

CODE OF CONDUCT



SIRO-BIELSKO SP. Z O.O.
STRAŻACKA 80 43-382 BIELSKO-BIAŁA
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1. INTRODUCTION

a. Strong values build a strong company

Our Code of Conduct specifies how our employees should do their work. We are proud of our ethical principles that this document deals with.

It is thanks to employees who adapt to our ethical principles and their commitment to work that we are a strong company. This is extremely important for the perception of us by our surroundings, including our future employees and clients. In this way, we create trust between the employer and employees, as well as with our external partners. Only in this way can we develop our company.

We are a fairly young company (founded in 1999) but during this time we managed to develop a strong market position. This is associated not only with the responsibility and expectations that sets the environment before us, but above all, which we set ourselves.

It is the violations of ethical principles that pose the greatest risk to us in maintaining our position, and therefore there is no room for any unethical behavior. In such situations, we will act immediately and uncompromisingly.

This document is very important and shows us the directions of how to proceed. Nevertheless, he is unable to answer every ethical question. We rely here on a huge list of the advantages of our employees in their daily decisions. If there is any doubt, we encourage employees to contact their superiors to discuss the problem. Only in the team is real strength.

b. Why do we need a Code of Conduct?

Our Code of Conduct is a guide written with our employees in mind to help them understand our values and to present them our expectations regarding their daily behavior towards colleagues and external partners. Our Code is a document we use in case of ethical doubts. It also contains detailed information about who to contact in case of questions and / or ethical concerns.

c. Basis of the Code of Conduct

Our Code is based on faith in people and also on the values we believe in and guide us in everyday life. These values oblige us to act in accordance with the highest ethical standards. We believe that man is good and has good intentions. Our Code is based on responsible and sustainable values that respect the diversity that surrounds us. Caring for everyone is the key to understanding our values. We work safely or not at all. We never pass by dangerous behavior indifferently. We support care for health and well-being.

We care not only for people but also for the environment. We promote green, environmentally friendly solutions and conduct our business in a manner consistent with nature. We are responsible for future generations.

We conduct business in a fair and transparent manner. We operate according to the Code of Conduct and do not accept shortcuts. We support the creation of an open work atmosphere where everyone can express their opinion.

Individually as employees, as teams and as a whole company, we always strive to be better in everything we do. We are a learning organization and we openly share our knowledge. We are proud of the quality and innovation. Together with clients, partners and communities we are building a better world. We are open and honest, showing mutual trust and respect.

We help our clients succeed in their business. We try to understand the needs of them and their clients. We help our clients transform their vision into reality.

Our Code is accompanied by a number of more detailed documents that apply the principles and expectations outlined in the Code. In some cases, they contain stricter standards than those set out in this Code. These documents are:

1. Supplier Code of Conduct
2. Anti-corruption policy.

d. Who is affected by the provisions of the Code?

All employees of SIRO-Bielsko must comply with the principles described in this Code and meet the requirements contained therein. This also applies to employees employed on a part-time basis or on the basis of civil law contracts and temporary employees. If you have a managerial position and supervise the work of others, you have a special responsibility. You must lead by example and act in accordance with this Code.

Our Code has the highest priority. If you break a rule contained in the Code or other relevant document describing the company's policy, corrective or disciplinary actions will be taken against you, which may result in, among other things, termination of the contract.

This Code goes beyond our company because without our suppliers and partners we would not be able to run our business. Subcontractors, suppliers, advisors, recipients, agents and representatives must comply with our Code when cooperating with us. The Supplier's Code of Conduct should be included in the contracts concluded with these parties.

e. Compliance with the law.

We meet all legal requirements related to our business. Moreover, we apply our Code even when our standards, e.g. regarding the minimum age of employees, are stricter than legal requirements. Habits or practices generally accepted by the community never take precedence over legal requirements.

f. Reporting disturbing situations.

SIRO-Bielsko conducts business activities with a high degree of honesty and transparency. One of the elementary assumptions of such activity is the atmosphere in which everyone feels authorized to report cases of non-compliance with our Code, including suspected unlawful or unethical behavior.

Reporting suspected or known cases of misconduct should be reported immediately to your supervisor or your supervisor. If you prefer, talk to the President of the Board, Human Resources or the Ethics Committee. If you feel uncomfortable, you can report suspected or known violation of the Code of Conduct by phone (+48 33 818 34 82) or via email (komisjaetyki@siro.com.pl). Reports can be confidential and anonymous. You don't have to introduce yourself. We will promptly investigate any suspicions and problems reported and take appropriate action based on the results of our investigation.

If you have a managerial position, you must ensure that reports of suspected or known offenses are properly handled. For some reports, the most appropriate action may be to refer the matter to the Ethics Committee.

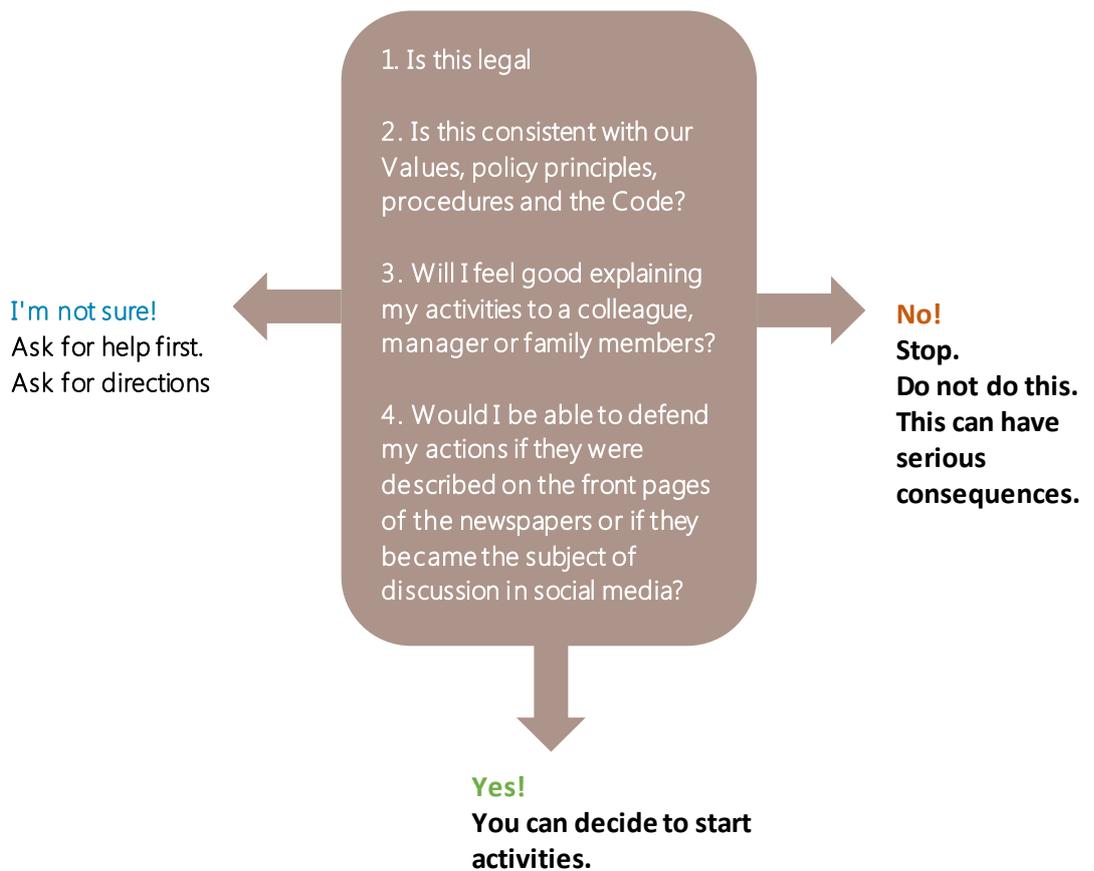
g. Prohibition of retaliation.

SIRO-Bielsko does not tolerate retaliation against an employee who has reported in good faith suspected misconduct. "Good faith" means that to the best of your knowledge and belief everything you report is truthful and no information has been intentionally distorted.

Disciplinary action will be initiated against any employee who engages in retaliation. If you experience retaliation, report it as suspected misconduct.

h. Before you make a decision - tips.

If you are facing an ethical dilemma and you are not sure what to do, use this scheme to determine the best path.



2. OUR OBLIGATIONS AT THE WORKPLACE

a. Introduction

Working at SIRO-Bielsko means not only providing the best solutions and helping clients achieve success. It also means sustainable management of SIRO-Bielsko assets and the creation of an honest, healthy and safe work environment in which we can improve professional skills and develop as individuals. You must contribute to this goal by professional conduct and promoting a culture of inclusion in which everyone feels good.

b. Health, safety and well-being.

Occupational health and safety are focused on preventing accidents and promoting a healthy and safe working environment for all employees, colleagues and all those who work with us. This is a priority for SIRO-Bielsko. Well-being is a feeling of satisfaction that often depends on the work environment. They include elements such as supportive supervision, a sense of purpose and physical security.

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OUR RULES:

- We care about our people and people who are affected by our work.
- We are constantly striving to create a work environment that promotes health, safety and well-being.
- We believe that visible leadership is necessary to implement a strong program focused on health, safety and well-being.
- We promote and exchange best practices on safety and accident prevention with entities in the supply chain and the entire industry.
- We provide our employees with appropriate OHS training.
- We make sure that employees of subcontractors are properly trained and equipped with equipment and tools enabling them to work safely.
- We want to be the industry leader in terms of healthy and safe work. We're constantly making improvements to create a risk-free environment.
- Everyone has the right to a safe workplace.
- You have a personal responsibility to help ensure healthy and safe working conditions.
- You take care of your colleagues' health and report all accidents in the workplace and all dangerous and hazardous situations to your immediate supervisor or health and safety specialist.
- You never ignore jobs that are dangerous or hazardous to health. You have the right and duty to interrupt them if you think they are being performed in a hazardous manner.

- Regardless of your role in the team, you can help create a safe workplace by demonstrating active, bold and visible leadership in matters related to health and safety at work.

EXAMPLE:

When you heard a strange engine sound while cutting on a saw. What are you doing?

In this situation, stop work and call your supervisor. He will report the matter to a workshop employee. Never compromise the health and safety of yourself or others to do the job. If the conditions change, stop work and if you cannot eliminate the danger yourself, report it to your manager.

c. Decent working conditions.

A tolerant and fair environment is the basis of our perception of the world. Our standards are based on our values, as well as the UN Universal Declaration of Human Rights, conventions affiliated to the United Nations International Labor Organization (ILO) and UN Guiding Principles on Business and Human Rights.

OUR RULES:

- We recognize human rights as defined by the international community
- We make sure that our activities do not affect the observance of human rights and that any problems in this area can be solved if they arise.
- In our supply chain, we do not tolerate any forms of forced or compulsory child labor, including practices such as unlawful or unlawful deduction from salaries. We recognize as a child any person under the age of 15 or above the age specified by local law.
- We do not allow practices that would limit the freedom of movement of employees, such as taking identity documents or work permits as a condition of employment.
- We recognize the special needs of employees under the age of 18 and our obligation to provide them with special care.
- We only allow working hours, salaries and allowances that are in accordance with national and local laws and applicable ILO conventions.
- We recognize and respect collective agreements and the right of our employees to associate and conduct collective negotiations where permitted by law.
- We maintain good relationships with work organizations, trade unions and employee representatives.
- We maintain a constant dialogue with our employees to ensure that their rights are respected.
- Everyone has the right to be treated with respect and dignity. At the same time, everyone has a duty to respect the dignity, privacy and rights of every person they contact and all those who are affected by our business activities.

- Everyone is obliged to raise objections if they become aware of any unworthy working conditions at SIRO-Bielsko or any of the cooperating parties or suppliers.

EXAMPLE:

Someone in the town where I live says that the employees of the main cooperator SIRO-Bielsko receive below statutory remuneration and work overtime without receiving appropriate remuneration for it. What are you doing?

You must report this so that others can take action and remove this anomaly. If you do not report this, the probability of removing this regularity is very low. Remember that you can submit anonymously.

d. Diversity and inclusion.

Diversity is everything that we differ as individuals, e.g. age, gender, sexual orientation, ethnicity, belonging to a particular generation, religion, beliefs, language, education, marital status, etc.

Inclusion is that the wealth of unique ideas, views, perspectives and opinions from various group members is valued and promoted.

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OUR RULES:

- We respect all individuals, strive to work as one team and support forms of open, honest and respectful communication.
- We trust that in a diverse and accepting work environment, better solutions are created for clients.
- We treat everyone equally, providing everyone with equal development opportunities, regardless of appearance, origin, religion, beliefs, gender, sexual orientation, gender identity or expression, age, disability, marital or family status or anything else that tells someone to treat someone worse.
- Our policy of equal employment opportunities covers all aspects of employment, including training, promotion and all other conditions related to this matter.
- We disagree with any form of disrespect, harassment, discrimination, bullying or unwanted sexual propositions.
- You contribute to creating a positive work environment in which everyone feels appreciated and respected for their unique contribution.
- You are open, you support teamwork, you encourage others to submit new ideas and opinions.
- You do not participate in or respond to any form of bullying, harassment or discrimination.
- You do not engage in activities inappropriate, illegal, sexually marked or otherwise offensive, whether in the workplace or when representing SIRO-Bielsko outside the company. You do not distribute such content.

EXAMPLE:

1. You notice how an older employee is verbally abusing a less-experienced colleague: he uses offensive language and tells jokes about sexuality. What are you doing?

You must stop this behavior and, if necessary, report it to your supervisor or through the notification channels described in the introduction to this Code. Remember that you can submit anonymously.

2. What will you do when you see that the driver who brought the materials is scolded by his boss over the phone?

We do not tolerate any form of bullying, discrimination or disrespectful behavior from our suppliers. You must stop this behavior and, if necessary, report it to your supervisor or through the notification channels described in the introduction to this Code. Remember that you can submit anonymously.

e. Personal development.

Possibilities of personal development help employees of SIRO-Bielsko in developing talents and potential as well as applying newly acquired skills and abilities in order to constantly improve the operation of our teams.

OUR RULES:

- We believe that our people are our greatest asset.
- We support employees in both personal and professional development.
- We offer employees training and other development opportunities to broaden their knowledge and skills.
- We encourage them to develop and learn through cooperation with other people and exchange best practices.
- You are responsible for your own learning and personal development and you are active in this field.
- You have the right to receive feedback from your supervisor about your actions.

EXAMPLE:

For some time there have been opportunities to participate in training that you know would help you grow. However, the supervisor keeps saying that there is so much work at your current position that you don't have time to do this training. What to do?

It may happen that due to deadlines or other circumstances it is sometimes impossible to take part in the training. However, if you feel that you are not provided with development opportunities, speak honestly with your manager. If nothing changes, report to this manager's supervisor.

f. Personal data protection (data protection).

Data protection is about securing your right to privacy when processing personal data about you. Different countries have different definitions of personal data and legal requirements for their protection. These data include, e.g. date of birth, contact information, names of family members, health information, photographs, and ID number.

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OUR RULES:

- We ensure that all activities on personal data, e.g. collection, recording, comparison, storage and deletion, take place in accordance with applicable regulations.
- We respect the right of everyone to protect personal data.
- We secure personal information about our employees and other stakeholders.
- We make sure that only persons who need it to perform their official tasks have access to personal data.
- We ensure that all persons who gain access to personal data retain appropriate measures to protect them.
- We ensure that personal data is not kept for longer than required to achieve the purpose for which it was collected.
- If you use other people's personal information at work, you respect and pay attention to their privacy. You gain access to personal data only when you have the right to do so and only to the extent necessary to perform your official duties.
- You protect and treat confidential personal data to which you have access.
- You grant others access to personal data only when they really need it, with the appropriate authorization and in accordance with legal requirements.

g. Reporting and keeping records.

SIRO-Bielsko maintains and presents complete and precise documentation of business activities, which means that our records and financial statements must always present the actual state of our company.

OUR RULES:

- We believe that proper record keeping is an essential part of doing business honestly and transparently.
- We document the nature of all financial transactions in a full and precise manner, in accordance with accounting principles.
- We maintain accurate non-financial documentation, for example on quality, safety, health, environment, human resources, working time and training.
- You make sure that all reports and documents are complete, accurate, truthful and not misleading.
- You never falsify tests or test results.
- You never destroy or alter any information or data that must be stored to meet legal or contractual requirements or that is required for future audits or audits.

EXAMPLE:

You are wondering whether in the monthly report in the expected profit to provide information about a high customer claim due to a complaint. You think the claim is overstated and it would be better to wait and file it later. Is such action acceptable?

No. Regardless of when claims arise and what their potential impact on profits is, it is important that the reports are always accurate. Talk to your supervisor and together determine the most likely result of the claims, and then provide this value in your current monthly report. Transparency is the most important thing.

h. Company assets.

SIRO-Bielsko has both tangible and intangible assets included in the assets. Examples of tangible assets are: products, materials, money, computers, real estate, machinery and equipment. Examples of intangible assets are: our brand, patents, trademarks, know-how, trade secrets and copyrights.

OUR RULES:

- We use our assets responsibly.
- We protect our assets against damage, theft, loss and misuse because they are key to our business.
- We do not use our computer and electronic communication systems for inappropriate communication, including any illegal activity, or behavior that may be considered discriminatory, harassing or harassing.
- We protect the assets of our clients and other stakeholders entrusted to us against damage, theft, loss and misuse.
- You properly manage the company's assets when using them in connection with the work done for SIRO-Bielsko or its clients.
- You use company assets for private purposes, if and only if you have obtained permission from the President of the Management Board
- You don't use company assets to make a personal profit, for example by carrying out private orders.
- You must not misuse company assets, including fraud, breach of data security, phishing or use of offensive or obscene content in sexual or ethnic terms.

i. Confidentiality.

Protecting our calculations, ideas, processes and business information is important to our competitiveness. For this reason, some information is the protected property of the company and is considered confidential.

Confidential information includes business secrets, know-how and proprietary information. They also include business plans, financial records, customer information, pricing information, employee files, prosecutions and investigations of reported misconduct, financial and accounting data, as well as other business issues and methods.

OUR RULES:

- We respect the confidentiality of information
- We do not expect new employees to provide confidential information about their previous employers.
- We take all reasonable measures to prevent disclosure of confidential information to people who do not need it or do not have the right to access it in connection with their work.
- You do not access confidential information, do not use, store or disclose it without proper authorization.
- You protect confidential information against loss or theft. This means, among other things, the need to protect portable computer devices such as laptops, smartphones and tablets
- If you receive confidential information by mistake, regardless of whether it comes from an external business partner, colleague, client, employee of the competition or anyone else, you do not contact the sender, disclose the situation to your supervisor and do not use the knowledge gained in this way.

3. OUR COMMITMENTS ON THE MARKET

a. Introduction.

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We believe that the best relationships in business are built on the basis of respect and mutual benefit. That is why we always try to understand and anticipate the needs of our clients, suppliers, partners and other stakeholders, act honestly and act responsibly and fairly. As employees of SIRO-Bielsko, we must do our best so that our work brings high-quality results, is on time and falls within the planned costs. We always try to exceed expectations.

b. Relations with stakeholders

How the market perceives us depends on how we act in our daily relations with our stakeholders. When we operate in an open, honest manner and adhere to the principles we believe in, we become the company we want to be. We all need to help achieve this goal.

Stakeholders are employees, clients, shareholders, external business partners with whom we sign contracts, and the communities in which we work.

External business partners are cooperators, suppliers, agents, advisors and others with whom we enter into contractual relationships to provide products and services

OUR RULES:

- We strive to build positive, constructive and long-term business relationships with organizations whose values coincide with ours.
- We believe that stakeholders conducting business with SIRO-Bielsko have the right to be treated at the same level and in accordance with the same ethical principles that we expect from them.
- We will not give up our values for any stakeholder.
- Zanim wejdiesz w relacje z zewnętrznymi partnerami biznesowymi, dbasz o to, by zrozumieci nasze standardy etyczne bo jest to tak samo ważne dla nas jak i dla naszych klientów.
- Aktywnie słuchasz naszych klientów i upewniasz się, że dobrze rozumiesz ich potrzeby i oczekiwania.

EXAMPLE:

You learn that a resident of the house next to the factory complains that the height of the stored materials obstructs her access to the sun.

It is very important for us to respect the community in which we operate and build, and to take into account its needs. This means maintaining an open dialogue with the community and seeking solutions to the problems it reports. Talk to this lady and then try to find a solution to this problem.

c. Conflicts of interest.

Conflicts of interest arise when there is a conflict between our personal interests and our responsibilities as employees. The appearance of a conflict of interest can be just as harmful as an actual conflict.

Conflicts of interest may arise in hospitality and entertainment, gifts, charitable and political contributions, sponsorship and close relationships, or in other forms of engagement with an entity competing or cooperating with SIRO-Bielsko.

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OUR RULES:

- We are responsible to our stakeholders for making decisions without taking into account personal benefits.
- We disclose potential conflicts of interest to the President of the Management Board.
- You do not engage in activities that cause actual or alleged conflict between your personal interests and those of SIRO-Bielsko
- You avoid situations where there may be a conflict of interest or which may appear to be a conflict of interest.
- In the event of a potential conflict of interest, it is your responsibility to report it to the President of the Management Board

EXAMPLE:

Your relative has a sawmill and would like to present his offer for SIRO-Bielsko. You don't work directly with lumber orders or have any influence over who you buy it from, but you are worried that this situation may create the appearance of a conflict of interest. Can your relative still present his price offer?

Your relative may submit a price offer but you are required to report kinship to the President of the Management Board so that he is aware of the potential conflict of interest and can approach this issue accordingly. You must also opt out of the decision to award any order, approve changes to the order, or make payments related to this company.

d. Hospitality and gifts.

To promote their business, companies show their clients and partners hospitality in the form of meals, travels or events.

A gift is something given voluntarily without expecting anything in return.

Misrepresenting your hospitality and giving gifts can create conflicts of interest or appearances of bribery.

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OUR RULES:

- We do not demand, accept or offer any forms of hospitality or gifts that may influence or appear to influence our or our partners' business decisions.
- Forms of hospitality and gifts that are accepted and given must be appropriate and:
 - They must comply with local laws and customs.
 - They may not create obligations of the recipient towards the donor or appearances of such an obligation.
 - They must serve an actual business purpose.
 - They must not be immoral or violate the dignity of others.
 - Must be acceptable under the recipient's employer policy.
- Showing hospitality should be within moderate value.
- Gifts should have a symbolic value; for example pens, notebooks and other small value business gadgets. Remember that promotional items are gifts.
- You make the best possible assessment when deciding whether to offer or accept a form of hospitality or gift. If you feel something is wrong, you are probably right.
- You never offer or accept any gifts in the form of money or cash equivalent.
- You avoid offering or receiving any form of hospitality or gifts that may affect the objectivity of the host or yours when making business decisions.

- Also remember that overly frequent or routine gifts or hospitality may not be appropriate.
- You report any forms of hospitality given or received, or gifts that you value over 500 PLN.
- You have a responsibility to know and follow your clients' hospitality and gifts policy.
- You never ask customers, suppliers or other external business partners for any form of hospitality or gift.

OUR RULES FOR PARTICIPATION IN CONFERENCES AND EVENTS ORGANIZED BY EXTERNAL BUSINESS PARTNERS:

- Participation in a provider-sponsored conference should have clear business goals.
- Consider whether the issues discussed at the conference are useful for the operations of SIRO-Bielsko.
- The President of the Board must be notified and approve your participation in the event.
- Travel and accommodation costs must be paid by SIRO-Bielsko.
- Participation cannot cause a supplier to expect to be favored in business matters.
- Additional activities during the conference must be appropriate, within reason. If during the conference tickets for sports or artistic events are handed out at another time, it is an obvious conflict of interest.

e. Attention to quality.

We are proud of quality and innovation and we understand that providing high quality products serves both our clients and SIRO-Bielsko.

OUR RULES:

- Our goal is to provide high quality in every area of our business. We focus on continuous improvement.
- We work with our stakeholders to provide products and services that meet or exceed their expectations.
- If defects occur, we acknowledge our responsibility and try to resolve them in accordance with contractual obligations.
- You try to achieve perfection in every aspect of your work.
- You work with clients and external business partners to understand their expectations and quality requirements.
- You report to your supervisor any suspected defects that have not been repaired in time.

EXAMPLE:

The worker drills his legs. A colleague points out that drilling is too shallow. However, you know that you have drilled your legs before and that there was no complaint so it certainly doesn't matter to the customer. What should you do?

Even if it is a negligible defect for the customer, such behavior and approach to the subject is contrary to our commitment to care for quality and should be responded to and drilled in accordance with the technical drawing.

f. Fraud.

Fraud is a situation in which someone knowingly tries to mislead another person, acts dishonestly or abuses the power associated with his position to achieve any material benefit, or engages anyone else in such activities.

Fraud is usually about fraudulently obtaining money, property or services. In most countries it is a crime. One potential type of fraud is false claims, which consist of deliberate or reckless misrepresentation or inaccurate documentation of the costs of providing materials or services, willful concealment of defects, or fabricating of evidence.

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OUR RULES:

- We always act honestly, fairly and truthfully
- You ensure that your books and records contain accurate, complete and not misleading entries, and that you carefully check and control your activities.
- You make sure that the reimbursement claims you submit contain only those items to which you have the right to reimbursement and which were properly acquired during the performance of duties at SIRO-Bielsko.
- You present only valid invoices to our clients and make sure that the claims arising from the contract are supported by appropriate and truthful documents.

EXAMPLE:

We buy cartons from a carton supplier. The invoice says that it has delivered 1000 cartons, meanwhile you can see that there are 990 cartons. The supplier is trying to turn jokes into situations and says he will bring 10 next time.

You do not agree to this solution and inform the person responsible for shopping that there is a discrepancy between the actual delivery and the document. Our values do not allow us to turn a blind eye to such irregularities.

g. Sponsorship.

Sponsorship is a transaction after which a commercial benefit is expected. As part of this transaction, SIRO-Bielsko makes payments in cash or in kind in order to associate our brand with an activity or organization. In return for the fee paid under the sponsorship, SIRO-Bielsko obtains rights and benefits, such as the ability to use the sponsored name of the organization, promotional benefits, the ability to use the facilities or the opportunity to promote the name of products or services.

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OUR RULES:

- For sponsorship, we choose activities that are directly related to our business: areas of activity, sectors in which we are present, a sustainable development program and other topics related to business, e.g. contacts with the media, human resources, etc.
- We never use sponsorship if it could affect someone improperly.
- We avoid the appearance of impropriety that sponsorship may create regarding business opportunities.
- Carefully choose sponsorship activities and ensure that the sponsored partner has similar values to SIRO-Bielsko.
- You understand that sponsorship involves some risk, such as perceiving such activities as bribery.
- You ensure that we never offer sponsorship as an incentive for obtaining or maintaining a business or as a reward for it, or for any other improper purpose.

Sponsorship is not:

- Community investment, such as a charity contribution.
- Advertising in magazines, newspapers, radio, television, Internet and social media.
- Any form of political support.
- Any form of lobbying.

4. OUR COMMITMENTS IN SOCIETY.

a. Introduction.

We are not only important to our employees, suppliers or customers. We are an integral part of society, and our activities go beyond projects implemented for our clients. Our beneficial contribution to society includes, among other things, seeking new ways to reduce the environmental impact of our activities, promoting fair competition and improving the local community in which we live and work.

b. Environment.

The natural environment includes the impact of our activities and processes, as well as the long-term environmental performance of the products and services we provide.

OUR RULES:

- We strive to protect the environment and believe that we can make a significant contribution to sustainable global development.
- We are actively working to improve the environmental performance of our operations, products and services throughout their entire life cycle.
- We acquire FSC certified wood or equivalent.
- We engage stakeholders in environmental management. This applies to employees, customers, suppliers, as well as those who live and work near our factory
- SIRO-Bielsko operates in accordance with its environmental management system.
- You take the time to understand the risks and environmental impacts associated with your daily work, and actively look for opportunities to reduce them. This includes the production of waste and carbon dioxide, as well as the consumption of energy, water, materials and other resources.
- You comply with the requirements and procedures for the use, storage, labeling, transportation and disposal of chemicals and hazardous materials.

EXAMPLE:

The time has just come when you finish work. On the way to the locker room, you see a puddle of strange liquid on the floor. If it were working hours, it could be taken care of immediately, but now you are in a hurry and recognize that in the morning someone will take care of it yourself. What should you do?

Returning and reporting a pool of unidentified fluid is not only a requirement of the environmental policy adopted by SIRO-Bielsko. This is also right behavior at this time. Turn back and report the observed problem to the foreman. Before you do this, secure the puddles properly so that nobody falls over.

c. Corporate social commitment.

Community investment (CI) is an important way in which we engage and invest in the communities in which we operate, especially the local ones in which we operate most.

OUR RULES:

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- We believe that community investment builds our reputation as a good citizen and helps build long-term relationships with our shareholders and the local community
- We support communities using our time, knowledge and resources (in-kind contributions) as well as cash contributions. We never use charitable donations (a type of Community investment) to obtain undue profit or influence.
- We focus on educational opportunities that bring clear and long-term benefits to community members.
- We encourage every employee and supplier to support social activities.
- You understand that Community investment involves a certain degree of risk, such as the perception of bribery, and therefore requires high-level approval. Prior to investing for the benefit of the community on behalf of SIRO-Bielsko, the relevant consent of the President of the Management Board should be obtained
- You never offer or undertake to do anything that arouses the unjustified expectations of either party.

EXAMPLE:

During a team meeting, your colleagues have the following ideas for investing in a local community:

- *sponsorship of a holiday tournament for children in the area where the company is located.*
- *implementation of wooden furniture for the local kindergarten.*

Both ideas are good examples of corporate social involvement.

d. External communication.

External communication is an important element of our marketing efforts and those focused on branding. Includes all communications to customers, potential customers, partners, suppliers, investors, shareholders and other stakeholders. This group includes media activities, press releases, statements, social media, publications, advertisements and public presentations.

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OUR RULES:

- We are open during dialogue with entities influenced by our activities.
- We answer professional queries and communicate with interested partners.
- We provide timely, accurate, relevant and reliable information when communicating with external parties.

- You are an important part of informing about who we are and how we influence our environment and you are aware that the way you communicate affects SIRO-Bielsko

- You talk to the media on behalf of SIRO-Bielsko only if you are authorized to do so and you request media information to the President of the Management Board

- You send media questions regarding our shares and other financial questions to the President of the Management Board

- Clearly state whether you speak on behalf of SIRO-Bielsko or on your own.

EXAMPLE:

You receive a phone call from a kindergarten's parent asking if we will also sponsor a children's tournament this year. What do you do?

Don't promise anything. Say that you do not decide on such matters and ask for direct contact with the President of the Board.

e. Counteracting corruption and bribery.

Corruption is the abuse of power, often for personal gain, and includes conflicts of interest, embezzlement, bribery, collecting fraudulent commissions, extortion, fraud, favoring family or favoring friends. Facilitation payments are a related issue. These are bribes, often small, for public officials to accelerate bureaucratic processes or gain access to services to which the payer is entitled.

Corruption undermines the principles of honest business operations, distorts competitiveness, damages brands and exposes companies and individuals to risk.

Bribery is an attempt to influence a person who performs business activities by granting, offering or promising undue benefits. It can also be the acceptance of an undue advantage or its promise or a claim for benefits such as cash or other value, e.g. unpaid internship.

OUR RULES:

- We conduct business with integrity and do not tolerate any form of bribery or corruption.
- We avoid situations that could even appear to be bribery, corruption or other forms of inappropriate behavior.
- We do not demand, accept, give or offer bribes, either directly or through external parties acting on our behalf. In our contracts, we oblige external parties to comply with the same policies and procedures related to the fight against corruption and bribery that apply to everyone in SIRO-Bielsko
- We do not make facilitating payments and we do not allow external business partners to make them on our behalf, even if the law allows such action.
- Regardless of the circumstances, you never demand or accept bribes; you do not give bribes, offer them or accept the transfer of bribes - neither directly nor indirectly. This means, among other things, that you never try to bribe a public official, including a foreign public official, or any person or entity, or improperly influence them.
- You do not offer or make facilitating payments, nor do you allow others to make such proposals or make deposits on your behalf.

- You ensure that brokers are always used in accordance with the conditions of honest business operations, the fees they pay are always appropriate to the services actually performed and duly documented, and the documents stored as required.
- You do not use contributions to charity or sponsorship to circumvent our Code or the Anti-Corruption Policy (document available at siro.com.pl)
- You never try to influence the way a public official performs his duties by proposing, promising, delivering or approving any undue advantage. The above rule applies regardless of whether the benefit is offered directly or by another person.

EXAMPLE:

Your supplier offers a 5-star hotel stay for you and your family. In return, I want you to agree to a 3% price increase.

You do not agree. And you immediately report this test to your supervisor.

f. Sanctions.

Sanctions are legal instruments used by governments and international bodies to influence foreign policy by prohibiting transactions with specific countries, persons, entities or sectors. Lists of sanctions are drawn up, among others, by the United Nations, the EU and the United States.

OUR RULES:

- We never engage directly or indirectly in cooperation with any person or entity listed as prohibited on the sanctions list.
- We do not do business directly or indirectly with any sanctioned country or region.
- You know the external partners and their real owners (beneficiaries) with whom SIRO-Bielsko does business.
- You are carefully monitoring whether the list of sanctions does not include external partners or whether their affiliated company is not in the sanctioned country.

Usually, sanctioned parties are not transparent and try to hide behind financial transactions. In such cases, special care should be taken in particular when:

- The other party is reluctant to provide information about its real owner and the financing method.
- The other party has small or unclear business activities.
- Cash payments are required.
- Payments are required to another entity that is not a party to the contract.
- Bank details are not provided up to the last minute or are changed after sending shipments.

g. Money laundering.

Money laundering involves hiding the source of money or goods acquired through crime and creating the appearance that they come from a legitimate source.

OUR RULES:

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- We only do business with reputable clients and business partners who engage in legal activities based on funds from legal sources.
- In accordance with applicable laws, we notify the appropriate authorities if we have any reasonable suspicion of money laundering.
- Usually, money laundering involves an unusual transfer mode. Pay special attention to:
 - payments made by or for someone who is not a party to the contract
 - Payments directed to foreign accounts or from foreign accounts or accounts in countries outside our home markets
 - requests for payments to accounts other than those specified in the respective contracts
 - cash payment requests
 - requests for overpayments
 - requests to split payments into individual tranches.

If you suspect a money laundering business, talk to your supervisor or your finance / accounting officer

h. Fair competition.

Competition and anti-monopoly laws promote free and fair competition. These laws are designed to combat practices such as price collusion, market sharing, bid collusion, and other practices that, in their assumptions or in effect, restrict competition.

OUR RULES:

- We believe that fair and open competition best serves our company, our shareholders, clients, employees and society as a whole. It affects efficiency and innovation, which is the basis of a well-functioning market economy.
- We do not tolerate any violations of antitrust law, competition laws and related regulations.
- You do not enter into any agreements with competitors to restrict competition.
- You do not discuss or exchange commercially sensitive information with competitors.

EXAMPLE:

You participate in an industry event where representatives of competing companies are also present. Two of them are starting a discussion about prices. They try to draw you into this conversation. What should you do?

Discussing pricing policy with competitors is a potential violation of competition law, so you should always avoid such situations. You need to withdraw from the discussion, apologize to those present and leave to contact your supervisor and report this.

i. Political activities.

Political contributions are: financial or non-monetary contributions made to support political organizations, parties, candidates or referendums. In-kind contributions may include the provision of services, material transfers, employee time or the use of company facilities.

Lobbying: activities aimed at influencing decisions taken in the framework of public activities by providing information and opinions to elected or appointed officials. Lobbying activities include both direct communication with such officials and providing support to any person who deals with such communication. Lobbying is regulated in some countries.

OUR RULES:

- We do not make payments for any political purposes.
- We understand that lobbying is one of the ways to positively impact our industry and / or SIRO-Bielsko's business opportunities.
- We ensure that any lobbying activities performed on our behalf do not affect us negatively.
- You have the right to make political donations out of your own pocket, but you must never apply for a refund from SIRO-Bielsko for such expenses.
- You have the right to participate in the policy on your own behalf.
- You understand that a lobbyist is an intermediary and you always follow protocols regarding the involvement of an intermediary

5. HOW TO REPORT A SUSPECT.

Reporting suspected or known cases of misconduct should be reported immediately to your supervisor or your supervisor. If you prefer, talk to the President of the Board, Human Resources or the Ethics Committee. If you feel uncomfortable, you can report a suspected or known violation of the Code of Conduct:

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by phone (+48 33 818 34 82)

or via e-mail (komisjaetyki@siro.com.pl).

Reports can be confidential and anonymous. You don't have to introduce yourself.

We will promptly investigate and investigate any suspicions and problems reported appropriate actions based on the results of our investigation.

The Ethics Committee pursuant to the ordinance of the President of the Management Board of December 2, 2019 shall be submitted of 3 people, where each of these people is employed in a different department. Actual list persons on the ethics committee are: Anna Adamowicz, Izabela Gutowska and Beata Kossowska.