

# Code of Business Ethics and Behaviour



## INTRODUCTION

The code of business ethics and procedures is a collection of rules which determine the basic ethical and legal standards which will guide us in our everyday work. We declare that we will behave ethically in every area of our business. This means that we are honest with regard to each other as well as to people outside ASKOM Sp. z o.o.

The provisions of this Code of Ethics apply to all employees of ASKOM Sp. z o.o. whether they are employed on the basis of an employment contract or a civil law contract, regardless of the post held. It also applies to our business partners to the same extent.

This Code of Ethics does not provide an answer to all problems which may occur, it gives guidelines to be followed in situations where the proper behaviour is not obvious.

Every employee of ASKOM Sp. z o.o. is responsible for his or her behaviour being ethical, honest and legal.

## HONESTY OF BEHAVIOUR

### 1. Customer Relations

ASKOM Sp. z o.o. aims to be the best possible supplier for its customers. Our products and services of the highest quality are delivered at the agreed time and place. We conduct all transactions honestly and professionally. Both as a company and as individuals, we make every effort to act in an innovative and proactive way, exceeding the expectations of our customers and predicting their needs in order to form long-term relations which bring mutual benefits.

To build customer relations based on trust and reliability, we only take on obligations which are proportionate to our capabilities. If some unforeseen circumstances prevent the fulfilment of an obligation, the person responsible must inform both their direct superior and the customer.

Our commercial presentations and advertising materials contain only true facts regarding product quality and availability, delivery times and payment terms. We sell our services and products in a way that is honest and precisely reflects their specifications. The use of dishonest practices is a violation of our Code.

### 2. Anti-corruption rules

ASKOM Sp. z o.o. is opposed to corruption and bribery. Our employees do not accept bribes or any other improper financial gains. Neither do they pay bribes or give expensive gifts to customers or state officials in order to obtain business benefits. Small customary souvenirs bearing the company logo are permissible for customers, suppliers and business partners, as well as occasional snacks and refreshments during technical and business meetings.

### 3. Relations with suppliers and service providers

Companies providing deliveries and services on behalf of the company should be selected on the basis of objective criteria based on quality, reliability, price, usefulness and performance. Suppliers and service providers should be treated in a fair, equal and honest way.

We always maintain consistency, respect and confidentiality when conducting ordering procedures.

We encourage our suppliers and service providers to adhere to the standards described in our Code. For this reason we strongly advise suppliers and service providers against taking any actions which are forbidden by law or by this Code, or involvement in such actions. In individual cases, the company will analyse reports of illegal or unethical behaviour by a supplier or service provider. Confirmation of involvement by our supplier or service provider in illegal or unethical behaviour may result in our relations being discontinued.

We respect all our contracts and obligations accepted, including copyright, licences and reserved rights. Because of this, we conduct business only with those service providers or suppliers who are qualified to use, forward or sell the products and/or services connected with the aforementioned obligations. As a result, we require service providers and suppliers to prove the authenticity and legality of their products and services. ASKOM Sp. z o.o. will not commence any cooperation with service providers or suppliers who are unable to demonstrate such proof.

#### 4. Confidential information

The company's data, information and documents may only be used by employees for work-related purposes, and may only be provided to third parties insofar as is required for business relations or if the information has already been made public, or in cases where it is required by law or a court order. In case of any doubt whatsoever with regard to the possibility of revealing information or the addressee of such information, consult your direct superior.

During their period of employment at the company, and after expiry of the employment relation, employees are obliged to maintain professional secrecy and discretion when handling confidential and restricted information. Apart from information regarding technologies used by the company, this information also includes intellectual property rights, commercial and financial information concerning sales, revenues, balance items, forecasts, business plans, takeover strategies and other information of a confidential nature. It is forbidden to disclose or discuss confidential information with unauthorised persons, regardless of whether they are company employees or third parties.

#### 5. Competition

The company conducts its business according to the principles of honest competition.

It is forbidden to use any unethical or illegal business practices or take any actions which could lead to competitors being discredited.

We obtain information about our competitors from legal sources.

If you notice any cases of these principles being violated, inform the Board immediately.

#### Norms and behaviours of managerial staff

Persons who belong to management and supervise the work of other employees bear particular responsibility for adherence to the Code of Ethics. They are the body which an employee can approach with a problem, and they are most often subject to the assessment of their subordinates.

For this reason it is exceptionally important for management staff to behave in an exemplary manner and to ensure that their subordinates follow the Code of Ethics.

If you notice anything that seems improper or inconsistent with the rules of ethics, you are obliged to **TALK ABOUT IT!**  
**TELL YOUR SUPERIOR ABOUT IT.**

#### WORKPLACE ENVIRONMENT WITHOUT HARASSMENT, BULLYING AND DISCRIMINATION

The company makes every effort to ensure that the workplace will be free of such occurrences as sexual harassment, bullying or other forms of employee harassment, whether this concerns harassment of an employee by another employee, or harassment by representatives of customers or suppliers, or vice versa.

The company attaches great importance to equal and respectful treatment of every employee. This means there will be **NOT TOLERANCE** of discrimination based on race, skin colour, sex, age, religion, ethnic or national origin, disability or other factors which would be illegal to use to differentiate employees.

The company makes every effort to ensure that all employees have the same chances to develop without discrimination. Necessary differentiation of employees, based on ability or qualifications required to hold a given position, is not considered discrimination. Employees who consider that they have been victims of sexual harassment, bullying or discrimination, or have witnessed such practices, should immediately report this to the company Management Board. This report will be treated as confidential.

At ASKOM Sp. z o.o. bullying, verbal threats and other forms of harassment are not permissible. If you encounter any verbal threats, **INFORM** your superior of this.

## HEALTH PROTECTION AND WORKPLACE SAFETY

Our duties include caring for the health and safety of all employees.

Official standards and legislation concerning workplace health and safety apply on company premises, as do our internal regulations. We provide employees with training concerning these requirements. This training should be treated very seriously, and the applicable health and safety procedures closely followed. These procedures apply to our employees and all other persons present on company premises.

The company supplies our employees with the personal safety equipment required to carry out their work, as well as providing the training necessary to use that equipment properly. The employee has a duty to use the protective equipment assigned to him properly.

Any problems or doubts concerning workplace health and safety can be reported to the Senior H&S Inspector. If you notice any inappropriate behaviour which breaches H&S procedures or may constitute a hazard - REPORT IT!

When you are on our company's premises, you must follow the safety procedures which apply at our company. This also applies to external subcontractors and guests.

### 1. Drugs and alcohol

The presence of alcohol or drugs at work is not something our company can tolerate. An employee who comes in under the influence of alcohol or drugs is a danger to himself and others.

THERE WILL BE NO TOLERANCE in cases of possession or distribution of alcohol or narcotics on company premises, or anywhere else the employee is working.

## ENVIRONMENTAL PROTECTION

We undertake to follow all the applicable provisions and regulations concerning environmental protection. We try to protect the natural environment, save energy and natural resources, and also prevent pollution by applying the appropriate technologies and minimising waste production. Our company must adhere to

specific legislation. We monitor procedures in accordance with those laws. What is more, we conduct regular reviews of our procedures to adapt them to changing circumstances. We follow the guidelines contained in the ISO 14001 standard implemented. In the event of any queries concerning environmental protection or reporting irregularities please contact the Plenipotentiary for Integrated Management System.

You should aim to :

- Limit water consumption
- Limit waste produced
- Use energy more efficiently
- Save packaging use

## HUMAN RIGHTS

WE WILL NOT TOLERATE human rights violations, particularly the use of under-age labour or forced labour either at our company or by our clients. If you know of any irregularities of this kind, SAY IT OPENLY!

## EMPLOYEES' DUTIES TOWARDS THE COMPANY

### 1. Protection of company property

All employees are obliged to protect company property, including buildings and their surroundings, company vehicles, rooms along with their fittings and all equipment. Employees receive telephones, computers and email for their use. All these resources constitute the property of the company. Employees are expected to make use of the equipment in an ethical and legal manner. When using company equipment at home or outside the workplace, take every care to protect the equipment against theft or damage, as if it was your own property. All equipment must remain fully accessible to ASKOM Sp. z o.o. and is the exclusive property of the company.

Software developed or acquired by the company should not be copied or used for any purposes other than those intended by the company. It is forbidden to use any software which is not the property of the company, or for the use of which the company does not hold a licence, for the purposes of the company's activity or on its premises.

ASKOM Sp. z o.o. supports the demonstration of initiative, creativity and innovativeness by employees. However, legal and intangible assets, such as documents, software and other forms of intellectual copyright concerning the company's business and produced or invented by its employees in connection with the duties they carry out, constitutes the property of the company. For this reason, subject to the relevant legislation in this field, benefits may not be had from intellectual property under one's own name if it was created while carrying out professional duties.

## 2. Email and Internet

ASKOM Sp. z o.o. has its own email and internet mail systems. These systems should be used above all in communication for purposes connected with professional duties. Although each employee has their own password protecting access to email and internet, subject to the reservation of legislation in this matter, the company reserves the right to inspect and supervise the propriety of use of those systems in appropriate circumstances. It is completely forbidden to use email and the Internet for inappropriate or illegal purposes, including sending messages which could be offensive for a given person or which could be considered harassment of another person, such as text messages, illustrations or jokes which may be considered discriminatory on grounds of skin colour, religion, sex, age, nationality or disability.

## CONSEQUENCES

Every employee of the company is responsible while carrying out their professional duties for adhering to the values and principles of ASKOM Sp. z o.o., and for making efforts to ensure our principles of behaviour are generally respected. Behaviour which violates these principles is subject to disciplinary punishment, up to and including termination of the employment contract, based on the regulations and procedures applicable in such cases.

## REPORTING CASES OF ILLEGAL OR UNETHICAL ACTIONS

Employees who witness illegal or unethical behaviour at ASKOM Sp. z o.o. — in this case a breach of this Code — are obliged to report the matter to:

- their direct superior or
- the company's Management Board or
- the Head of HR.

Reports of unethical behaviour are extremely important for our activities and we treat them very seriously. Employees who submit such reports in good faith can be certain that they will not be punished, will not be subject to reprisals, and that it will have no negative effect on their work. The company DOES NOT TOLERATE reprisals - this is a promise made to employees by the company in exchange for employees reporting such incidents. In addition, anyone who discourages or prevents a colleague from making such a report in good faith is subject to disciplinary procedures.

**ASKOM**

Sp. z o.o.  
13, Józefa Sowińskiego Str.  
44-100 Gliwice, POLAND  
phone +4832 3018100  
fax .+4832 3018101  
<http://www.askom.pl>  
<http://www.asix.com.pl>