



**"CENTRUM METAL CHEMICAL REAGENTS - MIDAS INVESTMENT LIMITED LIABILITY COMPANY"**

**Limited Partnership**

**Company Headquarters** 05 -090 Falenty, ul. Opacki 46A/11

**Production Plant, Correspondence address**

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## **CODE OF CONDUCT IN THE COMPANY "CENTRUM METAL ODCZYNNIKI CHEMICZNE - MIDAS INVESTMENT LIMITED LIABILITY COMPANY" Limited Partnership**

### **Who are we and what do we do?**

"Centrum Metal Odczynniki Chemiczne - Midas Investment Sp. z o. o." Spółka Komandytowa (Limited Partnership), or CMOCMI for short, was founded in 2005 as an extension of the founders' previous business activity – international trade in chemical products. Drawing on market knowledge and experience in trade, the company's owners decided to launch a manufacturing business, which laid a solid foundation for its operation and development.

We are a company producing chemical compounds dedicated to companies applying them to industries such as glass production, feed premix additives , fertilizers, water treatment, pigments, catalysts, electroplating, and general chemical applications. We are constantly strengthening our position as a leading chemical company producing metal salts in the global market. We achieve this by strengthening long-term business relationships.

CMOCMI's core business is the production of inorganic chemicals, particularly compounds (metal salts) of molybdenum, selenium, copper, manganese, zinc, cobalt, and nickel. CMOCMI is the only Polish and leading European producer of sodium molybdate and ammonium heptamolybdate, as well as a major European producer of sodium selenite. In addition to its manufacturing activities, the company also conducts international trading in specialty chemicals. The company is ISO 9001, ISO 45001, ISO 50001, ISO 14001, and GMP+ certified, ensuring its products reach the most demanding customers in numerous industrial sectors, including feed and food producers.

Currently, the company possesses modern technical and technological resources for the production of chemical compounds with parameters desired by customers. CMOCMI has long collaborated with leading national research institutions, universities, and the Polish Academy of Sciences. Due to the limited supply of raw materials containing molybdenum, selenium, and other metals listed as critical and in short supply, CMOCMI has specialized in obtaining them from waste sources or low-quality primary raw materials. Thanks to innovative hydrometallurgical processes, the company gains access to raw materials from which it can produce high-purity products – building its competitive position while aligning with the Circular Economy philosophy.



## **Corporate Governance**

As part of the company's operations, we introduce organizational principles to improve daily operations and establish relationships with external entities in a transparent manner.

The Company operates:

- 1) Organizational Regulations defining the organizational principles of the Company and organizing corporate governance;
- 2) Work Regulations defining broadly the rights and obligations of employees;
- 3) Remuneration Regulations specifying the principles for determining remuneration in the Company.

## **Equal treatment, human rights, diversity**

At the Company, we recognize, respect, and observe human rights, including employee rights. We are committed to conducting our operations in accordance with the UN Universal Declaration of Human Rights. Employee dignity and personal rights are subject to unconditional protection, and our relationships are based on respect for them.

We apply objective and fair criteria for employee evaluation, prioritizing knowledge, professional competence, social skills, and quality of work performed. We have clear remuneration and motivation criteria.

We create a discrimination-free environment and workplace. We do not tolerate any form of discrimination, particularly on the basis of gender, race, age, origin, religion, disability, worldview, sexual orientation, social status, marital status, disability, political party or trade union affiliation, or employment status. We emphasize this in our Corporate Documents.

## **Taking care of the employer-employee relationship**

We are aware of the role of social capital and its impact on the company's stable operation and development. We strive to be an attractive employer in the labor market, one chosen by high-class professionals. We continually build a positive employer brand through initiatives aimed at creating attractive workplaces and a strong organizational culture. We pursue a transparent HR and payroll policy, supporting the development of employee competencies, and ensuring, wherever possible, the social and cultural needs of our employees.

We guarantee and respect employees' time for leisure and non-professional activities, support our employees' families, and implement flexible working hours whenever possible. We prioritize internal communication. Dialogue with employees is a crucial element of company management. We recognize that employees have the right to access information and consultation, to freely associate, and to form employee organizations. We protect our employees' personal data and their privacy. To ensure data protection, we



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implement appropriate organizational and technical solutions in accordance with regulations. We limit employee supervision and monitoring to activities necessary and justified for the company's well-being and safety. Employees are informed of the employer's right to monitor the equipment (computers, telephones), workspaces, and documentation entrusted to them.

### **No to mobbing**

Mobbing manifests itself in actions or behaviors directed at or directed against an employee, consisting of persistent and prolonged harassment and intimidation of the employee, causing them to underestimate their professional suitability, causing or intended to humiliate or ridicule the employee, isolating them, or eliminating them from the team. At CMOCMI, we do not tolerate mobbing. We take preventative measures to prevent situations in which employees could experience forms of physical, psychological, sexual, verbal, or other forms of harassment.

In the event of mobbing, investigation procedures are implemented and appropriate further legal steps are taken depending on the outcome of the investigation procedure.

### **Relationships with external entities**

We build relationships with external entities/partners based on transparency, honesty, trust and professionalism.

In our mutual relationships, we require adherence to the principle of "zero tolerance for corruption." We emphasize the transparency of our transactions. We monitor the supply chain and track the life of our products. Our business partners are vetted for corruption risks. We conduct business only with entities with proven reputations. We combat money laundering and the financing of criminal activities, including terrorism.

### **Taking care of the company's resources**

When managing company resources, we are guided by the company's economic interests, always striving to optimize profits and minimize costs. We treat CMOCMI assets with due diligence, avoiding any losses to the employer. We maintain a transparent purchasing policy. We monitor financial expenditures, which should be rational and justified. CMOCMI has specific rules for the use of entrusted company assets, which all employees are familiar with. Generally, the use of company equipment for personal purposes is limited to occasional and strictly necessary situations. When using materials necessary for work (office supplies, consumables, tools, and others), we are guided by the principles of economy, honesty, optimization, and diligence. We are responsible for the equipment entrusted to us and its operation. We use tools and equipment only in accordance with their intended use and the instructions for use and occupational health and safety regulations. We are obligated to secure property entrusted to us against unauthorized access and



theft. When organizing business trips, we comply with applicable internal regulations, ensuring accurate accounting. In the event of loss, theft or destruction of equipment, you must immediately notify your supervisor and the appropriate services and make every effort to minimize the negative effects of the incident.

## **Environmental protection**

CMOCMI undertakes a range of activities to reduce its environmental impact. Environmental responsibility is an integral element of our business strategy. We believe that economic success goes hand in hand with respect for natural resources and care for future generations. Therefore, we implement solutions that combine corporate development with the principles of sustainable development.

We limit or offset our environmental impact through modernization efforts that reduce pollutant emissions, energy and water consumption, and investing in innovative and renewable energy sources. We recover and reuse raw materials, reducing waste and supporting recycling.

We constantly monitor data related to the environmental impact of our operations. We comply with regulatory requirements and implement voluntary international standards that go beyond applicable norms. This is confirmed by our exemplary performance in periodic official inspections.

We conduct regular environmental reporting and share the results of our activities in terms of emission reduction, waste recovery and energy consumption (e.g. calculating the carbon footprint of the company and products).

Protecting the natural environment and minimizing operational disruptions is a company priority.

## **Compliance with REACH regulations and international law**

. Chemical safety is the foundation of our business. We comply with all regulatory requirements for chemicals, both in the European Union and in the other international markets in which we operate. Our goal is to ensure full legal compliance and protect human health and the environment.

- **REACH ( Registration , Evaluation, Authorization , and Restriction of Chemicals)** – We actively implement and maintain compliance with the requirements of the REACH regulation, registering and evaluating all chemical substances in accordance with applicable procedures. We ensure full traceability and transparency regarding the materials we use.
- **CLP ( Classification , Labelling and Packaging )** – all our products are properly classified, labelled and packaged in accordance with legal requirements to ensure their safe use and proper information for users.
- **International law and global regulations – we comply with chemicals regulations in various jurisdictions, including REACH UK, Fertiliser Regulation 1019/1109 , Animal Feed Additives Regulation 1831/2003, and other standards applicable in global markets .**
- **Responsible management of hazardous substances** – we implement best practices for the safe transport, storage and disposal of chemicals, in accordance with international conventions (including ADR, IMDG, ICAO/IATA).



- **Restrictions and Authorisations** – We comply with the REACH Authorisation and Restriction Lists and relevant international regulations, eliminating or replacing materials with the highest risk to health and the environment.
- **Supply chain communication** – we ensure that our partners and customers receive reliable and complete documentation (including SDSs) that enables the safe use of chemical substances and mixtures.
- **Proactive approach** – we do not limit ourselves to meeting the minimum legal requirements – we actively monitor legislative changes, participate in industry consultations and implement solutions that anticipate regulations.

This allows us to guarantee that our products are **safe, compliant with legal requirements and responsibly managed** at every stage of their life cycle – from production, through distribution, to their final use.

### Process safety

Process safety is a key element of our organizational culture and the foundation of responsible industrial operations. Our priority is to protect people, the environment, and property through prevention, control, and continuous improvement of risk management systems.

- **Hazard identification and assessment** – we use advanced risk analysis methods (including HAZOP) to systematically identify potential hazards and develop effective preventive measures.
- **Safety culture** – we believe that process safety begins with people. That's why we invest in regular employee training, developing risk awareness, and promoting responsible attitudes.
- **Emergency preparedness** – we have emergency response plans and evacuation procedures developed in accordance with industry best practices and legal requirements.
- **Continuous improvement** – we monitor and analyze incidents and near misses (near misses) misses ) and audit results to continuously improve the security level of our operations.

Our goal is **zero accidents and zero incidents** . With a comprehensive approach to process safety, we protect employees, customers, partners, and the environment, while also strengthening the stability and reliability of our industrial processes.

### Cybersecurity

In the age of digital transformation, cybersecurity is one of the cornerstones of our business. We protect not only company data but also the information of our business partners, customers, and employees. Our approach is based on prevention, monitoring, and rapid response to all threats.

- **Data protection and privacy** – we use rigorous procedures in line with GDPR and international standards to ensure data confidentiality and integrity.



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- **Awareness and education** – we invest in employee training so that each of us is a conscious participant in the security system.
- **Business continuity** – we have emergency procedures and data recovery plans that ensure the stability and resilience of our processes to cyber incidents.
- **Partner trust** – we care about supply chain security and only work with suppliers who meet our information protection requirements.

**Thanks to this, our clients and partners can be sure that cooperation with us is based not only on high-quality products and services, but also on a guarantee of security in the digital space.**