

Mostostal
WARSZAWA

Mostostal
Grupa Mostostal Warszawa KIELCE

Mostostal
Grupa Mostostal Warszawa PŁOCK

aMk
Grupa Mostostal Warszawa KRAKÓW

**PEOPLE, ENVIRONMENT
AND DEVELOPMENT
IN THE MOSTOSTAL WARSZAWA GROUP**

POLICY BOOK

Introduction

Mostostal Warszawa Capital Group [hereinafter referred to as 'MOSTOSTAL WARSZAWA'] is a group of companies involved in a wide range of design and construction activities in all segments of the Polish construction market, including volume, infrastructure, power and industrial construction. The Capital Group comprises the following companies: Mostostal Warszawa S.A. - the parent company, Mostostal Płock S.A., Mostostal Kielce S.A., AMK Kraków S.A. and Mostostal Power Development Sp. z o.o. which pursue a joint strategy of developing a production, commercial and marketing offer, remaining related to the strategic investor, the Spanish company Acciona Construcción S.A.

Acciona Construcción S.A. is part of the ACCIONA Group, a global corporation operating in the field of infrastructure, energy, water and services projects, focused on sustainable development and social well-being. The ACCIONA Group conducts business activities in over 40 countries worldwide, on 5 continents and employs over 39 thousand people. It promotes a philosophy of sustainable development in its business activities, the guiding principle of which is to focus on ensuring the conditions for development for future generations and preserving the integrity of the environment.

ACCIONA Group and through it MOSTOSTAL WARSZAWA are involved in a number of projects related to the development of clean technologies, obtaining energy from renewable sources and continuous initiation of actions aimed at protecting the environment from degradation.

This Policy Paper is a postulate presenting the vision and strategy of MOSTOSTAL WARSZAWA as regards constant creation of synergy between the conducted business activity and its continuous development, and taking care of the good of the environment, employees and communities in which MOSTOSTAL WARSZAWA operates.

I. INNOVATION AND SUSTAINABLE DEVELOPMENT

1. POLICY OF SUSTAINABLE DEVELOPMENT

Objective:

This policy constitutes MOSTOSTAL WARSZAWA's commitment to its stakeholders, as well as its strategy in the area of sustainable development, defining framework principles for detailed solutions in this respect.

MOSTOSTAL WARSAW's commitment to sustainable development should be understood as support for social progress, environmental sustainability and economic growth.

MOSTOSTAL WARSZAWA, as a group of companies belonging to the global ACCIONA structure, responds to the basic needs of society by applying modern technologies to construction and other business activities. Sustainability, as a key element of strategy, situates the ACCIONA Group as an organization capable of setting long-term objectives and values shared by its various stakeholders.

The ACCIONA Group adheres to the 10 principles of the United Nations *Global Compact* related to human and labor rights, the environment and the fight against corruption.

The ACCIONA Group's commitment is reflected through its contribution to achieving the 17 United Nations Sustainable Development Goals.

Rules of conduct:

- **Factor of change** - MOSTOSTAL WARSZAWA through sustainable development strategy meets the global challenges and trends that affect the business, providing solutions to meet the basic needs of society.
- **Long-term basis** - MOSTOSTAL WARSAW considers sustainable development as a long-term commitment that reinforces the principle of economic and financial stability.
- **Ethics** - MOSTOSTAL WARSAW ensures that all stakeholder relationships incorporate the principles of ethics, honesty, integrity and transparency in operations.
- **Management** - actions for sustainable development are initiated by MOSTOSTAL WARSAW's management bodies.

- **Integration of sustainable development** - MOSTOSTAL WARSZAWA assumes that the sustainable development strategy should be present in all areas of business and at all organizational levels, inspiring customers, suppliers, shareholders and other stakeholders.
- **Risk and opportunity management culture** - MOSTOSTAL WARSAW supports the principle of basing the strategy building and decision-making processes on the results of risk and opportunity assessment analyses.
- **Respect for fundamental human rights** - MOSTOSTAL WARSAW respects and contributes to the protection of universally understood fundamental human rights in its activities, preventing any abuse or violation of these rights.
- **Creating value for society** - MOSTOSTAL WARSZAWA brings value to local environments, where it operates in business, by relying on such business models, which contribute to social development and improvement of the quality of life of local community residents.
- **Caring for the environment** - MOSTOSTAL WARSZAWA implements a prudent approach in its business activities, characterized by an effort to achieve the maximum level of efficiency in all projects it undertakes, while minimizing environmental impact.
- **Combating climate change** - fighting climate change is a priority for MOSTOSTAL WARSAW and consists in supporting the conversion of conventional energy sources to renewable energy, promoting the optimisation of energy consumption and mitigating the negative effects of climate change.
- **Innovation** - MOSTOSTAL WARSZAWA supports innovation as one of the pillars of business development, promoting the search for sustainable solutions at the technological and operational levels.
- **Dialogue with stakeholders** - communication and dialogue is the basis of the relationship MOSTOSTAL WARSZAWA maintains with its stakeholders, ensuring understanding of their needs and satisfaction of expectations.
- **Transparency in communication and accountability** - MOSTOSTAL WARSZAWA provides its stakeholders with transparent, reliable and complete information.

2. STAKEHOLDER RELATIONS

Objective:

MOSTOSTAL WARSZAWA has implemented a sustainable business model in its operations, based on building common values and mutual trust between the parties with respect to long-term commitments to its stakeholders.

An element of MOSTOSTAL WARSZAWA's strategy is to strive to understand the needs and expectations of stakeholders in order to manage them in a way that ensures the realisation of shared values, the building of long-term relationships, effective management of risks and opportunities, and the maximisation of sustainable development methods.

Continuous communication and dialogue are the basis of the relations MOSTOSTAL WARSZAWA maintains and builds with its stakeholders, understood as persons and organizations whose activities directly or indirectly concern MOSTOSTAL WARSZAWA. The above relations are developed within the principles of transparency and equal treatment.

The main stakeholders of MOSTOSTAL WARSZAWA include employees, shareholders, customers, local communities, suppliers and subcontractors, local and governmental public administration, market regulators, investors and analysts, and the media.

Rules of conduct:

- **Value creation** - MOSTOSTAL WARSZAWA strives to ensure value in the areas in which it operates by implementing a business model that contributes to sustainable development; at the same time, it undertakes to take actions towards stakeholders to prevent and minimize economic, social and environmental risks.
- **Integration of Stakeholders' Needs and Expectations** - MOSTOSTAL WARSZAWA maintains a regular and open dialogue with its stakeholders, verifying their needs and responding to their expectations, and introducing those which it considers most important to its business strategy.
- **Popularizing the strategy of sustainable development** - MOSTOSTAL WARSZAWA is building a culture of sustainable development among employees, customers, suppliers and shareholders and other stakeholders to ensure that this topic is present in all business areas and at all organizational levels of MOSTOSTAL WARSZAWA.
- **Channels of communication and dialogue** - MOSTOSTAL WARSZAWA shall provide interested stakeholders with channels for communicating suggestions, needs, expectations, opinions and complaints, and for effectively facilitating their access to transparent, reliable and complete information regarding the fulfilment of obligations undertaken to shareholders and the results achieved by MOSTOSTAL WARSZAWA's management.

- **Responsibilities and Resources** - MOSTOSTAL WARSZAWA undertakes to define the responsibilities of organizational units and ensure adequate human resources to meet the needs and expectations of stakeholders.
- **Monitoring and continuous improvement** - MOSTOSTAL WARSZAWA shall define and implement mechanisms to regularly assess stakeholder satisfaction and make necessary improvements to satisfy them.

3. INNOVATION POLICY

Objective:

For MOSTOSTAL WARSAW innovation is a priority, as a factor distinguishing us from the competition and driving force for change. Aware of the fact that competitiveness, globalization and sustainable development are linked with innovation, MOSTOSTAL WARSZAWA is committed to continuous effort, resources and support for innovation to develop innovative solutions and to continuously work to identify both technological and business opportunities, which will allow to create value and strengthen the existing potential of MOSTOSTAL WARSZAWA.

The above approach is put into practice by basing business decisions made in day-to-day operations on the strategic values of excellence, innovation and compliance.

Rules of conduct:

- **Commitment and support of the Management Board** - innovation and research activity are inspired in MOSTOSTAL WARSAW from the management level, providing financial means and personnel resources necessary to realize the assumed objectives.
- **Culture of innovation** - MOSTOSTAL WARSZAWA promotes a culture of innovation through communication and encouraging employees to participate in internal initiatives.
- **Focus on continuous improvement** - MOSTOSTAL WARSZAWA makes every effort to continuously create value, develop business, increase customer satisfaction and contribute to sustainable development.
- **Searching opportunities** - is realized in MOSTOSTAL WARSAW through close cooperation between business units and management, providing conditions for innovation, fostering openness through structured channels of sharing expertise.
- **Impact tracking, monitoring and analysis of results** - MOSTOSTAL WARSZAWA continuously monitors the effects of its innovation and research activities with the help of introduced control measures, aimed at verification of compliance with the assumed requirements and identification of potential improvements by subjecting the achieved effects to critical analysis.
- **The promotion of cooperation and partnership with third parties** is achieved at MOSTOSTAL WARSAW through the conclusion of strategic agreements and the search for synergies.

- **Promoting scientific innovation** - MOSTOSTAL WARSAW takes an active part in promoting scientific development, from internal communication to employees about achievements to participation in international scientific community events.
- **Protection of intellectual property** - MOSTOSTAL WARSAW promotes the protection of industrial and intellectual property, created as part of its innovative and business activities.

II. ADMINISTERING AND GOOD GOVERNANCE

4. ANTI-CORRUPTION POLICY

Objective:

MOSTOSTAL WARSZAWA expects that the behaviour of each employee will be ethical and that employees will be guided in their conduct by honesty, integrity and transparency. Any manifestation of corruption or bribery on the part of employees and third parties who act on behalf of MOSTOSTAL WARSZAWA will be met with a strong response from MOSTOSTAL WARSZAWA and appropriate consequences.

The ACCIONA Group, as a signatory to the United Nations *Global Compact*, and with it MOSTOSTAL WARSZAWA, openly support and respect the attitudes against corruption embodied in the United Nations Convention against Corruption. The ACCIONA Group adheres to the principles set out in the Guide to Reporting Events under the Convention, based on Principle 10 on Corruption, committing itself to initiate action to combat corruption in the following forms: blackmail or incitement to commit a crime, bribery, conflict of interest, clandestine influence, falsification of documents, money laundering, use of a privileged position, information obtained and fraud.

Rules of conduct:

- **Culture of integrity** - aware of the importance of prevention and detection of corruption, MOSTOSTAL WARSZAWA supports the culture of integrity in MOSTOSTAL WARSZAWA by means of training and popularization of ethical behavior patterns.
- **Gifts in business** - MOSTOSTAL WARSZAWA regulates the principles of giving gifts, invitations and other expressions of courtesy offered to public officials and business partners, as well as their acceptance by MOSTOSTAL WARSZAWA employees. Invitations to meetings, events, etc. shall be accepted on the basis of the principle of restraint, according to which in no case shall a gift imply or be interpreted by an objective observer as anything more than an expression of courtesy towards those who have been given or invited.
- **Conflict of interest** - MOSTOSTAL WARSZAWA bases its relationship with its employees on the principle of loyalty based on a community of interest. Therefore, while respecting the right of its employees to engage in activities outside working hours, MOSTOSTAL WARSZAWA expects them to be lawful and not competitive or interfering with the employment duties of MOSTOSTAL WARSZAWA employees.
- **Prohibition of bribery** - MOSTOSTAL WARSZAWA's employees shall not accept, promise, offer or give, directly or indirectly, any financial or non-pecuniary benefit to any person providing services, employment

or other business relationship with a public or private institution, political party or candidate for public office with the intent of maintaining an illegal relationship or obtaining an advantage.

- **Use of confidential information** - All employees of MOSTOSTAL WARSZAWA are obliged to keep in full confidentiality all confidential information to which they have access in connection with the performance of their duties and are obliged not to use such information in an inappropriate manner, inconsistent with its intended use, for their own or third parties' benefit.
- **Ethics in relations** - MOSTOSTAL WARSZAWA shapes its relations with third parties, clients, partners, suppliers and government and local administration in a professional and ethical manner. MOSTOSTAL WARSZAWA, within the supply chains of which it is a part, requires in contracts with stakeholders the implementation of ethical standards, including anti-corruption principles.
- **Transparency and accountability guarantee** - MOSTOSTAL WARSZAWA's financial services and operations are subject to transparency controls and reporting. Employees or other stakeholders must not conceal undue payment, bribery or any other act contrary to the above policy, including the creation and maintenance of corrupt funds.
- **Control, reporting and monitoring** - with the assistance of the competent control services, MOSTOSTAL WARSZAWA supervises and controls the accounting records reflecting payroll, costs, transactions and disposition of funds and prevents, by identifying and controlling, any event or action that constitutes or may lead to a violation of laws and internal regulations. In addition, MOSTOSTAL WARSZAWA shall make available to employees and third parties confidential whistleblowing channels, as an avenue for reporting any type of behavior that is not in compliance with the above policy, promoting integrity and responsibility against corruption.

5. PREVENTION OF CRIME AND BRIBERY

Objective:

The Crime and Bribery Prevention Policy is intended to promote among all MOSTOSTAL WARSZAWA's officers, management and employees, as well as third parties who have business relations with them, an attitude of unequivocal opposition to committing any criminal act and MOSTOSTAL WARSZAWA's expectation of absolute compliance with applicable criminal laws.

The following principles of prevention of crime and bribery, together with the anti-corruption policy and the Code of Conduct, confirm MOSTOSTAL WARSZAWA's commitment to zero tolerance of illegal activities, constant supervision through measures aimed at prevention and detection of illegal activities, maintenance of effective communication mechanism and proper awareness of all employees in this respect. MOSTOSTAL WARSZAWA aims to develop a corporate culture based on ethics and compliance with the law. In order to improve the crime prevention policy, MOSTOSTAL WARSZAWA implements procedures and internal control systems that allow to identify the risk of violation of criminal law, to which MOSTOSTAL WARSZAWA is exposed in connection with its operations and to reduce the likelihood of their commission. These systems and procedures, functioning as part of the process of improving the level of compliance with internal requirements, are subject to constant review and modification, and at the same

time constitute a mechanism for prevention and monitoring of other abuses, such as fraud, administrative offences and other irregularities.

The purpose of the control is, on the one hand, to demonstrate the attitude of non-acceptance towards criminal activity, which reflects the organisational culture of respect for the law, prohibiting the commission of criminal acts, and, on the other hand, it is aimed at taking care to limit the number and reduce the diversity of criminal behaviours in all manifestations of MOSTOSTAL WARSZAWA's professional activity.

Rules of conduct:

- The Crime Prevention Policy applies to MOSTOSTAL WARSZAWA's officers, directors and employees in respect of their professional activities.
- Persons acting as representatives of MOSTOSTAL WARSZAWA in companies and units not belonging to MOSTOSTAL WARSZAWA are obliged to promote and, as far as possible, implement crime prevention principles reflecting the standards in force at MOSTOSTAL WARSZAWA.
- The policy integrates and coordinates all activities aimed at preventing and combating criminal acts as well as irregularities, being, together with the Code of Conduct and anti-corruption policy, a fundamental element of the system for counteracting irregularities.
- MOSTOSTAL WARSZAWA maintains internal, compliant channels for notifying irregularities.
- In exercising its rights under this policy MOSTOSTAL WARSZAWA shall act in all situations in accordance with the letter of the law, and in matters not regulated by it in accordance with the spirit of the applicable law and accepted custom.
- MOSTOSTAL WARSZAWA promotes a culture of prevention, based on the principle of "zero tolerance" for unlawful acts and applies the principle of ethical conduct, based on the patterns of conduct contained in the Code of Conduct.
- MOSTOSTAL WARSZAWA shall ensure that the persons responsible for the supervision and control of the Crime and Bribery Prevention Policy have the appropriate background, resources, autonomy, authority to effectively and proactively monitor the operation of and compliance with the Policy, without colliding with or compromising the responsibilities of other MOSTOSTAL WARSZAWA organizational units.
- MOSTOSTAL WARSZAWA undertakes to investigate every signal concerning an act which is a potential crime or fraud, or suspicion of such actions, as soon as possible, guaranteeing confidentiality and protection of the signatory and the rights of the persons concerned.
- MOSTOSTAL WARSZAWA is committed to informing stakeholders through designated channels of any incident that may constitute an illegal activity or other irregularity; MOSTOSTAL WARSZAWA shall implement appropriate training programs, either *in-class* with a trainer or *online* or by any other method it deems appropriate, to meet legal requirements for the scope and frequency of employee training on crime prevention topics.

- MOSTOSTAL WARSAW shall apply disciplinary sanctions, in accordance with the provisions of collective bargaining agreements and applicable labour law, to employees who act contrary to the provisions of the Code of Conduct, the Crime and Bribery Prevention Policy and other internal regulations of MOSTOSTAL WARSAW.

6. FIGHT AGAINST UNFAIR COMPETITION

Objective:

MOSTOSTAL WARSAW respects the coexistence of competitive companies in the market, treating coexistence as a criterion conducive to increasing the quality of goods and services and price competitiveness.

As a Capital Group guided by ethics and transparency of operations, MOSTOSTAL WARSZAWA rejects any form of unfair competition, understood as including agreements between competitors on, e.g. setting prices or strategies, dividing markets, customers, goods or abusing dominant market position.

Rules of conduct:

- **Implementation of regulatory metrics** - MOSTOSTAL WARSZAWA supports compliance with anti-competitive laws and follows the applicable regulatory instruments aimed at mitigating, reducing and avoiding competition-restricting phenomena and price-setting mechanisms.
- **Fair competition** - MOSTOSTAL WARSZAWA rejects any unfair competition practices, such as dumping, contractual taking over of customers, spreading false information about a competitor, misrepresentation, imitation, abuse of privileged market position and actions aimed at favouring selected entities, initiating corrective actions in case the above phenomena are identified.
- **Fight against monopolistic practices** - MOSTOSTAL WARSZAWA develops solutions which fight against anti-competitive phenomena and support free competition.
- **Selection of contracts** - MOSTOSTAL WARSZAWA supports the practice of rejecting contracts with competitors who practice price fixing, market sharing, bid rigging or production limitation.
- **Cooperation with authorities** - MOSTOSTAL WARSZAWA actively cooperates with government representatives in order to combat documented acts of competition infringement.
- **Preventive action** - MOSTOSTAL WARSZAWA undertakes to establish appropriate measures to guarantee the lawful flow of services and activities corresponding to the specifics of the market in which it operates.
-

7. RISK MANAGEMENT

Objective:

The Management Board of MOSTOSTAL WARSZAWA has implemented a risk management process in the Company in order to identify and assess potential events that may affect MOSTOSTAL WARSZAWA, manage them within the limits of accepted risk acceptance parameters and ensure an appropriate level of security of achievement of set objectives.

The risk management process aims to control all organizational, strategic and operational activities taking place at MOSTOSTAL WARSZAWA in such a way that allows managers to precisely determine the acceptable level of risk so that those responsible for the business lines can maximize the profitability of the processes for which they are responsible, maintain or increase resources and ensure the achievement of objectives above the assumed thresholds, while avoiding future and uncertain events that could have a negative impact on their achievement.

The risk management process takes into account all risks related to the operations of MOSTOSTAL WARSZAWA's business units and applies to all companies within MOSTOSTAL WARSZAWA.

Rules of conduct:

The framework for the risk management process presents the methodology that MOSTOSTAL WARSZAWA adopts when managing risk. The process is developed with the following objective:

- Unifying the principles of identifying, classifying, assessing, managing and tracking risks in various business areas and the so-called corporate risk, affecting the operations of MOSTOSTAL WARSZAWA.
- Implement integrated reporting to identify and track key risks.
- Linking the level of risk tolerance to the strategic objectives of MOSTOSTAL WARSZAWA, enabling their achievement with controlled variables, reducing the level of sensitivity of the business to adverse circumstances.
- Improve decision-making in response to risks, protecting MOSTOSTAL WARSZAWA's operations and reputation.

All activities directed at identifying, assessing, prioritizing, processing, checking and controlling risks are included in the Risk Management System, and each area and business line is responsible for adopting and applying policies related to risk management with reference to the principle:

- **Promote a culture of risk/opportunity assessment** in the management of MOSTOSTAL WARSZAWA using the Risk Management System.
- **Integration** - taking into account the results of analysis and risk assessment of MOSTOSTAL WARSZAWA strategy. Risk management is integrated with MOSTOSTAL WARSZAWA's megaprocesses, providing a full and multifaceted analysis in the decision-making process.

- **Tolerance level** - MOSTOSTAL WARSZAWA supports the achievement of business objectives contained in the tolerance range of acceptable risk.
- **Responsibility** - Risk management is the responsibility of all MOSTOSTAL WARSAW employees, each employee should identify and understand the risks in his/her area of responsibility and manage them within the assigned decision-making authority within the established tolerance limits.
- **Protection of interests** - risk management protects the interests of shareholders, customers and other stakeholder groups.
- **Confidence** - the risk management process presents MOSTOSTAL WARSAW's obligations to the Market Regulator and investors in a transparent manner and provides an account of MOSTOSTAL WARSAW's risks and the functioning of the systems for their management and control.
- **Compliance** - respecting and complying with internal rules and current law, with particular emphasis on corporate governance, including the Code of Conduct.
- **Commitments** - The risk management process is MOSTOSTAL WARSAW's sustainability commitment to identify, assess and manage the environmental, social and ethical impacts of MOSTOSTAL WARSAW's operations.
- **Processing, optimization and updating** - risks are subject to analysis, which includes their updating and processing, the analysis is performed within the framework of coordination of information flow between business lines and business units and optimization of resources allocated for this purpose. It is the responsibility of each business unit to report material, actual and potential risks in a timely manner and to ensure that risk management information is presented to the appropriate audience in a timely manner.
- **Periodic Review** - The Audit Committee of MOSTOSTAL WARSAW conducts a formal risk assessment on an annual basis.

8. QUALITY POLICY

Objective:

MOSTOSTAL WARSZAWA commits itself to stakeholders to continuously improve the quality of products and services through improved management, remaining responsible for compliance with relevant requirements, both applicable laws and voluntarily adopted by MOSTOSTAL WARSZAWA system of conduct and to continuously give the best example of good practice, maintaining as a priority the continuous improvement of product and service quality and improvement of management systems.

The above culture of quality and operational effectiveness covers all areas of business activity of MOSTOSTAL WARSAW.

Rules of conduct:

- **Leadership** - The Management Board of MOSTOSTAL WARSAW takes the leadership initiative and commitment to improve quality management at MOSTOSTAL WARSAW.
- **Strategic compliance** - established objectives and tasks in the organization are consistent with the quality policy and mission, vision and strategy of MOSTOSTAL WARSZAWA.
- **Risk and opportunity management** - MOSTOSTAL WARSZAWA manages the identified risks and opportunities, expanding its capabilities in order to better implement its projects and achieve the anticipated results, reduce negative effects and take advantage of emerging opportunities.
- **Customers and other stakeholders** - MOSTOSTAL WARSZAWA identifies the needs and expectations of its customers and other stakeholders and takes them into account in its operations so as to offer them fully satisfactory products and services conducive to mutually beneficial and long-term relationships.
- **Highest quality and safe use of products and services** - MOSTOSTAL WARSZAWA acts with utmost care to ensure the highest quality and reliability of its products and services, guaranteeing customers and users their safe use.
- **Continuous improvement** - MOSTOSTAL WARSZAWA increases effectiveness of management system by digitalization of construction processes (e.g. BIM, DALUX) supports innovativeness and bets on development of specific projects aimed at continuous improvement of processes, which allow to identify good practices and use the experience gained, creating a culture aimed at continuous improvement of performance and customer satisfaction.

III. SOCIAL AREA

9. HUMAN RIGHTS

Objective:

MOSTOSTAL WARSAW supports, respects and contributes to the protection of internationally recognized fundamental human rights and does not allow any form of abuse or participation in the violation of such rights in its relations with employees, suppliers, contractors, collaborators, partners, competitors, customers, local communities and society.

MOSTOSTAL WARSZAWA undertakes to defend the observance and protection of human rights in its activities and to support the application of principles and values in MOSTOSTAL WARSZAWA's companies and in relation to its suppliers, contractors and business partners.

MOSTOSTAL WARSAW undertakes to respect human rights and freedoms as set forth in the Universal Declaration of Human Rights of the United Nations and their basic tools: International Covenant on

Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights; the Declaration of Fundamental Principles and Rights at Work and the Convention of the International Labour Organization; the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy; the OECD Guidelines for Multinational Enterprises and the United Nations Global Compact.

MOSTOSTAL WARSZAWA supports the United Nations Guiding Principles on Business and Human Rights, committing itself to respect human rights, striving not to violate them and not to contribute to the negative consequences of its activities, and to take corrective action in case the effects of violations arise. MOSTOSTAL WARSZAWA shall prevent and minimize the negative consequences of human rights violations directly related to MOSTOSTAL WARSZAWA's operations, products or services provided in connection with its activities, even if it did not contribute to their occurrence.

Rules of conduct:

- **Compliance** - MOSTOSTAL WARSAW undertakes not to instigate, participate or collaborate in initiatives that may threaten the violation of human rights universally recognized in national and international legislation. In countries where national legislation or regulations could conflict with respect for human rights, MOSTOSTAL WARSZAWA shall take appropriate measures to control and mitigate the risk.
- **Respect for humanity** - MOSTOSTAL WARSAW does not accept human rights violations in relation to and between its employees, as well as in relation to and between its suppliers, contractors, partners, customers and communities.
- MOSTOSTAL WARSAW **does not accept any form of discrimination** based on age, race, ethnic origin, colour, sex, religion, political opinion, nationality, sexual orientation, social origin or disability.
- MOSTOSTAL WARSAW rejects **forced labor** in any form, as well as any form of physical, psychological, moral harassment or abuse of power or any other behavior that intimidates or offends others.
- MOSTOSTAL WARSAW is concerned about the safety of children and **condemns child labour** in every area of its activities.
- MOSTOSTAL WARSAW recognizes the right of employees to work in a decent, safe and healthy **working environment**.
- MOSTOSTAL WARSAW ensures **the rights of association**, belonging to organizations and recognizes the rights of collective bargaining.
- MOSTOSTAL WARSAW is committed to offering **decent work to** satisfy the basic needs of individuals and families.
- MOSTOSTAL WARSZAWA provides **measures to eliminate threats** to human health and safety.

- **Respect for communities and communities among which operations are carried out** - MOSTOSTAL WARSAW recognizes that the protection of human rights extends to those who have been affected or may be affected by MOSTOSTAL WARSAW's operations, in particular this applies to vulnerable groups such as the homeless and minorities. Therefore, MOSTOSTAL WARSAW respects the rights of communities to access to food, water and sanitation, energy, education, health and housing, to enjoy a clean and healthy environment, the right to freedom of expression and freedom of thought and religion.
- **Due diligence** - MOSTOSTAL WARSAW undertakes to identify, prevent, mitigate and respond to the negative consequences of its human rights activities as follows:
 - Impact assessment - MOSTOSTAL WARSZAWA assesses the actual and potential impact on the human rights protection status, exerted both by direct activities and commercial relations.
 - Prevention and remediation - MOSTOSTAL WARSZAWA shall identify preventive measures to mitigate potential impacts and, if realized, undertake to develop remediation mechanisms.
 - Standardization - MOSTOSTAL WARSZAWA shall develop dedicated processes and procedures and establish responsibilities and appropriate tools to apply these measures and mechanisms.
 - Complaint mechanisms - MOSTOSTAL WARSAW defines communication channels so that stakeholders can communicate and report any human rights issues in order to trigger corrective mechanisms without undue delay.
 - Monitoring - MOSTOSTAL WARSZAWA monitors the effectiveness of the applied solutions and communicates them to individuals or groups that may be affected and other stakeholder groups.
 - Reporting - MOSTOSTAL WARSZAWA shall report on the measures that are taken to minimize the consequences of its activities in the area of human rights. In the event that serious violations are detected, MOSTOSTAL WARSZAWA undertakes to inform the market by way of public information reporting.
- **Promotion and training** - MOSTOSTAL WARSZAWA promotes internally and externally the respect for human rights among employees, the environments in which it operates and other stakeholders, which also means creating training plans on human rights for employees, suppliers and contractors.
- **Monitoring and cooperation with authorities** - MOSTOSTAL WARSZAWA, in accordance with the provisions of the Code of Conduct, shall monitor and correct all abuses violating human rights, and, if necessary, notify appropriate law enforcement authorities and cooperate with them in further proceedings.

10. PERSONNEL POLICY

Objective:

- MOSTOSTAL WARSZAWA places in the foreground, among the desired behaviors, those which are consistent with ethics and safety - implementing values that identify and distinguish MOSTOSTAL WARSZAWA as a place of work. At the same time MOSTOSTAL WARSZAWA undertakes to invest in the professional development of its employees in the process of pursuing their professional success, retaining the best talent in the organization.
- MOSTOSTAL WARSZAWA respects human rights and keeps abreast of the most current solutions in the matter of human rights protection emerging in the market and strives to ensure the safety and well-being of all its employees.
- Occupational health and safety is in MOSTOSTAL WARSAW an area of utmost attention, which is an indispensable condition of work and cooperation, ensuring the safety of employees and business partners.

The ACCIONA Capital Group, to which MOSTOSTAL WARSZAWA belongs, aware of conducting business in industries where occupational risk is present, has declared its support for the objectives of the Seoul Declaration on Health and Safety at Work.

Rules of conduct:

- **High ethical standards** - as one of the basic components of the Capital Group's functioning, MOSTOSTAL WARSZAWA supports the observance of ethical values related to respect, cooperation, teamwork and patterns of behaviour collected in the Code of Conduct.
- **Respect for human beings (opposition to forced labour, child labour and limitations to freedom)** - implementing the assumptions of the International Labour Organisation convention, MOSTOSTAL WARSAW prohibits forced labour in any form. MOSTOSTAL WARSAW combats the employment of minors by implementing appropriate control mechanisms during employment.
- **Equal treatment** - MOSTOSTAL WARSAW promotes the employment of the best professionals, ensuring equal opportunities based on individual skills and professional achievements and rejects any type of discrimination based on age, race, color, religion, sex, political opinion, sexual orientation, national origin or disability.
- **Competitive working conditions** - MOSTOSTAL WARSZAWA offers fair and equal remuneration and competitive working conditions, at the same time implements employee development programs for the most talented employees, facilitating their further education, development of management skills and acquisition of new competencies.

- **Right to freedom of association and bargaining** - MOSTOSTAL WARSAW supports and respects the right to voluntary association and collective bargaining in the employment context through legally permissible means, developing mechanisms to detect, control and manage identified risks.
- **Work-life balance** - MOSTOSTAL WARSZAWA supports the reconciliation of professional and personal life of its employees by offering flexible mechanisms that affect the satisfaction of the employee and his/her environment, in accordance with the best practice appropriate to the organizational unit of the company in which the employee is employed.
- **Socially responsible employment** - MOSTOSTAL WARSAW applies the practice of equality, diversity and inclusion in all aspects of employee management, especially in employment aimed at active inclusion of socially excluded and disabled groups.
- **Value creation** - MOSTOSTAL WARSZAWA acts for the benefit of the communities among which it does business by promoting the policy of employing local workers, possibly in the area of influence of the implemented project.
- **Guaranteeing optimal working conditions** - MOSTOSTAL WARSZAWA respects the law in terms of wages and working time and respects all employees' rights established in the applicable contracts and collective agreements, ensuring a friendly atmosphere at work.
- **Continuous improvement of the level of occupational health and safety** - MOSTOSTAL WARSZAWA supports and develops preventive management system to prevent accidents related to its activities, as well as in the activities of business partners, in order to achieve zero accidents. At the same time MOSTOSTAL WARSZAWA facilitates its employees and companies from the Capital Group MOSTOSTAL WARSZAWA to participate in trainings, obtaining authorizations and necessary material measures in the field of prevention and occupational risk, so that they perform their professional work safely and without taking risks to their health and life.
- **Risk identification and analysis** - in order to avoid and/or reduce exposure to risk, MOSTOSTAL WARSZAWA conducts detailed studies of the workplaces and the preventive measures in place.
- **Delegation of responsibility** - MOSTOSTAL WARSZAWA facilitates access to resources and equipment needed to ensure health and safety at work, relying on the assignment of responsibility to employees and their obligation to take care of their own safety, as well as that of others.
- **Dissemination of good practices** - MOSTOSTAL WARSZAWA promotes standards concerning the risks associated with its activity in places of work and applies preventive and emergency measures, in particular with regard to suppliers, contractors and collaborators. In order to promote best practices Mostostal Warszawa participates in industry initiatives, e.g. "Agreement for Safety in Construction", whose motto is "Zero accidents" on construction sites.
- **Encouragement of accreditation** - MOSTOSTAL WARSZAWA promotes accreditation of all its activities in accordance with the highest standards in the matter of Safety and Health, based on the principles of OHSAS 18001.

11. COMMUNITIES

Objective:

MOSTOSTAL WARSZAWA perceives its role in the process of sustainable development of the local communities in which it conducts business in a manner which is to contribute to improving the quality of life of those communities.

To achieve the above objective, MOSTOSTAL WARSAW strives to combine social initiatives with business development through sustainable medium/long term projects, where MOSTOSTAL WARSAW has a local presence, strengthening the trust between MOSTOSTAL WARSAW and the communities in which it operates, as well as increasing its positive contribution in line with the OECD Guidelines for International Groups.

Rules of conduct:

- **Consistency between business and community needs** - social activity of MOSTOSTAL WARSAW focuses mainly on issues connected with business activity, which in turn is an essential direction for social development. Therefore, the social activity of MOSTOSTAL WARSAW is organized based on the following principles:
 - *Environmental protection*: implementation of systems of rational water and eclectic energy management.
 - *Promoting Sustainable Development*: fostering, promoting and disseminating a culture of sustainable development in order to shape a more responsible and compassionate society.
 - *Project-related social investment*: to contribute actively to feeding and improving the socio-economic system in the communities where MOSTOSTAL WARSAW operates.
 - *Health, Education and Culture*: a commitment to collaborate with various institutions in allocating resources to meet neighborhood expectations and cultivate initiatives that have greater community resonance and are considered priorities in the areas of health, education and culture.
- **Positive value** - MOSTOSTAL WARSZAWA strives to ensure that its presence in society contributes to increasing the level of society's well-being, and that the actions taken are not only corrective or substitutive in nature, but reach beyond the obligations arising from corporate responsibilities.
- **Commitment for the medium and long term** - social initiatives and relations with local communities, like business activities, are a long-term perspective for MOSTOSTAL WARSAW for the medium and long term.

- **Community** - MOSTOSTAL WARSAW cooperates with institutions, NGOs, private companies and other stakeholders in order to effectively develop its social action. Relationships and cooperation with public and private institutions are aimed at combining efforts to support the community.
- **Ethics** - MOSTOSTAL WARSZAWA operates in accordance with business ethics and transparency in cooperation with external entities so that it is not used for illegal purposes.
- **Adaptability** - in each project MOSTOSTAL WARSZAWA supports activities flexibly, adjusted to the needs and supply of the local community in which it is present.
- **Employee involvement** - social activities are also an opportunity to inspire solidarity local initiatives, that is why MOSTOSTAL WARSZAWA supports volunteering among its employees.
- **Monitoring progress** - MOSTOSTAL WARSZAWA monitors implemented initiatives and assesses their impact on the environment.

IV . ENVIRONMENTAL AREA

12. ENVIRONMENTAL POLICY

Objective:

Respect for and protection of the natural environment are the basic pillars of MOSTOSTAL WARSAW's activity, which manifests itself in the application of the best environmental practices in all its activities by preventing and eliminating adverse effects on the environment and the conservation of natural resources so that they can be used by future generations.

The environmental strategy of MOSTOSTAL WARSAW focuses on action against climate change, promotion of alternative energy sources, rationalisation in water use and management, responsible use of resources, application of the principles of closed-cycle economy, both in the design, selection and/or use of raw materials and in the management of generated waste, prevention of pollution and preservation of the natural environment and biodiversity.

Rules of conduct:

- **Compliance with environmental legislation** is a fundamental condition of MOSTOSTAL WARSAW's commitment to environmental protection.
- **Setting environmental objectives in projects** - MOSTOSTAL WARSZAWA implements the principles of environmental protection and control contained in the strategy of MOSTOSTAL WARSZAWA in business processes.
- **Reducing environmental impact** - MOSTOSTAL WARSZAWA takes into account environmental aspects in all phases of the development of its activities in order to minimize the impact it may have on the environment, promoting the sustainable use of resources. To this end, we integrate the environmental aspect into the decision-making process, taking into account the natural cycle perspective when analyzing the environmental impact.
- **Promoting sustainable business development** - MOSTOSTAL WARSZAWA promotes sustainable business development based on the opportunities offered by renewable energy generation, development of new clean technologies aimed at energy savings and the issue of water imbalance.
- **Efficiency and excellence** - MOSTOSTAL WARSAW promotes efficiency and excellence in internal management with an environmental management system that combines economic, technical, social and environmental elements with understandable guidelines for continuous process improvement.
- **Risk management** - MOSTOSTAL WARSZAWA manages environmental and climate change risks and opportunities and water resources.

- **Raising environmental awareness** - MOSTOSTAL WARSZAWA supports cooperation in environmental protection, conducts awareness-raising activities, training and promotes environmental sensitivity among its employees and stakeholders.
- **Reducing the impact in the supply chain** - MOSTOSTAL WARSZAWA tries to make the suppliers also take part in the projects directed at environmental protection, exerting influence on the supply chain.
- **Transparency** - MOSTOSTAL WARSZAWA reports on its environmental activities in a transparent manner and develops public documents addressed to stakeholders.
- **Monitoring and measurement** - MOSTOSTAL WARSZAWA develops indicators, necessary to obtain quantitative data that will contribute to the launch of actions to improve products, services and management processes, supports the rational use of resources and the highest efficiency through the best available technology.

V. OTHER RULES

13. POLICY OF COMMUNICATION WITH THE MARKET

Objective:

MOSTOSTAL WARSAW's Board of Directors oversees MOSTOSTAL WARSAW's communication policy, which includes information and communication procedures for financial, non-financial and corporate communications through the channels listed below, so as to contribute to maximizing the transmission and quality of information provided to the market for shareholders, institutional investors, shareholders, proxies, markets, media and the public, including information published on the website.

The presented principles are applied to information and communication of MOSTOSTAL WARSAW with shareholders, institutional investors within the scope of their engagement with MOSTOSTAL WARSAW and other interested parties, such as intermediary financial institutions, management units and share depositories, financial analysts, regulators and supervisors, credit qualification (rating) agencies, information agencies, *proxy advisors*, etc.

Rules of conduct:

MOSTOSTAL WARSZAWA, in order to improve communication with its shareholders and investors, both domestic and foreign, as well as to increase the transparency of information it publishes, applies a policy based on the following principles:

- Transparency, truthfulness, promptness and uniformity in the provision of information in such a way that shareholders and various interest groups receive all the financial and non-financial information required by law and that which may be useful to them, in a clear and accessible manner.
- Make it easier to obtain information on those matters that you may need to properly exercise your rights as a shareholder by providing clear and direct channels and lines of communication to address any concerns about the information provided.
- Periodic publication of information in a required and continuous manner, allowing shareholders and investors to learn about the most significant aspects of the functioning of MOSTOSTAL WARSAW at any time, using the most effective channels for receiving the above information.
- Equal treatment for all shareholders and investors who find themselves in the same position with regard to information, participation and the exercise of their rights as shareholders and investors.
- Use various instruments and information channels that will contribute to maximizing the transmission and quality of information provided to the market, investors and other stakeholders, using the benefits

of new technologies that will provide shareholders and other stakeholders with access to MOSTOSTAL WARSZAWA in the easiest and most transparent manner.

- Act in accordance with the law and the rules of reporting public information to the Polish Financial Supervision Authority.

14. PERSONAL DATA PROTECTION POLICY

Objective:

MOSTOSTAL WARSZAWA attaches importance to personal data protection. Such data shall be properly protected and stakeholders shall be entitled to reliable and full information on how it is processed. The ultimate goal is to protect the rights and freedoms of the individual.

Rules of conduct:

The Data Protection Regulation (hereinafter: "DPA") bases the processing of personal data on the following principles:

- lawfulness, reliability and transparency - through the obligation to provide the legal basis for processing, processed in a careful and acceptable manner for the individual, also taking into account the business purposes of MOSTOSTAL WARSZAWA, in a way that is clear for the data subject;
- purpose limitation - by indicating the purpose of the processing;
- minimization of the scope of data - only as much data as is necessary is collected;
- storage limitation - data shall not be processed longer than it is required by law or for the purpose of processing;
- integrity and confidentiality - data must not be modified or destroyed and should be properly secured;
- accountability of personal data processing - MOSTOSTAL WARSZAWA shall demonstrate compliance with the provisions of RODO.

In matters related to personal data processing, you can contact MOSTOSTAL WARSZAWA: iod@mostostalwarszawa.waw.pl.

Personal data collected by MOSTOSTAL WARSZAWA shall be processed in order to execute contracts with contractors, as well as to handle investor relations, human resources management processes, employment, administrative processes and OHS.

Data are processed on the basis of:

- the consent of the data subject;
- contracts;

- to comply with a legal obligation of MOSTOSTAL WARSZAWA:
- legitimate interest of MOSTOSTAL WARSZAWA, which is proper execution of contracts, as well as securing possible future claims.

Data recipients will be MOSTOSTAL WARSZAWA Capital Group entities, IT service providers, contractors, entities providing occupational health and safety services, entities providing property protection services, as well as entities offering legal services. Personal data shall be stored for the period resulting from individual acts, and if this is not specified, for the period which MOSTOSTAL WARSZAWA deems reasonable and sensible, taking into account the purpose of processing.

The full content of the rules of processing, protection and administration of personal data by Mostostal Warszawa can be found on the Mostostal Warszawa website at: <https://www.mostostal.waw.pl/firma/dane-osobowe>

15. REMUNERATION POLICY FOR MANAGEMENT AND SUPERVISORY BOARD MEMBERS

Objective:

The Policy establishes the general principles of the remuneration system, in a manner adequate to the involvement and responsibility of Members of the Management Board and Supervisory Board of MOSTOSTAL WARSZAWA and favours the acquisition and retention of the most suitable experts and contributes to the achievement of the strategic objectives of MOSTOSTAL WARSZAWA.

Rules of conduct:

The Policy is consistent with the values and long-term interests of MOSTOSTAL WARSAW, including the promotion of long-term and sustainable development of MOSTOSTAL WARSAW, while introducing mechanisms aimed at limiting excessive risk-taking and eliminating undesirable behaviours that may affect its operations or financial standing.

The Policy shall adequately take into account the general employment and remuneration conditions applicable at MOSTOSTAL WARSZAWA so as to ensure synergy of remuneration of Management and Supervisory Board Members with the remuneration of other employees of MOSTOSTAL WARSZAWA, while taking into account differences in qualifications, scope of duties and responsibilities of Management and Supervisory Board Members, as well as taking into account market requirements and the need to recruit and retain persons with the highest qualifications and relevant experience in those positions.

- The policy was developed based on:
- Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the incentive for long-term shareholder engagement.

- Chapter 4a of the Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies.

16. DECLARATION OF INTENT OF MOSTOSTAL WARSZAWA REGARDING BIODIVERSITY, CLIMATE CHANGE AND WATER RESOURCES

Objective:

For MOSTOSTAL WARSZAWA the preservation of biodiversity, the fight against climate change and the protection of water resources are an understandable and fully accepted prerequisite for business activity, embedded in the ACCIONA Group's strategy on a global scale as elements of a responsible use of natural heritage, ensuring the maintenance of environmental sustainability.

MOSTOSTAL WARSZAWA, aware that the environment itself is a common property of the highest value, supports its protection as a key basis for further economic development and social progress, fully sharing in this respect the global and long-term policy of the ACCIONA Group.

Rules of conduct:

- **Conservation** - ACCIONA Group's strategy specifies biodiversity conservation initiatives as an important element of decision-making in the areas of planning, implementation and action, which are translated into projects, defining specific objectives, principles for the protection and conservation of biodiversity.
- **Impact monitoring** - The ACCIONA Group establishes a periodic control system, applying indicators for surveillance and continuous estimation of biodiversity impacts in projects at each stage, thus identifying and managing direct and indirect risks to biodiversity, taking the necessary measures to minimize negative impacts and increase positive impacts on biodiversity.
- **Offsetting impacts** - The ACCIONA Group works to neutralize the impacts caused by its impact on the environment and biodiversity, particularly in green protected areas.
- **Promoting the preservation of biodiversity** - The ACCIONA Group emphasizes the values and notices of action it pursues in matters of environmental protection in its business activities, fostering and disseminating a culture of biodiversity preservation and environmental protection in order to have a positive impact on biodiversity.
- **Protection and improvement of the environment** - The ACCIONA Group supports and implements actions aimed at protecting and improving the environment in environmentally valuable areas in which it operates.

- **Knowledge and training** - The ACCIONA GROUP promotes knowledge and training in biodiversity and environmental matters, supporting good practices and disseminating them among stakeholders at internal and external level.
- **Awareness and research** - The ACCIONA Group works with public administrations, local communities, social organizations and other stakeholders to develop dialogue, awareness and research on biodiversity issues.
- **Renewable energies** - The ACCIONA Group encourages the development of renewable energies that generate clean electricity and reduce energy dependence on fossil fuels.
- **Energy efficiency** - The ACCIONA Group supports the idea of saving energy consumption and improving energy efficiency in the area of development and innovation in products and services and in the supply chain in order to reduce greenhouse gas emissions.
- **Carbon zero** - The ACCIONA Group supports decarbonization in its business model by investing in renewable energy, optimizing and reducing energy use and offsetting emissions through the acquisition of Emission Reduction Certificates, with the long-term goal of becoming a CO2 neutral company.
- **Market mechanisms** - The ACCIONA Group supports market mechanisms such as carbon pricing, in addition to being actively involved in the development of projects to combat climate change by supporting the transfer of clean technologies and applying flexible adaptation mechanisms.
- **Managing climate change risks and opportunities** - The ACCIONA Group manages climate change risks and opportunities in the short, medium and long term in order to take appropriate steps to ensure that its business operations can adapt to the coming climate changes.
- **Cooperation** - The ACCIONA Group cooperates with other private sector companies, public institutions, social organizations and other stakeholders in the fight against climate change.
- **Awareness** - The ACCIONA Group has developed training programs to raise awareness and sensitize employees and other stakeholders, supporting cooperation in the fight against climate change.
- **Transparency** - the ACCIONA Group reports transparently and accurately on its activities that affect climate change and, above all, on the risks and opportunities and on the mitigation and adaptation actions initiated.
- The ACCIONA Group complies with current legislation on **water management** and adheres to specific international standards in this area, as well as the indicators established internally by the organization.
- The ACCIONA Group manages the resource of water responsibly and efficiently throughout its cyclical cycle, promoting social development and preserving ecosystems.
- The ACCIONA Group establishes indicators, targets, monitoring procedures and strategies to control and continuously evaluate the effective management of the water cycle and its responsible

use in the ACCIONA Group's operations, optimizing the balance resulting from the water footprint of the ACCIONA Group's business operations.

- The ACCIONA Group supports the strategy of using new technologies to consume water more responsibly.
- The ACCIONA Group integrates water consumption into its risk management strategy.
- The ACCIONA Group supports the development of legislation that will promote sustainable water management.
- The ACCIONA Group is committed to raising awareness and sensitivity regarding the sustainable use of water resources among employees as well as public institutions, local communities, private and public sector companies and other stakeholders.