

CODE of Conduct



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RULES OF THE CODE OF CONDUCT

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1. Purpose

The purpose of the **CODE OF CONDUCT** (hereinafter referred to as the “**CODE**”) of Mostostal Warszawa S.A. is to establish the values which should govern the conduct of all Companies of the Mostostal Warszawa Capital Group and to contribute to the strengthening of behaviours acceptable and observed by all its employees.

Its purpose is to shape the relations between the employees, rules of cooperation with customers, suppliers and external partners and relations with shareholders, public and private institutions as well as with the public.

The **CODE** relates to all our activity, which is based on the respect for values such as honesty, integrity, reliability, transparency and safety. It constitutes the starting point for any regulations within the company and the Capital Group.

Every employee of the Capital Group shall observe the rules of the **CODE**. The supervisors are responsible for providing their subordinate employees with the rules of conduct, providing support during the implementation of the **CODE**, giving good example and supervision over the observance of the adopted rules of conduct. The HR Department will support the employees during the implementation of the provisions of this document. Moreover, the Committee of the Code of Conduct will be appointed, which will be entitled to perform independent reviews of the execution and observance of the **CODE**.

Mostostal Warszawa Capital Group encourages all its suppliers, customers as well as the cooperating enterprises and units to adopt the models of operation adequate to those included in this document.

2. Scope of application

This **CODE** is directed to all employees of the companies of Mostostal Warszawa Capital Group.

The models of conduct included in the **CODE** relate to all companies of Mostostal Warszawa Capital Group over which it exercises control, as well as other entities and organisations related with Mostostal Warszawa. Simultaneously, Mostostal Warszawa recommends the adoption of rules and values adequate to those included in this **CODE** in these Companies, in which it holds shares, even if it does not control them, as well as among its suppliers, contractors and partners.

For the purposes of this **CODE** the name “Mostostal Warszawa” refers both to Mostostal Warszawa S.A and the whole Capital Group, in which a parent company is Mostostal Warszawa S.A.

The Management Board and management of Mostostal Warszawa make all efforts to guarantee the observance of rules included in the **CODE**.

3. Basic rules of conduct

The Management Board and management of Mostostal Warszawa are involved in the development of products and services which meet the requirements of the economy and society that increasingly more care about the sustainable development. In this context, clean technologies of generating energy, biofuels, design and construction of infrastructure on the basis of environmental parameters and innovation, as well as the energy efficiency criteria in buildings, water purification with the use of the latest technologies and sustainable and effective development of transport system are gaining importance.

Mostostal Warszawa intends that all persons and entities to whom this **CODE** applies, observe in all relations the following rules of conduct:

- actively contribute to the environmental sustainability and promote low-emission economy,
- contribute to social and economic growth by innovation, technology development, as well as efficient use of resources, while maintaining responsible and fair conduct,
- ensure good working conditions and observance of employee rights,
- comply with applicable legal provisions,
- observe human rights and civil liberties guaranteed in the Universal Declaration of Human Rights, adopted by the United Nations,
- involve in the protection of environment and cooperate for the development and welfare of the communities,
- promote integrity, reliability, truthfulness in internal relations and towards external partners, fulfil the obligations of fair competition and transparency,
- innovation serving for the development of new technologies contributing to the improvement of social and environmental conditions,
- report cases of violation of applicable legal provisions and breach of ethics.

4. Models of conduct

4.1. Respect for law and ethical values

Mostostal Warszawa, assuming a close correlation between ethics and business, undertakes to carry out its business and professional activity in accordance with the applicable legal provisions and observing high standards of ethical behaviours in accordance with, among others: the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Tripartite Declaration of Principles and the United Nations Global Compact initiative.

All employees of Mostostal Warszawa are obliged to observe the applicable regulations and to act always in accordance with ethics. They should avoid any behaviours which, even if they do not violate the law, may harm the reputation of Mostostal Warszawa and have a negative influence on its image.

All employees should know the legal provisions, which relate to their work and, if necessary, they should demand being provided precise information by their supervisor or relevant organisational units of Mostostal Warszawa.

All employees involved in registering, preparing, verifying or providing financial information should know and observe both the legal provisions and rules and procedures of internal control which relate to the performed work to ensure the reliability of the provided information.

All employees perform their tasks not only in accordance with the applicable law and tax, accountancy provisions, but also with rules and procedures of internal control.

No employee may cooperate with third parties violating the law, nor involve in any activity which could breach the rule of law and competition.

4.2. Respect for human rights

Mostostal Warszawa does not allow any form of physical, psychological, moral abuse or abuse of authority, nor other behaviours violating human rights or contributing to the creation of intimidating environment.

The employees of Mostostal Warszawa should be treated with respect and ensured healthy and safe working environment.

All employees are obliged to behave fairly and with respect towards their peers, supervisors and subordinates. Similarly, the relationships between the employees of Mostostal Warszawa and cooperating entities should be based on mutual respect and cooperation. Mostostal Warszawa supports and respects the right to organise and bargain collectively in employee matters.

The employees and their representatives cooperate with the company for its development and for

the benefit of the employees.

Mostostal Warszawa is aware of the importance of comprehensive human development, therefore it ensures essential work-life balance.

4.3. Principle of equality

Mostostal Warszawa promotes the diversity of sexes, and the professional and personal development of all employees, ensuring equal opportunities through its action strategy.

It does not accept any kind of discrimination in the professional field based on age, race, sex, religion, political views, nationality, sexual orientation, social background or disability. It oversees the observance of the provisions of the International Labour Organisation, especially in relation to minors and does not allow the work of children in any form.

Mostostal Warszawa supports and actively works for the implementation of policy aimed at promoting equal opportunities in the workplace.

Recruitment and promotion of employees is based on their skills and performance, as well as on the subject-related criteria specified in the requirements for the job position, in accordance with the principle of diversity. Mostostal Warszawa propagates promotion and internal mobility as a manner to retain talents in the organisation, at the same time striving to ensure its employees stable jobs, development and motivation.

All employees should actively participate in training offered by Mostostal Warszawa and engage in their own development, committing to update their knowledge and skills necessary for their professional improvement and to provide value to customers, shareholders and the public.

The persons holding management positions should support the professional development of their subordinates.

Irrespective of the above, Mostostal Warszawa ensures working conditions which prevent sexual harassment and discrimination based on sex. Moreover, Mostostal Warszawa promotes the respect of real equality of women and men, as well as prevents any forms of direct or indirect discrimination.

4.4. Cooperation and involvement

Mostostal Warszawa fosters creation of environment for collaboration and teamwork to better use all capabilities and resources.

All employees shall act in a spirit of cooperation, making available to other organisational units and persons forming part of Mostostal Warszawa knowledge and resources facilitating the achievement of goals and interests of the Capital Group, including contribute to fast flow of

information.

The employees should work efficiently during the working hours, making an optimal use of time and resources made available by the company.

Mostostal Warszawa promotes among its employees a sense of belonging to the organisation and professional pride. To ensure the appropriate level of communication, Mostostal Warszawa makes available to its employees communication channels which shape and develop a sense of belonging to the organisation.

4.5. Health and safety at work

Mostostal Warszawa implements the Integrated Policy of Mostostal Warszawa Capital Group in the scope of safety and health protection at work and applies preventive measures specified in the regulations, ensuring the respect for health and dignity of employees.

Moreover, Mostostal Warszawa promotes the application of company rules and policy of health and safety at work by partner companies, organisations and suppliers with whom it cooperates.

All employees of Mostostal Warszawa should know and observe the rules of health protection and safety at work and care for their own safety, safety of other employees, customers, suppliers, partners and all other persons to whom their activity may relate. In case of violations of the safety rules, any inconsistencies shall be immediately reported to the relevant bodies (units).

4.6. Use and protection of assets

Mostostal Warszawa provides for the disposal of its employees resources necessary to perform their work.

In the work environment, all employees are obliged to use the resources of Mostostal Warszawa in a responsible, cost-effective and proper manner. They shall also protect and secure them against improper use, which could harm the interests of Mostostal Warszawa, including use it in an unauthorised manner for private purposes.

4.7 Image and reputation of Mostostal Warszawa

Mostostal Warszawa takes the stance that one of the basic factors forming the image and reputation of Mostostal Warszawa is the promotion of responsible citizenship in all areas of its business.

While they perform their duties, all employees must take into account the interests of local communities.

Mostostal Warszawa considers its image and reputation as one of the most valuable assets necessary to maintain the trust of the shareholders, customers, employees, suppliers, authorities and the public.

The employees shall make all efforts to protect the image and reputation of Mostostal Warszawa. The employees are obliged to be very careful during public performances, and every time they must obtain the necessary consent to perform in front of the media, take part in conferences and seminars and any other events which could be communicated to the public, if they represent Mostostal Warszawa during such events.

4.8. Loyalty towards Mostostal Warszawa and a conflict of interests

Mostostal Warszawa is convinced that the relations between the company and employees should be based on the loyalty resulting from the shared interests. Therefore, it respects the right of the employees to carry out other financial or business activity, provided that it is legal, does not constitute unfair competition and does not collide with their job duties.

In case of any doubts or carrying out such activity, the employee is obliged to notify Mostostal Warszawa through its line manager or through the Committee of the Code of Conduct and avoid making decisions which could result in the suspicion of acting against the interests of Mostostal Warszawa.

4.9. Measures against bribery and corruption

Mostostal Warszawa is against influencing the will of persons outside Mostostal Warszawa in order to obtain any profit by the use of unethical practices. It does not accept that other persons or entities would apply such practices towards its employees.

The employees of Mostostal Warszawa must act in accordance with the applicable law and under no circumstances can they accept or allow material benefits for Mostostal Warszawa or its employees from third parties and vice versa.

The employees of Mostostal Warszawa cannot accept, offer or provide, directly or indirectly, cash payments, contributions in kind nor any other benefits to the persons working for any public or private entity, political party or candidate for the public office, with the intent to obtain or maintain benefits inconsistent with law.

Presents, invitations and other business courtesies towards the public officials can be only provided in accordance with the generally applicable provisions.

4.10. Processing of information and knowledge

Mostostal Warszawa considers information and knowledge as one of its key assets necessary to manage the company, therefore they must be the object of special protection.

All information which the employees forward inside and outside Mostostal Warszawa must be true and complete and in under no circumstances can inaccurate or false information that can mislead the recipient be intentionally forwarded.

All employees who introduce any information to computer systems must ensure that this information is accurate and reliable.

The employees are obliged to keep strictly confidential all restricted information to which they have access as a result of performing professional activity. This information must not be used for own benefit or the benefit of third parties.

In case of any doubts relating to the nature of information, the employees should deem it confidential, unless it is stated otherwise.

All information and knowledge collected at the company are the ownership of Mostostal Warszawa in the scope specified in the provisions of the applicable law.

Mostostal Warszawa acts in accordance with the applicable provisions relating to data protection, protecting personal data entrusted by the customers, employees, job applicants and other persons. Thus, it undertakes to request and use only these data which are necessary to effectively manage the business of Mostostal Warszawa.

The employees who in connection with the performed work have access to information relating to other employees, are obliged to ensure confidentiality of this information and use it in a responsible and professional manner. If inappropriate processing of data is noticed, this fact shall be notified to the persons handling the protection of these data.

The computers and computer systems of Mostostal Warszawa are designed exclusively for professional use. The IT resources which Mostostal Warszawa makes available to its employees cannot be used to express on behalf of Mostostal Warszawa personal opinions nor to use for this purpose discussion fora or social networking media, unless this is done upon express consent.

The computers and computer systems of Mostostal Warszawa may not be used to:

- visit inappropriate websites nor store or distribute contents that infringe the human rights to privacy, honour, self-esteem, religious freedom or dignity, such as racism, xenophobia, propagation of violence or terrorism and pornography or propagation of discrimination based on sex
- use, enter, download, copy, forward, reproduce, disseminate or store without appropriate licence or permit any kind of software, published works or inventions protected by intellectual property rights
- carry out or take part in bulk emailing including spam messages, jokes or inappropriate

images.

4.11. Customer relationships

Mostostal Warszawa promotes involvement in quality on the basis of the best practice, recognised and standardised, at a national and international level. All employees should strive to achieve the highest quality of services provision, to develop long-term relationships based on trust and mutual respect.

4.12. Relationships with suppliers, contractors and partners

Mostostal Warszawa takes a stance that its contractors, suppliers and partners are key to achieve the aims of growth and improvement of services quality, therefore it builds relationships with them based on trust, mutual benefits and respect for competition. The rules of purchase policy ensure effective observance of these rules by inclusion of norms relating to ethical cooperation with suppliers.

All employees of Mostostal Warszawa taking part in the selection process of contractors, suppliers and external partners, are obliged to act impartially and objectively, using quality and cost criteria, avoiding conflicts of their personal interests with the interests of Mostostal Warszawa.

Mostostal Warszawa undertakes to implement own rules and actively work for providing them to its suppliers/contractors so that they are also involved in following them.

That is why Mostostal Warszawa always tries to employ contractors and suppliers who will observe the environmental regulations and practice as well as human rights.

In accordance with the internal regulations, Mostostal Warszawa verifies the reliability of persons or entities with whom it establishes commercial relations of special importance, to guarantee that the conducted actions will not be used among others for money laundering. The employees of Mostostal Warszawa will pay special attention to such cases in which there are conditions indicating a lack of reliability of persons or companies with which Mostostal Warszawa maintains relationships, and the Committee of the Code of Conduct shall be immediately notified of the above. The contents of this **CODE** applicable to contractors, suppliers and external partners will be reflected properly in the agreements for cooperation or provision of services.

4.13. Respect for natural environment

Protection of and respect for natural environment is a priority in the activities of Mostostal Warszawa. They are demonstrated by using the best environmental practice in all activities by

preventing and limiting negative impacts on the environment and the protection of natural resources. Mostostal Warszawa undertakes to support initiatives aimed at combating climate changes and protecting biodiversity.

Mostostal Warszawa implements the rules expressed in the Integrated Policy of Mostostal Warszawa Capital Group acting always in accordance with the norms of respect and sustainable development, implementing habits and behaviours relating to the best environmental practice. We do all this in response to the requirement of shareholders which is treated by the Management Boards of the Companies of the Capital Group as a commitment. As part of this strategy, Mostostal Warszawa and all its employees must know and accept this Policy and make all efforts to minimise the environmental impact resulting from their activities, using of possessed devices, equipment and work resources. Mostostal Warszawa will also organise necessary training to promote the best environmental practice and responsible production. All events having a negative impact on the environment should be immediately notified to relevant bodies (units).

In relations with suppliers, contractors and partners, Mostostal Warszawa provides them the above rules, encouraging to implement the procedures and fulfil the requirements which are applicable in a given case.

4.14. Social involvement

The Management Board of Mostostal Warszawa is aware of the necessity to actively contribute to the improvement of social and economic system in which it operates, therefore it adopts as its business goals three basic pillars of sustainable development: creating economic welfare, improvement of environment and responsibility towards the society.

The involvement of Mostostal Warszawa in social matters is expressed in the sponsoring, patronage and partnership strategies which are implemented through agreements and resources allocation, with important institutions representing society.

In accordance with this commitment as well as transparency and integrity rules, every donation made by Mostostal Warszawa shall fulfil the above conditions:

- it must be based on the relevant internal authorisation or if necessary external authorisation
- it is granted to organisations/institutions which have appropriate organisational structures ensuring good resource management
- it is fully recorded in the books and registers of Mostostal Warszawa
- it may not be used as a measure to conceal improper payment or material benefit. Donations cannot be made for political parties and their representatives, except for the cases expressly provided for in the applicable provisions.

Moreover, each company of Mostostal Warszawa Capital Group which will make a donation must monitor the payment made to learn about its designation or use.

4.15. Securities market

The securities market is currently an essential tool of economic life in financing Mostostal Warszawa. Mostostal Warszawa has internal regulations in place aimed at prevention of use of internal information, market abuse and ensuring action in accordance with the obligations resulting from the relevant regulations. The persons who abide by this **CODE**:

- cannot make operations on securities and financial products, based on internal information to which they have had access on account of the performed work
- cannot also provide this information to third parties nor order on its basis purchase or sale of shares or any financial instrument

against the mentioned regulations and legal provisions.

Internal information shall mean every information of special nature, relating directly or indirectly to one or several securities, as well as to financial instruments admitted or in the process of admission to trading or their issuers, which has not been announced to public, and if it was, it could significantly influence their quotations.

They shall restrain from the dissemination of false or unconfirmed information which may influence the quotations of Mostostal Warszawa S.A. or other companies and from the performance of speculative operations on securities and financial products.

5. Acceptance and observance of the rules of the Code

Mostostal Warszawa shall notify and disseminate among its all employees, suppliers, contractors and partners the contents of this **CODE**. All employees who will undertake work or form part of the Capital Group must accept values, rules and norms of conduct specified in this **CODE**.

The Management Board of Mostostal Warszawa S.A. expects from the management and employees the involvement in the actions in line with the **CODE**. They may be assessed against the observance of the provisions of this **CODE**. Non-observance on its rules is subject to examination in accordance with the provisions and applicable rules.

Any doubts which may result as to the interpretation or application of this **CODE** shall be consulted with the supervisor or if necessary with the Committee of the Code of Conduct.

Nobody, irrespective of its status and position, is authorised to demand from the employee to violate the provisions of this **CODE**. No employee may justify his/her improper conduct by referring to the instruction made by the supervisor or by not knowing this **CODE**.

The employees must inform their supervisors or the Committee of the Code of Conduct of each violation of the rules included in this document.

6. Committee of the Code of Conduct

The Committee of the Code of Conduct is a body to which the cases of violations of the rules of the **CODE** shall be reported, irrespective of whether the violation relates to the reporting person or third parties.

The Committee is composed of:

Director of the Office of the Management Board

- Chief Accountant
- Head of HR Department - Coordinator
- Head of Legal Department
- Head of Procurement Department
- Head of Health and Safety Department

The Committee of the Code of Conduct, apart from the functions imposed by this **CODE** and its Rules, is aimed to:

- act for the propagation, knowledge and observance of the rules of the **CODE**
- interpret the **CODE** and provide explanations in case of doubts. Ensure proper communication with all employees to receive and provide information relating to comply with the rules of the **CODE**
- prepare annual reports relating to the degree of observance of the **CODE** and present relevant recommendations and suggestions to ensure its updating, introducing amendments and facilitating the implementation of these aspects which require special attention
- ensure the observance and proper performance of functions resulting from this document.

6.1 Standards of procedure

The Committee of the Code of Conduct ensures strict confidentiality in considering the notifications. Towards an employee, who in good faith reports a possible violation, it is prohibited to use professional or disciplinary punishments or harassment.

Anonymous complaints are allowed only in relation to financial irregularities.

The Committee of the Code of Conduct is also responsible for ensuring the highest respect for the

rights of the persons in relation to whom there is a suspicion of possible violation of rules.

The Committee of the Code of Conduct is obliged to guarantee a thorough examination of a possible violation of the **CODE** to make sure about its validity.

However, the application of this procedure requires reminding that intentional bringing of false charges or reckless neglecting of the truth may lead to the criminal or civil liability on the terms provided for in the applicable provisions.

The decisions of the Committee of the Code of Conduct must be duly justified.

6.2 Channel of Ethics

Having in mind the achievement of the highest level of satisfaction of the employees, Mostostal Warszawa established through the Committee of the Code of Conduct the Channel of Ethics through which information, advice, advisory can be obtained and cases of any violations of the rules of conduct specified in this document can be reported.

Telephone number 22 250 76 50

E-mail address: etyka@mostostal.waw.pl

Mailing address: Komisja Kodeksu Postępowania [Committee of the Code of Conduct], Mostostal Warszawa S.A. ul. Konstruktorska 11a, 02-673 Warsaw

If, in the opinion of an employee, any of the rules referred to hereinabove has been violated, he/she is obliged to inform of this the Director of the Office of the Management Board, if he/she has not done it earlier via the Channel of Ethics or its supervisor.

7. Validity term

The **CODE** shall enter into force as of the date of its publication and shall be applicable to all employees until it is revoked.

The **CODE** will be periodically analysed and updated by the Management Board of Mostostal Warszawa S.A. at the request of the Committee of the Code of Conduct, taking into account the requests and suggestions provided by the employees and the commitments of Mostostal Warszawa relating to the social responsibility and good management.

8. Final provisions

- This **CODE** is announced to the Employees by putting it on notice boards of the Employer and via office electronic mail
- The **CODE** enters into force in two weeks after it is announced in the manner specified

in section 1 above.

- A newly employed Employee prior to starting work shall be acquainted with the contents of this **CODE** which is confirmed by a written statement and is obliged to observe it.
- The amendments to the **CODE** shall be made in the same manner in which it has been determined.
- The rules specified in this **CODE** are applicable from the date of entering into force until the revocation of the **CODE** or replacing it with a new issue.
- To any matters not regulated herein, the provisions of the Labour Code and other legal provisions shall apply.

REGULATIONS of the Code of Conduct

1. Purpose

These Regulations are aimed at the establishment of procedures applicable to the employees of Mostostal Warszawa in conflict situations or situation of violating the **CODE**.

The aim of these Regulations is also to establish necessary preventive measures to identify, assess and control risk of the **CODE** violation.

The below provisions are aimed at ensuring that if the actions violating the rules of the **CODE** occur, they will be examined in a professional and confidential manner and proper measures shall be taken to protect the interests of Mostostal Warszawa and effective execution of the provisions of the **CODE**.

2. Scope of application

These Regulations are connected with the **CODE**, and thus they are applicable to all employees and companies of the Capital Group. Furthermore, they shall be also applied to third parties (temporary work agencies, interns, suppliers, contractors and partners) related with Mostostal Warszawa, although in the legal aspect they are not employees of the Capital Group.

3. Committee of the Code of Conduct

The Committee of the Code of Conduct is a body coordinating and supervising the observance of the rules of the **CODE** to which all employees, suppliers, contractors and partners shall report the cases of violations of the **CODE**, irrespective of whether the violation relates to the reporting person or third parties.

The Committee of The Code of Conduct is composed of the members appointed by the Management Board of Mostostal Warszawa. The members of the Committee elect the Chairperson and Coordinators among themselves. The Committee implements its tasks through the Coordinator.

The Committee of the Code of Conduct, apart from the duties imposed by this **CODE** and the Regulations of conduct, has the following aims:

- act for the propagation, knowledge and observance of the rules of the **CODE**

- interpret the **CODE** and provide explanations in case of doubts,
- ensure proper communication with all employees to receive and provide information relating to complying with the rules of the **CODE**. Prepare for the Management Board reports relating to the degree of observance of the relevant recommendations and suggestions to ensure its updating
- ensure the observance and proper performance of tasks resulting from the Regulations of conduct.

4. Procedure applied in the case of improper actions

Stage one: Identifying the problem

An employee, supplier, contractor or partner who has become aware of irregularity or any infringement, violation of the rules of the **CODE** or thinks that they have taken place, should immediately notify this fact to his/her supervisor or the Committee of the Code of Conduct.

Stage two: Notification

An employee, supplier, contractor or partner should contact his/her supervisor or the Committee of the Code of Conduct through one of the following communication channels:

- personal appearance and direct oral explanation
- e-mail message directed to the address etyka@mostostal.waw.pl
- letter to the Committee of the Code of Conduct, Mostostal Warszawa S.A. ul. Konstruktorska 11a, 02-673 Warsaw
- telephone number: 22 250 76 50

In every case it is recommended to notify the situation in a descriptive and detailed manner as much as possible, with the indication of dates, incidents, facts and witnesses.

The supervisor who has been informed of any infringement shall immediately notify the Committee of the Code of Conduct of this fact.

Stage three: Initiation of actions and examination

In relation with the notification made, the Committee of the Code of Conduct through the Coordinator shall initiate the investigation procedure and can undertake the following measures;

- appoint an employee of Mostostal Warszawa or a person outside the company to conduct the procedure. The person conducting the procedure should take actions and prepare relevant Report
- interview employees to whom the infringement relates
- submit applications to relevant organisational units of Mostostal Warszawa for providing reports or documents necessary to initiate the procedure
- apply for taking evidence of opinion of the experts (e.g. of IT specialists) being the employees of Mostostal Warszawa or external parties
- file Reports of the conducted investigation.

The Committee of the Code of Conduct guarantees the confidentiality of information on initiation the procedure and its contents.

All organisational units are obliged to cooperate with the person conducting the investigation and to provide them support in the form of explanations, information, documentation and technical assistance, related with their professional activity at Mostostal Warszawa.

The Coordinator of the Committee of the Code of Conduct has a duty to inform its Chairperson of initiating the procedure, if the complaint is clearly groundless or reported actions are evidently correct. The complaint may be rejected on this basis, without initiating the investigation. The Coordinator may also order to conduct a short preliminary investigation to exclude the above reasons for rejection.

Apart from the procedure initiated on the basis of the notification on the violation of the CODE, the Committee of the Code of Conduct may decide about the initiation of the procedure in the scope of assessment of the prevention system, corporate conduct and/or conduct resulting from serious charges of criminal or administrative nature.

Stage four: Conclusions

In the event that the investigation is initiated, the Coordinator of the Committee of the Code of Conduct shall present the Final Report of the investigation including the decisions and recommendations relating to the actions which should be taken if the behaviour violating the

CODE has been found and/or if necessary proposals of sanctions which will be provided to the Chairperson of the Committee of the Code of Conduct.

Otherwise, the Coordinator shall deem the investigation completed, providing to the Chairperson of the Committee of the Code of Conduct the Report of the actions taken.

5. Operating procedure

The Committee of the Code of Conduct ensures the confidentiality of complaints. Towards an employee, who in good faith reports a possible violation, it is prohibited to use professional or disciplinary punishments or harassment. The cases of the Code violation are treated as serious violation of employee duties.

The Committee of the Code of Conduct also ensures the highest respect for the rights of persons in relation to whom there is a suspicion of participation in the possible infringement, as well as guarantees correct processing of personal data provided and effective use of a right to access, rectify, revoke and oppose.

It is deemed that the reporting person has acted in good faith, if his/her complaint is consistent with the provisions of the **CODE** and the Regulations and is based on facts or conditions from which it reasonably results that the improper, illegal or criminal behaviour has occurred.

If the complainant does not have material evidence or causes, it is not deemed that he/she has acted in bad faith, if the complaint has been filed without the intent for revenge, moral persecution, harming the professional career or losing the honour of the person against whom the complaint has been filed.

The Committee of the Code of Conduct is obliged to guarantee a thorough analysis of a possible violation of the **CODE** to verify its validity.

However, the application of this procedure requires reminding that intentional bringing of false charges or reckless neglecting of the truth may lead to the criminal or civil liability on the terms provided for in the applicable provisions.

The decisions of the Committee of the Code of Conduct should be duly justified.

While making a decision, the basic rule is to exclude persons who are a party to the procedure.

6. Validity term and modification of the procedure

The above Regulations shall be effective in the validity term of the **CODE**, unless the Management Board of Mostostal Warszawa S.A shall decide of its modification.

Warsaw, 14 September 2015

The Code of Conduct approved by the Management Board of Mostostal Warszawa SA.
Attachment No 1 to Resolution of the Management Board No 972/VII of 14 September 2015

Attachment No 1 to the CODE OF CONDUCT Mostostal Warszawa

.....
(forename and surname of the employee)

.....
(position)

STATEMENT

I hereby represent that I have read the "Code of Conduct" applicable at Mostostal Warszawa and I undertake to observe it strictly.

.....
(date and signature of the employee)