



OEX GROUP CODE OF ETHICS

TABLE OF CONTENTS

OEX Group Code of Ethics	3
Operation of the Code of Ethics.....	4
Ethics in the OEX group	5
Workplace.....	5
How do we ensure equal opportunities in the workplace?.....	5
Values that we are guided by in our everyday work.....	5
Health and safety at work.....	6
Assets, data, business data, documentation and information.....	6
Behaviour in the workplace	6
Ethical communication	7
Attitude to the risk of corruption at the OEX Group.....	8
Conflict of interest.....	8
Corruption.....	8
Accepting benefits	8
Offering benefits	8
Donations and loans	8
What is acceptable.....	8
Relations with the business environment.....	9
Relations with customers	9
Relations with suppliers.....	9
Relations with competitors	9
Relations with capital market participants	10
Relations with the public and local communities.....	10
How do we care about the environment?.....	10
OEX Group Supplier and Customer Charter.....	10
Ethics.....	11
Employment and working conditions	11
Security and standards.....	11
Environment	11

OEX Group Code of Ethics

The OEX Group Code of Ethics is a set of rules that are followed by all employees in the workplace, at the place of implementation of tasks and projects as well as in external relations. For the purposes of this Code, an OEX Group employee is any person who is employed at an OEX Group company under a contract of employment or a Civil Code contract.

We also encourage our business partners, customers, suppliers and all of our close and other stakeholders to apply this Code. The Code of Ethics is a commitment to apply the highest standards that reflect our corporate values. We believe that promoting transparent principles of cooperation, being oriented at dialogue, respect and making ethical choices will strengthen our business relations and contribute to the sustainable development of the OEX Group.

Jerzy Motz

President of the Management Board of OEX SA

Operation of the Code of Ethics

The Code of Ethics is available on the OEX S.A. website, on the CSR page, at the companies' HR departments and at the communication department of the OEX Group.

At the time of employment, each employee is familiarised with the Code of Ethics and is responsible for applying the Code in their area of activity. All employees should be informed about the applicability of the Code.

All suspected violations of the Code as well as information about an improper benefit being offered to an employee by a third party should be notified to the management board's ethics representative or any other member of the management team. If the employee has not violated the Code, has not acted with a bad intention or in bad faith, they will be protected to the widest possible extent against any forms of repression, and their personal data will be kept secret at their request.

Any suggestions or comments concerning the implementation of the Code may be provided at any time to the management board's ethics representative or any other member of the management team.

Contact

E-mail: etyka@oex.pl

or leaving a message in boxes marked with the phrase "OEXNiełamieZasad", which are located at the offices of OEX Group companies.

Our business partners, subcontractors and collaborators may also use the above-mentioned contact methods.

Ethics in the OEX group

Workplace

All those employed in the OEX Group have the right to work in an environment in which labour law and international human rights requirements are respected. Our goal is to guarantee to our employees, among other things:

- participation in fair recruitment involving an objective evaluation,
- equal treatment, without discrimination; we promote integration and diversity,
- professional development and planning of one's career path; decisions regarding promotions, awards, etc. are made on the basis of substantive criteria,
- the right to fair remuneration on the basis of clearly defined principles,
- work in a safe and friendly environment,
- respect for and taking account of personal dignity in communication and in mutual relations.

How do we ensure equal opportunities in the workplace?

Our goal is to provide a workplace that is free from discrimination, apply the principle of equal opportunities regardless of age, gender, education, nationality, religion and political views, prevent gender discrimination, including with regard to pay, respect human rights, promote respect, openness and tolerance with regard to other cultures, religions and worldviews. This is done through the application of clear principles formulated in relevant policies, procedures and guidelines that are followed by the OEX Group companies, which principles cover the following areas:

- Principles of recruitment,
- Counteracting mobbing and discrimination and supporting diversity,
- Counteracting corruption,
- Counteracting alcoholism and the use of illegal psychoactive substances.

In addition, at the OEX Group, we wish to provide employees with equal opportunities regarding promotion and professional development by means of:

- providing feedback as well as substantive and matter-of-fact performance evaluation,
- possibility of dialogue and support from superiors with regard to innovative initiatives and the pursuit of professional development,
- open attitude to communication, clear and transparent message and effective provision of information on all important issues related to the working environment.

Values that we are guided by in our everyday work

- honesty and responsibility – we reliably fulfil our promises and commitments, keep our word, present clear rules, act honestly and abide by the law, to ensure that we do not disappoint our colleagues and customers,
- openness – we communicate clearly, are open to new ideas, do not set barriers and listen attentively,
- commitment and excellence – we do our best to obtain the best possible satisfaction, strive for excellence every day with passion and determination, try to maintain an advantage over competing companies and are flexible and ready to work effectively in an ever changing environment, in line with technological progress and the expectations of our customers,
- respect and trust – we respect and trust one another and are trustworthy.

Health and safety at work

We are all responsible for safety in the workplace. Each employee and subcontractor and all persons cooperating with OEX Group companies are required to:

- comply with health and safety at work rules,
- comply with all internal regulations, if any, and report any cases of their breach, including those regarding hazardous or threatening situations in the workplace,
- consulting immediate supervisors or persons responsible for health and safety at work on any issues that may prevent or reduce the risk of hazardous situations.

Assets, data, business data, documentation and information

The property of the OEX Group companies serves all employees, helping them perform their tasks. It includes tangible (e.g. fixed assets, equipment, company vehicles, telephones and other work tools) and intellectual property (e.g. data, data constituting a business secret and confidential data, intellectual and economic property), as well as the company's reputation and brand. Each employee is obliged to use the company assets responsibly and comply with the regulations and guidelines governing such use.

The OEX Group companies support asset protection by exercising due care and skill in the following areas and applying the principles adopted at companies regarding:

- fleet management,
- detailed rules regarding information and data security, formulated by persons responsible for these areas at OEX Group companies.

In addition, all OEX Group employees exercise due care and skill in order to:

- protect intellectual property – all goods created during work for OEX Group companies,
- protect technology – equipment, systems and other resources referred to as technology. One must make use of appropriate and licensed software, take security measures related to passwords, Internet use, software installation and devices, and make use of disc and program security measures (back-ups), in order to ensure data recoverability.

The following activities are prohibited in the OEX Group companies:

- one must not make, offer or authorise any inappropriate payments or benefits to anyone,
- any documents kept by the company, employees as well as all of its units and entities associated with the company must be accurate, transparent, prepared on time and compliant with the guidelines of OEX Group companies,
- any of the company's employees who have any information or knowledge about any irregularity in documentation must immediately inform thereof the persons responsible for a given area,
- without a prior written consent, employees are not entitled to disclose restricted information, including one that constitutes a business secret, during their employment at the company and thereafter,
- it is forbidden to make use of the company's assets or the results of one's work outside of one's place of work or for purposes unrelated to work, without a prior formal consent from one's supervisor.

Behaviour in the workplace

Employees are the most important asset in the OEX Group. Thanks to their skills, expertise, decisions and attitudes, we are constantly developing and strengthening our market position. Therefore, we must be fully aware that our behaviour and decisions significantly affect the company's image and the OEX Group's reputation. All employees, regardless of their age, gender or position, are required to comply with **the OEX Group Anti-Mobbing Procedure**.

While maintaining the highest standards of business ethics, we should keep in mind that the following behaviours are prohibited:

- discrimination,
- corruption,
- bad manners,

- outbreaks of aggression,
- mobbing,
- molestation,
- violations of law and procedures,
- creating situations that pose a threat to security.

Discrimination is an unequal treatment of employees, in particular on the basis of their gender, age, disability, race, religion, nationality, political views, trade union membership, ethnicity, religion, sexual orientation as well as the form of employment for a fixed or an indefinite term or a full-time or part-time basis. Discrimination can take a direct or indirect form.

Corruption is the offering or accepting financial or personal benefits in exchange for specific activities related to the operation of the company. It also includes paid protection, favouritism, nepotism and cronyism as well as the use of company funds to obtain personal benefits.

Mobbing are deliberate, persistent and long-term actions or behaviours concerning or directed against an employee, consisting in harassment or bullying in a verbal or non-verbal manner. As a consequence, an employee has a lowered self-assessment of their professional abilities, is ridiculed and humiliated. This may result in their bad mental state, giving rise to a decrease in their self-esteem, isolation or elimination from a group of colleagues. A person engaging in mobbing activities is not always a superior, but may also be a colleague.

Molestation is a form of unequal treatment (discrimination), which is an undesirable behaviour, the purpose or effect of which is the violation of an employee's dignity of an employee in relation to their specific characteristic and the creation of an intimidating, hostile, degrading, humiliating or disparaging atmosphere for the employee. Molestation manifests itself as a behaviour that is offensive and subjectively unpleasant for the employee, even a single instance of it, unacceptable by the people around the person. It may be sexual or psychological molestation.

Ethical communication

All internal regulations related to communication applicable to OEX Group employees are presented in:

- OEX Group principles of preparing marketing materials,
- OEX Group external communication principles,
- OEX Group internal communication principles.

All these principles are designed to ensure ethical communication. Our aspirations include, among other things:

- providing all employees with clear information necessary for the performance of their duties and functioning within the organisation,
- conducting dialogue with employees, motivating and supporting the achievement of business goals,
- communicating with the surrounding world in compliance with applicable laws and regulations, in particular those pertaining to copyright and the protection of protected information and personal data,
- communicating reliable information outside, ensuring the publication consents required in marketing communication, in particular with regard to customers and suppliers,
- counteracting unethical behaviours, such as, in particular, hate speech, disclosure of personal information in the OEX Group's public communication channels and social media channels, improper representation of the OEX Group,
- supporting the building of the OEX Group's brand and promoting its values.

Attitude to the risk of corruption at the OEX Group

Conflict of interest

When performing work or executing an order, each OEX Group employee should act in the employer's best interest and in accordance with the law. A conflict of interest is a situation in which personal activities may conflict with activities for the benefit of the company.

Remember

If you are unsure whether a particular situation carries a risk of a conflict of interest, report it to your direct superior or to the person who is responsible for a given area or the ethics representative.

Corruption

The OEX Group companies operate in accordance with Polish laws and regulations, complying with the absolute prohibition of providing or offering financial or personal benefits to anyone, in particular to public officials, persons performing public functions (in connection with the performance of such functions) as well as to entities/persons being members of the governing bodies of non-public units.

A bribe or corruption includes requesting, providing or accepting valuable benefits in exchange for an improper action by persons in a business or private relationship or third parties.

OEX Group all employees are required to be particularly vigilant and take measures reducing the risk of corruption suspicions.

Accepting benefits

In the OEX Group companies, it is forbidden to accept any inappropriate benefits directly or indirectly. Accepted gifts should not be intended to influence any decisions or lead to inappropriate actions by a company employee. It is unacceptable to accept gifts of any kind, including meals and entertainment in exchange for a promise to engage in certain business activities.

Offering benefits

OEX Group employees may not compromise the Group's good name by offering benefits. We must not offer, promise or provide any financial or other benefits, directly or through intermediaries, in order to establish and/or maintain business relationships or to achieve other advantages as part of our market activities. Offering gifts for these purposes is, as a matter of principle, not in line with the company's principles of ethics.

Donations and loans

We make donations for charitable purposes that are legal and ethical in accordance with local laws and practices. It is forbidden to make or offer any charitable donations on behalf of OEX Group companies without obtaining a previous proper consent of the persons responsible for this area.

What is acceptable

Giving and accepting items of low financial value, including so-called advertising gadgets with a company logo (pens, calendars) as a so-called a courtesy gesture, without a specific intention, is allowed. Giving or accepting such items cannot, however, be motivated by a desire to exert any influence. It is also permissible to invite counterparties and accept counterparties' invitations to sporting, cultural or entertainment events, trips, dinners, etc., if they do not cause the customer to commit to specific behaviour, do not play a role in the customer's decision-making process, but are, instead, used to build business relationships.

Detailed rules and guidelines related to this area are contained in the anti-corruption policy of the OEX Group.

Remember!

If you have received a gift and returning it could adversely affect a business relationship, please inform the ethics representative about it. Document all expenses related to gifts. Keep in mind and follow the OEX Group's anti-corruption policy and the internal recommendations of the Codes of Partners, Suppliers, Customers as well as all companies and institutions with which you cooperate.

Relations with the business environment

At the OEX Group, we do not accept behaviours that are designed to make an unfair advantage use customers, suppliers, competitors or other persons through manipulation, concealing information, misrepresentation of facts or other dishonest activities.

We do not allow for deliberate distortion of facts, intentions or opinions in any communication and relations with the outside world. Telling an untruth as a result of a mistake or error of assessment is not a case of dishonesty.

Relations with customers

At the OEX Group, it is not allowed to conduct, alone or with a competitive company, any hidden activities against customers. The OEX Group companies operate solely in legalised associations, for appropriate business, scientific or industry purposes.

The customer group includes our current and potential customers and former customers, who may resume cooperation with OEX Group companies. Our business depends on gaining and maintaining the trust and loyalty of our customers.

We express our commitment to ethical relations with customers by:

- treating all customers fairly and with respect,
- complying with internal procedures regarding customer service, in particular those related to deadlines, standards and quality,
- providing customers with reliable information and conducting communication in accordance with internal regulations, while respecting the customer's regulations,
- taking care to ensure information protection,
- encouraging customers to include clauses regarding respect for human rights and environmental protection in contracts and to comply with the provisions contained in the OEX Group Supplier and Customer Charter.

Relations with suppliers

At the OEX Group companies, activities related to the selection and building of relationships with suppliers are aimed at jointly creating added value, increasing the quality and value of services and eliminating the risk of corruption, as well as respecting the principles of social responsibility and sustainable development in business.

To this end, we are guided by the following principles when selecting suppliers:

- the supplier selection process is conducted in accordance with internal regulations and is aimed at choosing the best offer in accordance with the criteria adopted,
- suppliers participating in the process have equal access to information regarding the terms, criteria and course of the process, which information is reliable and timely,
- making efforts in the process of clarifying doubts, if any, regarding the supplier selection process.

We encourage suppliers to sign our [OEX Group Supplier and Customer Charter](#).

Relations with competitors

The OEX Group companies base their relations with competitors on principles such as honesty and ethical competition on the market taking into account quality and offer as well as commercial conditions.

The OEX Group companies comply with Polish laws and regulations pertaining to competition. In cases of relations on foreign markets, where the law regulating these issues may be unclear, in case of doubt they should be reported to the direct superior or the legal and compliance department.

Remember!

Behaviours allowed in Poland may not be allowed in other countries. Always analyse these issues in detail when cooperating with foreign entities.

When collecting data for the purposes of market and competition analysis, the persons responsible for these activities should comply with the principles of ethics and the applicable law and obtain such data from generally available sources or using the services of recognised specialised market research companies.

It is unacceptable to make use of or engage in the unlawful obtaining of information about competitors, as well as the provision and publication of information that is not publicly available.

Relations with capital market participants

The goal of the OEX Group is the responsible and lawful operation on the capital market.

We take care to ensure proper communication with the market, the transparency of message and due compliance with corporate governance principles by:

- acting in accordance with the internal procedures related to information management,
- taking care to ensure the reliability and timeliness of the information provided as well as their readability and comprehensible message,

Relations with the public and local communities

The OEX Group engages in activities aimed at building positive social relations. Our goal is to become involved in social campaigns and support public benefit organisations in such a way as to provide our assistance with regard to important social issues, such as support for children and assistance to educational institutions as well as health promotion and protection.

Our corporate social responsibility policy is primarily designed to involve employees, support volunteering and make use of professional skills in the campaigns in which we participate.

Activities related to relations with the public also include relations with the media and conducting communication, which enables all interested parties to access information on the activities of the OEX Group.

How do we care about the environment?

The OEX Group companies operate in accordance with the environmental protection laws and regulations applicable in Poland.

The Group promotes measures aimed at protecting natural resources, the environment and nature among its employees and stakeholders.

We take measures aimed at making us fully understand the company's environmental impact and strive to achieve savings through utilising less resources, in particular energy, fuel, paper and water.

OEX Group employees should be guided by the following principles with respect to the natural environment:

- acting in accordance with the internal procedures related to environmental protection,
- actively supporting promotion and initiatives benefitting the environmental protection,
- demonstrating care for the environment in the workplace and outside of work,
- striving to reduce the unnecessary consumption of resources such as water, paper or electricity,
- encouraging a pro-environmental attitude among colleagues and all the people involved in external relations.

OEX Group Supplier and Customer Charter

We encourage our suppliers and customers (hereinafter jointly referred to as "Business Partners") to sign the OEX Group Supplier and Customer Charter, which regulates the most important ethical and corporate social responsibility issues as described below. Thanks to this, the OEX Group supports actions fostering responsibility in the supply chain.

Ethics

OEX Group Business Partners are committed to:

- operating in accordance with the principles of ethics. Corrupt behaviour and illegal benefits obtained from counterparties are unacceptable. An OEX Group Business Partner follows the principles of the OEX Group Code of Ethics related to counteracting corruption (see Attitude to the risk of corruption at the OEX Group),
- complying with applicable Polish laws and regulations pertaining to fair competition,
- complying with the law on data protection and securing protected data,
- providing their employees, subcontractors and counterparties with the opportunity to report violations in the areas of ethics, security, human rights and other legal regulations.

Employment and working conditions

OEX Group Business Partners are committed to:

- not allowing child labour in their activities and in their supply chain,
- providing their employees with fair and honest remuneration in accordance with applicable local laws and regulations,
- employing and remunerating employees in accordance with the law applicable in Poland. In other countries, they do not tolerate forced labour or labour in exchange for inadequate pay,
- ensuring equal treatment of employees and not discriminating against their employees on the basis of gender, race, religion, beliefs or worldviews,
- providing their employees with a workplace that is free from unfair treatment, ensuring respect for human dignity and human rights, preventing mobbing and molestation,
- not allowing any unfair practices in connection with employee evaluation, remuneration and contract termination.

Security and standards

OEX Group Business Partners are committed to:

- fulfilling their contract in accordance with the conditions set out in it in relation to the quality and standards of services,
- complying with all legal regulations, including holding the required licenses, permits and registrations, with regard to the activities carried on by them, as well as with provisions related to safety, quality and environmental protection,
- giving notice of any activities or products that may be dangerous, that may pose a threat or that may increase risk in the area of product and service safety,
- complying with all norms and standards that apply to the performance of their contract,
- ensuring compliance with the relevant health and safety at work regulations on company premises and in the supply chain and making available all information regarding process security risk and appropriate procedures for dealing with emergency situations

Environment

OEX Group Business Partners are committed to:

- complying with applicable laws and regulations pertaining to environmental protection,
- giving notice of harmful effects on the environment, such as emissions and waste, related to the activities carried on,
- applying a policy of protecting natural resources and active measures aimed at minimising the negative impact on the environment.