

CODE OF ETHICS AND BUSINESS INTEGRITY

28.10.2021

NAFTO Sp. z o.o.



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§ 1

PURPOSE AND OBJECTIVES OF THE CODE

NAFTO Sp. z o.o. (hereinafter "NAFTO"), in the course of conducting and developing its activities, strives to achieve a balance between economy, ethics, and respect for the natural environment by complying with applicable laws and applying the highest ethical standards in relations with customers, suppliers, subcontractors, employees and the company's social and economic environment.

This Code defines the values that guide us in our business and which we want to disseminate by making this Code also applicable to Contractors cooperating with NAFTO Sp. z o.o. "Contractors").

The Code applies regardless of the type of concluded agreement and, in particular, it applies to contracts with suppliers and subcontractors, contracts for the provision of services, lease agreements, contracts for consulting services, intermediation contracts and agency contracts at the stage of their conclusion and throughout the period of cooperation.

We would like to base our operations on the following main principles and thus develop our organizational culture.

§ 2

MAIN VALUES AND ETHICAL PRINCIPLES

1. Respecting legal principles

NAFTO and its Contractors conduct business activities in accordance with applicable law in all places of operation, both in Poland and abroad. In our area of business we comply with the legal acts, regulations and other applicable national laws, European Union law, and also with applicable industry regulations and local regulations in the countries where the Company operates

2. Concern for health and safety at the workplace

For NAFTO and its Contractors the health and safety of employees constitutes a priority. We promote a "Zero accidents" policy and the "Safety first" principle by ensuring the highest level of occupational health and safety with particular emphasis on the prevention of accidents and occupational diseases. We strictly adhere to all established health and safety standards and rules, we monitor the level of safety in the workplace through audits and controls and we shape employees' attitudes through training and meetings with them. We constantly strive to increase the level of safety of all employees in our Company by implemented management systems and we strive to minimize the effects of possible accidents at work by offering employees all possible assistance in recovering and, if necessary, transfer to another position.

3. Concern for work environment and employees

NAFTO and its Contractors emphasize cooperation, mutual trust, respect and enlightened personal culture. We are convinced that a good atmosphere at work is good for the creative and effective functioning of our entire organization. We oppose behaviours that lead to conflicts and which disrupt the work atmosphere and we actively prevent behaviours that are manifestations of discrimination and mobbing. We strive to provide all employees with comfort at work and equal employment opportunities, as well as systematic development and opportunities for improving the professional qualifications of employees, taking into account their personal needs and predispositions.

4. Attention to what surrounds us

NAFTO and its Contractors feel responsible and want to have an impact on the immediate environment in which they operate. We understand social responsibility as responsibility for any and all of our actions that may have an impact on the immediate surroundings and the natural environment.

We care for our environment by strictly obeying environmental protection regulations and, if possible, gradually reducing the negative impact of the Company's operations, i.e. reducing energy and water consumption, controlling emissions of harmful substances and dust, segregating municipal waste and recycling post-production waste.

We strive to be a member of the local community wherever we operate. As we are part of our social environment, we want our relationships to be based on mutual understanding of conditions, respect and trust. We are sensitive to the needs of our surroundings, we take actions to protect the environment and participate in actions for the benefit of the local community. In particular, we want to support youth, health and charity initiatives.

5. Attention to human rights

When operating on foreign markets, NAFTO and its Contractors take into account the need to ensure compliance with the requirements of legal regulations being in force on individual markets, in particular labour laws. First of all, we provide decent working and pay conditions, working and rest time in accordance with labour laws and collective agreements in force in a given industry. We comply with the regulations that apply to the work of minors, disabled people and pregnant women.

We do not tolerate any form of human trafficking, forced labour or practices that restrict individual freedom. We strive to ensure that all Employees are treated fairly and respectfully by supervisors, subordinates and colleagues, and to prevent all forms of discrimination, harassment, inappropriate behaviour and violence. For this purpose, we have established Anti-mobbing Policy.

6. Honesty and transparency

NAFTO and its Contractors care about the honesty and transparency of their business activities. We conduct our business with integrity, applying the principle of "zero tolerance" for corruption, bribery, money laundering and embezzlement. We comply with the legal standards regarding the principles of fair competition, we do not tolerate any violations of the antitrust law and we do not participate in any collusion

regarding prices, delivery times, terms, strategies, relations with Customers or in other mechanisms that limit fair competition.

We do not participate in and do not create a conflict of interest in situations or circumstances that may appear to generate a conflict of interest.

We make sure that all documents, reports and invoices issued by the Company are complete, reliable and are truthful and not misleading.

We do not violate economic sanctions imposed by national and international legislation, which Poland is obliged to apply.

7 Confidentiality and protection of personal data

NAFTO and its Contractors guarantee that the confidentiality of data relating to employees and third parties as well as information received from customers and Contractors is respected. We ensure that all activities regarding personal data are carried out in accordance with the applicable laws and regulations.

§ 3

SUMMARY

The above-mentioned main principles that we follow are addressed to all employees and Contractors cooperating with us. We hope that they will be respected and used in business relations contributing to the improvement of the quality of goods and services as well as work safety, while caring for the environment and people.

We would be grateful if you could confirm in writing that you have read the contents of this Code.