



PURCHASING POLICY

FIBRAIN Sp. z o.o.
Zaczernie 190F

Done by:	Date:	Approved by:	Date:
Małgorzata Lorenc	29.04.2024	Rafał Kalisz	29.04.2024

§ 1. Definitions

1. **Supplier** - is an individual or legal entity that provides goods and/or services to FIBRAIN Sp. z o. o.
2. **Supplier Code of Conduct** - shall mean a document setting out the standards of conduct to be adhered to by business partners of FIBRAIN Sp. z o.o.

§ 2. Purpose of the Policy

1. The objective of the Purchasing Policy established in FIBRAIN Sp. z o.o. is effective and planned purchasing on the most favourable commercial conditions while maintaining the highest quality of materials, goods and services.
2. Working on the basis of a coherent Purchasing Policy, adapted to our conditions, allows us to effectively strengthen cooperation with existing Suppliers, as well as ensures constant acquisition of new Suppliers of goods and services.
3. The policy is intended to prevent events that could lead to image or financial loss at FIBRAIN Sp. z o.o.
4. Achieving the objective is possible due to transparency, honesty and reliability - the key principles that FIBRAIN Sp. z o.o. also requires from its Suppliers.
5. All activities within the scope of the Policy are compliant with the principles set out in the Supplier Code of Conduct, Code of Ethics, Human Rights Protection Policy, Anti-Corruption Policy, Anti-Mobbing and Anti-Discrimination Procedure, which define in detail the values and principles of conduct adopted in FIBRAIN Sp. z o.o.

§ 3. Scope and area of operation

1. The Purchasing Policy covers all purchasing areas in FIBRAIN Sp. z o.o., including in particular purchases of products, goods and services.
2. Employees implementing purchasing processes, and in particular those responsible for concluding agreements with Suppliers and placing orders, are responsible for the implementation of the Policy.

§ 4. Standards of cooperation with suppliers

1. Employees of FIBRAIN sp. z o.o. undertake to conduct their business in an ethical, legal and socially responsible manner.
2. Employees, in their cooperation with Suppliers, are based on good cooperation practices, in particular:
 - a. partnership, which refers in particular to the pursuit of mutually beneficial cooperation,
 - b. principles of fair competition,
 - c. anti-corruption,
 - d. transparency of the agreed principles of cooperation,

- e. security of information, including personal data,
- f. compliance with the FIBRAIN Policies listed in § 2 point 5, in particular:
 - respect for human and labour rights,
 - respect of social and working conditions,
 - prohibition of child labour and forced labour,
 - prohibition of discrimination,
 - fair remuneration respecting the environment and having policies and procedures in this respect,
 - compliance with the principles of fair competition and business practice.
3. Employees apply objective criteria for evaluating tenders and conditions for participation in the purchasing process, thus supporting a model based on mutual trust in business.
4. Employees conduct regular evaluations of Suppliers, which specifically includes undertaking the following:
 - a. assess the verification of Suppliers in accordance with established procedures, in particular through the Supplier Self-Assessment Questionnaire,
 - b. respond to negative signals from the market regarding Suppliers,
 - c. oblige Suppliers to accept the General Terms and Conditions of Purchase (GTC) and the Supplier Code of Conduct,
 - d. carry out a periodic evaluation of the Supplier, in particular by auditing the Supplier,
 - e. assess the quality of products or services provided by the Supplier,
 - f. verify timely delivery of products/services,
 - g. assess the stability and competitiveness of pricing terms,
 - h. assess general business relations between FIBRAIN Sp. z o.o. and the Supplier.

§ 5. Qualification and verification of Suppliers

1. Suppliers are selected on the basis of the criteria and principles of pre-assessment defined by FIBRAIN Sp. z o.o.
2. Qualified suppliers are regularly assessed by FIBRAIN Sp. z o.o. based on selected performance factors.
3. The regular assessment of suppliers is mandatory and is an essential tool for verifying the established objectives and framework of cooperation with FIBRAIN Sp. z o.o. suppliers.
4. The evaluation is objective and impartial and is based on an equal footing with respect to all entities subject to evaluation.
5. In the event of an unsatisfactory evaluation from the point of view of FIBRAIN Sp. z o.o., corrective measures are taken or cooperation with the supplier is terminated.
6. FIBRAIN Sp. z o.o. shall verify compliance of its contracting parties with the Supplier Code of Conduct by conducting relevant audits in the form of visits or documentation, including online meetings or exchange of electronic correspondence.

§ 6. Final proceedings

1. Detailed methods of proceeding in relations with Suppliers are defined by separate procedures in force in FIBRAIN Sp. z o.o.
2. The Supplier shall be informed of any material change to the Procurement Policy and the Supplier's Code of Conduct. In such case the Supplier shall be obliged to sign the Declaration of Conformity again.