

A close-up, high-angle photograph of industrial machinery, likely a lathe or mill, showing polished metal surfaces and complex mechanical components. The lighting creates strong highlights and shadows, emphasizing the metallic texture and precision of the equipment.

CODE § of Business Conduct

Consolidated Precision Products Poland Sp. z o.o. (CPP Poland)

FOR EMPLOYEES,
CUSTOMERS, SUPPLIERS
AND SUBCONTRACTORS

Dear All,



The power of precision – that is our brand statement. It refers not only to the diligence which we apply to the manufacturing of our products, but also to every aspect of our business activity on which we all have influence: management staff, office administration employees, workers who are directly and indirectly involved in the production process as well as suppliers and subcontractors.

Fulfillment of our Company's ambition in the field of excellent performance and maintenance of the position of a leading supplier in the industry requires a solid foundation. To this end, we have created the CPP Poland Code of Business Conduct. The values and principles of fair conduct contained in the Code are supposed to give us a sense of direction and strengthen our conviction that by acting ethically at all times we enrich ourselves and contribute to the success of CPP Poland on global markets.

Thus, we provide you with this mandatory reading; I also encourage you to place a copy of the Code in a visible location at your workplace and to make brave, ethical decisions.

Grzegorz Koszel
Grzegorz Koszel
General Director

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Introduction

WHY DO WE HAVE A CODE?

Our Company's Code of Business Conduct outlines our shared rules, values and ethical standards which we follow and promote on a daily basis. The Code serves as a guide when you have questions or face dilemmas where the right choice is not clear.



WHAT DO WE HAVE IN COMMON AS A TEAM?

Respect ... for everyone

Not only in our dealings with business partners, but also within our Company, we should not do anything which might involve disrespect for another person. We should treat everyone just as we wish to be treated ourselves. We share the same objective and we must provide everyone with an opportunity to bring their perspectives and life experiences to the table, which will contribute to the achievement of better results.

Fair Dealing

We always act in an honest and transparent manner. We do the right thing, even if it means losing profits. We keep our promises and commitments. We treat our employees and business partners fairly.

Cooperation and Accurate Communication

Team work always has more potential. We ensure transparency of our operations, excluding information which must remain confidential due to competition or legal requirements but we patiently explain the reasons for this exclusion. In doing so, we give others information that contributes to their success. If we communicate in an accurate manner, everyone knows what are their tasks and why should they be performed.

Customer Focus

The whole Company must be focused on the customer and delivering the results required by the customer. In order to be a viable competitor in the market, we need to acquire the ability to adapt to our customers. We require all our employees to recognize who the organization's customers are, how do the customers assess their experience in co-operation with the Company and what is the role of each of the customers in building that experience.

Involvement/ Pro-activity

We focus on our work, we are enthusiastic about performing our tasks and we accomplish (sometimes even exceed) the business goals set for us, acting in the interest of the company.

WHAT DOES THE CODE DEMAND FROM US?

Irrespective of whether you are an employee of our Company, a supplier or a subcontractor of our Company, it is your responsibility to respect this Code, to make decisions consistent with the Code and to spread corporate culture promoted by the Code. You are obliged to report any violations of the Code which you experience or suspect. If you fail to comply with the Code or conceal any problems, you expose both yourself as well as the organization to severe consequences.

WHAT DOES THE CODE DEMAND FROM THE MANAGERS OF OUR ORGANIZATION?

Managers set the tone for their teams, and they are often the first place employees turn with questions.

As a result, they are expected to:

- ✓ act as a role model, setting an example of ethical conduct;
- ✓ provide training and support their teams in complying with the Code and underlying Company policies; provide guidance on the Code and Company's expectations;
- ✓ promote open and inclusive work environment, encourage open debate, giving everyone a voice and enable employees to ask questions or raise issues without fear of retaliation;
- ✓ watch for and appropriately address misconduct in their teams.

Guiding Principles

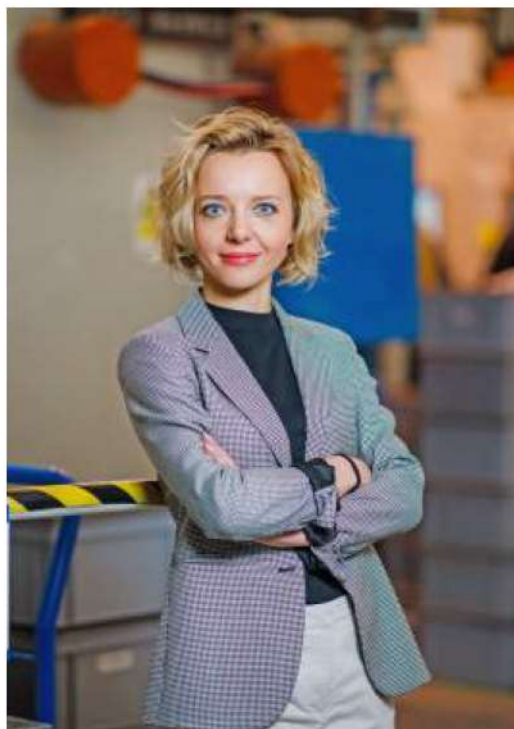
CPP Poland

1. WE OBEY THE LAW

OBEYING APPLICABLE LAWS

CPP Poland conducts business globally and our suppliers and customers are citizens of many countries. Our business activities are subject to the laws of many different jurisdictions. As a result, our guiding principle is to conduct business in accordance with the applicable law and regulations.

We have the responsibility to comply with all of the laws pertaining to the international trade, bribery, trade sanctions and to ensure that the contacts with our associates, customers and suppliers are ethical and maintained at the highest level.



Business Compliance Manager

IMPORTANT!

If there is a conflict between the applicable law and the company policy, you must obey the law under all circumstances and report the „conflict” immediately to your supervisor, Business Compliance Manager or use E-nform dialogue platform.

We live in a world where „temptations” are waiting for us everywhere. We must keep this in mind and strictly adhere to the principle that any illegal activity is completely prohibited. The company's reputation depends on its employees and associates. We are each responsible for recognizing signs that indicate individuals are engaging in potentially illegal activities and using CPP Poland to assist them.

IMPORTANT!

If you have any concerns that the person with whom you are doing business/ co-operate might be using our Company to assist in violating the law, resolve your concerns before proceeding with the transaction – report the problem to your supervisor, Business Compliance Manager or use E-nform dialogue platform.

2. WE CONDUCT OUR BUSINESS WITH INTEGRITY

FIGHT AGAINST CORRUPTION

Corruption is a huge challenge for entrepreneurs. It takes various forms and is difficult to define. It pursues the objectives of an individual or a group against the law and the public interest. Corruption is a negative phenomenon not only in ethical terms – it also has adverse economic impact on the state. It limits investments, hinders development, and results in making wrong economic decisions. We all lose out on corruption.



Financial Manager

The most popular forms of corruption are: bribery, embezzlement, fraud and swindle.

CPP Poland does not accept any of the above mentioned forms of corruption, therefore you should remember about the following:

- ✓ never directly or indirectly offer, give, accept or solicit any form of bribe, kickback or other corrupt payment;
- ✓ select third parties who act on our behalf carefully (e.g., sales agents, consultants and forwarders);
- ✓ do not allow our partners to offer or accept a bribe, as you and CPP Poland may be held responsible for their actions.

Dealing with government officials: the anti-corruption rules that apply to our dealings with government officials are often stricter than the rules that apply to our dealings with commercial contractors. These rules may differ depending on the place where our dealings are carried out. You have to be especially careful and remember that it is a crime to offer or give anything of value (either directly or indirectly) to a government official in order to improperly influence the official.

IMPORTANT!

In Poland, corruption in legal terms is a criminal offence prosecuted ex officio and may be subject to imprisonment from 1 month to 12 years; restriction of freedom from 1 month to 1 year or a prohibition from carrying out a particular business activity.

MONEY LAUNDERING

The concept of money laundering refers to financial or economic transactions which serve to channel illegally acquired funds into legal financial transactions with the intention of concealing the true origin of these funds. In almost all countries money laundering is punishable as a criminal offence.

CPP Poland accepts money only from clean and reliable sources. The employees responsible for the company's sales and finances, especially before making major commercial transactions, must gather comprehensive information about the business environment of a given partner and the transaction itself.

When establishing contacts with new customers and business partners, you should be particularly sensitive to warning signs which might indicate money laundering. These could be unusual payment methods, escrow accounts or unreliable beneficiaries.

BUSINESS GIFTS AND ENTERTAINMENT

Appropriate business gifts and forms of entertainment (including meals) can promote goodwill of the company and reinforce strong business relationships. They may also cast doubts on our personal integrity or give the appearance of causing an independent business advantage. Therefore, we must always use common sense when deciding whether to offer or accept a gift or entertainment of a business nature.

Follow these requirements:

- ✓ You should not seek gifts or other forms of entertainment
- ✓ You should know and obey the local laws, codes and principles that are applicable.
- ✓ It is forbidden to offer or accept any gifts or forms of entertainment which:
 - ◆ are in the form of cash or cash equivalents, such as vouchers or gift cards;
 - ◆ are offered in the form of a service exchange;
 - ◆ might have a negative impact on our reputation;
 - ◆ violate the applicable law or the rules of the donor or recipient.

Since it is difficult to establish absolute rules on permissible gifts and entertainment, you should discuss the relevant circumstances with your supervisors and/or the Business Compliance Manager before offering or accepting a gift of more than the nominal value of PLN 200.00 or any form of business entertainment.

The questions below may help you to decide whether a particular business gift or a form of entertainment are appropriate:

- ✓ When you receive a business gift, would you be willing to write an acknowledgement notice and send a copy to your supervisor?
- ✓ When offering a gift, would you feel comfortable if it was disclosed to others or made public?
- ✓ Would you feel comfortable if photos showing you and others participating in an event or entertainment activity were published on the Internet?
- ✓ Does the acceptance of a gift or form of entertainment give the appearance that you are not objective in your decisions or business choices?



FAIR COMPETITION

Competition laws are known as “antitrust” laws. They help foster and preserve fair and honest competition in the market place. Conducting business in compliance with these laws has contributed to the growth and prosperity of CPP Poland throughout the years. Despite the fact that these laws are complex and can vary from country to country, they generally prohibit competitors from working together to limit competition. They also prohibit improper attempts to monopolize markets or control prices.

Employees must be careful when interacting with competitors – for instance, in connection with trade associations and benchmarking.

Gathering competitive information and business data is an appropriate business practice, but it must be done in a legal and ethical manner. It is never acceptable to engage in fraud or misrepresentation in order to obtain competitive intelligence.

DO

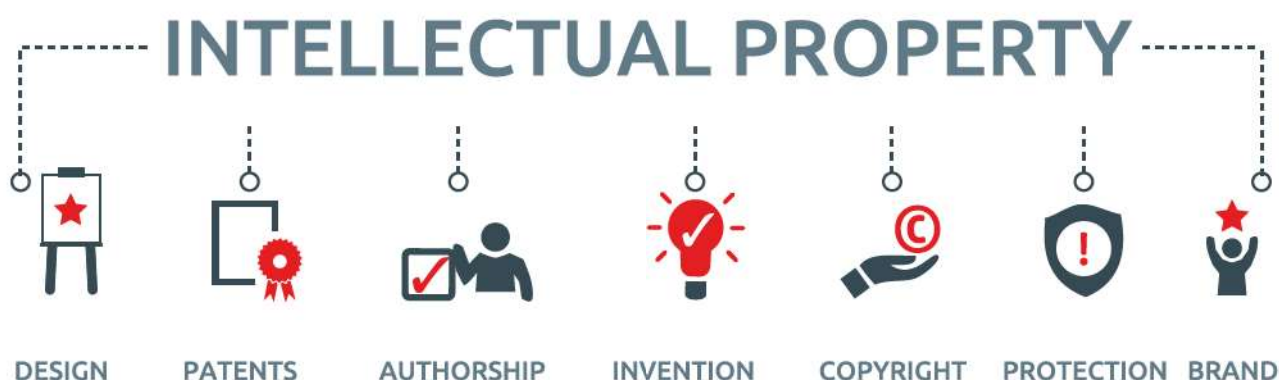
- ✓ Compete vigorously, but legally.
- ✓ Win based on the merits.
- ✓ Remember that competition laws are complex.
- ✓ Seek help when in doubt.

DON'T

- ✓ Discuss prices, sales plans or volumes with competitors.
- ✓ Divide customers, markets or territories with competitors.
- ✓ Agree with others to limit production or not do business with customers or suppliers.

IMPORTANT!

All employees, suppliers and subcontractors of CPP Poland are expected to follow competition laws, as well as CPP Poland's corporate policy rules.



CONFIDENTIAL AND PROPRIETARY INFORMATION

Our confidential information and intellectual property are important company assets that we must preserve and protect. We must also respect the intellectual property rights of third parties and protect confidential information entrusted to us by individuals and companies. The misuse or disclosure of this type of information may weaken our competitive position, restrict our business activities or even lead to financial loss.

Follow these requirements:

- ✓ You must comply with the corporate policy rules applicable in the Company to ensure that our confidential and proprietary information is not misused and that any disclosure thereof is authorized or required by law.
- ✓ You must not disclose confidential information to any person, whether a colleague, family member or other third party outside of the Company, unless you are entitled to do so and the disclosure is required for business purposes.
- ✓ Prior to the disclosure of confidential information to persons outside of the Company, you must obtain approval from your manager and verify that all required contracts exist and are observed.
- ✓ Confidential information should not be discussed or used in places where it can be heard or seen by persons who are not authorized to do so.
- ✓ Never use or copy the software or the licensed information, except as permitted by the applicable license agreement.
- ✓ Remember that the obligation not to disclose or abuse confidential and proprietary information also applies after an employee has left the company and that all company documents in any form must be returned to CPP unless otherwise instructed.
- ✓ Care must be taken when disposing of documents containing confidential information in order to avoid inadvertent disclosure.

Confidential information includes the following:

- ✓ Engineering data and other technical data;
- ✓ Financial data, including forecast and actual profits and sales results;

- ✓ Planned new services and products;
- ✓ Advertising and marketing programs;
- ✓ Actual and proposed business plans and strategies;
- ✓ lists of customers and suppliers and details thereof, including contract terms and prices;
- ✓ Capital investment plans;
- ✓ Product configurations, specifications, components, logic schemes and technical drawings;
- ✓ Test data;
- ✓ Trade secrets including methods, programs and processes;
- ✓ Information regarding employees, including personal data, data on remunerations and organizational charts.

RESPECT OF PRIVACY AND DATA PROTECTION

CPP respects the privacy and protects the personal data of employees, suppliers, customers and other business partners. We are committed to complying with all applicable laws and policies regarding personal information which is collected, used, transferred and stored by our Company.

Follow these requirements:

- ✓ You should know and comply with all applicable laws, policies and procedures on privacy and data protection which apply to your work.
- ✓ The confidentiality and security of information collected by the Company or on its behalf must always be respected and ensured.
- ✓ You should never collect or make an attempt to access personal information regarding employees, customers and business partners which is not needed to perform your work or which should not be kept longer than necessary.
- ✓ When accessing personal data, reasonable precautions must be taken to protect it against loss and misuse and against unauthorized access, disclosure, alteration or destruction.

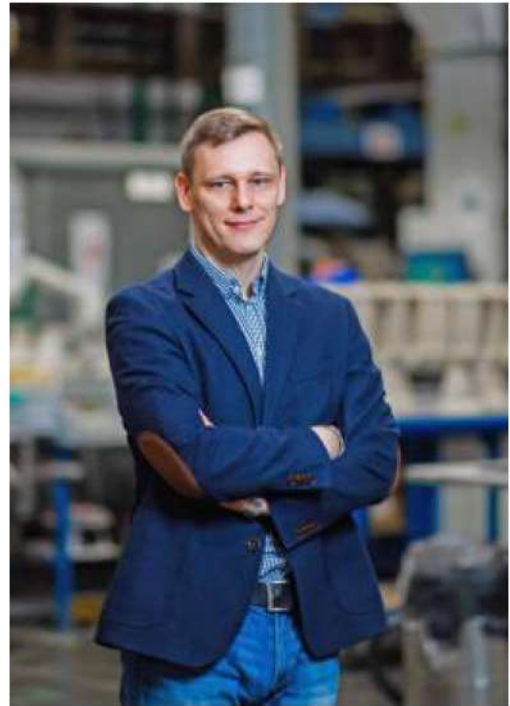
Personal data is all information identifying natural persons and may include the following:

- ✓ Private addresses and telephone numbers
- ✓ Identification numbers issued by government authorities, such as social security numbers or driving license
- ✓ Credit card data and other information on bank accounts.

TRADE SANCTIONS

Various countries and organizations, such as the United Nations, have imposed trade sanctions against certain countries, organizations and individuals. Many of these sanctions apply to transactions beyond the borders of the country imposing them. Some sanctions impose a complete ban on all transactions, while others may ban a specific type of transaction, such as trading in specific goods or providing particular services.

CPP Poland does not do business with any sanctioned country, organization or individual unless permitted by law.



Sales Support Manager

IMPORTANT!

If you are involved in international business transactions, you must be familiar with and comply with applicable trade sanctions. If you are considering business with a sanctioned country, organization or individual, consult with the Law Department first. Keep in mind that trade sanctions laws can be very complex and change frequently, so a transaction that was allowed in the past might not be allowed now.

ANTI-BOYCOTT LAWS

„Boycott” occurs when at least one person, group or country refuses to do business with certain individuals or countries. Our Company complies with anti-boycott laws that prohibit any participation in an unsanctioned boycott.

Since violations of anti-boycott laws are serious violations and may involve civil or criminal penalties being imposed, any request to participate in a boycott must be reported immediately to the Business Compliance Manager.

INTERNATIONAL TRANSACTIONS

Very complicated export regulations and laws require special attention. You must act in accordance with Polish, EU and US export law, as well as the export law of the country from which we import, to which we export and where the possible trans-shipment takes place.

If you deal with international transactions, you must comply with the following requirements:

- ✓ All information provided in connection with export/import must be accurate and truthful, including the relevant export/import value.
- ✓ Items classified as 'dual-use' items or as "military use" items according to Polish Munitions List usually require an export license or authorization.
- ✓ You should be careful about cases in which we might have been provided with inaccurate information regarding the final destination, customer name or product use.

IMPORTANT!

Prior to shipment you should always verify whether CPP Poland has a basis for a given transaction. This applies to the export/import of goods, equipment, software and technology.

If you have any doubts as to whether a particular export situation applies or whether the information regarding export which you have been provided with is accurate, you should seek the assistance of Business Compliance Manager.

CONFLICTS OF INTEREST

We must all avoid conflict of interest, i.e. situations where our personal interests could inappropriately influence our business judgment.

- ✓ You should present your actions in a transparent way, be careful in situations where your actions might interfere with your work and hinder your objectivity.
- ✓ You must not use your position for your own gain or that of your friends or family members.
- ✓ You must never take advantage (for yourself or other individuals) of business or corporate opportunities that you became aware of through your employment with CPP or by using company property or information.

Below you will find some examples of situations where a conflict of interest may arise:

- ✓ A close family member or a friend works for an organization that does or wants to do business with CPP or competes with our Company.
- ✓ Your work or other activities realized outside of the Company - including service on the management board of another organization - may interfere with your work at CPP, harm the Company or place it in a difficult situation.
- ✓ You use company resources for your own gain or that of another person.
- ✓ You or a close relative of yours holds an investment or financial interest in a competitor's, customer's, supplier's or other CPP business partner's company. Holding of public company shares that are not material does not usually constitute a conflict of interest.

- ✓ You are having authority over or you are reporting (directly or indirectly) to a family member or a close friend.
- ✓ You were offered a gift or a form of entertainment which is too generous and that affect - or could appear to affect - your business objectivity.

IMPORTANT!

It's not always clear whether an activity creates a conflict of interest. For this reason, you should discuss any potential conflicts with your supervisor or a representative of Business Compliance Department.

3. WE KEEP ACCURATE AND HONEST RECORDS

CREATING AND MANAGING BUSINESS RECORDS

Every day, we create thousands of business records, from customer contracts and reports for regulatory agencies to timesheets and expense reports. At times, our e-mail and telephone communications are even considered business records.

CPP Poland counts on the accuracy and truth of business records when analyzing and reporting on the Company's operations and making sound business decisions.



Quality Manager

Follow these requirements:

- ✓ When creating or maintaining company records, you should never engage in unfair or deceptive practices or attempt to mislead anyone.
- ✓ Make sure that the information you prepare, process and analyze is accurate, complete and in accordance with applicable laws, accounting principles and Company policy.
- ✓ You should never falsify records or attempt to conceal or disguise the true nature of our actions.
- ✓ You should never circumvent any Company procedure or inspection, even if you think it would be harmless or it might save time.
- ✓ You should always cooperate with our external and internal auditors and you should never intentionally conceal Company information from them.
- ✓ You should know and follow the company's policy and procedures for business records that we maintain and delete or dispose of.
- ✓ You must never destroy business records to avoid disclosure during legal proceedings and investigations.

DEALING WITH SUBCONTRACTORS AND SUPPLIERS

We want to maintain the best possible business relations with our trading partners. We make sure that our suppliers' procurement, production and delivery activities are sustainable and responsible. Compliance with our values and all applicable laws by the sub-contractors and suppliers co-operating with our Company is of particular importance to us.

Our principles:

- ✓ We want to be an honest and trustworthy partner for our subcontractors and suppliers and to establish co-operation with them to the benefit of both parties.
- ✓ Our selection of suppliers is based on transparent criteria and procedures, taking into account the principles of free and fair competition.
- ✓ If a reasonable suspicion exists that a given subcontractor or supplier does not meet our expectations or requirements, we verify this information in order to make a decision on whether to maintain further business relations with this particular company.

FINANCIAL STATEMENTS AND CONTROLS

Our financial information is relied upon by our management team, shareholders, creditors, rating agencies and counterparties. It's also used when preparing government returns and reports for tax, regulatory and statistical purposes.

When compiling and sharing our financial information, we comply with generally accepted accounting principles. We prepare and file our tax returns and other filings in accordance with all tax laws. Any employee, who supplies information for financial or tax purposes, must provide it in a timely manner and certify both the accuracy of the information and their compliance with CPP Poland policies.

Failure to provide timely and accurate information to Corporate Financial Department and other financial institutions can result in significant legal and commercial risk for CPP Poland. For additional guidance, contact Financial Reporting Department of our Company.



Chief Accountant

4. WE HONOUR OUR BUSINESS OBLIGATIONS

TRUST IN BUSINESS RELATIONSHIPS

Honoring our business obligations goes far beyond just meeting our contractual responsibilities.

We want to demonstrate that we approach our business relationships with customers, suppliers, vendors, consultants, other business partners and one another from a standpoint of mutual trust.



W67 Department Manager



W50 Department Manager

This means that:

- ✓ We make only those commitments we can stand behind. A commitment means any promise – not just those that are captured in our contracts. Therefore you should be thoughtful about your promises and do not commit to something that CPP Poland cannot deliver.
- ✓ We handle changes to commitments responsibly. Sometimes we won't be able to meet a commitment that we have made. In this case you should work with the affected customer or business partner to find a solution and discuss appropriate next steps. You should also make sure that you properly amend or terminate existing contracts if needed.
- ✓ We treat personal data related to our customers and other business partners with care. In the course of business we may collect, hold or process information about people who represent our customers' and other business partners' organizations.

5. WE TREAT PEOPLE WITH DIGNITY AND RESPECT

HUMAN RIGHTS

We respect the principle that every person deserves to be treated with dignity, justice and respect. In CPP Poland there is no place for illegal, violent or forced labor. We follow all employment laws and regulations, including rules about the employment of minors. We pay regular and competitive wages, we provide appropriate benefits and invest in resources to assist employees who want to develop to the full of their potential.



Human Resources Manager

SAFE WORKPLACE

CPP strives to ensure a safe working environment. Each of us is responsible for our own and other persons' safety.

Follow these requirements:

- ✓ You must be familiar with health and safety rules, policies and procedures and comply with them at all times.
- ✓ You should be alert to safety hazards in your everyday work and report to your manager or other relevant staff all accidents and injuries, as well as dangerous equipment, practices or conditions.
- ✓ You must never threaten to be violent or to behave in an aggressive manner.
- ✓ You must never use or threaten to use weapons at work.
- ✓ You must not possess, use or sell drugs while at work or within the Company's premises.
- ✓ You should know that it is prohibited to work or represent the company under the influence of drugs, alcohol or any other substance that limits your ability to work in a safe and effective manner.
- ✓ You should report any health and safety concerns to your supervisor or Health and Safety Specialist as soon as possible.
- ✓ In exceptional cases, you should follow the procedures for emergency reporting.

STRENGTH THROUGH DIVERSITY

CPP Poland embraces the variety of backgrounds and life experiences our employees bring to work. As colleagues, we offer the perspectives of different genders, languages, local customs, physical abilities, races, religions, sexual orientations, gender identities, life experiences and socio-economic statuses, and we vary in our personal styles of thinking, expressing ourselves and problem-solving.

To be successful as a global organization, each of us has to demonstrate respect for those who are different from us. This includes recognizing that our own way of thinking is not the only way, and that when diverse backgrounds lead to diverse viewpoints, this is not a weakness. In fact, our differences make us stronger and better able to serve the needs of our global organization.

IMPORTANT!

Discrimination and retaliation against anyone for either sharing a concern or participating in an investigation have no place in CPP Poland. This applies to the way we treat each other, along with anyone else we interact with.

HARASSMENT AND VIOLENCE

We all have a right to work in an environment that's free from violence or harassment.

In our Company, we will not tolerate:

- ✓ Harassment in any form.
- ✓ The use of physical force intended to cause bodily harm.
- ✓ Acts or threats that are intended to intimidate someone or cause them to fear bodily harm.

Examples of sexual harassment:

- ✓ Promises of special treatment for submitting to sexual conduct.
- ✓ Subjecting an employee to unwelcome sexual attention or conduct.
- ✓ Intentional physical contact which is sexual in nature.
- ✓ Sexually oriented gestures, jokes or comments directed at or made in the presence of an individual who does not welcome such conduct.
- ✓ Sexual or discriminatory displays or publications anywhere in CPP Poland's workplace.

IMPORTANT!

If you witness or learn about harassment, violence or threats of violence, you should not remain indifferent but you should report the problem to the managing staff. Managers are responsible for maintaining a work environment that's free of violence and unlawful harassment, and their duty is to act promptly to investigate all allegations in accordance with the laws and our policies.

ALCOHOL, DRUGS AND SMOKING

We expect employees to come to work free from the influence of any substance that could impair or impede performing their duties in the safest way possible, which means responsible and professional behavior in all situations. Therefore, you must never work under the influence of alcohol, illicit narcotic drugs or improperly used prescription or over-the-counter drugs. Furthermore, you must never use, possess, give or sell illicit narcotic drugs or alcohol within company premises or at company-approved events.

Alcohol beverages are allowed to be served in moderate quantities at official company events.

IMPORTANT!

Smoking cigarettes (both regular and electronic) and other intoxicating substances is completely prohibited within the premises of CPP Poland.

ENVIRONMENTAL PROTECTION

We are committed to protecting the environment and conducting our business in an environmentally sustainable manner.

Follow these requirements:

- ✓ You must know and follow the environmental laws, policies and procedures that apply to your work.
- ✓ Waste should be disposed of in a way that is legal and complies with our environmental standards.
- ✓ You must strive to help CPP to minimize the environmental impact of our operations in all aspects of our business activity, including i.a. the development of products, services and practices that are safe and sustainable.



6. WE PROTECT CPP POLAND'S INFORMATION, ASSETS AND INTERESTS

COMPANY PROPERTY AND RESOURCES

Each of us is responsible for safeguarding company property and resources made available to us in the course of our jobs. Our property and resources include both our physical assets, such as our facilities, materials, equipment and appliances, as well as our communication systems, such as our computers, Internet service, telephones and electronic mail.



IT Department Manager



*Maintenance and Infrastructure
Department Manager*

Follow these requirements:

- ✓ Use facilities, materials, equipment and other physical assets belonging to CPP Poland, including corporate credit cards, only for authorized purposes that are related to your job responsibilities.
- ✓ Never take part in any action that involves fraud, theft, misappropriation, embezzlement or similar illegal activities. CPP Poland takes these and other crimes seriously and will pursue prosecutions vigorously.
- ✓ Use electronic mail, Internet, phone and other CPP Poland communication systems for business purposes only – keep personal use to a minimum. Never use our systems in ways that could be perceived as illegal, harassing or offensive, or that could reflect poorly on CPP Poland.

This applies any time you use CPP Poland's equipment, both during and beyond working hours and while at work or at a remote location.

- ✓ It is forbidden to log in to the pages and to view prohibited, sexually motivated content.
- ✓ When you communicate about CPP Poland or matters that directly affect CPP Poland – whether through texting, electronic mail, instant messaging, social networking or the Internet – always respect the „limited confidence rule”.
- ✓ You must never post on social networking sites anything containing confidential information about CPP Poland, its employees, customers, suppliers or business partners.

- ✓ On the territory of CPP Poland there is a total ban on photographing with the use of mobile phones and taking pictures by third parties (guests, suppliers, subcontractors).

7. REFLECTION

Check if you have the facts necessary to understand the relevant issues, consider the options and possible consequences.

Ask yourself the following questions:

- ✓ Am I authorized to make a decision?
- ✓ Should I consult it with other people who may be affected by my decision before taking action?
- ✓ Would such action violate any law?
- ✓ Is this appropriate, fair and consistent with CPP values?
- ✓ Would it damage the Company's reputation?
- ✓ Would I feel comfortable telling my supervisor about my decision or action?
- ✓ How would I feel if I saw information about my actions in the news or on the Internet?
- ✓ How would I feel if my family members knew about the situation and my choice?

DO NOT MISS WARNING SIGNS

You may hear someone saying that a given action might be wrong – or maybe you'll think the same.

For example:

- ✓ It's no big deal. No one will notice.
- ✓ Everything will be fine.
- ✓ It's not my job. It's not my problem. Someone else will deal with it.
- ✓ Don't worry about it. We have to come up with our standard.
- ✓ Everybody else does that. It's nothing. No one will notice.

You should be alert to the above mentioned warning signs.

8. REPORTING VIOLATIONS/SUSPECTED VIOLATIONS

HOW TO REPORT VIOLATION/ SUSPECTED VIOLATION?

If you have any questions or concerns, or if you want to report a violation or alleged violation of this Code, Company policy, applicable laws, rights or unethical behavior, follow these requirements.

- ✓ It is essential that you report the violation to your supervisor or a trusted management representative. If this is still awkward for you, there are other options available to help you report violation or alleged violation.
- ✓ You can report each case by putting the information (anonymously or not – the decision is yours) in a box marked with the following label:
„GIVE US A SIGNAL TO TAKE ACTION”.
- ✓ You can discuss the matter with the Business Compliance Manager.
- ✓ You can use an anonymous, independent online platform, i.e. E-nform:
<https://enform.cppoland.pl> – describe the irregularity, provide us with an idea for improvement and we will take care of the rest, keeping you informed about the progress of our activities.

We guarantee that CPP Poland will not retaliate against those who raise concerns or participate in an investigation in good faith. We take all reports seriously and deal with them promptly, fairly and on a confidential basis.



9. CONCLUSION

The Code provides guidance to help you deal with the problems you may encounter at work. However, the Code does not answer every question or provide a solution for every situation. If you cannot find an answer in the Code or other applicable policies, you should consider the options which are available for you and choose the best course of action for yourself, your colleagues and anyone with whom you do business.

FOR THE EMPLOYEE – page 1 of the insert

If you are an **Employee** of CPP Poland Sp. z o.o. – please sign the form in the indicated place and return it to Human Resource Department of CPP Poland.

Thank you.

FOR THE SUPPLIER/SUBCONTRACTOR – page 2 of the insert

If you are a **Supplier** or **Subcontractor** of CPP Poland Sp. z o.o. – please sign the form in the indicated place and return it to Purchasing Department (by electronic or regular mail).

Thank you.



**We work with passion,
be part of our success!**



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