

Racibórz, August 2nd 2018

ETHICS CHARTER OF RAFAKO S.A.

INTRODUCTION

1. Global principles of business conduct

It is our policy to comply with the laws of the countries in which we operate and with administrative requirements that affect our business. This means complying with antitrust, competition protection and anti-corruption laws, laws governing trade, safety, copyright, employment, occupational health and safety, human rights and environmental protection, as well as other regulations governing business activities and criminal law. In countries where legal requirements and business practices are less stringent than those set out in our Code of Ethics and this Ethics Charter, the principles of the Ethics Charter should be followed.

We are a responsible company, and our goal is to create a positive image and reputation, as well as to build the trust of our employees, trading partners and customers. Implementation of this Ethics Charter is intended to strengthen our responsibility and trust in our Company.

2. Expectations towards trading partners

All our trading partners should comply with the Company's policies, procedures, practices and guidelines set out in this Ethics Charter, which describes the ethical principles we have established and apply. We expect our trading partners to comply with laws and ethical standards, as well as to treat other people, including their employees, with due respect and fairness. We do not accept any unethical, illegal or unfair behaviour, so our suppliers and other trading partners are expected to declare that they have read this Ethics Charter, are aware of the principles applicable at the Company and apply the same at their organisations. This Ethics Charter and the Company's other policies and procedures are designed to help our stakeholders understand and comply with our standards.

OUR PRINCIPLES

1. Protection of human rights

We do not accept or tolerate anything that violates human rights or conceals knowledge of human rights violation. We respect all our employees and other people we work with. We expect our employees and trading partners, including suppliers, to respect human rights. We are opposed, in particular, to forced labour, child labour and any human trafficking activities. We comply with international and Polish human rights standards.

2. Non-discrimination in the workplace

We make employment, payroll, promotion and other employment related decisions in compliance with the applicable law, based on such factors as qualifications and previous performance, and without any regard to race, gender, ethnicity, religion, age, descent, sexual orientation or any other feature protected under anti-discrimination legislation. We create working environment free of any form of discrimination or retaliation. We comply with international and Polish employment standards.

3. No violence, harassment or mobbing in the workplace

We do not tolerate actual or threatened violence in the workplace against other employees, their property or the Company's property. Neither do we accept any mobbing or harassment at our Company, and our employees do not bear any consequences of reporting suspected violence, mobbing or harassment at the Company.

4. Anti-corruption and anti-bribery

We do not condone corruption and bribery, or the concealment of information on such practices. It is forbidden at our Company to accept or offer bribes in connection with our activities. The Company's and its subsidiaries' employees, suppliers and other trading partners must not engage in any activities which may involve corruption or bribery. We comply with international and Polish anti-corruption standards.

5. Diversity

We care about the diversity of our workforce, in terms of education, experience, skills, knowledge, gender, age and personal values. We create inclusive workplaces, where we do not perpetuate gender stereotypes but rather rely on thorough, impartial and informed assessment of employees.

6. Preventing conflicts of interest and abuse

Members of the Management Board, directors and employees of the Company are required to avoid relationships, activities and undertakings which would be in actual or apparent conflict with the Company's interests. In dealing with actual or prospective customers, suppliers and manufacturers, our employees must neither offer nor receive preferential treatment for their own benefit or for the benefit of any family member or friend.



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Our employees are not allowed to take actions competitive to the Company's business, and are obliged to take care of the employer's interest and be loyal to it in accordance with the Labour Code.

7. Political activity

It is not allowed to require our employees to support any specific politician or political party, and our employees' duties, earnings or positions do not depend on whether or not they support any particular political group.

8. Property protection

All of our employees are committed to protecting the Company's property and facilities, as well as its other tangible and intangible assets, including equipment entrusted to them and intellectual property rights. The entrusted property should be used in accordance with its intended purpose and to perform the assigned tasks, and the Company's property should not be used for activities not related to the Company's business.

9. Information security

All commercial, technical and personal documents concerning the Company, its employees, customers and suppliers are considered confidential and are thus protected, including against loss and theft. Our employees must not disclose any confidential information about the Company, its other employees, customers or suppliers. We protect the personal data of our employees and trading partners.

10. Image

Our employees take care of the good name of our Company, strive to build its positive image, and are loyal to it. Our employees are also obliged to be clothed properly and maintain good manners at work.

11. Product and process quality

We are committed to developing and manufacturing high quality products that are safe to our customers and other users. The quality control system for products and processes that we have designed and implemented ensures compliance with internal standards and applicable laws. We meet international and Polish quality management standards, including the ISO 9001 standard.

12. Business transparency

The activities of our Company are transparent both to employees and trading partners. We follow clear rules and guidelines for selection of suppliers, which are treated equally. We always select our suppliers in accordance with the law and our internal procedures, which include non-discriminatory criteria for selecting the Company's trading partners.



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13. Environmental protection

We strive to minimise our environmental impact, as well as to rationally manage waste and promote environmental initiatives among our employees. We comply with international and Polish environmental management and protection standards, including the ISO 14001 standard.

14. Occupational health and safety

We comply with all applicable occupational health and safety legislation. Our employees follow internal OHS policies and procedures. In order to ensure that our employees' workplaces meet all safety requirements, we monitor the working conditions at our Company on an ongoing basis and prevent threats to the life and health of our employees.

15. Fair competition

We respect the principles of fair competition and therefore do not seek to damage the reputation of our competitors or take illegal or unethical measures. We treat competing market players with respect and our employees must not manipulate, conceal, or abuse information covered by professional secrecy, or use any other unfair commercial practices to gain us an unfair advantage over competitors.