



BORYSZEW
AUTOMOTIVE PLASTICS

BORYSZEW

Automotive Plastics Group

Code of Ethics

Revision 1

Tychy, 07.05.2021

Dear Sir or Madam,

In view of the dynamic development of the BAP Group and continual changes of social and economic circumstances, please find attached the Code of Ethics of the BAP Group, which establishes a system of values, standards, and principles we are guided by in our daily business operations. This Code also forms our commitment to act in compliance with the highest ethical standards.

The BAP Group's mission is to keep up with changes in the global economy and create new technical and organizational solutions to manufacture and deliver products that meet our customers' requirements. We make every effort to ensure that this mission is carried out in compliance with the highest ethical standards in relationships with our employees and business partners.

We believe that the basis for our future success lies with our ethical values, the development of the organization and its employees, building mutual relations with our suppliers, customers, and employees based on respect, integrity, solidarity, and partnership. Simultaneously, the BAP Group aspires to be perceived as a reliable business partner and places great emphasis on providing a friendly and safe working environment.

Moreover, the Code of Ethics, which I am pleased to present to you, is to prove that the BAP Group is a trustworthy business partner and employer. Therefore, this Code of Ethics, which forms the basic set of rules followed by the BAP Group when conducting its business, must be applied by each of the Group's Employees. It should also be noted that it is essential for the BAP Group that both our customers and suppliers share similar values.

Considering the above, I would like to express my high hope that the Code of Ethics will contribute to creating friendly working conditions and improving the quality of activities undertaken by the BAP Group, and it will help to enhance the Group's image.

Yours faithfully,

Mirosław Kastelik



Chief Executive Officer of the BAP Group

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1. Purpose of the BAP Group's Code of Ethics

- 1.1.** The BAP Group Code of Ethics defines the framework and standards of behavior for the execution of work in accordance with ethical norms, entrepreneurial culture and applicable law in the regulated areas. It is a set of accepted patterns. However, the Code does not exempt Employees from using their own good judgement of observed behaviors and determining on their own whether such behavior strengthens the reputation of BAP Group as a member of the market and a credible business partner, as well as whether it does not have a negative impact on the trust of BAP Group's clients and business partners.
- 1.2.** Each BAP Group employee, regardless of employment and work type, job position and work experience, is bound to act according to the rules of this Code in any external or internal communication.
- 1.3.** The Code of Ethics constitutes the basis of business culture of BAP Group and is a kind of declaration and a message for people, companies and organizations cooperating with the Group. BAP Group expects the above-mentioned cooperators to follow similar rules of conduct and to respect the rules described in this Code of Ethics adopted by the Group.

2. Definitions and basic assumptions

- 2.1.** Whenever the term "Company", "BAP Group" or "Group" appears in this Code of Ethics, it should be understood as each of the entities belonging to the BAP Group (separately), as well as the BAP Group as a whole.
- 2.2.** The term "BAP Group employee" or "Employee" means a natural person cooperating with any of entities belonging to the BAP Group (regardless of the form, basis and type of legal relationship), as well as natural persons employed by intermediary companies or temporary employment agencies providing work for the BAP Group.
- 2.3.** Some issues covered by the content of the Code of Ethics may be regulated by more detailed procedures and instructions in force in BAP Group. In such case, BAP Group shall pass on to the Employees the proper particularizing acts in order to adjust the behavior and actions of the Employees to the standards stipulated therein.
- 2.4.** Should there be any less restrictive legal norms than the norms of this Code, principles of the Code shall apply.
- 2.5.** The Code of Ethics of BAP Group is available on the website www.bap.boryszew.eu, on the internal IT resources of BAP Group, at the direct supervisor and in the Human Resources Department.

3. Rules of Conduct

3.1. Protection of the property and image of the BAP Group

1. Employees of BAP Group are responsible for preventing any misuse or waste of widely understood property and assets of the company, which are in particular: fixed assets and other movables, working time, legally protected information, intellectual property rights, copyrights, trademarks and signs of BAP Group including names and companies under which the companies of BAP Group operate as well as other intangible assets and monetary assets.
2. BAP Group assets may be used solely for the purpose of the appropriate execution of professional duties and for the achievement of the Group's goals. The use of BAP Group assets for private purposes which are non-compliant with internally binding rules is not allowed.
3. In an effort to deliver on commitments and maintaining honest relations with clients and business partners, BAP Group does not commit to obligations deemed impossible to execute.
4. The quality of products for BAP Group is the matter of the highest importance and therefore the improvement activities are constantly introduced on every stage starting from designing, through production, storing and sale.
5. BAP Group respects the obligation to protect employee's privacy. It also reminds about the influence of employee behavior on the reputation and image of the Group. Within their own environment, Employees should act so as to protect the company's name and show respect of BAP Group's trademark and values.
6. Communication with the media regarding each entity of BAP Group may only be made by authorized individuals, in accordance with separately binding regulations.

3.2. Conflict of interest

1. Any decisions and activities undertaken on behalf of the Group should be made according to BAP Group's best business interest.
2. Employees should avoid possible conflicts of interests which may have an influence on making objective decisions and taking actions related to the Group.
3. Personal employee relations may not have an influence on acting in the best interest of the Company, nor on any other employee responsibilities. Decisions related to the execution of professional duties should be made based on the Group's goals and employee qualifications, skills and experience.



4. Employees must avoid making personal financial or commercial commitments with business partners from the Group.
5. Employees must avoid making personal financial or commercial transactions with business partners from the Group.
6. The employee should avoid participating in activities of other companies or supporting external activities which may be in conflict with BAP Group's best interests.
7. The employee should avoid cooperating with relatives or similarly close individuals on behalf of BAP Group, as well as with companies which belong to the employee, their relatives or other close individuals.
8. Employees should not compete with the Company individually nor in collaboration with other entities.
9. Any situation constituting or giving rise to a conflict of interest shall be notified by the Employee to the direct supervisor.
10. If you have difficulty assessing whether you have a conflict of interest, you should contact your direct supervisor or the Human Resources Department.

3.3. Use of information and confidentiality

1. All Employees are held responsible for abiding by legal regulations regarding the protection of confidential data.
2. The access to confidential information, in particular regarding the terms of commercial contracts or other information provided by our clients and business partners, requires absolute compliance with the procedures and standards established for this purpose by the BAP Group.
3. Employees must protect non-public information concerning the Group from third party access.
4. Employees and other interested parties may not use for non-professional purposes the non-public information obtained as a result of their duties, in relation to their function or as a result of other business relations.
5. Knowledge and experience obtained by BAP Group are fundamental resources which must be protected by all Employees and interested parties. They must keep in mind that inaccurate publicizing may lead to losses for BAP Group, as well as BAP Group's clients or business partners.



6. Employees and other interested parties may not disclose non-public confidential information, specifically technical, technological and commercial knowledge of the Group, except in cases when disclosure of such information is required by the law or results from the decision of appropriate public authorities, or when such disclosure is specifically mentioned in appropriate agreements which contain defined confidentiality clauses.
7. All Employees regardless of the job position are responsible for assuring the accuracy and completeness of information in their area of responsibility. The correctness and reliability of the information used by the Company affects its reputation and credibility.
8. The duty of confidentiality mentioned in this Code remains in force after termination of employment or termination of contract.
9. All documentation of BAP Group is prepared in a reliable, accurate and truthful manner. No Employee shall give or cause others to give false or misleading information.

3.4. Market analysis

1. BAP Group observes the export restrictions and economic sanctions according to the law of the country on the territory of which the company from the Group acts and therefore it will not cooperate with any entities from the countries covered by these sanctions and restrictions.
2. BAP Group values and protects non-public information of other entities in the same way as it respects the protection of its own non-public information.
3. BAP Group approves conducting market analysis based on publicly available information or conducting investigations according to ethics.
4. BAP Group Employees conducting a competition market analysis should use information obtained from sources such as:
 - a) publicly available documents of public institutions,
 - b) announcements and communications of legal representatives of commercial entities or their representatives authorized to communicate with the media,
 - c) yearly and other periodic reports,
 - d) news, articles and other publications,
 - e) market analysis offered by third parties and lead according to the law.
5. BAP Group Employees, who conduct a competitor market analysis, should not:
 - a) engage in any illegal or non-authorized activities aiming at accessing competitor information,
 - b) use information consciously obtained as a result of violation of non-disclosure agreements,

- c) use "restricted" or "confidential" information, as well as information obtained from a previous or a current employee of a competitor.

3.5. Handling of personal data

1. BAP Group respects the privacy of all Employees, its clients and business partners, gathered data is used in a responsible and legally compliant way. The Group requires from all Employees who handle personal data to:
 - a) Act in accordance with the law,
 - b) Follow all relevant contractual obligations,
 - c) Collect, use and process personal data solely for the lawful business goals of the BAP Group',
 - d) Prevent accessing information by non-authorized individuals.
2. Any BAP Group employee who enters into ownership of personal data is responsible for abiding by confidentiality of data and act in accordance with internal regulations and the law.

3.6. Accepting and offering benefits. Prohibition of corruption

1. BAP Group, its Employees and other interested parties are obliged to observe the highest standards of integrity, honesty and reliability in all relations – both outside and inside the Group.
2. The Employee should not (directly or indirectly) accept, demand (for himself or for other people), offer or transfer sums of money and other financial and personal benefits (voluntarily or under the influence of unlawful pressure) with the exception of small gifts commonly used and accepted legally and customarily in commercial relations or when they are occasional or promotional and they are given in accordance with the law.
3. BAP Group does not tolerate any type of corruption as defined in point 2 above, used in any form.
4. Gifts are allowed to be handed or received according to admitted standards and may not exceed the generally and legally defined values or types, in order to avoid being regarded as a commitment or a suggestion to commit to a specific activity.
5. The gifts' value and way of conduct following their acceptance must be in accordance with internal and external regulations of BAP Group.
6. BAP Group abides by rules of hospitality which define the appropriate manner of hosting business guests with consideration of their tradition and culture, and with respect of appropriate business standards in each country.



7. While hosting business guests, BAP Group refrains from manifestations of hospitality which could meet with an unfavorable social reception, negative reaction of the recipient or endanger the reputation of BAP Group.

3.7. Anti-money laundering

1. BAP Group and its Employees should not participate in activities which could be connected with accepting and using money obtained in any form and manner as a result of unlawful or prohibited acts, including misdemeanors or crimes.
2. BAP Group Employees are obliged to examine available information regarding clients and other business partners, in order to verify the credibility and legitimacy of their activities.
3. The Group complies with any regulations concerning the prevention of money laundering.

3.8. Fair rules of competition and promotion

1. BAP Group accepts the competition rules of the market and is bound to act in compliance with legal norms regarding competition.
2. BAP Group Employees must avoid any practices considered as a violation of the anti-competition law as well as any dishonest market practices.
3. BAP Group, following the rule of fair competition, does not infringe intellectual property rights of third parties and does not counterfeit products of other entities.
4. BAP Group assures the compliance of any advertising and promotional activities with the law in force, taking into consideration any internal BAP Group norms.
5. BAP Group Employees must act in an honest, integrated and non-misleading way while conducting advertising and tendering activities with clients and contractors.
6. BAP Group does not allow the transmission of dishonest, untrue or ambiguous information to clients and other business partners.

3.9. Customer relations

1. BAP Group respects the guidelines concerning the products ordered by the clients and always pays attention to the recommendations of the clients and, with respect to the regulations of commonly binding law, considers them as the most important criteria when making decisions



about the realization of orders. In addition, all customer requests are considered as quickly as possible in a given case with due diligence and respect for customers.

2. BAP Group is constantly working on the technology development and on ensuring higher and higher quality of the products having in mind that the success of BAP Group is directly correlated with the success of its customers.
3. BAP Group obliges itself to pass always only true information about manufactured products. All customer complaints will be handled in good faith and information regarding the results of the complaint analysis will be provided to the affected customer. Customers will be treated with due respect during the complaint process.

3.10. Supplier relations

1. As a socially responsible company, BAP Group abides by international supplier standards regarding the protection of human rights, the prohibition of child labor and slavery, the protection of fairness of competition, and anti-corruption and environmental protection rules.
2. BAP Group, in the range of suppliers' selection, acts according to internal procedures, General Commercial Conditions (GTC) established by BAP Group as well as rules defined in this Code of Ethics, guided by the rule of objectivity and equality of all entities applying for cooperation with the Group.
3. BAP Group selects only suppliers who guarantee the required quality of purchased material and at the same time care about the natural environment, good work standards and the business ethics in the whole supply chain.
4. BAP Group does not cooperate with the suppliers who manufacture the products which are known to be subject to a human rights violation, bribery, committing an unethical act or having a negative impact on the environment.
5. BAP Group does not use its superior and dominant position in relations with suppliers for accepting any financial benefits, unjustified demands, or compensations.
6. BAP Group conducts all transactions in a fair, rational and market-oriented manner. Any modifications to the terms of the transaction are always agreed with the supplier. Undisclosed oral ancillary agreements with contractors are prohibited.
7. BAP Group builds with its suppliers the relations based on mutual cooperation, trust and honesty.
8. BAP Group evaluates on current basis the way and quality of cooperation with its suppliers aiming at objective and fast clarification of all incompatibilities and doubts related to its course in order to maintain transparent and fair-trade relations. Moreover, BAP Group in the first



place solves all conflicts arisen in relation with suppliers in a way leading to an amicable solution of the matter.

9. It is required from the suppliers of BAP Group to comply with rules and standards of conduct described in the " Sustainable development Policy for Suppliers" of the Group as well as to transfer these requirements in the chain of supplies.

3.11. Environment and local communities

1. BAP Group conducts its activity in accordance with the environmental law, regulations and permissions. If there is no such law, regulations or rules, the BAP Group determines sufficiently high standards in internal acts in order to protect the environment.
2. BAP Group aims at ensuring good relations with local communities based on agreement and cooperation by participating in social initiatives appropriate with the level of engagement in a specific location.
3. Each Employee is obliged to know and follow the environmental procedures issued by individual entities of the BAP Group.

3.12. Health and safety

1. Employee's health and safety protection is a key value of BAP Group.
2. BAP Group abides by Health and Safety regulations in force, promotes safe operational practices and avoidance of unnecessary risk for Employees.
3. All Employees in the BAP Group are obliged to comply with health and safety regulations to protect their own safety and safety of colleagues.
4. Every Employee is responsible for safety and is capable to prevent any accidents and accidents of colleagues by rigorously abiding by health and safety rules and reporting any failures and dangers noticed.
5. BAP Group Employee should not expose other employees to unnecessary risk that may result in damage to health or personal inviolability.

4. Use of the Code

4.1. Work environment and rules of cooperation and employment

1. BAP Group assures work and career equality to all Employees, by making employee decisions/assessments in accordance with the law. The way an employee's career path is developed depending on the Company's needs, the results and evaluation of the employee's work, as well as the use of objective evaluation criteria.
2. Depending on the Group's needs, requirements and possibilities, the Group enables Employees the access to trainings and programs which improve their knowledge and skills.
3. BAP Group ensures equal treatment to all candidates applying for employment and Employees of BAP Group both during the employment relation and after its termination avoiding any form of discrimination in particular due to sex, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, sexual orientation and also regardless of employment for definite or indefinite period of time or full-time or part-time employment.
4. BAP Group observes the rules concerning the working time of Employees and provides the Employees with the right to rest in accordance with legal regulations as well as in accordance with additionally determined internal regulations of the Group.
5. The BAP Group also adheres to the principle of decent remuneration of employees, taking into account, first of all, their education, experience, seniority and the position of work, while not discriminating against any employee. The rules for rewarding and remunerating employees have been set out in detail in the internal regulations of the BAP Group.
6. BAP Group ensures freedom to form and operate trade unions, social and professional organizations of Employees as well as the right to freedom of speech in relation to activities undertaken by BAP Group with respect to each party. Additionally, BAP Group guarantees that joining any organizations will not meet with any negative consequences for Employees on this account.
7. BAP Group declares that it will undertake negotiations with the Employees' professional organizations and the postulates submitted by them will be considered by the Employer in good faith.
8. Any form of abuse or unrequested behavior, especially based on sex, age, disability, race, religion, nationality, political views, union membership, ethnic origin, sexual orientation, or related to the type of employment contract (definite or indefinite, full-time or part-time) which aims at or leads to damaging the employee's freedom, both at work and outside of work is not accepted.

9. The Group declares that it protects pregnant or breastfeeding Employees in accordance with applicable law. In connection with the above, pregnant or breast-feeding women are not entrusted in BAP Group with any works that may have negative influence on their health, course of pregnancy or breast-feeding.
10. The Group declares that it does not and will not employ child labor. Juveniles may be employed in accordance with applicable law within the scope of government activities under an approved vocational training, apprenticeship or similar program designed to provide education for children and youth, only within the limits of working hours established by applicable law. BAP Group at the same time declares that young workers are not and will not be employed for works that can have negative influence on their health.
11. The Group declares that it does not participate in the so-called modern slavery, forced labor or human trafficking and categorically condemns all such actions aimed at the exploitation of people, regardless of gender and age, violating the right to self-determination, whether it be physical, psychological or deceptive.
12. The Group does not accept any derisive or offensive behaviors, harassment or threatening aimed at lowering the employee's self-esteem, alienation or embarrassment of the employee in the work environment.
13. Due to the fact that the image of the Employees of the Group also reflects the image of the Employer, the Employees of BAP Group are obliged to take care of their dress and appearance at work. Accordingly, Employees should dress in a neat, non-confrontational and work appropriate manner appropriate to the circumstances.
14. BAP Group prohibits and counteracts undertaking professional duties under the influence of alcohol, drugs or any other narcotic.
15. BAP Group obliges its Employees to show sensitivity and react to situations that may have influence on health and safety of co-workers.
16. BAP Group Employees are responsible for abiding by personal culture rules and respecting colleagues, no matter the job position and type of employment.
17. The Company prohibits acts of dishonest behavior, use of understatements or purposeful misleading when communicating with colleagues, subordinates and supervisors. The Company encourages cooperation and mutual support between Employees.
18. BAP Group communicates to its Employees expectations related to the way duties and the quality of work is executed, and assures access to information related to the functioning of the Company in a level necessary to allow the accurate execution of tasks.

19. BAP Group is an international organization which values cultural differences and draws upon experiences of Employees, clients and other business partners from different regions of the world.

4.2. Attitude of the management staff

1. Employees in managerial positions at all levels of management in the BAP Group are people, who should set a good example and be a model to follow for other Employees.
2. Employees in managerial positions shall treat Employees fairly and reasonably based on each Employee's individual abilities and capabilities.
3. The role of the BAP Group's management staff is to:
 - a) create such conditions of goal and task execution which supports the work culture based on ethical values,
 - b) transmit, communicate and ensure access to standards and rules of behaviors defined in BAP Group Code of Ethics,
 - c) provide necessary explanations and support in the area of solving ethical dilemmas reported by Employees and securing them from unwanted behavior related to reports regarding ethical rules violation,
 - d) receive reports from Employees regarding situations considered as a breach of BAP Group Code of Ethics,
 - e) analyze reports and taking appropriate actions and reacting to any behaviors which are a violation of the BAP Group Code of Ethics.

4.3. Proceedings in the case of ethical concerns

1. The BAP Group Code of Ethics constitutes a source of basic knowledge for rules and ethical standard behaviors adopted in the Group.
2. Whenever a situation arises that raises questions about your review against these ethical standards, you should contact your direct supervisor or the Human Resources Department.
3. In case of ethical doubt, Employees should ask themselves one of the following questions:
 - a) Is my behavior or the behavior of my colleagues in accordance with the law and the internal rules of BAP Group?
 - b) Is my behavior or the behavior of my colleagues in accordance with values, rules and standards introduced by the BAP Group Code of Ethics?
 - c) whether my action or event of which I am a participant or a witness may expose the Group to financial or image losses?
 - d) Does the task I am assigned to constitute a danger to myself, my colleagues or the natural environment?

- e) Does my behavior or the behavior of my colleague have a negative influence on professional decisions and duties?
- f) Is the specific behavior in accordance with my values and would I like to experience such a behavior?
- g) What would my supervisor, colleagues, family and friends think of my behavior?

4.4. Reporting violations

1. The Employee of BAP Group who witnesses a violation of law or provisions of the Code of Ethics by BAP Group or one of its Employees can undertake independent actions aiming at correcting a given situation or can report a case of violation of law or provisions of the Code of Ethics in an open conversation with a direct supervisor.
2. If the Employee is unable to speak to their direct supervisor, or if the nature of the matter makes this inadvisable, he should contact Human Resources Department.
3. Reports regarding the violation of the law or of the BAP Code of Ethics by BAP Group or its employee may also be made by external BAP Group stakeholders.
4. Reports may relate to cases which do not personally concern the author of the report.
5. BAP Group Employee should report cases of violation of the law or of the Code of Ethics in a good will, even if the employee is not directly involved in the case.
6. Any situation where an individual makes a report of a possible violation of the Code or asks for an explanation of the interpretation of the Code and is held responsible for the negative consequences of such an action is considered as a violation of the BAP Group Code of Ethics.
7. False accusations against Employees who have witnessed a violation of the law or rules of the Code may also be considered as a violation of the Code.
8. In the course of considering a given report, BAP Group protects the identity of the authors of the report. The identity of individuals mentioned in the report should also be protected until charges are confirmed.
9. The above-mentioned protection does not concern cases where the disclosure of personal data of the individual who made the report results from legally binding regulations.
10. Employees who do not comply with this Code of Ethics will be subject to appropriate consequences.
11. BAP Group obliges itself that the Employees reporting any incorrectness regarding observing internal regulations of BAP Group including this Code of Ethics as well as those resulting from the binding law shall not bear any negative consequences on this ground. Simultaneously, BAP

Group shall undertake actions preventing suspension, demotion and intimidation of the person reporting the irregularities or using other forms of retaliation.

4.5. Implementation and management of the Code

1. The Managing Director and Directors in particular areas are responsible for the implementation of the Code of Ethics, conducting investigations related to its violation and making decisions regarding corrective and disciplinary actions towards Employees.
2. The Human Resources Department is responsible for making decisions regarding the interpretation of the Code of Ethics, for the maintenance of the violations reporting system, as well as for conducting investigations related to this matter.
3. Directors responsible for individual areas and direct superiors, to whom a violation will be reported, are obliged to provide such information immediately to the HR Department.
4. The Human Resources Department is responsible for setting up a register of violations reported in BAP Group completed with an information regarding corrective and disciplinary actions, as well as for reporting the above to the Managing Director once a month.
5. The Managing Director or Directors responsible for individual areas, may, if considered appropriate, in order to conduct the investigation and make decisions in a specific case, organize an Interventional Team Ethics comprised of at least one representative of the Human Resources Department.
6. BAP Group must make any efforts to execute disciplinary actions in all case considered as a violation of the Code of Ethics.
7. Violations of the Code of Ethics may lead to loss of trust towards the employee and to consequences on the employment terms mentioned by the law of a specific country.
8. Any penalties for violations of the Code will be executed by the Chief Executive Officer or Directors responsible for individual areas.
9. BAP Group Code of Ethics is introduced via an Ordinance of the Chief Executive Officer. Any changes to it will be made in the same mode.
10. Taking necessary steps to implement the BAP Group's Code of Ethics in individual BAP companies is entrusted to the Directors responsible for individual areas.