

CODE OF CONDUCT FOR BUSINESS PARTNERS OF POLIMEX MOSTOSTAL CAPITAL GROUP

Polimex Mostostal Capital Group (hereinafter: PxM CG) conducts and develops its business activity while pursuing the balance between the economy, business ethics and respect for the environment. In business PxM CG is guided by legal norms and high ethical standards, building partner relations with customers, employees and with the socioeconomic environment.

This Code of Conduct (hereinafter: the Code) for Business Partners is based on the key values and principles of Polimex Mostostal Capital Group.

The purpose of this Code is to align the norms and principles of PxM CG and our Business Partners, both those seeking to establish business relations, as well as those in permanent ongoing partnerships with the Group (hereinafter: Business Partners).

The Business Partner undertakes to pursue their economic objectives in accordance with the principles of the rule of law, business ethics and human rights, in particular through compliance with basic principles of conduct set out in this Code.

This Code is in force regardless of the type of contract concluded with a company from PxM CG, and this concerns in particular the contracts with suppliers and subcontractors, service provision contracts, consultancy service contracts, as well as intermediary and agency contracts, both at the stage of their conclusion and performance.

1. General principles of legal compliance

The Business Partner conducts their business activity in compliance with applicable provisions of law in all locations of their activity in Poland and abroad.

2. Corruption and bribery prevention

PxM CG as a group of companies conducts its business activity with integrity, does not tolerate and objects to any form of corruption, bribery, embezzlement, money laundering, charging unfair fees, fraud, scam, favouring family members or friends, as well as directly or indirectly favouring any Business Partners.

The above rule applies regardless of whether the malpractice happens directly or through the involvement of a third party (e.g. consultant or intermediary).

The Business Partner confirms that:

- They conduct their business activity with integrity and do not tolerate any form of corruption or bribery referred to above;
- Regardless of the circumstances, they never demand, accept or offer bribes and they refuse any transfer of bribes, direct or indirect. This means that under no circumstances should they offer a public person, PxM CG employees or their families, customers or any other person or entity any tangible or intangible benefits that are in conflict with the legal regulations or norms referred to in this Code that could influence them in an inappropriate manner;
- They ensure that all documents, reports and invoices are complete, precise and reliable, that they reflect the actual state of affairs and are not misleading;
- They do not violate any economic sanctions imposed by national or international legislation which they are obliged to apply.

3. Fair competition

The Business Partner confirms that:

- They comply with the legal norms of fair competition protection, they do not tolerate any antitrust violations and they do not participate in the fixing of prices, delivery times, conditions, strategies, relations with customers or any other practices restricting fair competition;
- They do not participate in any form of cartel practices with competitors, such as market sharing agreements, and do not misuse any information relevant from the point of view of the competition law.

4. Conflict of interests

The Business Partner confirms that:

- They do not participate in and do not generate situations of conflict of interests or situations that may be perceived as giving rise to the conflict of interests;
- They will inform the Company from PxM CG of any cases of an existing conflict of interests in their cooperation with PxM CG or of the circumstances which may constitute a conflict of interests.

5. Gifts and invitations

The Business Partner is obliged to:

- Respect the principles and comply with the policy on gifts and invitations of the company from PxM CG with which they cooperate;
- Neither offer nor accept any gifts or invitations which may inappropriately influence or may be perceived to inappropriately influence the business decisions of a Business Partner or PxM CG.

6. Natural environment

The Business Partner is obliged to:

- Strictly comply with environmental protection regulations, act in a socially responsible manner and abide by the laws of the country in which they operate;
- Act with respect for the natural environment while performing their operations and make available to their employees, as well as to other persons cooperating with the Business Partner under civil law contracts (hereinafter: Employees) all necessary resources to make it possible for them to achieve the above objective.

7. Decent working conditions

The Business Partner confirms that:

- They recognize human rights and ensure decent working conditions to all persons working on our projects;
- When hiring minors or the disabled they ensure compliance with the provisions of the International Labour Organisation and other regulations which pertain to the work of minors and people with disabilities;
- They do not condone any form of human trafficking, forced or compulsory labour, nor do they allow freedom restricting practices, such as collecting identity documents, passports or work permits as a condition of employment.

8. Discrimination and abuse prevention

The Business Partner confirms that:

- They ensure that all Employees are treated fairly and with respect by their superiors, inferiors and colleagues;
- They assume responsibility for creating a working environment free from any forms of discrimination, harassment, bullying, unsolicited sexual advances and other inappropriate behaviours, including abuse and violence.

9. Health and safety

The Business Partner confirms that:

- They ensure a safe working environment to their Employees and are committed to strictly comply with applicable laws in all locations where they conduct their operations;
- All Employees are responsible for compliance with the principles of health and safety at work and for the proper use of the equipment assigned to them while performing hazardous work;
- They act with due diligence to ensure that all Employees are properly trained and provided with equipment allowing them to perform their work safely.

10. Confidentiality and personal data protection

The Business Partner confirms that:

- They guarantee the confidentiality of data held by third parties, including companies from the PxM Group;
- They ensure that any handling of personal data will be conducted in accordance with applicable laws and regulations.

11. System for reporting breaches of regulations

The Business Partner and their Employees, as well as other people cooperating with the Business Partner under civil law contracts are obliged to report any breaches of regulations, guidelines, provisions of this Code or any other applicable principles specifying mutual relations, so that appropriate action can be taken.

The Business Partner and their Employees may report any breaches of regulations to **the Ethics Committee of PxM CG to the following email address: etyka@polimex.pl**.

12. Sanctions for a breach of regulations

In the event of a breach of the rules of professional conduct outlined in this Code and of legal regulations, applicable organizational procedures and measures arising from the contracts and other provisions of law will be deployed in order to respond to such behaviours.

PxM CG reserves the right to apply appropriate legal measures against the Business Partners who violate the Code, taking into account the principles prevailing in PxM CG under this Code.

For more information please contact:

Ethics Committee, PxM CG