



Code of Conduct

of BURY Group

Principles of conduct and guidelines concerning conduct

Dear Employees,

While formulating this Directive we would like to meet the expectations of workers who want to obtain clear and transparent rules of conduct. It is supposed to facilitate the procedure according to the assumptions defined in it. Our common goal is to make honesty become even more obvious at BURY company. Each of us can contribute to the creation of a common company culture with their actions.

The Directive is applicable in all locations.

Approved by the Management Board.

Principles of conduct and guidelines concerning conduct.

1. We respect human rights and we obey the regulations

As a company operating on a global scale we - as BURY company – hold a global responsibility and therefore decided to take on the obligation to respect the principles of the UN Global Compact. In this context, the following are of the particular importance:

- human rights protection,
- ethical and equal opportunities regarding recruiting and employment for all nations, genders, confessions and minorities,
- protection of fundamental rights at the workplace, in particular freedom of association and the right to collective bargaining, elimination of any signs of discrimination in recruiting, employment and working,
- lack of permission of forced labour and child labour,
- business, financial and work ethic,
- balanced environment protection,
- fighting corruption.

We are striving to make our business partners and customer and not only us guided by these principles.

In addition, we adhere to international and accepted local laws and regulations. Together we make sure that everyone at BURY company follows rules and provision pertaining to our work.

In case of violation of the regulations of this Code of Conduct we defined detailed way of proceeding in our whistle blowing policy, system of notification has been established not only for our employees but for all interested parties.

2. We act honestly towards each other and in relation to others

In contacts with each other and with others we care about culture characterized by openness and tolerance, respect and courtesy and integrity and trust. Every employee should be sure that their dignity and personality will be always and duly respected by all. We show respect.

We support variety and we also care about equal treatment:

- descent origin and nationality origin
- religion and outlook on the world
- political activity and taking part in trade unions
- gender and sexuality
- age
- disability
- disease
- employment conditions (fixed-term / unfixed-term, full-time / part-time employment)
- religious, national, ethnic minorities and indigenous people including land, forest and water rights.

An elementary human right to land, forest and natural resources as water etc. especially in the context of indigenous people. Forced eviction is not acceptable in any way.

We protect rights of each individual

Our common task is to create fair and friendly work environment. We will manage to do so if each person is treated with respect individually and also of we treat each other with mutual attention. Therefore we do not tolerate neither comments nor behaviours that may lead to creating hostility and aggression towards our colleagues, partners or customers.

All forms of pestering, unethical behaviour, sexual harassment and mobbing are severely forbidden in the BURY company. We are definitely against such behaviours.

We provide security of our employees by qualified private security services.

We protect private zone of each individual person

Cooperation based on trust requires respecting and securing private zone of our employees, partners and customers. This is in regards with both our behaviour to each other as well as using and processing appropriate information. Consequently, we take, process and use personal data only in a range allowed by laws, provisions and internal directives.

Personal information are stored in a secured manner and all necessary security measures are taken in order to prevent using them by an unauthorized person.

Our managerial staff work responsibly and respect recognized values

The managerial staff aware of their responsibility is necessary in order to be able to work responsibly. We expect our managerial staff at all levels to be an exemplar in matters of fair behaviour and a guidepost for employees, and also to care about good atmosphere at the place of work. Open attitude towards employees allows free exchange of thoughts. We care about the good cooperation and avoid conflict of interests.

Regard and mutual respect should be the indicator of our cooperation. This means that we allow different opinion, we openly talk about problems and together we look for solutions. Trust, tolerance and honesty in the environment can be shaped only on the basis of that.

We care about employees satisfaction

In contracts with our employees we fulfill all legal requirements on wages and benefits. We established benefits system for all staff including subsidies to insurances, gym and cinema tickets in which we care not only about our employees but also about their family.

We perform employees satisfaction survey annually and as a result of it we prepare action plan to continuously improve level of employees satisfaction.

We care about safe and fair working conditions

The BURY company guarantees work safety and health security at the work position. As minimum standards we adopt laws valid locally and also the national ones. We create work conditions which motivate and encourage to action. We wish to shape the work environment so as to find balance between career, family and private life.

Cooperation with employees and employees' representatives is based on mutual trust. We aim at finding balance between economic business of the company and employee's business. Also in case of conflicts our aim is to create together firm basis for further constructive cooperation.

We do not require our employees to work more than the regular and overtime hours allowed by the law. The regular work week shall not exceed 40 hours with maintaining all required periods of break. All overtime work shall be consensual. We do not request overtime on a regular basis and shall compensate all overtime work at a premium rate.

We set course for success

Realizing our tasks we are ready for action, motivated and all these take place in an atmosphere of team spirit. We take responsibility for our actions and we perform our work carefully and efficiently.

Our knowledge and skills are the contribution to the success of the company. We improve our skills and, engaged and equipped with the appropriate competences, we are coming ahead of the future requirements. Ideas and proposals of our employees move us forward. We support them with all the power. At the same time we work in friendly and respectful atmosphere.

We treat mistakes as a chance

We want to learn from our mistakes. However, the condition is to admit them. We wish to be informed about mistakes and improper behaviour and we expect such remarks. Only in this way we can together eliminate all trouble affecting our employees and the whole company.

Employees reporting mistakes and situations of wrong behaviour are not punished for that. In the same fair manner we treat all employees who are accused of wrong behaviour.

We respect ownership and property of our enterprise

Our common interest is to care about ownership and property of the BURY company. It is obvious for us to protect the company's property, we treat it with attention and diligence and also we do not misuse it or use improperly for our own purposes, neither do we appropriate it. Stolen, defrauded or appropriated financial and material resources are a loss for the whole enterprise and harm us all.

We care about transparency and proper offers

Responsible cooperation requires from us making clear and logic decisions. Only in this way they meet acceptance. Also during control and research we pay close attention to transparency, and we refer justly to the concerned.

We react accordingly to all improper behaviours, making balanced and justified decisions. The BURY company always follows the principle of proportionality. In each individual case we check what consequences might be proper, necessary and justified.

3. Together with partners and customers we can succeed

The existence of market competition is motivating and moves us to achieve the best results. Our aim is to do the possibly best business in the most honest manner offering only the best products. Therefore we act straight with our competition, and cooperate with our partners and customers on the basis of respect and trust. Common principles determining all commercial activities taken are the bases.

Therefore, the criteria we follow while choosing our direct business partners is the information in what extend do they realize principles we have stated ourselves in this directive. In trade relations we pay attention to the implementation of these assumptions. We reject business partners and customers who violate human rights, employer's rights as used in "Code of conduct", environmental rights and the prohibition of corruption.

We believe in honesty

The financial reports and other business information maintained internally and the financial information provided to the Board, regulators and other stakeholders must be accurate and complete. Our records provide valuable information for the business and evidence of our actions, decisions and obligations. Procedures and processes are in place to ensure that underlying transactions are properly authorised and accurately recorded.

We support fair competition and follow regulations

We act in defence of fair competition and we follow anti-monopoly provisions in force and provisions connected to fair competition.

It is forbidden here to illegally conclude and anti-competitive practice aiming at and influencing on restriction of competition. We block them immediately after detecting and impose proper penalties. In connection to our activities implemented globally and winning new markets we are also obliged to follow additional laws and principles. Particularly

- The law on foreign economic relations including provisions on export control.
- Tax and customs law
- The law against money laundering
- Anti-terror laws

We treat privileges confidentially

Business secrets connected to e.g. discoveries, new products, concepts of cars and current sales figures are of large value. They guarantee us dominating our competition. Therefore we treat all business information confidentially and do not forward them without proper permission.

In a similar manner we proceed in case of business secrets of our competitors, partners and customers.

We protect our and ours customers intellectual property

We are responsible for design and development of our products, that is why proper protection of our intellectual property is very important for us. We own numerous patents and other property rights. They are among the company's most important assets and enable us to stay competitive and react to the market. We therefore ensure that they cannot be misused by third parties. It is equally important to ensure that we avoid the unauthorized use of third-party intellectual property by Bury.

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective process should be in place to detect counterfeit parts and materials and mark parts obsolete as appropriate.

Applicable principle: We don't give or accept a bribe

We don't do business at all costs. We want to win orders only in an honest and legal manner. BURY as an organization does not tolerate any immoral or corruptive actions of its employees and partners, as well as it counteracts them, because the decisions made on the basis of corruption are immoral, they destroy competence, generate property losses for the company, have negative influence on reputation and violate the public good.

In a contact with parties, domestic and foreign offices and officers we pay particular attention to the business ethics. We guarantee that on no account shall we pay or ensure financial benefits to clerks, employees of the public service or government employees, in order to win an order or benefits to the BURY company or other persons. We stick to this rule also when such benefits are expected or are 'a common practice' aiming at settling the legal or official issue. Also we do not allow the possibility of influencing on particular transactions, being accompanied by private enterprises by means of forbidden payments.

In our business activities we pay attention not to even give the appearance of influencing our business partners and customers.

The BURY company ensures corruptive actions being baffled or revealed and punished thanks to creating awareness and carrying out regular inspections. We want to use our influence on the market in order to show up also in working against corruption. We are sure that this will strengthen our good reputation in the world and secure a long-term economic success for us.

We analyse carefully the personal business and the business of the enterprise.

The Bury company respects personal business and private life of our employees. Personal and financial business of an individual cannot influence business decisions because they may conflict with the company business.

Therefore we avoid situations in which personal or financial business of an individual conflict with the business of our concern or our business partners.

If such conflict of business takes place, we attempt to be open and, together with the management, we search for a solution, thanks to which the business of the BURY concern will not be violated.

Conflict of business may appear for example in a situation in which an employee:

- accepts, offers or guarantees gifts or invitations
- is a member of executive committee of another company, is involved in the additional activity or at the competence.

In such situations the activities taken depend on the character of received advantages: gifts, money and invitations.

As the employees of the BURY company we cannot suggest, ask or require gifts, additional financial profits or invitations, neither providing private services or doing a favour from the business partners or customers to us or others.

We reject accepting gifts, additional financial benefits or invitations from the business partners and customers, if they may, because of their value, influence decisions made by us or if their presence may create appearances of influencing those decisions.

We accept discounts and other reductions proposed to us by the partners only when they are guaranteed to all the employees of the BURY company.

Advertising and occasional gifts given voluntarily from the business partners and customers can be accepted by us if they are kept within reasonable limits. While checking, which we consider justified in such cases, we take 50 euro as a reasonable value.

We accept invitations for meals or for parties/ events from the business partners and customers only when these invitations were offered voluntarily, they serve a business purpose, they do not take place very often and a visit takes place under usual cooperation and appropriately to the occasion.

If in doubt regarding the appropriateness of the gifts, financial benefits and invitations we consult our management.

We talk openly about the fact of accepting gifts and financial benefits or participation in meals and parties/ events and also we document such situations, if the value of such gifts or financial benefits exceeds 50 euro, whilst in case of invitations – 100 euro. The obligation of reporting on the basis of other legal regulations is binding with no amendments.

We offer gifts and financial benefits to the business partners and customers only in reasonable amount and within the ordinary course of trade.

If we invite business partners and customers, we also have to keep the reasonable and adequate to the occasion limits. We can't give the impression of having intention to make someone dependent on ourselves.

Membership in bodies and the sideline

Acceptance of the membership in the managing board is needed.

Before starting additional professional activity the management needs to be informed, they need to check this issue in regards with possible conflict of interest. If such conflict of interest is stated, the management can refuse issuing acceptance for starting an additional professional activity. This takes place when this activity is against the interests of the company.

Shares

As employees of the BURY company we can procure and possess the shares of our business partners and competence, if:

- This takes place in small extend and
- conflict of business or the appearances of their existence are excluded.

This regulation cannot be circumvented in exchange payment and ownership of shares by the third parties to the order of employee/ is.

We keep a secret in regards to the knowledge of business confidentiality

We handle unpublished information with confidentiality and we do not forward it without prior approval - also to the trusted people from a family or a circle of friends.

4. Retaining the directive of the BURY company related to the honest behaviour

The BURY company expects from the management, members of management bodies, managerial staff and employees retaining this directive related to honest behaviour. All employees familiarized themselves with the content of this directive, they know it and follow its guidelines. It is the basis of our everyday work.

Our management take care of all the employed to know and follow regulations of this directive connected to honest behaviour. The management is the first contact point in case of questions and supports employees in proper actions according to its system of values.

Apart from the management, the HR dept. serves as an advisor and provides support in case of questions related to honest behaviour.

The directive related to honest behaviour cannot regulate standards, procedures and decisions accepted in our concern in each individual aspect. If the BURY concern adopts more detailed directives, instructions or guidelines related to particular issues, they will become binding.

Specificity of different units, areas and locations may require additional regulations. Such regulations are binding as well.

Non-compliance with the assumptions of the directive related to honest behaviour or of other directives and regulations adopted by the BURY company, taking the principle of proportionality into account, may result in bearing the consequences towards the employment contract or other legal effects.

5. Humans and the Environment / Safe working environment / We care about safe work environment / We work in an innovative, environmentally friendly manner, making an efficient use of resources

Health and safety of our employees is very important to us. Therefore, we care about healthy and safe working environment. For this reason, compliance with applicable laws and principles of health and safety

in the workplace is an obvious matter, the management in particular, but also all employees care about keeping it.

Our aim is to support the environmental protection. In particular this includes complying with environmental legislation.

We pay attention to it, so as to use the natural resources in an economical way and according to their destination and also to keep the impact on the environment at the possible low level.

Issue:	Change description	Editor	Date
1.0	Preparation of a document	M. Wagner	31.07.2016
2.0	Document Review; point 2 - adding employment conditions; the paragraph "we protect rights of each individual" - adding "unethical behavior".	A. Smoleń / T. Szylar	15.07.2019
3.0	We care about safe and fair working conditions – description about work hours added. We care about employees satisfaction – new chapter added.	A. Smoleń / J. Tejchma	20.12.2020
4.0	Issues regarding ethical recruiting and employment, minorities rights, conflict of interests, non-discrimination of women, use of private security services added to Code of Conduct.	P. Bujak / A. Węgrzyn	01.03.2023