

SUSTAINABLE PROCUREMENT POLICY

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POLICY			
Title	Sustainable Procurement Policy		
Confidentiality	For internal use	Date of implementation	31.07.2024 r.
Version number	1	Date of revision	-

At Altkom Akademia, we are committed to sustainable development that integrates environmental, social, and governance (ESG) considerations into our operations. We recognize that sustainable procurement practices are essential for building a responsible and resilient supply chain. This Sustainable Procurement Policy provides guidance for our procurement activities and aligns with our core values: Partnership, Professionalism, and Agility.

All objectives and principles outlined in this policy are consistent with the **Altkom Akademia S.A. Business Ethics Code** and the **Rules of Conduct for Suppliers and Business Partners of Altkom Akademia S.A.**

1. Objective

Our goal is to promote sustainable development through responsible procurement that minimizes negative impacts on the environment and society while supporting sustainable growth and an ethical approach to business.

- a. **Sustainable development:** Supporting suppliers who take actions to protect the environment and communities. Promoting sustainable practices among our suppliers and business partners. Reducing negative environmental impact through responsible procurement.
- b. **Transparency:** Ensuring openness and accountability in procurement processes.
- c. **Collaoration:** Building long-term relationships with suppliers based on mutual trust and respect.

2. Scope

- This policy applies to all Altkom Akademia departments and employees, as well as our suppliers and business partners.
- Preference is given to suppliers who implement sustainable practices in their operations.
- Supplier agreements will include clauses requiring compliance with the **Rules of Conduct for Suppliers and Business Partners**, incorporating sustainability standards and expectations.

3. Pillars of Sustainable Procurement

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a. Environmental care

- i. We expect our suppliers to take actions that minimize negative environmental impact, including efficient resource management and the implementation of energy-saving technologies.
- ii. Suppliers should operate in accordance with environmental laws and standards.

b. Compliance with labor rights

- i. All suppliers must comply with labor laws, ensuring safe and healthy working conditions for their employees.
- ii. We expect suppliers to prevent all forms of discrimination and to respect human rights.

c. Ethics and legal compliance

- i. Suppliers should act in accordance with the highest standards of business ethics, avoiding corruption, bribery, and unfair practices.
- ii. We expect suppliers to comply with applicable laws in all locations of operation.

d. Responsible procurement

- i. Academy suppliers should conduct procurement responsibly, ensuring that the supply chain complies with this policy.
- ii. We support local suppliers and promote practices that contribute to the development of local communities.

e. Monitoring and audits

- i. We reserve the right to conduct audits of suppliers to assess their compliance with this procedure.