

# CODE OF ETHICS

## Cyfrowy Polsat Capital Group

### Contents

1. Introduction.....	2
2. Definitions.....	2
3. Conducting business activities .....	3
4. Relations with the environment.....	5
4.1. Customers:.....	5
4.2. Suppliers: .....	5
4.3. Social partners: .....	6
5. Workplace.....	7
5.1. Basic principles .....	7
5.2 . Employee Relations.....	7
5.3. Employee Responsibility .....	9
6. Company assets.....	9
7. Application of the Code .....	10
8. Reporting violations of the Code.....	10

## 1. Introduction

This code contains a set of principles that are important to us as the Cyfrowy Polsat Capital Group (hereinafter referred to as the “Group”). We want all employees and associates to be guided by them in their actions, both within the organization and when representing the Group in relations with the environment.

We believe that this document will provide guidance and assistance to every employee in situations that may potentially raise ethical dilemmas.

The Code does not, as a rule, refer to issues regulated by generally applicable law. We have assumed that the provisions of the law apply to each employee independently. In a situation where the provisions of the Code are in conflict with them, the legal provisions take precedence.

Furthermore, the Code does not exclude the application of other internal regulations in force in the Group or individual Group companies (such as regulations, policies, procedures) or individual contractual obligations that regulate the matters covered by the Code in more detail.

The Code applies to and should be observed by all employees of the Group, regardless of the form of employment or cooperation. A breach of the principles set out in the Code may, depending on the circumstances of the case, constitute grounds for drawing appropriate consequences against the employee.

## 2. Definitions

**Cyfrowy Polsat Capital Group (Group)** – Cyfrowy Polsat SA and all subsidiaries of Cyfrowy Polsat SA.

**Close person** - A close person of an employee or co-worker of the Group is understood to mean a spouse, relative or in-law, statutory representative, a person related to them by adoption, care or guardianship, a person in a common-law relationship and any other person with whom they have a personal or financial relationship that may affect their ability to remain objective in making decisions on matters concerning this person or the entity that this person represents or the entity in which this person holds shares, stocks or other forms of capital participation, or in which they are employed or with whom they cooperate on the basis of another agreement.

**Conflict of interest** - A conflict of interest should be understood as circumstances that may lead to a conflict between the obligation of employees or associates of the Group to perform their professional activities and tasks (including making business decisions) in an objective and reliable manner, taking into account the interests of the Group and the personal interests of an employee or associate of the Group or their close persons. A conflict of interest may arise in particular when, as a result of actions or business decisions taken by an employee or associate of the Group, they may gain a benefit or avoid a loss while the Group suffers a loss or does not gain a benefit.

### 3. Conducting business activities

#### Transparency of actions and reliability of communication

***We care about relationships with our environment based on openness and trust. That is why we care about the transparency of our actions, we communicate in a professional and reliable manner, we are open to dialogue and cooperation.***

What does this mean for us?

- We do not condone any behavior intended to deceive or mislead others.
- We communicate with our environments in a professional manner, with a focus on dialogue.
- The information we publish is complete, comprehensive, and true to the facts. We provide it in accordance with the principle of equal access to information.
- We conduct all contacts with the media in a professional manner, through appropriate units designated to conduct such activities.
- Employees should follow the rules of netiquette in online communication (especially in social media), including when publishing private statements and comments.

#### Corruption and bribery

***We do not accept personal benefits from business activities.***

What does this mean for us?

- We do not offer, give or promise monetary benefits to our business partners that could influence their business decisions.
- We do not accept material benefits from business partners that could raise doubts as to their influence on the decisions we make in the performance of our professional duties.
- It is unacceptable for an employee of the Group to derive personal or material benefits in exchange for offering a product or service other than that specified in the contract.
- It is prohibited for Group's employees to create corruption funds and/or allocate part or all of the remuneration for the provision of a service or the sale of goods to cover the costs of providing material or personal benefits.

#### Fair competition

***We believe that fair competition is the basis for long-term business relationships. Therefore, in our activities we take care to observe the principles of fair competition and we expect the same from other market participants.***

What does this mean for us?

- We do not engage in activities with other market entities that could ultimately affect the principle of fair competition:
  - we do not discuss prices offered to customers with other entities,
  - we do not enter into agreements with competitors to divide markets,
  - We do not take any actions or make any omissions that could allow for the manipulation of purchasing/offering processes.

### Offering and accepting benefits

***We believe that business relationships should be based on clear and transparent principles. We understand that there are situations in which it is a well-established custom to give or receive a gift. We make sure that it is always done in a transparent manner and is not related to business decisions.***

What does this mean for us?

- We do not accept or give gifts of significant value that exceed generally accepted principles in normal business relationships.
- We accept the offering and receiving of gifts that are occasional or promotional in nature and do not require reciprocity, in a transparent and lawful manner.
- We allow employees to participate in external events and trips financed or co-financed by business partners if they are directly related to the performance of their duties or serve professional development. Each time, the employee should receive permission from the president of the management board of the given company (or a person authorized by him) to participate in an event or trip.

### Ethics in advertising

***We are aware of the impact of our advertising messages on consumer decisions, which is why we care about their quality and reliability.***

What does this mean for us?

- We make sure that advertising messages about our products and services are complete and contain all the information necessary for a potential customer and product user.
- We take care to ensure that our ads do not mislead recipients.

### Relations with public authorities

***We are a neutral organization in terms of worldview, not affiliated with any political party or public institution. Therefore, we conduct relations with public entities in a transparent manner, based on clear rules and procedures and specific standards of business cooperation.***

What does this mean for us?

- Our actions are guided by business interests. The political views of the owners, management staff or employees have no influence on them.
- We do not allocate Group funds for political purposes, nor do we support political campaigns of any parties or specific candidates.
- We conduct contacts with public administration, both at the central and local government level, in a transparent manner, in compliance with appropriate procedures.
- We are involved in activities for the development of the country by supporting third sector organizations (NGOs) or institutions subordinate to public authorities that pursue the public interest.

## 4. Relations with the environment

### 4.1. Customers:

#### Customer relationships

***We want our customers to be happy with our products and be able to use them for as long as possible, in a safe manner. We care about the highest quality of service and reliability in communication with the customer.***

What does this mean for us?

- We provide customers with access to the highest quality products and services at a reasonable price.
- We ensure high standards of service quality.
- In our relationships with clients, we respect the principle of confidentiality of the information provided, especially the client's personal data.
- We take care to provide our customers with full information about our products and services, their properties, purpose and rules of use.
- We only provide reliable and factual information about our products and services.
- We pay particular attention to vulnerable groups (elderly people, children, etc.) and make every effort not to mislead them in our sales and communication activities.
- We make sure that our contract templates with clients are as clear and transparent as possible.

### 4.2. Suppliers:

#### Supplier selection policy

***We care about cooperating with the best suppliers, which is why the rules for establishing cooperation with them are clear, based solely on business criteria and equal for everyone.***

What does this mean for us?

- In order to ensure comprehensive and adequate selection criteria within a given procedure, they are each time co-created by a broad group of representatives of the relevant units in the Group.
- The criteria for selecting suppliers within a given purchasing procedure are always the same for all entities wishing to participate in the procedure.
- We only work with suppliers who, to our knowledge, operate in accordance with the law and meet the selection criteria in a given procurement procedure.

## Supply chain responsibility

***We only work with suppliers who comply with the law and whose ethical conduct is beyond doubt.***

What does this mean for us?

- We take active steps to verify the source of raw materials for our products
- We do not work with suppliers for whom there are reasonable grounds to suspect that they obtain raw materials illegally.
- We do not work with suppliers against whom sanctions have been introduced.
- We work with suppliers who, according to our knowledge, operate responsibly and treat their employees and associates with respect.
- We expect our subcontractors and intermediaries to conduct themselves in accordance with our standards, including the provisions of the Code of Ethics.

## Rules for cooperation with suppliers

***We care about long-term relationships with our suppliers, which is why we base them on transparency, reliability and equality.***

What does this mean for us?

- We always fulfill our obligations in accordance with the agreed terms.
- We provide all suppliers interested in cooperating with us with equal access to information, including requirements regarding the terms and conditions of cooperation.
- We care about the security of our suppliers' confidential information.

## 4.3. Social partners:

### Transparency of sponsorship and charity activities

***As a member of the community in which we operate, we see our role in supporting social initiatives. We make sure that all such activities are conducted in a transparent manner and have the greatest positive impact on the environment.***

What does this mean for us?

- We provide all donations for social activities in a transparent manner.
- Our sponsoring activities are conducted based on specific principles and consistent with the Group's business objectives.
- We do not support the activities of unreliable organizations or initiatives that are not consistent with general social values.

## 5. Workplace

### 5.1. Basic principles

#### Openness and neutrality of worldview

***We believe that every employee has the right to their own political, religious, and other views. That is why we create a workplace where everyone has the opportunity to express their views openly, in a way that is not offensive to other employees.***

What does this mean for us?

- We are honest with each other and avoid misunderstandings.
- Everyone has the right to express their opinions, but we avoid expressing opinions that may be offensive, violate the personal rights of other people/employees or otherwise violate the law.
- An employee's views should not influence his or her professional work and the decisions he or she makes.

#### Atmosphere in the workplace

***We believe that the workplace and the atmosphere there are co-created by each employee. We want each employee to be aware of this and feel co-responsible for it.***

What does this mean for us?

- We do not accept slandering other employees or other behaviors that negatively impact the atmosphere and well-being of other employees.
- We do not accept employees disclosing private information about other employees.

#### Working conditions

***We care about the efficiency and well-being of our employees, which is why we ensure appropriate working conditions and maintain a work-life balance.***

What does this mean for us?

- We provide employees with decent and safe working conditions.
- We implement tools and solutions that enable reconciling professional and private life.

### 5.2 . Employee Relations

#### Equality and diversity

***We are committed to creating a workplace where everyone feels respected, regardless of position, age and experience. We believe that equal and fair treatment of all employees is a guarantee of our success.***

What does this mean for us?

- We treat each other with respect, regardless of our role in the organization, position, experience and competence.
- We do not use our position or role in the organization for any purpose or in a way that violates the personal rights of other employees.

### No discrimination

***We create a work environment free from discrimination, where everyone can feel comfortable and safe.***

How do we work?

- We respect individual differences and opinions.
- We do not engage in any discriminatory behavior based on race, ethnicity, religion, sexual orientation, age, gender or other dimensions of diversity.
- We oppose and do not engage in any form of harassment or mobbing .

### Equality in the process of hiring, development, promotion

***We want the best to work with us. That is why we are guided solely by merit-based criteria in our recruitment and development activities.***

What does this mean for us?

- In the recruitment process, the same criteria, available to all interested parties, apply to all candidates.
- When assessing job applicants in the Group, we rely solely on the substantive criteria defined for a given job offer.
- Promotion decisions are made solely on the basis of objective factors related to an individual's job performance.
- Every employee has the right to regular, periodic, reliable evaluation of their work and feedback.
- All employees in comparable positions have equal opportunities for development and professional improvement, according to appropriate criteria and principles.

### Human and employee rights

***Human and employee rights are our highest priority. We respect them unconditionally.***

- We respect the dignity of our employees and associates.
- We respect employee privacy rights.
- We store and use employee personal data in accordance with the law and with due diligence.
- We do not allow any form of humiliation, verbal abuse, harassment or intimidation.
- We respect the right of employees to associate in employee organizations, including trade unions.
- We do not allow any illegal or forced form of work.
- We do not employ children, and we ensure that our partners and suppliers also do not employ children.



## 5.3. Employee Responsibility

### Conflict of interest

***We understand that each of us has different social roles. We expect that these do not affect the integrity and objectivity of business decisions made.***

What does this mean for us?

- We avoid any situation that may give rise to a conflict of interest. Each employee is required to inform their superior of a situation where private relationships or activities performed outside of their work duties may create a conflict of interest.
- Every employee is obliged to critically analyse and evaluate a given situation in terms of its impact on the objectivity of his or her actions or decisions.
- We do not conduct any activities that could threaten the interests of the Group.
- Every employee is obliged to inform their superior when their private interests or those of people close to them may conflict with the interests of the Group.
- Employees should not be involved in making decisions about an entity with which someone close to them is associated.
- Personal relationships should not influence decisions made regarding the hiring or promotion of individual employees.

### Protection of confidential information

***Information is our key resource, which is why every employee is obliged to take care of it and protect it in the best possible way, in accordance with all procedures.***

What does this mean for us?

- We disclose confidential information only to authorized persons, in compliance with the law and internal regulations in this area.
- We do not discuss confidential matters in public places or other places where they could be overheard by others.
- We do not use information obtained in the performance of our official duties for purposes unrelated to the provision of work/services to the Group.
- We do not comment or discuss sensitive issues in the media or on social media (we respect the rules of netiquette).
- Every employee is obligated to protect company secrets and confidential information.
- You should not disseminate information that may be harmful to the Group.

## 6. Company assets

### Use of company assets

***Company assets are used to support employees in carrying out their work duties and should be used in accordance with their intended purpose.***

What does this mean for us?

- Every employee is responsible for the employer's property entrusted to him.

- Every employee should take care of the company's property, protect it against destruction, loss of value or theft.
- The Group's resources are used to achieve business goals. Private use of the Group's property is permitted under the terms of separate regulations or individual agreements.

### Business expenses

***We are aware that the performance of official duties sometimes requires incurring expenses without purchasing procedures. Each employee is responsible for the rational spending of company money and the reliable settlement and documentation of incurred costs.***

What does this mean for us?

- Business expenses generated by employees should reflect the actual state of affairs and be properly documented.
- Employees' business expenses should be directly related to the duties they perform.
- When incurring business expenses, an employee should be guided by applicable internal regulations and the principle of rational management of the Group's funds.

### Intellectual property

***Every employee is responsible for respecting and protecting the intellectual property of both the Group and other entities and individuals.***

What does this mean for us?

- We use the Group's logos and trademarks only in an authorized manner.
- We use the Group's intellectual property only in accordance with legal and contractual provisions.
- We do not use the intellectual property of other individuals or entities in an unauthorized manner.

## 7. Application of the Code

This Code is effective from 1 January 2018.

The Code applies to and should be observed by all employees and associates of the Group, regardless of their form of employment.

## 8. Reporting violations of the Code

Any employee who suspects a violation of the Code of Ethics should report it. No consequences will be imposed on the reporting party, even if the report is not confirmed in the verification process. Any retaliatory behavior by the person who reported the report is unacceptable.

At the same time, it is unacceptable to abuse the mechanism for reporting violations in order to harm another employee or to gain some other personal benefit. Deliberate abuse of this mechanism may be considered a disciplinary offense.

Suspected violations of this Code may be reported:

- To your immediate supervisor, or
- by e-mail to the address: [naruszenia.etyki@grupapolsat.pl](mailto:naruszenia.etyki@grupapolsat.pl)

In the case of anonymous reporting of a violation, confidentiality of the identity of the person reporting the violation is guaranteed, except in the event of requests from authorized state authorities.

Detailed rules for reporting suspicions and a description of the procedure for handling reports will be developed by the newly appointed: Group Ethics Committee and Group Ethics Advocate no later than 31/03/2018. These rules will be presented to Group employees in a separate procedure, together with the composition of the Group Ethics Committee and the Group Ethics Advocate.