



**GROCLINGROUP**

**ETHICS POLICY  
& CODE OF BUSINESS  
CONDUCT**

[www.groclin.com](http://www.groclin.com)

## INTRODUCTION



In the period of almost 40 years of existence, the well-being of its Employees has always been at the heart of Groclin Group. Being a good employer who offers a chance to develop and who ensures good atmosphere for cooperation is one of the most important, internal objectives of our organization.

In order to ensure a sense of security and belonging to the company as well as for the purpose of avoiding any misunderstandings we created a Code of Business Conduct, which will be subject to systematic reviews. The Code of Business Conduct aims at highlighting the recommended principles of conduct and the value of corporate responsibility, thus guaranteeing further sustainable development and smooth cooperation of the whole team.

By informing clearly about our Ethics Policy and the Code of Business Conduct we strongly demonstrate respected regulations and obligations and emphasize ethical values which guide us in taking measures in all fields of our operation.

The following Code binds us in all our operations, it constitutes a basis for ethical conduct of all Groclin Group Employees as well as our partners and suppliers. I strongly believe that this document will answer all questions and make the cooperation between individual Employees as well as all Groclin Group entities even better.

Your sincerely,  
President of the Board André Gerstner

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The values that we cherish strive to develop a culture of positive cooperation and create an individual style of action - both in the business aspect as well as on a personal level. The following values should guide our Employees in all their actions related to professional life. We would like them to be visible also in personal attitudes towards the Group and in the promotion of its image in Poland and beyond.

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# HUMAN RIGHTS

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These are the most important rights observed in Groclin.

It is people that create our company, therefore they are the most important element of our organization.

Equality among Employees is something that should be ensured by every Employer.

# HUMAN RIGHTS

## 1. COMPLIANCE WITH THE LAW



Groclin observes the law and at every stage of its market activity; it abides by legal regulations applicable in countries in which it operates.

We are committed to combating the violations of human rights. All violations in that regard will be subject to severe sanctions, both within the Group as well as outside (criminal proceedings).

## 2. NON-DISCRIMINATION



Our Employees are selected based on their skills and qualifications. Groclin ensures the observance of the equal opportunities and the equal treatment principles.

We ensure mutual respect, irrespective of:

- ethical background,
- skin color,
- sex,
- religion,
- nationality,
- sexual orientation,
- political persuasion,
- trade union membership
- disability.

What is not tolerated in Groclin is physical and mental persecution, exploitation and other actions that violate the integrity and dignity of an individual, including sexual harassment and abuse, corporal punishment, mental and physical coercion, insults directed at Employees.

## 3. PROHIBITION OF JUVENILE LABOR

**Juvenile labor is forbidden.**



The minimum age of Groclin Employees is the minimum employment age specified by law in a country where Groclin operates.

## 4. CONFIDENTIALITY OF PERSONAL DATA



Groclin uses personal data only to support Groclin's operations and to provide Employee benefits. The access to personal data is limited to authorized personnel only.

Each Groclin Employee must pay particular attention to complying with all laws and regulations relative to the protection, use and confidentiality of personal data. The information concerning Employees' private lives, performance assessment, promotion and salary must be kept confidential, unless it is needed for the purposes of HR management or other legally admissible purposes.

It is also forbidden to divulge personal information - in particular in relation to remuneration and employment terms and conditions - to third parties, unless an exceptional situation arises (provided for by applicable national or internal laws or regulations).



# ENVIRONMENTAL WELL-BEING

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Groclin Group cares about the preservation of the natural environment. In our work we follow the highest environmental standards and we regularly undertake measures which support environmental protection - both on a regional as well as a global level.

## 1. ENVIRONMENTAL POLICY



In everyday operation Groclin Group uses a number of materials and manufacturing methods which are necessary for providing business partners with efficient service. Modern-day economy and the situation on the market require us to boost that efficiency and provide services faster and better. Each measure aimed at boosting manufacturing capacity may have a negative impact on the environment if it is taken in an inconsiderate manner.

Natural ecosystem is of huge importance to Groclin, therefore we observe all regulations in that scope of operation. We also promote actions contributing to environmental protection and apply production materials and processes which are socially as well as legally acceptable and environmentally-friendly.

Employees should remember about our joint responsibility for environmental protection during the performance of day-to-day tasks. Their actions should, in particular, concentrate on the reduction of waste, preservation of natural resources and recycling of materials at every stage of the manufacturing process. Sensible use of such natural resources like energy or fuel helps in preventing pollution and reduces the amount of waste. As a result, it is possible to eliminate risk factors and causes of environmental imbalance.

Groclin is also committed to minimize adverse environmental impact of its products and services during the whole product life cycle: at the stage of conception, development, production, transport, use and disposal or recycling. We support regional measures aimed at the preservation of natural environment. Cyclically we implement innovative manufacturing technologies which help us to optimize production costs and minimize the impact of manufacturing processes on the environment.



## WORK

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Groclin Group demonstrates a high level of quality that meets the expectations of even the most demanding business partners. We make sure our products are of the highest quality possible and we expect our Employees to do their best to constantly improve their results. We want the development of our Employees to be synonymous with the development of the Group.

# WORK

## 1. WAGES AND BENEFITS



Groclin complies with all applicable laws and regulations, including those relating to minimum wages, overtime hours and benefits specified in legal provisions. As a principle, at Groclin, Employees are paid in a fairly and timely manner, and the basis on which Employees are paid is clearly communicated.

## 2. COMMITMENT TO PROVIDE SAFE, HIGH-QUALITY GOODS AND SERVICES



Groclin employees are committed to provide safe, top- quality products, services and solutions.

Defects in the process, design, product, tools, installation or maintenance may pose a risk to the health and safety of Employees and affect the quality of Groclin products and services, thus possibly compromising the reputation or financial interest of the Group. Due to the above-mentioned consequences we conduct inspections of processes and we make sure that all our actions are characterized by high quality.

## 3. OCCUPATIONAL HEALTH AND SAFETY



We care about our Employees and want to ensure the best working conditions possible. We want to prevent risks that may affect their health and safety. Our work methods and procedures are reviewed on a regular basis. We oblige Employees at all levels to take responsibility for health protection and the prevention of accidents at work. Groclin also ensures that the manufacturing facilities, work stations and tools are designed in a way which guarantees the best possible conditions for fulfilling work duties. We respect standards for safe and hygienic working environment and we are taking appropriate measures to guarantee health and safety at the workplace and good working conditions.

## 4. USING GROCLIN RESOURCES

Groclin Employees are responsible for the proper use of the Company's assets (intellectual property, documents, computer software and hardware, plant equipment, raw materials, machinery and all other tools needed and provided by Groclin to conduct work-related duties).

Each Employee should:

- use the assets in accordance with the Company's rules and procedures,
- protect all passwords and codes to prevent any unauthorized access to Groclin computer data system,
- refrain from unauthorized copying of software developed by Groclin S.A, procedures, codes, manuals, training programs and all other materials, unless authorized to so by the President of the Board or by an authorized member of the Board;

## 5. CONFIDENTIALITY OF GROCLIN ASSETS, DOCUMENTS AND DATA



Sharing of confidential information belonging to Groclin Group, its customers and business partners is not allowed. It is forbidden for Employees to divulge this information to third parties without prior authorization, or disclose it to other Groclin Employees without the prior approval. Persons whose employment contract has expired or who are no longer contractually bound to Groclin by an employment contract, shall keep all this information confidential.

## 6. VIOLATION OF THE ETHICS POLICY



We take Employees' concerns seriously. We investigate notifications of all possible violations. All Employees are expected to fully cooperate during investigations conducted by the Group.

Any signs of violations of the Ethics Policy are subject to disciplinary action, including termination.



# ANTI-CORRUPTION MEASURES

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Integrity is a value that the Group stands for, both in relation to customers as well as in internal cooperation. We want Groclin to be perceived as a fair employer and competitor on the market, therefore all our actions are performed in compliance with law, ethical standards and our culture.

# ANTI-CORRUPTION MEASURES

## 1. PROHIBITION OF CORRUPTION



The whole Groclin team is expected to observe the highest ethical standards. All attempts at corruption, extortion and other means of gaining unfair advantage will be severely punished. Groclin operates successfully thanks to the quality of its products and services. We do not seek to develop our business by trying to corrupt the judgment of our customers. Therefore in our business relations it is prohibited to accept and give expensive gifts.

## 2. FAIR COMPETITION



Groclin believes in the observance of provisions and principles concerning competition, both in Poland as well as worldwide. The rules and laws of fair competition forbid any written or unwritten understandings, agreements, plans, arrangements, or schemes among competitors concerning price, territory, market share, and/or customers. Groclin Employees should never conclude such agreements or make such arrangements with entities cooperating with Groclin and its competitors.

In case, such entities suggest some additional, unclear arrangements outside the scope of the contract, such a situation needs to be reported to one's superior or the HR department.

## 3. PROHIBITION OF ILLEGAL PAYMENTS TO GOVERNMENT AGENCIES OR THEIR EMPLOYEES



At Groclin no payment may be made in the hope of obtaining favorable action from a government or administrative agency. Offering gifts, services, or lavish entertainment to government or administrative employees or officers is forbidden, since such actions may be construed as attempts to influence government or administrative decisions in matters affecting Groclin Group.

## 4. PROHIBITION OF POLITICAL CONTRIBUTIONS



Groclin makes no payments and provides no services to political parties, elected officials, or candidates for office. Irrespective of political preferences, Employee should not at his/her own discretion use company funds to support any political organizations.

## ANTI-CORRUPTION MEASURES

The decision concerning a possible endorsement of a political candidate or a political cause by the Group is taken by Groclin Management Board.

### 5. THE PRINCIPLE FOR USING GROCLIN FUNDS, SERVICES AND RESOURCES



It is forbidden to use Groclin funds, services or resources for inappropriate or illegal purposes. The practice of purchasing privileges or special benefits on behalf of Groclin through the payment or receipt of bribes, gratuities, or other forms of payoffs is strictly prohibited.

### 6. TRUTH AND ACCURACY OF ACCOUNTS, BOOKS AND RECORDS



All assets, liabilities and transactions performed by Groclin must be recorded in the Group's financial books and on accounts that should be maintained in an accurate and reliable manner, in accordance with applicable standards. Documents pertaining to commercial or financial transactions must reflect these transactions faithfully.

No undisclosed funds or unrecorded assets of Groclin or its subsidiaries shall be maintained for any reason whatsoever.

False records shall never be entered to the books and records of Groclin and its subsidiaries. Failure to respect that rule constitutes a serious offence.

All Groclin Employees are responsible for protecting the culture of integrity. Any potential violation is a serious matter. We expect every Groclin Employee to notify us of any suspected violation of our Ethics Policy & Code of Business Conduct. We do not tolerate retaliation against anyone for raising good faith concerns. In case of any questions about the Ethics Policy or concerns about a potential violation of the Ethics Policy, one should take the following steps:

1. discuss the issue with one's supervisor
2. discuss the issue with another supervisor or manager
3. contact HR department
4. contact the headquarters of Groclin Group directly – [compliance@groclin.com](mailto:compliance@groclin.com)

## ANTI-CORRUPTION MEASURES

### REPORTING CONCERNS

In case of any doubts concerning this code or situations that arose in the workplace, one should contact the HR department.

We want to make sure that every Employee feels safe and comfortable at Groclin. In the process of shaping and modifying our organizational culture we want to use as many suggestions as possible to jointly create a good working atmosphere.

**GROCLIN**GROUP.

GROCLIN S.A. registered office  
Słowiańska 4, 62-065 Grodzisk  
Wielkopolski e-mail:office@groclin.com

Tel.: +48 61 628 7110

Fax: +48 61 628 7366

NIP PL 9230026002 / Regon 970679408 / KRS 0000136069  
District Court for Poznań-Nowe Miasto and Wilda. |IX Commercial Division  
KRS

**GROCLIN**GROUP.