

# CODE OF BUSINESS ETHICS OF THE INTROL GROUP

Introl Group (hereinafter: **Introl Group**) is an engineering holding providing advanced solutions for numerous sectors of the economy, primarily for general and commercial power industry, environmental protection, construction, mining, and automotive industries. As concerns its business, the Introl Group cares about conducting it in compliance with the highest ethical standards and the applicable law. That is why the Code of Business Ethics of the Introl Group (hereinafter: **Code**) has been established to emphasise the key values that the organisation is guided by in its day-to-day business. The internal regulations is to help in understanding, how to take current business decisions in a proper and impeccable manner. Thus, the Code is an intragroup primary regulation that has the highest legal power in the regulatory system applicable in the Introl Group. The primary source and the base for the Code incorporates ethical principles and standards that reflect moral rules that are desired, good, right, and material for the Introl Group. As a complex organisation we pose for ourselves high goals and intend to meet the assumed requirements across all areas of business.

Individual behaviour of single members of our organisation exert a significant impact on reliability and reputation of the entire structure, therefore, the Code applies to each employee of a company that is part of the Introl Group. Each person employed in the enterprise is required to comply with the following ethical principles and standards. What is crucial is that the Code also sets forth requirements that we pose for our associates, partners, customers, or business partners. We expect that the business environment in which we operate, will respect and, together with us, will develop both ethical ideals we seek, and create practice that is based on just principles, too.

We believe that the Code guarantees working out a strong market position since it will allow taking right, reasonable, and ethical decisions. We are aware that frequently current ethical issues may seem to be problematic and require consultations. We have in place a Group Compliance Officer and Compliance Coordinators for you in individual Introl Group companies and also other core units that have specialist knowledge in a given field of business. Using advice of an expert is the first step that allows promoting the standards of proper conduct. All information and queries will be processed in a confidential manner and with due care.

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## I. Goals and Expectations of the Code of Business Ethics of the Intral Group

The primary objective of the Code is to develop ethical and moral patterns of conduct. Being nonetheless aware that conducting a business activity that is reasonable, just, free from abuse, and corruption is the responsibility of a broadly understood community that makes up the Intral Group, it has become necessary to detail the principal goals and expectations that this internal regulation is founded upon.

A success of the Intral Group operating in numerous industrial sectors is dependent on compliance with basic recommendations in the field of integrity and fairness. We expect compliance with the Code's principles in day-to-day business. Only combination of business development with responsibility provides for developing a strong market position. The Code is to inform about expectations regarding proper and ethical conduct in business.

We exercise best efforts to conduct our business in an honest and reliable manner. Consequently, we care about creating a just and transparent business environment operating in compliance with international, domestic, and local regulations. The Code is to provide guidelines impacting the development of appropriate regulations, rules, and procedures concerning ongoing business, including charity, and how such activities are to be undertaken when faced with blackmailing or extortion. We do care that our relations with the business environment were permanently managed and reflected our key values.

In our business we also focus safety and security. We protect classified and confidential information that has been entrusted to us. We, too, provide support to protect the enterprise's assets, including business opportunities. We care that assets we have been entrusted with are properly secured, and that all business assets are attentively protected.

The Code contains basic information that indicates what actions are to be recognised as lawful, responsible, and fair from a point of view of the Intral Group. In daily operations, we need to be certain that we have necessary information that allows taking just actions. We encourage ongoing consultations concerning doubtful conduct and issues. Therefore, we have decided to meet expectations and work out a practice of handling issues and queries concerning proper conduct in business.

We also wish to promote good practice within the organisation. It is therefore necessary to recognise improper conduct and to properly respond to unethical behaviour. That is why reporting irregularities (whistleblowing) is an obligation of all employees and associates of the Intral Group. Indication confidential ways of reporting suspected breaches of the Code is to eliminate irregularities and promote ethical values. Channels used to report breaches ensure complete confidentiality and are available for the employees and the business environment.

The Code facilitates implementation of key expectations of the Intral Group, thus, consequently, impacting:

- **compliance with all applicable laws**, regulations, and rules governing the business activity of the Introl Group pursued globally,
- **integrity, honest, and trust in across all activities** of the Introl Group,
- **awareness of conflicts of interest** between work and personal matters and their avoidance,
- maintenance of an atmosphere of **fair principles of employment** regarding each employee of the Introl Group company,
- assistance in **ensuring a safe place of work and environmental protection**,
- **maintenance of workplace culture** in which every employee recognise ethical conduct, value and implement it.

In the modern business and legal environment, requirements concerning the Introl Group may be complex. The business and legal environment undergoes constant changes and overall ethical and legal matters, where issues could arise, may not be predicted. The Code cannot contain all responses to challenges relating to ethics. Thus, the Code is a signpost that directs the employees and associates to act in an honest and impeccable manner, and it also serves as a guide with indications allowing to solve problems.

## II. Core Ethical Values

Our primary goal is to comply with the applicable standards and base our decisions on ethical models only. Developed over years, our culture and tradition is the source of values that we, as the Introl Group, are guided by. By following those values we intend to be among leaders in terms of responsibility, observance of human rights, the environmental protection, corruption prevention, and the occurrence of any abuse within the Introl Group and its environment. We are guided by the following values within and without the organisation.

### ***Respect***

We are aware that developing trust and respect among employees, associates, partners, customers, or business partners takes years, among others, by means of high quality products, social responsibility, or the adopted management strategy.

Therefore, we support an open culture of discussion, since irrespective of a position held, or a role pursued, each man has the right of respect, human dignity, protection of personal and family life. We show appreciation and recognition to every individual. We promote and comply with international standards concerning human and labour rights. We treat diversity as an asset of the Introl Group, since our organisation is an open community that does not accept discriminating another man, especially because of sex, race, disability, nationality, ethnicity, sexual orientation, age, religion, political and philosophical views, financial condition and social status, cultural difference, trade union or political membership, or marital status.

### ***Integrity***

The Introl Group's business activity is based on integrity. All interactions with customers, service providers,

suppliers, and associates are done with highest reliability, fairness, and with mutual respect. Great emphasis is placed on ethical conduct and we follow the values that have been imposed by the Code. We absolutely comply with the regulations of law and good customs that form the basis for building credibility and reputation. Trust and respect of employees, associates, partners, customers, or business partners is an asset and benefit that obliges us to proper conduct. The Introl Group cares about business relations with customers, service providers, and suppliers and it develops them by conducting its business activity in a manner that is respectful, honest, and competitive. People characterised by competences, co-operation, and integrity are the Introl Group's assets. The Introl Group strives to establish a team that is strong, motivated, and committed to its professional development.

### ***Trust***

The Introl Group treats trust in business as the most important element in business and interpersonal relations. We value awareness that the environment is honest and does not act against us. We are aware that achieving the organisation's goals is possible only through productive collaboration with other entities. Managing, team building, or relations with customers are based on credibility, loyalty, and transparency. We believe in fair competition and actively counteract corruption, abuse, and other acts that are contrary to the applicable regulations of law and good customs.

### ***Responsibility***

The Introl Group feels responsible not only for the quality of provided services, but also the workplace. Tasks are performed with due care and proper commitment. We are aware that we must satisfy the expectations of our stakeholders, therefore, we guarantee impartiality, independence, and reliability. We base our co-operation on knowledge and diversity and show care about another man.

### ***Corporate Governance and the Compliance System***

The Introl Group complies with the rules of the Code of Best Practice for WSE Listed Companies and Standards recommended for the compliance management system in terms of counteracting corruption and the protection system of whistleblowers in the companies listed on the Warsaw Stock Exchange (WSE). The above rules are subject to annual reports on conduct in terms of observance of the corporate governance rules and compliance.

The Introl Group has implemented the compliance risk management system. The goal of the compliance system is to ensure that all activities pursued by the Introl Group companies are compliant with relevant regulations of law, the internal procedures, and the rules applicable in the Introl Group, especially including the provisions of law governing a business activity in the field of industrial automation and systems.

A Group Compliance Officer has been appointed in the Introl Group, who exercises supervision over compliance with law. Compliance Co-ordinators have been appointed in subsidiary companies of Introl S.A. within the meaning of the Code of Commercial Companies, who co-operate with the Group Compliance Officer in ensuring compliance with law and the internal regulations in individual Introl Group companies.

The Compliance System is particularly made up of the following, inter-related and supplementary procedures and internal regulations:

- 1) the Code of Business Ethics of the Introl Group;
- 2) the Compliance Supervision Policy in the Introl Group;
- 3) the Procedure of Anonymous Reporting of Irregularities (Whistleblowing) in the Introl Group;
- 4) the Procedure of Internal Explanatory Proceedings in the Introl Group;
- 5) the Procedure of Counteracting Adverse Developments in Employment at the Introl Group;
- 6) the Anti-Corruption Procedure of the Introl Group;
- 7) the Procedure of Managing Conflicts of Interest in the Introl Group;
- 8) the Procedure of Charity and Promotion in the Introl Group;
- 9) the Procedure of Dealing with a Threat of Commitment A Prohibited Act or Failure to Observe the Rules of Prudence in the Introl Group;
- 10) the Procedure of Exercising Best Efforts in Selecting Business Partners in the Introl Group;
- 11) the Code of Conduct for the Suppliers of the Introl Group;
- 12) the Policy of the Information Technology Systems' Security Management;
- 13) the Procedure of Conduct in the Event of Actions Pursued by Law Enforcement Authorities, Tax Audit Authorities, and the Office of Competition and Consumer Protection (UOKiK) in the INTROL Group.

### ***Continued Search of Excellence and High Quality of Services***

The Introl Group continuously seeks excellence. All processes and procedures implemented in the organisation are subject to continued verification and improvement to maintain a high level of the quality of provided services. We strive to work out an ideally efficient organisation that effectively employs its resources. The Introl Group keeps its promises acting with determination and in a transparent manner.

### ***Decent and Friendly Working Conditions***

To ensure decent and friendly working conditions, the following rules have been established which are based on integrity, respect in daily relations and dialogue, co-operation, and commitment.

The employees of the Introl Group are obliged to:

- create a working environment that is based on integrity, mutual respect, tolerance, and co-operation,
- not to accept any form of discrimination and mobbing, including harassment, oppression, humiliation, and to decisively oppose such occurrences,
- not to accept any form of sexual harassment and to decisively counteract them,
- not to accept conduct and utterances that violate moral rights of other persons,
- not to use their position in the enterprise to gain personal benefits,
- not to issue contradictory orders, and if the same have been given, they may be refused to follow until they have been explained by a superior,
- accept orders in line with the rights and related to a position held,

- if an ambiguous order has been given, an employee has the right to additional explanations as to what is expected of them,
- superiors do not issue orders that violate the law and those that exceed the rights that the employees have,
- management staff are required to develop a proper atmosphere of work, especially to:
  - a) partner-like treatment of employees,
  - b) carefully listen to matters with which employees approach them, ensuring a proper place and a sufficient amount of time to talk,
  - c) support their subordinates in hardship situations requiring special assistance,
  - d) exercise best efforts so that the way in which tasks relating to an employee leaving the company were ethical.

All employees are obliged to build a stable and modern organisation that treats man justly and with respect. Therefore, we place great stress on active, transparent, and open communications and teamwork the foundations of which are rooted in integrity and credibility.

### ***Safety and Health of the Employees***

The Intral Group undertakes every effort for the organisation to be a safe place of work. The system and procedures aimed at enhancing the level of occupational safety and protection of employees' health is constantly improved to achieve a goal to have no accidents at the workplace at all.

To this end the principles have been adopted that oblige all employee to:

- responsibility for their own safety and that of their associates,
- continual improvement of occupational safety and protection of health in line with the applicable laws, standards, and the internal regulations, and also according to their best knowledge,
- constantly improve methods of recognising threats and preventing accidents at work and occupational diseases,
- enhance of their own qualifications in terms of occupational health and safety and to promote an attitude of commitment in actions aimed at improvement of the working conditions,
- reliably inform associates and the public opinion about a policy on occupational safety and protection of health applicable in the Intral Group, and also about achieved results,
- put saving their own lives and lives of other over any other actions in emergency situations,
- absolutely comply with the regulations, rules, and standards applicable in a position held,
- protect their own lives and health by proper use of personal protective equipment, as provided for in the internal regulations, protective workwear and footwear provided for in a position held,
- aptly use protective measures that an employee is entitled to and to update their knowledge about their application and way of use,
- use proper tools in accordance with their intended purpose,
- consume no alcohol during work, not to use drugs or other intoxicating substances and not to report at the workplace under their influence,



- comply with the quality standards of products and services manufactured at a work position assigned to an employee,
- report each case of violation of the regulations and rules to appropriate persons concerning occupational health and safety, accidents, injuries, illnesses, and each instance of uncontrolled leakage of hazardous substances into the environment,
- warn of danger persons who are located within a danger area.

All employees are obliged to comply with the applicable internal regulations and external provisions of the applicable law. We respect the applicable standards and constantly undertake actions aimed at improvement of the working conditions. Each employee is obliged to comply with the rules of occupational health and safety and to inform about irregularities. Therefore, we increase the awareness of the employees in the area of occupational health and safety.

### ***Fair Exchange of Information***

Communications among the employees of the Intrl Group shall be based on fair and full exchange of information necessary for proper functioning of the organisation. Open and fair communications allows building permanent and positive relations with business partners, thus affecting an increase of the competitiveness and value of the Intrl Group.

Internal communications of the Intrl Group is based on the following principles:

- sharing with associates ongoing information on current strategies, plans, and goals of the Intrl Group,
- superiors' informing their subordinates of predicted changes affecting their current and future functioning within the organisation,
- providing the subordinates with full information about assessments of their work, explanations, and justification of decisions, as well as indicating areas for improvement,
- expressing opinions on management rooted in reliable merit-based arguments and presenting superiors with proposals of actions to improve functioning of the organisation and its development,
- the superior shall be obliged to:
  - a) explain to the employee any doubts that concern functioning of the organisation or – if it is impossible – direct them to a relevant person, who may provide a satisfactory answer,
  - b) explain to the employee any changes in the internal regulations that concern the position held by them,
  - c) initiate co-operation among individual organisational units within the organisation.

### ***Equal Opportunities of Employment, Promotion, Development, and Professional Improvement, and Responsibility for the Subordinate Employees***

The Intrl Group strives to create an atmosphere of trust and equal opportunities, fair treatment of everyone, regardless of their sex, age, religion, nationality, philosophical views, appearance, sexual orientation, position held, seniority, or trade union membership.

Furthermore, the Introl Group provides the disabled with employment, proper working conditions, professional development, and also constantly seeks to remove social barriers at the work place and increases the integration of the disabled with other employees of the enterprise.

Hiring and promoting, developing and assessing, and also remunerating and granting bonuses in the Introl Group is based on clear, transparent, and fair principles, i.e.:

- compliance with the regulations governing employment, promotion, development, and professional improvement,
- fair and merit-based assessment of work performed by associates or subordinates,
- acceptance with understanding and attention of feedback about the quality of work,
- superiors' support for actions taken by subordinates aimed at the development of their competences,
- engagement in open and competent dialogue concerning performance of the employees and ways of their remuneration,
- opposition to any forms of discrimination,
- creation and implementation of regulations allowing work by the disabled.

Detailed rules of determining remuneration of the employees hired in the Introl Group companies are worked out in internal regulations which contributes to their transparency and fairness in functioning. Offered remuneration corresponds to qualifications and contribution to work. We seek to ensure that the employees understand how important role they play within the organisation. The adopted systems of remuneration and bonuses have been defined on the basis of objective premises, and the employee appraisal is performed pursuant to reliable and merit-based criteria.

### ***Conduct Outside the Workplace and Time Management***

Employees' conduct outside the workplace is in the sphere of privacy and the Introl Group does not interfere with it. The employees' conduct may not adversely affect safety at the workplace, their ability to perform professional duties, or the Introl Group's image.

The employees are aware that outside the workplace and the working time, in certain private situations, their opinions may be perceived as a position of the Introl Group.

The employees express their opinion on topics related to the Introl Group outside the working time and the workplace presenting information in line with a position of the Introl Group or a Introl Group company, while being authorised to that or their explicitly indicate that they make such statements on their own behalf.

The employees care about a good image of the Introl Group and by their attitude and conduct they duly represent it, also outside the workplace and their working time.

The employees may not take actions on their own that are aimed at presenting a position of the Introl Group, since it is required to have special authorisation that allows contacting the mass media.

### **III. Business Activity Standards**

#### ***Responsible Handling of the Company's Assets***

Responsibility for the Introl Group, its well-being, and development belongs to duties of the employees of the

Group companies.

Caring about the assets of the Intral Group, using the company equipment according to its intended purpose, and also proper use of the working time are all the basis of fair functioning of each employee of a Intral Group company. According to the above guidelines, the employees shall not:

- use the assets of the Intral Group (including telephones, faxes, copiers, machinery, equipment, products, company cars) for purposes other than related to the performance of the tasks they have been entrusted with, unless separate internal regulations provide otherwise,
- perform private obligations in their working time,
- use entertainment funds for non-business purposes.

### ***Anti-Corruption***

In the Intral Group we do not tolerate any forms of corruption and unfair influencing. We build only positive business relations based on the principles of fair competition. It is not allowed to present officials with any benefits. In relations with our counterparties and business partners we refrain from offering or accepting gifts or any other additional benefits, favours, and hospitality with the exclusion of those that are of a token value and are justified by business, and their refusal could be perceived as an offence or violation of the applicable standards of culture. Never offer or accept gifts in the form of cash and its equivalents, regardless of the amount involved. Any conduct must be avoided, too, that could be perceived as expectation or request for bribes or other benefits.

Each of our employees/associates/business partners/partners shall strictly follow the rules defined in the Anti-Corruption Procedure of the Intral Group.

### ***Conflict of Interest***

Respect and integrity displayed towards the Intral Group is valued. Hence, the employees seek not to create situations of the conflict of interest understood as a circumstance in which decision taking may be affected by their private interests.

In the Intral Group, there is the Procedure of Managing Conflicts of Interest in the Intral Group in place, the purpose of which is to define and implement in the Intral Group basic rules of preventing the occurrence of conflicts of interest, including identification of cases that are or may be conflicts of interest and the rules of dealing in the event of such conflict and managing it in a manner that does not result in violation of an interest of a specific Intral Group company.

### ***Protection of Information and Privacy***

The Intral Group exercises best efforts in terms of information protection, including personal data of the employees and persons related to the enterprise, with whom the employees deal in the course of performing their corporate duties. Data is obtained only to the extent in which it is necessary for the proper functioning of the enterprise. Special care is given to information protected by the regulations of law, the internal organisational rules of the enterprise and relevant clauses incorporated in agreements with business partners.

The employees of the Intral Group pay special attention that:

- they collect only such information during their performance of corporate duties that is necessary for proper performance of their corporate duties, and thus functioning of the enterprise,
- collected information is stored while observing special precaution measures,
- care is exercised about information security of the enterprise, its employees or entities co-operating with it,
- care is exercised about intellectual property, i.e. materials that are owned by others are not copied or used without obtaining their author's consent.

Furthermore, the employee has the right to:

- know the collected and stored information on them,
- inspect their personal file.

The Policy of the Information Technology Systems' Security Management applicable in the Introl Group is a tool supporting the employees in the protection of information and privacy.

### ***Financial and Accounting Transparency***

The Introl Group operates in compliance with the regulations of law concerning maintenance of the books of account, registration of invoices, and performance of settlements in a clear and transparent manner so that they reflect in detail and truthfully transactions, and also the utilisation of funds by the Introl Group companies.

Special care given to correct financial and accounting entries in the Introl Group is the responsibility of those employees, who in their corporate duties, have access to such data and use it in their daily work.

Entries of financial data in the Introl Group are made in accordance with the following principles:

- no hiding of the actual amounts of transactions,
- no creation of undisclosed or unrecorded funds or financial means for any purpose,
- no creation of untrue accounting entries and no manipulation of the data disclosed in reports,
- acceptance and execution of payments for checked invoices in accordance with the actual status.

### **Introl Group and Its External Environment**

#### ***1. Customers***

Well-being and satisfaction of customers is a priority for the Introl Group. Customers of the Introl Group companies have the right to expect from the enterprise reliability, highest quality of goods, services, and products and professional service compliant with the highest standards.

During customer services, the employees of the Introl Group companies pay special attention to compliance with the following principles consisting in:

- meeting any obligations towards customers, not abusing trust, not using their any lack of knowledge and experience,
- treating all customers in the same way, regardless of their sex, age, religion, nationality, position held,

- philosophical views, appearance, or sexual orientation,
- providing customers with professional and competent service, friendly, being full of kindness and openness to their needs and expectations, both in direct relations and in communications,
  - conducting permanent control, corrective, and preventive actions while caring about the customers' well-being to guarantee detection of organisational or technical irregularities and to eliminate unprofessional conduct,
  - exercising care that services and products offered to customers comply with the highest quality standards,
  - providing in external communication only full and true information about goods, products, and services and operations of the enterprise, with the exception of information that constitutes technical, process, commercial, or organisational secrecy of the Inrol Group, the disclosure of which may expose the company to damage or that is subject to the protection pursuant to detailed regulations of law,
  - accepting full responsibility for offering goods, products, and services, and withdrawing from sales defective goods and products,
  - executing orders in accordance with the applicable regulations and the terms and conditions of mutual agreements,
  - informing customers in a reliable and accurate manner about any additional costs, difficulties, and delays in execution of the planned deliveries,
  - reviewing complaints in a quick and efficient manner and informing customers about a result of the complaint procedure,
  - analysing in a detailed manner provided remarks concerning goods, products, and services offered by an Inrol Group company, and the results of such analyses are to serve as an impulse to improve the offer and adjust it to the needs and expectations of customers,
  - recognising a need of conducting reliable marketing communications and responsible advertising activities.

## **2. Local Community**

The Inrol Group cares about building permanent relations with local communities based on integrity, dialogue, partnership, and trust. The Inrol Group feels responsible to support the closest environment, local initiatives, and the local labour market. Each of the Inrol Group companies wants to be for its closest environment not only the enterprise that contributes to the economic development at a local level, but also a good neighbour and a valuable element of the community.

Relations with a local community are built on the basis of the following activities:

- supporting local initiatives aimed at enhancing life quality of inhabitants based on the principles of partnership and dialogue,
- analysing an impact of the Inrol Group on the local environment over a long-term perspective and optimising benefits and costs stemming from the Inrol Group's presence in it,
- supporting initiatives to enhance education of local communities, preventing social and economic exclusion, improving safety, enhancing the system of health protection and promotion and a healthy lifestyle,
- engaging in charity activities that provide assistance to the needy, and support the protection of life and

health,

- guiding by the principles of responsible business, combining an economic success with caring about local communities and the natural environment.

### **3. Natural Environment**

The Intral Group attaches great attention to the protection of the natural environment and believes it to be necessary to maintain harmony between business and the natural environment.

### **4. Business Partners**

The Intral Group builds its relations with business partners on the basis of integrity, transparency of actions, mutual respect, and professionalism by:

- keeping the assumed obligations,
- executing payments and other obligations in a timely manner and in accordance with the established terms and conditions of agreements,
- striving in difficult and conflict situations that issues are resolved by way of dialogue,
- being guided in the process of selecting suppliers and collaborators by compliance with law and the applicable regulations and the free market principles (attractiveness of price offering, quality of goods and services, adjustment to expectations and needs, reliability and professionalism of the enterprise), while ensuring full transparency of actions performed to such end,
- assessing business partners on the basis of merit-based and business premises only,
- acquainting business partners with the standards of conduct in the Intral Group,
- not being indifferent, when law or the basic principles of conduct are violated by business partners of the Intral Group and notifying superiors about such events.

Special attention in the Intral Group is given to proper verification of business partners. To this end, the employees responsible for the procurement process are obliged to apply the verification rules and criteria that are included in the Procedure of Exercising Best Efforts in Selecting Business Partners in the Intral Group. We wish to co-operate only and solely with organisationally transparent entities and those that operate in a lawful manner.

Our expectations towards the suppliers have been defined in detail in the Code of Conduct for the Suppliers of the Intral Group.

### **5. Competition**

The Intral Group commits to care about complying with the principles of fair competition and transparency of the activities pursued by the Intral Group companies. We believe that competition on a single market should only be based on the quality of our goods, services, and products offered at a fair price.

Therefore, the Intral Group:

- absolutely follows no practices, such as: industrial espionage, theft, or identity hiding to obtain confidential information from a competitor,
- makes no offensive statements on the nature, financial condition, and prospective legal problems of its

competitive companies to gain business benefits,

- collects information about competitive companies to assess their products, services, and marketing methods is done only within the applicable law.

#### **IV. Liability and Reporting Breaches of the Code**

To the extent applicable to them, each employee and associate shall be obliged to comply with the principles provided for in the Code.

Everyone (employees, associates, counterparties, business partners) has the right to report information about irregularities, abuse, or conflicts understood as violation of the principles or standards described in the Code and other procedures applicable at the Introl Group.

Reporting irregularities or potential irregularities is the responsibility of all persons and units working for the Introl Group, or which have permanent relations with it. Failure to do so may constitute the basis for being held accountable. Reporting shall be done using the Procedure of Anonymous Reporting of Irregularities (Whistleblowing) in the Introl Group that is available at [www.introlsa.pl](http://www.introlsa.pl).

Reporting may be made using the following channels of communications:

- on-line form available at [www.sygnaLista.introlsa.pl](http://www.sygnaLista.introlsa.pl);
- by e-mail to: [gco@introlsa.pl](mailto:gco@introlsa.pl);
- personally to the Group Compliance Officer or a selected Compliance Co-ordinator;
- personally or by e-mail to the President of the Management Board of Introl S.A. – if reporting concerns the Group Compliance Officer.

A person, who makes reporting shall have the right to select its most convenient form and a person whom they trust most. A person, who makes reporting in good faith shall be entitled to protection (by having a status of the Whistleblower). If reporting is done in good faith, then even if it turns out that it is untrue, it may not be the basis for holding the whistleblower accountable or responsible.

It must be remembered that each reporting made in a correct manner, including anonymous one shall be thoroughly examined. To this end the Procedure of the Internal Explanatory Proceedings in the Introl Group shall be applied. We draw attention that clarification of the case that has been anonymously reported may be difficult, or even impossible due to lack of possibilities of obtaining additional information.

If it turns out that reporting has been made in bad faith, that is when a whistleblower has known that information provided by them is untrue, then such person shall be held accountable under disciplinary proceedings (in the case of employees) or a mutual agreement being the basis for co-operation with the Introl Group shall be terminated.

If, as a result of explanatory proceedings it is established that a company employee has breached the principles of the Code, actions against a breaching person shall be immediately undertaken in accordance with disciplinary rules that among others include giving a reprimand, subjecting to a trial period, suspension,

degradation, or termination of the employment relationship.

Disciplinary proceedings shall be instituted, among others, against a person, who:

- fails to comply with the Code and the procedures applicable in the Introl Group and a given Introl Group company,
- induces an employee to breach the Code,
- fails to inform about breaching of the Code,
- undertakes acts of retaliation against persons, who have reported suspected violation of the Code.