensure transparency and effective ESG risk management, the Bank provides a dedicated email address through which Vendors and all stakeholders can report environmental and ethical incidents, breaches of the Sustainable Development Code for Vendors of Bank Handlowy w Warszawie S.A., as well as other irregularities related to supply chain cooperation.

All reports will be considered confidential, as appropriate, to the extent permitted by applicable laws and regulations. The Bank ensures that individuals reporting incidents in good faith will not be exposed to adverse consequences as a result of making such a report.

Email address for reporting incidents: zgloszenia.esg@citi.com



The Bank undertakes to maintain high ethical and environmental standards in its cooperation with Vendors and expects their engagement in implementing the principles set out in this Code. In the event of refusal to accept its provisions or unwillingness to cooperate in implementing sustainability requirements, the Bank reserves the right not to establish cooperation with the entity in question.

Vendors for whom serious non-compliance or repeated incidents are identified may be subject to additional monitoring and control measures.

If, despite being requested to take corrective actions, appropriate remedial measures are not implemented, the Bank may decide to limit or terminate cooperation with such a Vendor.



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