



P E R F E C T W A L L

**Code of business
Conduct and ethics
Of CreoConcept
Sp. z o.o. Sp. k.**

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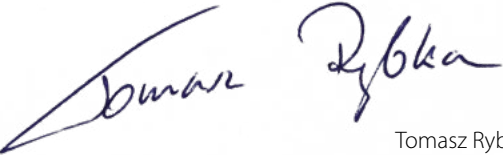
Clearly defined values build company credibility

This Code of Business Conduct and Ethics, which you are about to read, sets out how employees of CreoConcept Sp. z o.o. Sp. k. should do their job. This document contains a set of ethical principles and practices that we have followed and will continue to follow in the future. We are introducing it because we can only be regarded as a credible company if our employees are committed to and guided by the values listed in this document.

Credibility is a key feature of a company that attracts employees and customers. It allows building trust between groups of people under the influence of a given company. CreoConcept Sp. z o.o. Sp. k. is working towards a strong business position, strengthening its reputation and building a corporate culture reflected in this Code of Business Conduct and Ethics. We are in the process of earning a leadership position, and this comes with more responsibility.

Being fully aware that ethical principles are the basis for conducting business ventures, we are introducing this Code of Business Conduct and Ethics. Unethical actions in this area represent a business risk that, at worst, puts a company out of business and, at best, puts its good name at risk. This is why we do not condone unethical conduct and take immediate and uncompromising steps against it.

Our values and this Code can show us the right way, but they can never replace independent thinking. In making decisions that are often difficult and complex, doubts may arise, and this Code will not answer all your questions. Still, I hope it will guide you in choosing the right course of action that does not conflict with our personal principles. Let us all be aware that we build the company's credibility based on clearly defined values.



Tomasz Rybka



Introduction

This Code of Business Conduct and Ethics (hereafter the Code) is a guide designed to help you understand our values. It guides our conduct when interacting with each other in the office, interacting with customers and the wider community in which we operate, as well as with other stakeholders. This Code is the key document we can refer to when facing an ethical dilemma. It contains information on who to contact if questions or concerns arise.

We developed our Code in line with our values: a set of beliefs that guide our actions. These values oblige us to act according to ethical standards in a responsible and sustainable manner. Responsibility and balance should be reflected in everything we do, therefore:

We care about life. We care about the well-being of people and the environment. We work safely. We are not indifferent to conduct that could become potentially dangerous. We support health and well-being-related initiatives. We focus on 'green', environmentally friendly solutions, and we are committed to ensuring that our business activities do not negatively impact the environment. We act in this way because we are aware of our responsibility towards future generations.

We conduct our business activities fairly and transparently, guided by the principles described in this Code, and do not cut corners. We foster a culture of openness in the workplace: we create an environment where everyone can express their opinion. Acting as individual employees, as teams of employees (departments) and as CreoConcept Sp. z o.o. Sp. k., i.e. the whole organisation, we strive to be better in everything we do. We are a constantly improving organisation, sharing the knowledge we have. We pride ourselves on the quality and innovativeness of our solutions. We value diversity because it enables us to provide the best solutions. In business, we are guided by the principles of an inclusive, open and honest culture, showing trust and respect for each other.

We are committed to supporting our customers: we provide services that enable them to succeed in their business. We strive to understand our customers' needs and expectations so that we can help them transform their vision into reality thanks to our products.

This Code is based on values derived directly from human rights. We support the rights of all people, as codified in the Universal Declaration of Human Rights adopted by the United Nations (UN), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the conventions of the UN-affiliated International Labour Organisation.

CreoConcept takes its duty to protect and improve people's lives seriously, regardless of their position within its structure and organisation. All employees of our company undertake to abide by the principles described in this Code and to comply with the requirements contained herein: this also applies to part-time, full-time, civil law and B2B agreements. Managers, executives and all those who supervise the work of others bear a particular responsibility. Such persons set an example and must, therefore, act in compliance with this Code. Breaches of this Code or any other document describing company policies will result in corrective or disciplinary action, up to and including termination of employment.

This Code extends well beyond the professional activities at CreoConcept Sp. z o.o. Sp. k., as external beneficiaries play a key role in our business. They are subcontractors, suppliers, advisors, intermediaries, representatives of state and local authorities, and any interest groups that, in their cooperation with us, also undertake to abide by this Code in areas that directly concern them. We conduct our business on the basis and within the limits of the law. Please let us know if you discover that this Code conflicts with generally applicable laws.

The commitment of CreoConcept Sp. z o.o. Sp. k. to conduct business with high integrity and transparency is linked to a work culture in which everyone feels empowered to report non-compliance with the law and this Code, including unethical conduct. As an employee of the company, you are responsible for reporting misconduct or suspected misconduct to your manager or the manager's supervisor. You can report the suspicion or breach anonymously if you feel uncomfortable about it.

We will investigate any reported concerns promptly and confidentially and take appropriate action based on the results of our investigation. Instructions on how to report violations are provided on page 12 and in separate internal documents of CreoConcept Sp. z o.o. Sp. k. If you are a manager/department head, it is your responsibility to ensure that reports of misconduct are dealt with appropriately. The Management Board of CreoConcept Sp. z o.o. Sp. k. does not tolerate retaliation against an employee who has reported suspected misconduct in good faith. 'Good faith' means that the reporting party, to the best of their knowledge and judgement, truthfully reported everything they knew about without concealing any facts. Disciplinary action will be taken against any employee who engages in retaliation. If you experience retaliation, report it as misconduct.





Chapter I
**Our obligations at the
workplace**



Working at CreoConcept Sp. z o.o. Sp. k., in addition to providing the best products and supporting customers in achieving their goals, also means sustainable management of the company's assets and creating a fair, healthy and safe working environment where we can grow both as individuals and as employees. These goals can only be achieved through professional conduct and by promoting an inclusive culture where everyone feels comfortable.

Occupational Health and Safety

The term 'occupational health and safety' stands for the prevention of accidents and the promotion of a healthy and safe working environment for all employees, colleagues and others who come into contact with representatives of our company. For CreoConcept Sp. z o.o. Sp. k., this is a priority, and the objectives are clearly defined here: we create a risk-free environment. Health and well-being often depend on the working environment. This consists of elements such as supportive employee supervision, a sense of purpose and physical safety at work.





Principles of work at CreoConcept Sp. z o.o. Sp. k.

We care about the well-being of our employees and all people affected by our company's activities.

We work to create a working environment that promotes the health, safety and well-being of employees.

We introduce health, safety and well-being measures based on visible leadership.

We promote best practices regarding health and safety and the prevention of accidents at work. We exchange experiences in this area with those in the supply chain and our industry representatives.

We provide employees with appropriate occupational health and safety training.

We ensure that subcontractors' employees are adequately trained and provided with equipment, clothing and tools to enable them to work safely.

We aim to be industry leaders in healthy and safe working practices. We are continually making improvements to create a hazard-free environment.

We operate in accordance with ISO 9001:2015.

Decent working conditions

All employees should receive adequate remuneration for their work and be treated fairly and with respect for their labour rights. Decent conditions should prevail in the workplace, in line with legislation governing workers' rights, general human rights and the International Labour Organisation (ILO) standards to which we subscribe. These principles should apply not only to those employed within our organisation but also to employees operating in our supply chain.

We do not tolerate any form of child labour, forced labour or compulsory labour at our project sites or in our supply chain. The Act on the Ombudsman for Children recognises that a child is every human being from conception until the age of majority (as a rule, 18 years). Within the meaning of the Convention on the Rights of the Child, adopted by the United Nations General Assembly on 20 November 1989, 'child' means every human being below the age of eighteen years, unless, in accordance with the law relating to the child, they attain the age of majority earlier (Article 1). The child, due to their physical and mental immaturity, requires special care and attention, including appropriate legal protection, both before and after birth.

We do not accept practices that would restrict the freedom of movement of employees, such as making employment conditional on providing identity or other personal documents.

We recognise the special needs of employees of pre-retirement age and our obligation to protect them during this period of their lives.

Our company's working hours, wages and allowances comply with national and local laws and relevant ILO conventions.

We recognise and respect collective agreements and the right of our employees to organise and bargain collectively where permitted by law.

We maintain good relations with labour organisations, employee representatives and the employees of our company.

We maintain an ongoing dialogue with our employees to ensure that their rights are respected.





Diversity and inclusiveness

For us, diversity in the context of the human person means everything that we as individuals differ in, e.g. age, gender, sexual orientation, ethnicity, belonging to a particular generation, religion, beliefs, language, education, marital status. We understand inclusion as valuing and promoting the wealth of unique ideas, views, perspectives and opinions from the diverse members of our workforce.

We respect each individual, strive to work as if we are one team and support each other by operating within a framework of open, honest and respectful communication:

- **We believe that in a diverse and accepting working environment, we are able to deliver better products and services to our customers.**
- We treat everyone equally, providing equal opportunities for everyone to thrive, regardless of appearance, background, religion, beliefs, gender, sexual orientation, gender identity or expression, age, disability, marital or family status or any other characteristic protected by law.
- **Our employment equality policy covers all aspects of employment, including the right to training and upskilling, the right to promotion and any other conditions relating to this.**
- We do not condone any form of disrespect, harassment, discrimination, mobbing, abuse or unwanted sexual advances.



Personal development

Personal development opportunities help the employees of CreoConcept Sp. z o.o. Sp. k. to develop talents and personal potential and enable them to apply newly acquired skills and abilities to continuously improve the performance of our employee teams.

- We believe that the people we employ are our greatest asset.
- **We support employees in both personal and professional development.**
- We offer training and other development opportunities to our employees, allowing them to expand their knowledge and range of skills.
- **We encourage employees to grow and learn through collaboration and sharing of best practices.**

Personal data protection (data protection)

Data protection consists of complying with legal regulations concerning the creation and handling of sets of personal data, as well as individual data, relating to a specific natural person. Personal data means information concerning an individual or information that can be used, directly or indirectly, to identify said individual. Such data may be, for example, date of birth, contact information, names of family members, health information, photographs or identity document number. Data protection is intended to administratively and legally protect the right to privacy.

The Management Board of CreoConcept Sp. z o.o. Sp. k. represents that it endeavours to ensure that all operations on personal data, e.g. collecting, recording, comparing, storing and deleting them, take place in accordance with applicable regulations, including in particular the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation – GDPR).





Chapter II
Our market obligations



The best business relationships are built on mutual respect and benefit. Therefore, we always strive to understand and anticipate the needs of our customers, suppliers, associates and other stakeholders to act honestly, responsibly and fairly. As employees of CreoConcept Sp. z o.o. Sp. z o.o. Sp. k., we strive to do our best so that our work results in the creation of the highest quality products and is completed on time and within the planned costs. In the areas mentioned, we always strive to exceed expectations.



Relationship with stakeholders

How the market perceives us depends on how we conduct our day-to-day relationships with stakeholders. Stakeholders include employees, customers, external business partners with whom we sign agreements, and the community in which we work. External business partners are joint venture partners, subcontractors, suppliers, intermediaries, advisors and others with whom we collaborate to deliver our services. By acting openly and honestly and following ethical principles, we become the company we want to be. Achieving this is the combined effort of all employees.

In relationships with stakeholders:

- We seek to build positive, constructive, long-term business relationships with partners who share values that align with ours.
- We believe that stakeholders who do business with us have the right to be treated the same way they treat us.
- We will not give up our values for any stakeholder.

In our relationships with customers:

- **We anticipate their needs and strive to exceed their expectations by being proactive.**
- **We strive to help them achieve their goals by understanding and meeting their expectations.**
- **We try to solve any problems that may arise, from the simplest to the most complex.**



Hospitality and gifts

In order to promote their business, companies often extend hospitality to their customers and partners by sponsoring meals, travel or invitations to events, including offering gifts. As a rule, a gift is something given voluntarily without expecting anything in return.

We do not demand, accept or offer forms of hospitality or gifts to business partners that could influence – or give the appearance of influencing – our or our partners' business decisions.

The forms of hospitality used and gifts offered must be appropriate and:

- Must comply with local laws and customs.
- Must not create in the recipient a sense of obligation towards the giver.
- Must serve a genuine business purpose.
- Must not be immoral or violate the dignity of others.
- Showing hospitality to the other party should be within the bounds of moderation.

The gifts should be of symbolic value and appropriate to the occasion. Promotional items are also considered gifts.



Attention to quality

At CreoConcept Sp. z o.o. Sp. k., we pride ourselves on the quality and innovativeness of the products we offer. We also understand that having a high-quality product range serves both our customers and our company.

Our aim is to ensure high quality in every process carried out as part of our business activity. We continuously improve our products, services and company processes.

We cooperate professionally with all stakeholders to deliver products that meet or exceed their expectations.

If there are defects in our products, we take responsibility for them and rectify them under our contractual obligations.

Fraud

In legal terms, fraud is an offence of deceiving another person into a disadvantageous disposition of one's own or another person's property by means of misrepresentation or exploitation of their error or incapacity to grasp the intended action in order to obtain a material benefit. Fraud occurs when someone knowingly attempts to mislead another person, acts dishonestly or abuses the power associated with their position to gain any material advantage, or involves another person in such actions. Fraud usually aims to obtain money, property or services wrongfully. One type of fraud involves knowingly or negligently misrepresenting or inaccurately documenting the cost of providing materials or services, deliberately concealing defects or fabricating evidence.

At CreoConcept Sp. z o.o. Sp. k., we always act honestly, on the basis of legal principles and are guided by the truth.



Sponsorships

Sponsorships are a form of promotion. Its essence is association, whereby a positive image of the sponsored entity is transferred to the sponsor. The sponsor's logo most often accompanies events or activities of the sponsored institutions. CreoConcept Sp. z o.o. Sp. k. generally sponsors selected sports events. In return for the fee paid under sponsorship, CreoConcept Sp. z o.o. Sp. k. obtains benefits, such as the possibility of using the name of the sponsored organisation, promotion, using given facilities, or promoting the name of CreoConcept Sp. z o.o. Sp. k., its logos and the services and products it offers. When choosing the sponsorship activities and their subject matter and entity, CreoConcept Sp. z o.o. Sp. k.:

- Selects for sponsorship activities and entities related to selected sports events or of interest to the company's potential customers, as well as those related to sustainable development, education, scientific activities and business, e.g. media relations, human resources, etc.
- Sometimes, the company promotes itself through sponsorship activities linked to projects in which the products offered by the company have been used.
- The company never uses sponsorship if it could have any adverse impact on people, the environment or social phenomena.
- We offer sponsorships only on the basis and within the limits of the law.





Chapter III
**Our obligations
to the world**



We strive to be a leader in the construction industry while recognising that, as individuals employed by a business entity, we are an integral part of society, and our activities extend far beyond the products we deliver to our customers. For this reason, we believe that our positive contribution to society should also involve finding new ways to reduce the environmental impact of our business activities, promoting the principles of fair competition and contributing positive values to the communities in which we live and work.



Climate and environment

Working at CreoConcept Sp. z o.o. Sp. k., we strive to protect the environment and believe that we can make an important contribution to sustainable development worldwide.

We successively strive to improve our procedures and activities that may impact the environment. We offer services and products that minimise losses in this regard during their entire life cycle.

When approaching a project, we consider the opportunities and risks that its implementation brings to the environment.

We involve our stakeholders in carbon footprint management and environmental protection. This includes employees, customers, suppliers and all those who live and work in our company's spheres of influence.

CreoConcept Sp. z o.o. Sp. k. and all the companies working closely with it within the group operate on the basis of an environmental management system standard registered and certified in accordance with ISO 14001. This system must cover all activities over which CreoConcept Sp. z o.o. Sp. k. has management control or a majority shareholding. In cases of cooperation with subcontractors, we aim to maintain comparable environmental management standards.



Community engagement

Community engagement is usually defined as all activities during which individuals share their resources with others. CreoConcept Sp. z o.o. Sp. k. engages locally.

At CreoConcept Sp. z o.o. Sp. k., we believe that community investment builds our reputation and helps build long-lasting relationships with potential and actual customers.

We support the local community by using our time, knowledge and often our resources and monetary contributions. We never use charitable donations unethically for undue gain or to influence the recipient.

We focus on educational opportunities with clear long-term benefits for community members.



External communication

External communication, as an important part of our marketing and branding efforts related to the creation of the CreoConcept Sp. z o.o. Sp. k. brand, is carried out by the marketing department. Its activities include all communications directed to customers, potential customers, potential employees, partners, suppliers, investors, local authorities and other stakeholders.

The sphere of activities realised by the aforementioned department includes all media and promotional activities, information and press activities, publishing content via social media, participation in trade fairs, publications, advertising and any other public presentations.

When communicating with external parties, we provide data in a timely, reliable manner, ensuring the information's reliability. We provide information honestly, and our communications are geared towards maintaining a high level of trust.

We are open when engaging in dialogue with those we affect.

We respond to enquiries professionally.

We provide information to the media on behalf of CreoConcept Sp. z o.o. Sp. k. only if we are authorised to do so. Media requests for information are directed to the marketing department or the department responsible for providing the information in question.

When providing an answer, we clearly state whether we are speaking on behalf of CreoConcept Sp. z o.o. Sp. k. or on our own behalf.

We protect the CreoConcept Sp. z o.o. Sp. k. brand, and we show respect to our colleagues and other people when using social media.



Anti-Corruption & Anti-Bribery

According to Article 1 (3a) of the Act of 9 June 2006 on the Central Anti-Corruption Bureau (Dz. U. /Journal of Laws/ of 2021 item 1671), corruption is promising, offering, giving, demanding or accepting by any person, directly or indirectly, any undue pecuniary, personal or other advantage for themselves or any other person or accepting the offer or promise of such an advantage in return for an act or omission to act in the exercise of a public function or in the course of business.

Within the meaning of Article 2 of the Civil Law Convention on Corruption drawn up in Strasbourg on 4 November 1999 (Dz.U. of 2004 No. 244, item 2443), corruption is the requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue advantage or its promise, which distorts the proper performance of any duty or conduct required of the person receiving the bribe, undue advantage or its promise.

Corruption undermines all principles of fair business operations, distorts competitiveness in the market, harms the brands entangled in it and puts the companies and people involved at risk. Therefore, at CreoConcept Sp. z o.o. Sp. k.:

We act with integrity and do not tolerate any form of bribery or corruption.

We avoid non-transparent situations that could even give the appearance of bribery, corruption or any other inappropriate conduct.

We do not demand, accept, give or offer bribes either directly or through external parties acting on our behalf.

Sanctions

International sanctions, otherwise known as restrictive measures, are one instrument of influence against actors whose activities violate the principles and norms of international law, including international human rights law, and pose a threat to global or regional peace and security. CreoConcept Sp. z o.o. Sp. k.:

- Does not engage, either directly or indirectly, in business with any person or entity on the sanctions list.
- Does not do business, either directly or indirectly, with any country or region subject to sanctions.

Money laundering

Money laundering is any action aimed at introducing money or other assets obtained from illegal sources or used to finance illicit activities into the legal market. CreoConcept Sp. z o.o. Sp. k. does not support such activities, therefore:

- It conducts business only with customers and business partners of good reputation who operate in accordance with the law, using funds from legal sources.

Political activities

Like most companies, we operate in the market, and our business requires political and government relations. However, if you engage in politics, you may not make statements or (financial) contributions to political organisations or make political manifestos on behalf of our company. If you make any political statements on social media or other channels, it is important that you make it clear that these views are your own and not of the company that employs you. CreoConcept Sp. z o.o. Sp. k. is apolitical and takes no position on political parties. The exception to this may be circumstances that may affect our industry or company, but in that case, it will be up to the Management Board and colleagues in the Marketing Department to openly present our position. Lobbying, understood as advocacy, may also occur in the course of our work. These are lawful activities aimed at influencing the state's decision-making bodies (legislature, executive or local authorities) in order to obtain a favourable decision. Lobbying activities include direct communication with officials and supporting anyone who engages in this type of communication.

We do not make substantial political contributions or ones that would generate such a significant impact that their perception would be considered excessive or inappropriate.

We understand that lobbying is one way to positively influence our industry and/or business opportunities.

We ensure that any lobbying activities carried out on our behalf are appropriate and do not reflect negatively on the company.

The interest in our company's projects and initiatives of politicians from all parties is neutral to us.

If politicians of any level approach us seeking relevant information about our industry, we will provide it so they can make informed decisions.

Political contacts should always be in line with the purpose and values of CreoConcept Sp. z o.o. Sp. k.



Appendix
**Introduction of
the code of business
conduct and ethics**

Appendix

Appendix

Appendix

Appendix

The bodies of CreoConcept Sp. z o.o. Sp. k. and managers at all levels are obliged to serve the Recipients of this Code as an example.

Awareness

Employees must read the Code and learn the procedures applicable to them regarding their assigned duties and tasks. They are also required to comply with its provisions. They are obliged, in particular, to refrain from actions that are incompatible with the provisions of the Code of Business Conduct and Ethics.

Management Board

The President of the Management Board and the Shareholders shall promote the implementation of the Code and the development of appropriate procedures and shall supervise compliance with the principles set out therein. Recipients of the document may, at any time, contact the President of the Management Board directly to ensure proper compliance with the Code or to report its violations.

Reporting of violations

Recipients are required to immediately report conduct that is even potentially inconsistent with the provisions of the Code to their supervisor or to the President of the Management Board. Reports may be made anonymously. Persons reporting suspected violations in good faith shall not be subject to retaliation. Those making a report shall be protected from retaliation of any kind, including any discriminatory or punitive action. Their identity shall be kept confidential, subject to any obligations imposed by law.

All data shall be processed and archived by the Management Board in accordance with applicable legal regulations.

Training and information

The Code shall be made available to the Recipients within and outside CreoConcept Sp. z o.o. Sp. k. through specific communication channels. CreoConcept Sp. z o.o. Sp. k. shall develop a training plan appropriately adapted to the roles, responsibilities, duties and positions of the individual Recipients in order to introduce them to the principles of the Code and to emphasise the importance of complying with it.



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