

ETHICAL MARKET CONDUCT POLICY (POL-018)

1. Introduction

Cyfrowy Polsat SA strives to ensure that its business development and that of its subsidiaries is consistent with applicable Polish and EU law, as well as with good practices. It wants its activities to be carried out with respect for the principles of the free market and respect for competitors and consumer rights.

This Ethical Market Conduct Policy is in force in Cyfrowy Polsat SA (hereinafter referred to as the Company) and applies to its subsidiaries. If the subsidiaries have implemented their own market conduct ethics policies, they cannot be in conflict with this Policy.

2. Rules

The Company undertakes to take into account the following principles in its actions and decisions.

Policy towards customers and consumers

1. **[Consumer Safety]** The Company will make reasonable efforts to ensure that, regardless of the sector and market in which it operates, all products or services it manufactures, distributes or offers:

- a. were safe for end users, in particular they did not pose a threat to their life and health,
 - b. have at least all certificates and tests required for specific product categories, and where possible also non-obligatory ones, confirming compliance with higher than required requirements,
 - c. are free from undesirable features of which the customer and end user would not have been reliably informed and would not have been aware at the time of purchase.
2. **[Child safety]** The Company will exercise due diligence to ensure that the products and services it offers do not pose a risk to children and cannot be used in a way that poses a risk to them.
 3. **[Product availability]** The Company will exercise due diligence to ensure that the products and services it offers, particularly in areas where their absence may be a source of social exclusion, are available both territorially and economically.
 4. **[Counteracting pathology]** The Company will actively counteract pathology destructive to its business by engaging in joint initiatives of individual industries and cooperating with state administration and law enforcement agencies to prevent illegal and unethical use of its products and services .
 5. **[Reliable information]** The Company undertakes to exercise due diligence in developing information materials, offers, regulations, price lists and contract templates that will provide the end customer and consumer with the necessary information related to the services and the product and its use in a reliable and possibly legible manner.
 6. **[Reliable contracts]** When concluding contracts with consumers, the Company undertakes to avoid ambiguous and unclear provisions, in particular those that have been recognized by regulatory authorities as unfair terms or their recognition as unfair is probable.
 7. **[Personal data protection]** The Company will provide effective and efficient procedural and technological solutions for the protection of personal data of customers and end users which it possesses and processes.

8. **[Advertising ethics]** When creating an advertisement, the Company will be guided by the current Code of Advertising Ethics of the Union of Associations Advertising Council (formerly Advertising Council) and, in the event of a controversy, will submit to its arbitration.
9. **[Dialogue with customers and consumers]** The Company will develop channels of communication with customers, consumers and consumer organizations, enabling better knowledge and understanding of their expectations or concerns. It will also ensure effective mechanisms for filing complaints and claims, committing to their prompt and reliable consideration.

Market Policy

1. **[Respect for freedom of competition]** The Company undertakes to:
 - a. refraining from acts of unfair competition,
 - b. monitoring regulatory changes and refraining from any practices that could be considered unfair competition under the current regulations,
 - c. ruthlessly stigmatizing abuses that constitute acts of unfair competition that violate its interests or the interests of its business partners.
2. **[Counteracting corruption and bribery]** The Company declares zero tolerance for any manifestations of corrupt behavior and undertakes to provide internal mechanisms to limit the risk of such behavior.
3. **[Apoliticality]** The Company will remain apolitical by refraining from financial or material support for political parties and organizations that are not parties but operate in a manner analogous to them and engage in current political disputes.
4. **[Protection of whistleblowers]** The company will provide effective complaint mechanisms enabling the reporting of information about irregularities, and will also provide protection against retaliatory actions to persons who have made reports.
5. **[Timeliness of payments]** The Company will shape the contractual terms in a responsible manner, i.e. guided by its economic interest, it will not apply payment terms in a way that would threaten the financial liquidity of the partner;

it will also exercise the utmost diligence in timely settlement of liabilities, the justification of which raises no doubts.

Supply Chain Ethics Policy

6. **[Consistency of conduct]** The Company will expect its business partners, in particular collaborators, suppliers, including subcontractors and service providers, to act in accordance with similar principles, requiring key partners to meet minimum standards in this respect.