

 enson	Enson Limited Liability Company Tax Identification Number (NIP) 7732493141	Date: 29 May 2026
	ENSON SP. Z O.O. CODE OF ETHICS	Date of publication: 3 June 2026

Appendix 1 to Management Board Resolution No. 2/05/2026 of 29 May 2026

ENSON Code of Ethics

I. Letter from the ENSON Management Board to staff

Dear Colleagues

Together, we want to build a company where responsibility, integrity and mutual respect are evident not only in our statements, but above all in our day-to-day decisions. We believe that responsible business is about more than just complying with regulations. It is a way of operating that influences the quality of our collaboration, the trust of our customers and partners, and the value we create for the wider community.

The ENSON Code of Ethics was created to provide us with a common frame of reference. It is designed to help us make the right decisions, particularly when the situation is not clear-cut. We do not treat it as a set of formal rules to be 'ticked off', but as practical support in building a culture based on trust, responsibility and transparency.

An important part of the Code is also how we respond to concerns and irregularities. We want everyone to be clear about where to seek help, how to report breaches, and that they can do so safely. Openness in such situations protects not only the company, but also our collaboration and mutual trust.

Each of us, regardless of our role, workplace or scope of duties, has an impact on ENSON's credibility. We therefore encourage you to treat the Code as a shared commitment – to one another, to our clients, partners and everyone we work with.

Yours faithfully,

The Management Board of ENSON Sp. z o.o.

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II. Purpose and scope

As the ENSON community, we strive to conduct our business in an honest and reliable manner. All members of our team act in accordance with the letter of the law, as well as with the best practices, values and principles set out in the Code of Ethics.

The purpose of the Code is to ensure that ENSON's activities comply with the law, internal regulations and ethical standards. The Code of Ethics is the overarching document setting out the fundamental principles of conduct at ENSON.

Detailed rules and procedures for conduct in specific areas are governed by separate internal policies and procedures.

The provisions of the Code apply to the Management Board, all employees and associates of ENSON – regardless of their position, working hours or location. Every employee is required to familiarise themselves with the Code; the guidelines contained therein are binding and, as such, must be adhered to. When making decisions regarding conduct at work or in business relationships, advice and support may be sought from line managers and the ENSON Management Board.

The ENSON Management Board is responsible for the implementation, monitoring and updating of the Code, with the support of the Company's compliance function, carried out by the Executive Representative of the Management Board, in cooperation with the TDJ Group Compliance Officer.

III. ENSON's Vision and Values

1) Vision

Our company is driven by the synergy of technology, experience and our team – the combination of our passions, skills and knowledge creates a force that enables us to achieve ambitious goals and build a solid foundation for the development of the energy sector.

Thanks to our technical resources, expertise and comprehensive approach, we aim to set the standard in the design and manufacture of solutions that enhance the durability, safety and efficiency of projects.

We are building ENSON, which gives our clients confidence in their decisions, provides our team with the scope to build things that really matter, and offers the renewable energy sector a solid foundation for responsible development.

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Our activities are based on three strategic pillars:

- **Climate change and the energy transition** – we are actively involved in the transition to a low-carbon economy by providing the solutions necessary to build renewable energy infrastructure.
- **Digitalisation and automation** – we implement modern technologies and processes that enhance production efficiency and the quality of our products.
- **Evolving market needs** – we listen to our customers and partners, responding flexibly to the changing requirements of the photovoltaic industry and, more broadly, the renewable energy sector.

ENSON is part of the TDJ Group – a leading, family-owned investment firm that has been building long-term value across generations. The TDJ Group’s mission – to build communities with shared values and to support companies in becoming leaders in their industries – provides us with an important framework and source of inspiration.

2) Values

Our values are:

Commitment and entrepreneurship

- We have a sense of responsibility, agency and a long-term vision.
- We make every decision with the long-term development of the company and the team in mind.
- For us, every employee is like an owner. By taking responsibility for our actions, we have a real impact on the future.

Innovation and creativity in action

- We are a team that isn’t afraid to think outside the box, seeking innovative solutions and constantly setting new standards.
- Creativity in action is our way of overcoming challenges and achieving the successes that set us apart in the market.

The customer at the centre of our attention

- The customer is at the heart of everything we do.
- We listen carefully to our clients to understand their needs and respond to them as best we can.
- Strong, partnership-based relationships with our customers are at the heart of our company and the key to its long-term success.

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A culture of collaboration

- We are a team that believes in the power of collaboration, where each of us contributes something valuable towards our shared goal, because together we can achieve more.
- Together, we build a culture of mutual support, trust and cooperation that drives us forward.

Positive energy and trust

- Every day, we bring optimism, self-belief and a willingness to work together to our work.
- We build strong relationships based on trust, which enable us to face challenges and find solutions, even in difficult times.
- In our organisation, we believe that it is only in an atmosphere of mutual support and positive energy that we can foster innovation, creativity and continuous growth.

IV. Due diligence

1) Anti-corruption – gifts and invitations

We have a ‘zero-tolerance’ policy towards all forms of corruption. We strictly prohibit the offering or giving of bribes or other unauthorised personal or financial benefits to current or potential business partners, representatives, subcontractors, employees of such entities, and public officials. ENSON members neither solicit nor accept bribes or other unauthorised personal or financial benefits from any entity – for themselves, their family, acquaintances, friends or any other persons.

We recognise the value of offering and accepting invitations and gifts in building and strengthening business relationships. However, we exercise caution in this area to avoid the risk of a conflict of interest and to prevent even the suspicion of corruption.

Our internal regulations contain guidelines that clearly set out the behaviour we expect from our Team, examples of prohibited conduct, and the consequences of failing to comply with the applicable rules. Detailed rules in this regard are set out in separate internal policies and procedures, in particular: the Anti-Corruption Code and the Anti-Corruption and Gifts Policy.

2) Preventing conflicts of interest

We avoid situations that could give rise to a conflict of interest. A conflict of interest arises when an employee or business partner, acting in their own interest or that of another party,

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simultaneously acts against the interests of ENSON. We openly communicate instances that are or may be a source of conflict of interest, and we take steps to manage them appropriately.

We safeguard ENSON's good name and reputation. We do not undertake any actions that could harm the Company's interests or damage the good name or reputation of our business partners. Detailed rules of conduct regarding conflicts of interest are set out in: ENSON's Conflict of Interest Management Policy.

3) Information security – trade secrets and personal data

We adhere to confidentiality principles and protect information relating to ENSON and our business partners, recognising its value to the business. We are constantly developing best practices and technologies for the appropriate processing and protection of information. We monitor and develop mechanisms that ensure the security of our IT systems.

We protect confidential information relating to us and our partners from unauthorised access, loss or damage, with particular regard to intellectual property rights.

We comply with the rules on the protection of personal data and the privacy of the individuals whose data we process. Detailed rules and procedures regarding the protection of personal data are governed by separate internal policies and procedures, in particular: the Personal Data Protection Policy, the Privacy Policy, the Procedure for Exercising the Rights of Data Subjects, as well as other related documents supporting the implementation of the above.

4) Fair Competition

We recognise that acting in accordance with the principles of fair competition is an essential element of responsible and trustworthy business. We conduct our business based on fair market practices, whilst respecting good business practices. We operate in a manner that does not restrict competition in the market. In our dealings with business partners, we prioritise honesty. We work exclusively with reliable and trustworthy business partners, whom we select on the basis of transparent, objective and clear criteria.

5) Transparent taxation

We comply with all accounting and tax regulations. We fulfil our tax obligations honestly and conscientiously. We calculate and pay our taxes correctly, and we avoid all forms of tax fraud. In our day-to-day business operations, we do not make decisions aimed at evading or unlawfully reducing our tax liabilities. We only collaborate with reliable business partners, settling accounts with them in a transparent manner.

V. Relationships with business partners

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1) Money laundering and terrorist financing

We work only with reputable partners who engage in legitimate business activities based on funds from lawful sources. We carry out appropriate *due diligence* procedures to get to know our business partners. We ascertain the sources of their funding and where our funds ultimately end up.

2) Sanctions

We do not establish or maintain any commercial or business relationships with entities listed on sanctions lists. Sanctions lists are official registers of individuals, groups or organisations subject to legal or economic restrictions. Their purpose is to support the fight against international terrorism through economic means, by preventing financial transactions and access to sources of funding. Commercial or other business relationships with entities on sanctions lists are prohibited.

VI. Working environment

1) Health and Safety

Our priority is to safeguard the health and lives of our employees. We create a safe working environment and take measures to minimise risks to life and health. We respond to actual or potential hazards. We promote measures aimed at improving comfort and ergonomics in the workplace.

We implement and maintain an integrated management system comprising a quality management system compliant with ISO 9001 and an environmental management system compliant with ISO 14001, which demonstrates our commitment to improving production processes, meeting customer expectations and respecting the natural environment and its resources. We regard safety, quality and efficiency as mutually complementary pillars of responsible management.

2) Decent working conditions

We ensure a friendly working environment. We recruit on the basis of fair and lawful principles with the law and in accordance with ethical principles. We maintain a transparent HR policy. We provide our employees with the necessary resources to carry out their duties. We support them in developing their knowledge, skills and qualifications.

We regularly assess the level of engagement among our staff. The results of these assessments are analysed and form the basis for implementing improvement measures.

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3) Dialogue and employee participation

We believe in the value of open dialogue with our employees. This dialogue is facilitated by employee representatives, with whom we regularly consult on matters of importance to the Company and its workforce. We organise regular, quarterly meetings between all employees and the Management Board, during which employees have the opportunity to express their views directly, ask questions and discuss the Company's current affairs. Employees can ask questions anonymously via a special form made available prior to the meeting.

4) Human and employee rights

We are guided by the principle of equal treatment and do not tolerate discrimination or unequal treatment on any grounds. We treat everyone with the respect they deserve and avoid situations that could be construed as bullying, harassment or other forms of unethical behaviour. We respect the rights of our employees and colleagues to dignity, privacy and fair working conditions.

We strongly oppose child labour and all forms of forced labour.

We respect our team members' rights to freedom of association. We guarantee the right to collective bargaining in order to pursue common collective goals and protect the interests of those who work for us. We respect the right to both positive and negative trade union freedom, without fear of penalties or associated consequences such as intimidation, harassment or reprisals. The principles governing conduct in the area of human rights are set out in separate policies

and internal procedures, in particular: the Equality and Respect for Human Rights Policy, the Anti-Bullying and Anti-Discrimination Policy, and other related documents.

5) Equality, diversity and inclusion

We believe that diversity is a source of strength. We actively foster a working environment in which everyone, regardless of gender, age, background, religion, beliefs or other characteristics, is treated with respect and has equal opportunities for professional development. We promote a culture of inclusion and mutual acceptance. Issues relating to equality, diversity and inclusion are set out in detail in separate internal policies and procedures, in particular: the Anti-Bullying and Anti-Discrimination Policy, the Equality and Respect for Human Rights, and other related documents.

VII. Climate and the environment

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Integrating environmental, social and governance issues is a central element of our corporate identity. We are a direct participant and a co-creator of the green energy transition.

We operate in accordance with applicable environmental legislation and respect the natural environment and its resources. We are progressively implementing the principles of the circular economy, product emissions management and minimising our impact on the environment and climate. We are constantly improving our production processes with a view to enhancing energy efficiency and reducing waste.

ESG forms an integral part of production process management at ENSON. We take environmental responsibility, corporate governance and social engagement into account at every stage of planning and carrying out our operational activities.

VIII. Social engagement and local relations

We are committed to building positive relationships with the local communities where we operate. We believe that, as a responsible employer and manufacturer, we have a real impact on our surroundings and we take this responsibility seriously.

Our social initiatives focus on:

- supporting local initiatives and organisations,
- promoting environmental awareness and education on renewable energy sources,
- building partnerships with the business and institutional communities.

We maintain complete political neutrality in this regard. As part of our social and charitable activities, we do not support any political initiatives nor do we engage in political activities. Detailed rules and procedures governing social engagement are set out in separate internal policies and procedures, in particular: the Charity and Social Engagement Policy and the Anti-Corruption Procedure and Gift-giving Procedure.

IX. Intellectual Property

We respect and protect the intellectual property rights of ENSON, its employees and associates, as well as other entities, including our business partners. We believe that the benefits and recognition arising from intellectual property rights should accrue to their creators and lawful owners.

The obligation to protect intellectual property rights and the prohibition on the unauthorised distribution or disclosure of information constituting intellectual property applies to every member of our Team, even after their employment with us has ended.

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X. Technology and Innovation

The digitalisation and automation of production processes are one of the key pillars of ENSON's strategy. We focus on innovative technological solutions and cutting-edge projects. We foster an innovative organisational culture, encouraging our employees to take the initiative in their professional development. We place great emphasis on the use of modern technologies to improve our operational activities.

We view AI tools and solutions as an opportunity to improve quality, innovation and security. We use them ethically, lawfully and responsibly – respecting human rights, privacy, intellectual property and ENSON's reputation. We utilise AI where it adds value – yet key decisions always remain in human hands. We adhere to the principle that AI supports, rather than replaces, responsibility.

We invest in state-of-the-art technologies for production, quality monitoring and process management to continuously improve our operational efficiency and the quality of our products, responding to the evolving needs of the renewable energy market.

XI. Reporting instances of unlawful or unethical conduct

We firmly oppose any form of misconduct and encourage members of our team to report such incidents, whilst ensuring their confidentiality and protection against retaliation.

Employees and associates can report irregularities via an anonymous reporting system, available to all members of the ENSON community. This system allows information about potential breaches to be submitted without the need to disclose the reporter's identity. Reports can be submitted via the link on our website or on the internal intranet: <https://whistleblowersoftware.com/secure/enson>

Every report is taken seriously, analysed with due diligence and protected against any form of reprisal against the reporter.

XII. Implementation and monitoring

The implementation of the ENSON Code of Ethics is linked to a training programme for staff and awareness-raising activities across the Company. Every employee and associate keeps their knowledge of ethical conduct up to date. We will periodically review the Code to ensure its continued effectiveness and correct application. Regular training and updates to the Code help to maintain high standards and adapt to changing business and legal conditions.