



# *CODE OF CONDUCT*

*JUNY 2020*

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## 1. A FEW WORDS FROM CHAIRMAN OF THE BOARD

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***Dear Sirs and Madams,***

Since over 60 years we act on the industrial automation market and everything has changed during this time. Thanks to engagement of our employees also development in every area of our activity, from small company working on the international trade we created partnership selling products to more than 50 countries in the world. We introduced to production a whole range of new goods, we changed the appearance of the company, machinery park, technology, management system and many more. We were and are constantly gaining experience, earned reputation of credible company, responsible, stable, which enabled us to establish cooperation with demanding and renowned customers in the world.

We constantly strive for our development to still be a partner for highly developed companies and to compete both on the domestic market as well as international. Expectations of customers, employees and other stakeholder groups are rising. Towards our company, the partnership expectations of all the entities we work with and the people who work in Relpol S.A are also rising.

As a responsible, globally active and listed on the stock exchange public company, we must and want to adhere to the highest standards of business conduct, be reliable and ethical. We want to be competitive, offer wares of high quality and take responsibility for them. We are obliged to act in accordance with the law.

We moving through the maze of various regulations and recommendations of Polish and international law relating to every area of our business. Regulations concerning copartnership also indirectly affect employees and the companies we collaborate with. New law, new duties, greater risk, and as comes with that greater responsibility.

To help us all move efficiently in the current market conditions, respect the current regulations, rules and social norms, while building a positive corporate image, we decided to introduce Code of Conduct into our company.

This Code is the written set of rules of acting in different areas of our activity, consistent with applicable law, internal regulations, accepted ethical standards and social norms. It is the manual of our values, standards of conduct in daily work, in fulfilling the company's mission also implementation of the adopted strategy. For employees it should be a guideline facilitating making the right decisions as well as responding to the observed irregularities. For business partners it is declaration of accepted and applied ethical, social and environmental norms in Relpol S.A.

You are ambassadors of Relpol label. It is up to you how we will develop, what goods we will produce and how we will be assessed and perceived.

Code of Conducts involves every employee and people working for partnership/company and everyone should respect it. It is not describing every situation with which we can meet everyday it is not possible. However understanding the essence of guidelines and identification with represented values in this document surely will help you to make the right decision.

***Respectfully***

***Management***

## 2. OUR MISSION, VISION AND VALUES



### MISSION

Our mission is to be the best business partner for our clients and providers in whole world, a reliable european brand associated with quality, innovation and promptness, so that when our customers talk about Polish electrical engineering they associate it with the Relpol name. To our shareholders we want to bring benefits from the invested asset, expanding in steady and accountable manner as a modern organised company. We want to be desirable employer who hire dedicated and loyal employees, offering them expected conditions of personal development and friendly work atmosphere.

### VISION

To be recognisable and significant electromagnetic relays producent in the world and also to be the leader in selected product areas and selected markets.

### OUR KEY VALUES

**RESEARCH** - We are looking for new opportunities and innovative solutions

**EDUCATION** - We care about developing our skills.

**LEADER** - We set the standards for code of conduct.

**PRODUCT** - We provide customers with the best products and services, provide support, share knowledge and experience.

**OPERATION** - We respect our customers, shareholders, competitors, the environment and local communities.

**LOYALTY** - We show mutual respect, tolerance, honesty and loyalty to each other.



### 3. APPLYING CODE OF CONDUCT

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#### Purpose for creation

Code of conducts was invented in view of employees, in order to support them in daily measures and decisions also to maintain the high level of Relpol S.A reputation. Customers, providers, shareholder and other stakeholders are expecting that we will be a company worth to trust. Be the well-trusted partner requires ethical attitude of us, following the adopted values in Relpol S.A and remaining faithful to our policy. From our business partners to which we include customers, distributors, transport companies, suppliers and consultants, we anticipate for maintaining similar ethical standards. This Code aswell as mentioned principles, practices and procedures are to help us understand what we expect from others and what is expected from us, also that we always proceed consciously and fairly.

#### Superiors role

#### Be role model

A superior striving to achieve the Company's strategic objectives, with his/her knowledge, experience, consistency and attitude representing ethical behaviour, indicates to other co-workers the way of conduct. Therefore it is the overriding obligation of the managment employees to give an example by adhering to the Code and to expect the same from the others. It involves with proactive pursuit to openly discuss with subordinates methods of operation in practice and ensuring yours availability in situations requiring support. Superiors are obliged to attend in compliance training of law and internal rules of Relpol S.A and to implement this knowledge during daily duties. Full availability of staff managment is essential during the period of audits, SOP meetings as well as caring for the right implementation of new employee and acquainting him with company's regulations including the Code of Conducts.

#### Role of the employee

#### Play an important role in the successful operation of Relpol S.A.

Every employee of the company is an ambassador of the firm and brand. His role is to present the highest ethical standards and to associate with Relpol S.A values. Our every act seemingly unimportant, has in fact very significant meaning for firm's reputation and perceiving. By reacting to improprieties we have real influence on achievment of set objectives. Every employee is company's business card and works on our common success.

#### Why it is important to strict to undermentioned rules

Relpol S.A employees are required to adherent to Code of Conducts. Violation of the rules acting against company rules or laws in particular can endganer partnership on criminal liability, high costs, losing clients or image. In consequence it can result to take disciplinary action, including serverance. Bear in mind that being indifferent does not exempt from liability.

#### How to proceed in case of doubt

In case of doubt or questions related to Code report to immediate principal, director or compliance manager.

Aforementioned person will verificate reported irregularity with set out principles in the Code.

**The report of irregularity can be done anonymously by means of boxes located at every canteen, by e-mail: [etyka@relpol.com.pl](mailto:etyka@relpol.com.pl), phone 507 036 012, In person room 15 or in writing at the address Relpol S.A with compliance Manager annotation.**

If you have any uncertainty do not hesitate to ask. The compliance Manager position was established in the interests of every employee. Every notified malfunction will be reviewed according to accepted rules in Code of Conducts. Person who reports the malfunction in the company's best interest won't be subjected to any disciplinary sanctions. The company will make every effort to preserve discretion in activities, and the reporting can be sure that his personal data will be protected and revealed only if necessary (police, district attorney).

## 4. RULES AND REGULATIONS

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*As a company, we obey the law in all our activities, rules and regulations in all countries*

Relpol S.A operates under the provisions of the Commercial Companies Code, special laws and internal regulations

In Relpol S.A. we apply the principles of credibility and integrity in all our dealings. We conduct our business with the highest ethical standards in a transparent and responsible manner. We do not cooperate with companies or individuals who violate imposed on them sanctions. We are not involved in money laundering and we do not finance terrorism. We avoid situations where our professionalism, independence or impartiality may be compromised.

We report all financial transactions in accordance with generally accepted accounting principles and the accounting records must describe each transaction correctly and not misleadingly as to their nature. Our reports, which are prepared in a transparent, truthful and timely manner, give a true picture of the Company's situation.

All our internal regulations must comply with the law and the provisions of the Code of Conduct.

We place these regulations on the server \\Srv-z01\\Regulacje\_wewnetrzne, and for those without access to computer, at canteens and with superiors.

Any concerns may be reported to the direct supervisor, director or compliance Manager in accordance with the Whistleblower Policy.

Let us do everything to protect our reputation and act in accordance with the law.

### **Your role**

- Participate in trainings regarding compliance with the law and with Relpol S.A. internal regulations.
- exhibit behaviour and attitudes which are consistent with the applicable rules.
- Respond to illegal and unlawful conduct and if in doubt report to superior or Compliance Manager, in accordance with the Whistleblower Policy phone 507 036 012, e-mail: etyka@relpol.com.pl, room 15 or anonymously by boxes placed at canteens.
- Make suggestions on internal regulations to improve our procedures.

## 5. COMPANY ASSETS AND CONFIDENTIAL INFORMATION

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*We do not expose Relpol S.A. to unnecessary costs.*

*We take care of our common property and the protection of confidential information and company secrets.*

*We respect our workplace.*

*We use company devices responsibly*

We provide the resources and information necessary for the successful conduct of business activities, as well as adequate protection of these assets corporate secrets and confidential information.

### 5.1 Company assets

Company assets is intended for business use. Occasional private use is acceptable if it is not contrary to the interests of Relpol, Code of Conduct and partnerships internal regulations.

### Your role

- Respect and care for Relpol S.A. asset.
- Follow the rules regarding the use of company assets for personal use.
- Follow the regulations for the use of employer's property and company cars.
- Keep your workstand neat and tidy.
- Do not bring your private equipment. If you need something to do your duties better, report it to your supervisor.
- Submit to inspection when asked by security personnel.

### 5.2 Restricted information and trade secret

The issues of maintaining information security are considered with the highest care in Relpol S.A. Protection of restricted information and company's trade secret is necessary for securing firm's interests and succes. We are obliged to keep the commercial, technical, technological and organizational information strictly confidential. As they would be



used properly on business purpose and protected from unwanted this person's access. Our obligation to maintain the confidentiality of information and company secrets is based on laws, contracts and our internal regulations. The Board of Directors and Office Manager of the Board is authorized for media contacts.

## **Your role**

- Comply with regulations regarding confidential information and business confidentiality, also each employee is required to sign a confidentiality and business confidentiality statement.
- Care for security of restricted information in and outside workplace, for example in public places, private life etc.
- Do not provide confidential information to anyone unauthorized inside as well as outside the firm, even after your role in Relpol S.A.
- Secure suitably restricted information and the first page of such document mark with the word "confidential".
- While printing the confidential document outside your office, use the password, ask IT Department for instructions.
- When in doubt regarded about relaying the confidential information contact with the directed supervisor, director, compliance Manager, Office Manager of the Board of the with the Board of irectors.
- Do not leave the office open and documents on the board.
- Use social media with care, do not publish any information which could harm the firm's reputation.

### **5.3 IT systems**

Data contained in IT systems is one of the most valuable company resources, and its irreversible loss can lead to paralysis of the company, loss of business continuity, financial penalties, loss of customer confidence and inability to fulfill current orders. It is also serious and costly image problem. That is why we are doing everything to ensure our IT systems provide stability and security of Relpol S.A operation and that personal data be safe aswell. We demand from all employees absolute adherence of IT Security Policy. To oversee IT systems, to respond to any intrusion attempts to systems and not following the guidelines, IT department employees are obliged.

## **Your role**

- Comply with the IT Security Policy
- Before opening e-mail, make sure the file you receiving from outside as attachments or CD and USB drives are virus-free, If you have any doubts ask IT administrator for help.
- When you move away from your computer, lock it using a combination of keys (CTRL+ALT+DEL)
- save the data on the network drive used for backups
- If you suspect your computer may be infected do not turn it on, disconnect the network cable and call IT department.
- Turn off your computer and other informatic devices after finishing work, unless there is a reason why it should be turned on.
- Do not uninstall and block any software that is installed on your computer.
- Never install software on your computer by yourself, software installation process should be done by IT department.
- Do not leave computer in car or any other public place, if you have to do this always hide it in lockable stash.
- Make sure that your computer screen is visible only for you.
- Connect your guests' laptops only to a dedicated wi-fi network.
- Set and update your password in accordance with Security IT. Change your password if you suspect someone else might know it.
- Do not use internet in business web for other than business purpose.
- When printing documents use black and white mode, if you do not need to print colour. Always print on both sides if you can.



- Communicate confidential information only to authorized individuals in a secure manner and through secure media, channels.

## 6. PERSONAL DATA PROTECTION

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*We only store the necessary personal data for business purposes only, with appropriate protection and disclosure*

Relpol S.A. company is committed to providing a supportive work environment and conducts its business in a manner based on observance of law and mutual trust. This requires proper management and protection of the personal data of our employees, customers and suppliers also all others whose data we have.

### Your role

- Respect the policy of personal data protection.
- Gather, review and use personal data only on business purposes.
- Do not share personal data to unauthorised people.
- Apply the rule of clean desk/screen/printer, password security and closing rooms, lockers, where personal data are kept.
- When commissioning other entities on behalf of Relpol S.A. to perform activities involving the processing of personal data of employees, clients or business partners, ensure that signing an agreement on entrusting the processing of personal data is not required.
- When you find any harm regarding the personal data, inform the Data Privacy Specialist HR Manager or immediate superior.
- Protect personal data from accidents like: fire, water damage, throwing data to dumpster, loss of documentation, laptop, USB drive, accidental data modification, unauthorised access to personal data, public disclosure of data on Internet, burglary and robbery of data.

## 7. HUMAN RIGHTS

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### 7.1 Rewarding and work conditions

Relpol S.A. remunerates its employees in a timely manner in accordance with the Remuneration Rules adopted jointly with Trade Unions, observing the laws in force regarding work and salary in Relpol S.A., observes the principle of equal treatment in employment and the right to rest with work life balance.

### Your role

- Comply with the rules of ethics and other provisions of the Work Regulations and other internal acts of the Company, report any violations.
- Always inform supervisor if you do not have all the tools to perform your duties.
- As a supervisor care for positive development of employee.
- Cooperate instead of competing.
- As a supervisor build a cooperating atmosphere based on mutual trust.
- Respect yours and others health. If you have to, smoke tobacco products and e-cigarettes only in designated areas.
- Consume meals in designated places.

## 7.2 Mobbing, discrimination and harassment

Relpol S.A. applies a zero-tolerance policy towards any form of discrimination because of sex/gender, race, ethnic origin, nationality, religion, confession, beliefs, disability, age, sexual orientation, condition, political views, civil status or membership of associations or organizations. This includes recruitment, hiring of employees, the course of the employment relationship (access to promotions, bonuses, training, etc.) and termination.

### Your role

- Always treat everybody with respect.
- Do not terrorise or humiliate anyone physically or verbally.
- Always express your concerns to a person whose behavior you consider to be hostile, intimidating, degrading or rude. If necessary, you have the right to inform your immediate supervisor, Director or the Compliance Manager.
- Respect cultural and opinion differences.
- Always promote a culture based on acceptance and free from any form of discrimination.

## 7.3 Safety

Relpol S.A. observes all applicable standards of the labour law in order to ensure appropriate occupational health and safety standards for its employees. Each employee is personally responsible for compliance with occupational health and safety regulations and rules and must participate in training and instruction in this area.

### Your role

- Report any irregularity to health and safety expert.
- Walk in designated passageways and follow the signs in the production halls also on company's site.
- Comply with all health and safety laws, rules and standards concerned to your job.
- Remember that routine operations do not relieve you of the responsibility for doing your job safely nor the obligation to follow established operating procedures.
- Pay attention to the care of work tools and workplace equipment, proper servicing/maintenance of tools and equipment, and proper safeguarding of machinery.
- Wear protective clothing and footwear prescribed for your job and keep them in good condition.
- Make sure you have the correct safety equipment and certification, e.g. when working at height, operating machinery or driving vehicles.
- React when you see someone doing work in an unsafe manner that endangers life and health.
- Report unsafe situations, ignoring standards, actions that may have a negative impact on the health and lives of workers, as well as instances of concealment of hazards
- Stop work if you observe conditions or behaviors that may be hazardous for work safety and inform about that your supervisor.
- Do not work under the influence of alcohol or other illegal drugs.
- Undergo required periodic examinations and follow medical advice.

## 7.4 Freedom of association

Relpol S.A. recognises the right of employees to join trade unions and respects this right.

### Your role

- Do not influence your co-workers' decisions regarding union representation or affiliation to a union or other organization.
- You have complete freedom to seek guidance and support from official union organizations and bodies representing employees.

## 7.5 Work environment

Relpol S.A. places emphasis on teamwork, the ability to work together on projects, sharing knowledge and experience.

### Your role

- Communicate and cooperate with other in pursuit of common objectives of continuous search of new challenges.
- Create and support innovative approaches to problem solving.
- Do not limit or block colleague's access to knowledge .
- Respect employees free time and personal life.
- As a supervisor assure your workers a capability of honest and open conversation.
- As a supervisor do your best to understand worker's needs and treat them fair.
- As a supervisor care for worker's appropriate training in their fields of competence.
- As a supervisor reward employees for dedication and processes improvement.

## 8. ENVIRONMENT PROTECTION

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*We are aware of the company's impact on the environment.*

*We set trends and directions for responsible business and sustainable development.*



At Relpol S.A. we strive to economise on natural resources, minimise the level of pollution emissions and pursue a comprehensive approach to waste management throughout the entire supply chain, which effectively reduces the amount of waste. When creating new products and solutions, we use environmentally friendly technologies. Every employee of the Company, through his or her daily decisions, even those which seem insignificant, has an impact on environmental protection, regardless of his or her position and role in the Company. These decisions could relate to reducing waste production, through less consumption and segregation, saving paper, heat, water and electricity. Taking care of environmental issues matters to us and future generations.

### Your role

- Comply with all procedures relating to environmental protection associated with your position and role in Relpol S.A.
- React and report irregularities, suggestions to your immediate supervisor or to the investment and Implementation Department.
- Observe the principles of ecological behavior introduced in Relpol S.A. regarding the rational use of water, minimisation of electrical energy consumption of resources, packaging.
- Reduce paper consumption by printing only the necessary messages and in the necessary quantities.
- Separate waste according to procedures.
- Save electrical Energy by turning off the unnecessary lighting and electrical devices.

## 9. FAIR COMPETITI

*We operate in a manner that satisfies the client as much as possible, by actively recognizing and satisfying his needs, nurturing good relationships and constantly supporting his activities*



### 9.1 Preventing bribery

Relpol S.A. observes the principles of ethics and entrepreneurial culture. Positive image building and lasting customer relationships is the foundation of any successful business. We care about building positive and long-term relations with customers, and we build them in honest manner with all respect to legislation. We do not tolerate corruption and bribery, which are actions where one party offers another party a financial, material or other advantage in order to achieve an intended effect, e.g. to sign a contract, grant an application, expedite a case or resolve a dispute in their favor. Corruption and bribery are illegal and have serious consequences. Irresponsible actions may jeopardize the Company's reputation. They may also result in criminal prosecution of the corrupt employee.

### Your role

- Comply with the Company's Anti-Corruption and Ethics Policy.
- It is permissible to accept or offer small gifts and gadgets, up to the amount of 200 zł, if it does not involve any commercial obligation.
- It is unacceptable to accept or offer cash as a form of gift, for the privilege or persuade another person to take some action.
- If you are taking someone out for a business meal, enter that information in the registry located on the server - srv-z01 upominki\_posilki biznesowe\_sponsoring. Do the same when someone invites you. Remember the value of the meal should be moderate, appropriate to the situation and local customs.
- Never buy gifts. Only the marketing department responsible for building the company's image and promotion brand and has the right to purchase, give gifts and complete the column (A-H) in the file placed on server srv-z01 upominki\_posilki biznes\_sponsoring. .
- As a department manager, submit a request to the marketing department to purchase a gift and complete the columns (I-N) in the file located on the server srv-z01 upominki\_posilki biznes\_sponsoring.
- Do not give cash, gifts of value, to gain an unfair privilege or to persuade someone else people to take some action.
- Make sure all transactions are transparent and the documents describing them contain the necessary data and information for their proper classification and proper accounting. This means, for example, specifying Invoices reflecting actual purchases or sales, detailing discounts, commissions or bonuses, and follow Company procedures when describing and approving them.
- Refuse any form of bribe and immediately report any such offer to your line manager, Director or your Compliance Manager.

## 9.2 Conflict of interest

In Relpol S.A. We seek to prevent conflicts of interest from arising and avoid any situation that could be perceived as a conflict of interest. The mere suspicion of a conflict of interest may be detrimental both to the image of Relpol S.A. and the employee. A conflict of interest is a situation in which an employee acts in his own interest, as well as in the interest of another person or company, and at the same time acts against the interest of Relpol S.A.

### Your role

- Be loyal and honest towards Relpol S.A.
- In case if partnership wants to get into business relations with company in which you, your close friend or family member has own business, leave selection process to avoid suspicion of applying preferential conditions for it.
- In case if partnership intends to hire person who is a member of your family, close friend, exclude yourself from the recruitment process, and specifically from the process about the decision to hire him/her to ensure impartiality in evaluation and selection.
- Inform supervisor or whoever's in charge, if you think that you can stay in "conflict of interest".

## 9.3 Donations and sponsorship

The sponsorship and donation activities are intended to promote the Relpol brand and shape the company's image not only as a company focused on achieving good economic results, but also as a company with a social commitment. Main purpose is to help and support institutions caring for the upbringing and education of children. Relpol S.A. also supports local cultural, educational, health, sports and safety activities, which serve to build good relations with the environment and a positive corporate image. Sponsoring and donations are managed by the Company's Marketing Department, while the supervision is performed by the Management Office. Relpol S.A. does not finance political, terrorist or any other activities of criminal nature.

### Your role

- Comply with the anti-corruption policy.
- Do not use sponsorship or donations to influence decision makers.
- Do not make donations on behalf of Relpol S.A. to organizations affiliated with political parties or to individuals involved in political activities.
- Always care for objectivity and impartiality of decisions made.



## 9.4 Business negotiations and competition

At Relpol S.A., we observe the principles of fair, open and limitless competition. We conduct business in accordance with the law and with respect for our competitors. We build our competitive advantage by the quality of our products and services, business conditions, timeliness, flexibility in meeting customer needs, credibility and honesty. As part of their daily activities relating to competition issues, all employees are expected to avoid actual illegal activities or those that may be perceived as such.

### Your role

- Do not use bribery or corruption.
- Do not engage in price fixing, market allocation, output limitation, collusive bidding or other anti-competitive practices with competitors.
- Use arguments that highlight the value and advantages of our products while respecting the competition.
- Obtain market information lawfully, honestly and with due regard for competitors' confidentiality rights. Do not provide or disseminate false information about competitors.
- In business negotiations show respect and curiosity to your partners.
- Prepare for negotiations honestly, respect your business partner's time and your own.
- Inform the customer of any changes to delivery terms and dates.
- Conduct your conversations in such a way that not only you know, but also your partner is convinced that their case is important for you.

## 10. BUSINESS PARTNE

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As a company with global range we cooperate with business partners from many parts of the world. We require our partners to understand and respect our values. It is our responsibility to take action to ensure that this condition is met. Relpol S.A. does not participate in money laundering or in any activities which facilitate such practices. The company has no ties to organized crime groups and rejects any inappropriate requests. Prior to entering into a business relationship with a new partner, management and employees should review available information (including financial data) about future business partners and suppliers, to ensure that they are legitimate enterprises with good reputation.

### 10.1 Suppliers

Relpol S.A. implemented an optimal system of supplying materials and products supported by appropriate processes and procedures. Apply the same criteria to all suppliers when selecting, qualifying and evaluating. The Company expects its suppliers to apply similar principles to those described in this Code of Conduct.

### Your role

- Conduct a comprehensive supplier assessment and make decisions based on reasonable arguments regarding not only quality, price and delivery times, but also the status of suppliers' operational systems (e.g., technical and operational capabilities, financial health, regulatory compliance, environmental, health and safety) and other criteria.
- As part of supply transactions, retain evidence of arrangements with counterparties in addition to contracts (e.g., regarding the unit price of the ordered item) and evidence of delivery of products and/or performance of services.
- Closely monitor supply transactions for illegal activities, conflicts of interest and risk of cooperating with organized crime (e.g., money laundering).
- Always analyze the facts about suppliers and their reliability as business partners and re-evaluate them regularly before taking part in a transaction. Also strive to obtain as much information about our supplier's subcontractors.

- Do not work with companies or individuals in violation of sanctions imposed on them. Keep records of all contracts and orders, fully reflecting all purchases in accordance with reality.

## 10.2 Customers

Customer satisfaction and well-being with respect for the highest ethical values is our priority. Thanks to satisfied customers, the company can generate profits, invest and grow by achieving its own strategic goals, as well as the objectives of stakeholders such as employees, shareholders, suppliers, creditors or local authorities.

### Your role

- Show the customer respect and attention
- Meet the customer's needs, treat any comments with attention and openness, and incorporate them into Relpol S.A.'s business activities as far as possible.
- Be aware of sales restrictions on Relpol products.
- Make promises wisely and do not commit to something that Relpol S.A. cannot deliver.
- Keep your promises to the customer and honestly inform them of any obstacles to their fulfillment.
- Know the identity of our clients and make sure they conduct business with respect for laws and business ethics.
- Act in accordance with the company's Commercial Policy or contracts.
- Comply with applicable competition laws in your sales transaction.
- Do not work with business partners who engage in illegal activities such as bribery or actions that violate human rights, and with sanctioned organizations or individuals.
- From our customers demand understanding and respect of our values.
- Use standard contract templates from Relpol S.A., or create them with the help of legal advisors, following the instructions for the circulation, registration and storage of contracts.
- Respond and report to your supervisor or the Compliance Manager any inappropriate conduct by a co-worker toward a customer or the customer itself.

## 10.3 Financial institutions (partnership with banks, insurers, brokerage houses etc.)

Financial institutions are important business partners in running company, providing her access to cash that influences company's financial liquidity and realization of investment plans, guaranteeing safety of business activity. They are the link between us and our partners in the financial flows of receivables and obligations. Financial institutions have great impact on company, that is why solidity is so important, reliability and adherencing to all procedures and requirements when working with them.

### Your role

- Conduct a comprehensive assessment to select financial institutions servicing Relpol S.A. based on criterias: price, collateral terms, conventions to be met in future periods, financial stability of the institution and its capital, experience in working with large companies, dispute resolution.
- Keep evidence of agreements with institutions (offers, additional correspondence).
- Do not do business with institutions whose business practices may pose a risk to Relpol S.A. reputation or assets.
- Do not cooperate with institutions which are not overlooked by the Financial Supervision Authority or are on the KNF warning list.
- Conduct a risk assessment before deciding to purchase financial instruments (stocks, options, bonds, policies, etc.)
- Evaluate projected earnings, risks of loss and their effect on the Company's earnings.
- Conduct a repayment capacity assessment of long and short term financing. Analyze planned cash flow, see where you will be unable to meet obligations.

## 10.4 Investor relations

Bearing in mind the interests of our shareholders, we ensure that our business activities bring them benefits from their invested capital, in the form of dividends, satisfactory financial results and share prices. The way to achieve our goals is to develop the company and increase its value on a sound financial basis and with a balanced level of business risk. In compliance with the adopted principles of corporate governance, we ensure that our shareholders, among others, have the right to equal treatment, due protection of the interests of minority shareholders within the limits set forth by the law and the Articles of Association, receive relevant information about Repol S.A. in accordance with the applicable regulations. We provide comprehensive information to inquiries regarding our business activities, as well as the activities of group companies, with the exception of information covered by Company secrecy, relating to personal data, classified information, current and confidential information until it is published. We maintain transparent and fair relationships with all stakeholders.

### Your role

- Remember that effective law in Poland obliges everyone to protection of confidential information and trade secret.
- Remember, the Board of Directors and the Manager of the Board Office are authorized to provide information to the press and investors.
- Maintain clean and honest relations with investors.
- Provide equal access to information for all shareholders.
- Do not take unlawful actions that could be viewed as bribery, a crime or money laundering.
- Ensure that the information disclosed to the public, including financial statements, is reliable and reflects the true picture of the Company and the capital group.

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## 11. REPORTING VIOLATIONS AND CONCERNS



*Reporting of irregularities can be done anonymously by means of boxes located in all canteens, e-mail: [etyka@relpol.com.pl](mailto:etyka@relpol.com.pl), tel. 507 036 012 or in person, room number 15.*

### We are at Your service

Very often employees as first spot that irregularities may be occurring within the company. We encourage all company's employees to reporting them by speaking up, communicating your concerns and observed violations. In case of noticing or suspecting violations of the law, every employee has a duty to report them.

Notification of irregularities can be made by means of boxes located in all canteens, by e-mail: [etyka@relpol.com.pl](mailto:etyka@relpol.com.pl), tel. 507 036 012, in person room 15 or in writing to Relpol S.A. ul. 11 Listopada 37, 68-200 Żary with the note Compliance Manager.

We will respond to all submissions, including anonymous ones, but we encourage you to provide contact information in order to facilitate the investigation of the irregularity identified. The lack of a source of information may prevent us from proceeding further.

Remember that all inside regulations operating in Relpol S.A. are posted on server \\Srv-z01\\Regulacje\_wewnetrzne, and for those without computer access in cafeterias and supervisors.

### Your role

- Always react and do not remain indifferent to any irregularities.
- **It is your responsibility to report violations or suspected violations.**
- If you have concerns about a particular situation, you should report to your Compliance Manager or ask an anonymous question.
- Follow the Policy of reporting irregularities.
- Review and sign a statement that you are familiar with the contents of the Code of Conduct and submit it to the Compliance Manager room 15

# Statement

**I Declare that I have familiarized with the Code of Conduct of Relpol S.A. and I commit to adhere to the principles included therein.**

**Name and Surname:**

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**Department:**

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**Sign:**

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**Date:**

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