



Amica Group **Code of Ethics**

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I. INTRODUCTION

1 | Amica Group Code of Ethics

"All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood."

(Unesco: Universal Declaration of Human Rights, Article 1.)

At Amica Group we are determined to create a work environment where everyone is treated equally, with respect and dignity, and is able to fulfil their potential as well as derive satisfaction from attending their workplace. The basis for such a work environment are relationships based on respect for human dignity and rights, care for proper use and handling of the resources and property of Amica Group, and absolute compliance with the law as well as internal policies and procedures.

The Code of Ethics is a set of our principles and values which we, as Amica Group employees, follow and which we consciously care for in our daily work and interactions.

It is in the interest of each and every one of us to care for an ethical work environment and proper conduct, so that we, as Amica Group, can achieve our long-term business goals even better, based on trust of our employees, partners and stakeholders in the organisation and our brands. This approach allows Amica Group to ensure stable jobs and development for all of us.

In creating the Code of Ethics, we relied on the fundamental and recognized legal norms, including the Declaration of Human Rights, the Charter of Fundamental Rights of the European Union as well as local labour law regulations.

We are convinced that with full commitment and a sense of responsibility, we will jointly care for the ethical work environment and continue to develop our business based on mutual respect.

The Management Board of Amica Group

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Alina Jankowska-Brzóska

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Management Board Member
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2 | What is the code of ethics, its purpose and scope?

This document presents the principles that apply to all of us - employees of the Amica Group.

The Code sets out the general principles to be followed in our daily work within the organisation as well as when collaborating with our business partners and third parties. The Code also describes in more detail the areas of business and organisation that are especially prone to abuse.

Each and every one of us is obliged to follow and comply with the Code, ensure the common good and react immediately if there is a suspicion or any circumstances indicating that the Code of Ethics may have been violated.

Any unethical and/or illegal behaviour and/or breach of Amica Group's policies and/or procedures may lead to discomfort, ineffective work, demotivation, loss of commitment, and create a potential risk for Amica Group's reputation, loss of trust in our brands and business, which may negatively affect the business goals, ultimately leading to instability of employment.

For this reason, it is so crucial for all of us to comply with the Code of Ethics in our daily work and to immediately report any irregularities.

The Code describes key areas where ethical behaviour is of essence and inappropriate conduct may cause a high or very high risk for Amica Group, and thus also for its employees. Therefore, in the following chapter, we identify the values and principles to be followed at Amica Group, why they are important to us and how they are manifested in our daily activities and collaboration.

At the same time, we also provide examples of unethical behaviour i.e. behaviour that we do not accept at Amica Group.

3 | Responsibility of each and every one of us – employees of Amica Group

Each and every one of us is responsible for the proper conduct. Our duties include strict compliance with the law and adherence to the Code of Ethics as well as procedures and policies of Amica Group.

If in doubt as to how you should act in a given situation, project or activity, for example, whether the action you plan to take is appropriate (such as when working on a project, collaborating with a business partner, handling a financial transaction, when interacting with other employees, or when following manager instructions), and to avoid conduct that is illegal, or not in line with the Code of Ethics or internal policies and procedures, proceed as follows:

Check BEFORE you act!
Ask supervisor, expert or the person
responsible for a given policy or procedure,
or talk to HR Business Partner.

4 | Your duties and responsibilities

If you notice or suspect that the Code of Ethics has been, or may have been violated, you should take the necessary steps. You can take one or more of the following steps, which do not have to be followed in the order presented. It is important that you act!

- Report the case to your supervisor. If you do not feel comfortable e.g. the report concerns your supervisor, or you do not want to do so for other reasons, then...
- Report the case to your supervisor's line manager or...
- Report the case to your dedicated HR Business Partner or to HR Director or...
- Report the case to the Compliance Unit, Data Protection Officer, The Infringement Team or The Ethics Committee, depending on the type of the issue reported.

5 | Guarantee of anonymity no retaliation

Whenever you report an issue and prefer to remain anonymous, your wish will be respected, since it is of utmost importance for Amica Group to prevent negative impact and to resolve any issues as soon as possible.

At the same time, those who report breaches of the Code are protected and their identity is not disclosed during the investigation conducted by the authorized persons. You can read more about the guarantee of anonymity in the "Amica Group's Breach Reporting and Whistle-blower Protection Procedure".

At each stage Amica Group undertakes to ensure that there is no retaliation, and should it occur, that those responsible are severely disciplined, including termination of employment, in justified cases.

II. PRINCIPLES OF THE CODE OF ETHICS

- 1 | Compliance with the law, policies and procedures of Amica Group
- 2 | Respect, equality and no discrimination
- 3 | Mobbing prevention
- 4 | Sexual harassment prevention
- 5 | Internal communication based on respect
- 6 | Nepotism prevention
- 7 | Effective use of Amica Group resources
- 8 | Conflict of interest prevention
- 9 | Personal data and information security
- 10 | Image of Amica Group employees as an asset
- 11 | Gifts and hospitality
- 12 | Respect for the natural environment

1 | Compliance with the law, policies and procedures of Amica Group

Why is this important to us?

We are all obliged to comply with the law as well as internal policies and procedures to ensure the sustainability of business. We must not expose Amica Group to the risks associated with misconduct, which may result in loss of credibility and trust in Amica Group and its brands, leading to legal and financial consequences, and ultimately to the instability of our jobs.



How we act:

- Each and every one of us strictly adheres to applicable law as well as policies, procedures and internal standards.
- Each of us performs their duties with the utmost care.
- When in doubt, BEFORE you take action, ASK, check, and make sure that your actions comply with the law, internal policies and procedures and the Code of Ethics.



You are in breach of the Code of Ethics when:

- You break the law, violate policies, disregard procedures (e.g. violate the dignity of another person, discriminate, do business with a contractor without conducting a tender, issue an invoice for a service that has not been rendered, spend company funds for private gain, pay for private items as business expenses).
- Despite doubts or reservations, you take action (e.g. under the pressure of time, superiors, or performance) without checking or clarifying doubts.

2 | Respect, equality and no discrimination

Why is this important to us?

Each and every one of us deserves respect, dignity, equality and no discrimination.

We can realize our full potential in an environment of mutual respect, fairness and equality. We will then effectively collaborate with others and jointly grow the business of Amica Group.

If your conduct is found to be discriminatory, you may be subject to disciplinary procedure.

Definition of Equality and Discrimination:



Discrimination is a situation where a person is treated less favourably than another person in a comparable situation because of their sex, race, ethnic origin, nationality, religion, creed, belief, disability, age or sexual orientation.



Equality in employment means no discrimination, direct or indirect, on the grounds set out in the above definition of discrimination.

How we act:



- We show respect to every employee, business partner and every person we interact with at Amica Group, regardless of sex, age, nationality, sexual orientation, beliefs, religion or position in the organisation.
- Performance review, feedback, assignments, promotion criteria, starting and terminating employment, access to training, remuneration, bonuses, and all other activities related to work management, work performance and business management are based solely on merit criteria.
- At Amica Group, we do not tolerate discriminatory behaviour, we react to it and actively prevent it (e.g. we tell someone when they do something wrong).
- Internal policies and procedures apply to everyone.
- At Amica Group, we educate on and monitor compliance with the principles of equality and no discrimination.
- At Amica Group, we are determined to avoid discriminatory behaviour. Thus, we enable employees to report irregularities and blow the whistle in case of any wrongdoing.



You are in breach of the Code of Ethics when:

- You discriminate against another person when, for example, you deliberately disregard their opinion at a meeting, or assign “unattractive” tasks in a project.
- When assessing the work of an employee or a person involved in the project you adopt criteria other than merit-based.
- You express yourself or behave in such a way that another person feels disrespected (shouting, personal rather than professional comments, ignoring someone, withholding information, making jokes at the expense other people relating sex, sexual orientation, etc.).
- You make general statement such as “You always”, “You never”, “They always”, or spread false information about a given person or make insinuations, etc.

3 | Mobbing prevention

Why is this important to us?

Human dignity is the highest value. A work environment based on respect and kindness as well as a healthy environment driven by professionalism enable effective performance of duties. In order to classify a conduct as mobbing, it must meet all the criteria below:

- persistent and prolonged harassment or intimidation of an employee
- causing someone to feel low self-esteem
- intended to humiliate and/or ridicule
- aimed at isolating or eliminating an individual from the team.

Perpetrators of mobbing will be subject to disciplinary procedure, which may lead to termination of employment.

Definition of mobbing

"Mobbing means a conduct related to or directed against an employee, consisting in persistent and prolonged harassment or intimidation of an employee, causing him or her to underestimate their professional ability, causing or aimed at humiliating or ridiculing an employee, and isolating or eliminating them from the team."

If you believe you are a victim of mobbing, go to Chapter III. Whistle-blower Policy.

How we act:

- We show respect to every employee, business partner and every person we interact with at Amica Group, regardless of gender, age, nationality, sexual orientation, beliefs, religion, position in the organisation..
- Employees in managerial positions are especially responsible for building a healthy and supportive work environment based on respect. At Amica Group, we expect the highest standard of conduct and make sure that the same standards are observed by all members of a team.
- At Amica Group, we educate employees in this respect to help them monitor the risks of mobbing and blow the whistle when needed.



To learn about all the anti-mobbing rules, please read the Internal Mobbing Prevention Procedure of Amica S.A.

4 | Sexual harassment prevention

Why is this important to us?

Sexual harassment is a crime and a violation of the rights and dignity of another person.

We want to create a work environment where each and every one is treated with respect, so that we can feel at ease and safe in the workplace, thus being able to fulfil our potential and pursue common business goals of Amica Group.

Anyone who engages in sexual harassment will face severe disciplinary sanctions up to termination of employment. A person committing sexual harassment may also face criminal charges.

Definition of Sexual Harassment:



Sexual harassment is any unacceptable conduct of a sexual or gender-related nature towards an employee aiming to or resulting in humiliating, disgracing or violating dignity of an employee. Such conduct may involve physical, verbal or non-verbal elements. Such conduct is considered discrimination based on sex.

How we act:

- Address each person with respect.
- All activities and information must be formulated and communicated meaningfully.
- Respond promptly to any form of sexual harassment and any gender-based discrimination.



You are in breach of the Code of Ethics when:

- You make general sexist remarks, offensive comments, sexual and gender-based jokes, or make fun of people based on their gender.
- You tell, email, text, etc. sexist jokes.





- You engage in seductive behaviour, demand sex or other sexual activities in exchange for professional benefits (e.g. a raise, promotion, etc.)
- You touch a person or invade their personal space without their consent.
- You force sexual acts by way of a threat.
- You impose yourself with sexual behaviour or commit sexual assault.
- You do not stop the above unwanted behaviour, despite clear disagreement by the victim.

5 | Internal communication based on respect

Why is this important at Amica?

Communication is a key area that allows for effective collaboration in order to achieve common goals. It should be professional and respectful. How we communicate reflects our attitude and respect towards other people. The people with whom we work and communicate (in person, by e-mail, or via other forms of communication) are our business partners – we work together within the same organisation to carry out some common tasks to ultimately achieve Amica Group’s business objectives. Communication of the correct information to other employees – using proper form and tone – helps achieve these objectives and build good relationships providing the basis for effective collaboration and top performance.

If the communication hints violence, discrimination, disrespect, and/or retaliation, we may take formal disciplinary action.



How we act:

- Each and every one of us is responsible for ensuring collaboration based on professionalism, respect and willingness to help, and making every effort to ensure that communication is appropriate, reliable, professional, substantive, non-accusing, constructive, and focused on a solution.
- We share the necessary information in a timely manner, preventing situations where other employees cannot perform their duties due to the lack of information, and this in turn has a negative impact on the business of the entire Amica Group i.e. all of us.
- In case of misunderstanding, you should seek to discuss issues personally with the other person, for example, by sharing feedback. You can call or meet in person to do this. First you should try to resolve conflict on your own based on partnership and cooperation without the involvement of other people from a given area or of a senior rank.
- We take responsibility for our mistakes, apologize and try to remedy them.



You are in breach of the Code of Ethics when:

- Your communication is deliberately confusing and/or shows the signs of retaliation, or venting your frustrations, or is hostile, accusing, non-substantive, embarrassing, and humiliating.
- Your communication is sent to people who are not involved in the matter, project or case, sent to others to humiliate a person, team, etc.

6 | Nepotism prevention

Why is this important to us?

We want to work in an organisation consisting of professionals who are competent to perform their tasks, motivated and identify with their workplace. We create a workplace where decisions regarding promotion, salary raise, bonuses, access to training or other performance or development related decision are made objectively and based on professional criteria.

Nepotism occurs when you favour employees who are close friends or family .



How we act:

- Decisions concerning employees e.g. recruitment, promotions, and other are based on substantive criteria and on the principles of objectivity, professionalism and competitiveness.
- Employees are family members, life partners or are in a close relationship should notify their line manager and their HR Business Partner.
- In this case, persons responsible for career planning and duties (supervisor or HR department) will properly arrange the structure of duties so related persons are not directly subordinate to each other and are not responsible or co-responsible for decisions concerning the related person (e.g. payroll management, assignment of tasks, performance review etc.).
- The nepotism prevention rules are laid down in the **Family Relations Management Policy**.



You are in breach of the Code of Ethics when:

- You support decisions of relatives or friends, even though they are not optimal or are unfavourable for business and organisation.
- You promote, give bonuses and salary raise to employees related to you, without appreciating the objective efforts and contribution of other employees.

7 | Proper use of company's resources

Why is this important to us?

Among other things, our success depends on the effective use of available resources. Our resources include materials, monetary funds, work tools, vehicles, telephones, business PCs, information, data, working time, training time, etc. Misuse of resources for purposes unrelated to business goals may weaken the Company, increase cost resulting in rising prices of our products and adversely affect our sales causing the need to cut the number of jobs.



How we act:

- We all ensure that Amica Group's resources are used solely for business purposes.
- We correctly use Amica Group's resources in accordance with intended purpose (e.g. materials, funds, work tools, intangible resources such as information, data, working time, training time, etc.).
- We do not use Amica Group's resources for private gain.
- We are aware that company vehicles are also a resource and use them correctly. We keep the vehicles clean and report any damage to the insurer and the person responsible for handling the company fleet.
- We react immediately to irregularities in the use of Amica Group's resources.

8 | Conflict of interest prevention

Why is this important to us?

Business and employment decisions should be made on the basis of substantive criteria, with due care for the interests of Amica Group and its employees. Where private interest competes with the interest of Amica Group there is a risk that a decision may not be optimal for the organisation and its employees.

A conflict of interest occurs when the decision-maker is guided by his or her own (private) interest, or expects benefits for themselves, relatives or friends.



How we act:

- Each of us should judge if situation creates a conflict of interest.
- Everyone is obliged to report a potential conflict of interest.
- If there is a suspicion of a conflict of interest, do not get involved in the decision-making process related to a project or selecting a contractor in a tender.
- In case of doubt, consult your line manager or HR Business Partner or the Compliance Unit.
- Do not talk business during private contacts with persons who have personal or capital ties with business partners of Amica Group.



The locally adopted conflict of interest prevention policy lays down the principles for monitoring and avoiding the conflict of interest

9 | Personal data and information security

Why is this important to us?

Data and information are a key resource for an organisation. The information and processes that we deal with in our daily work allow us to compete effectively on the market. Unauthorized disclosure of confidential information may pose a serious risk to the operation of Amica Group and data subjects, and breaches may risk severe financial penalties.



*We encourage you to read **Personal Data Protection Policy**.*



How we act:

- We all ensure the security of data and information of Amica Group..
- We only share information and data required to perform our duties.
- We do not share data and information with people who do not need it, which may also apply to our colleagues.
- We are disciplined – we observe all internal data protection policies and procedures especially those relating to confidential information (data classification, file passwords, use password to lock your PC when leaving your desk, use screen savers, secure document storage —the Clean Desk Policy)
- We protect personal data (use appropriate security, store data in accordance with the law, and delete data effectively and on time), do not disclose personal data to third parties or unauthorized persons.
- We report any irregularities in accordance with the established procedures for reporting data breaches.



You are in breach of the Code of Ethics when:

- You disclose information or data to an unauthorized person (e.g. your colleague or colleague who does not need the data to perform official duties).
- You fail to secure documents correctly (e.g. you do not destroy documents in a shredder, you do not put documents in the filing cabinet after finishing work).
- You incorrectly secure your computer or business phone (e.g. leave your computer unsecured in a public place).
- You provide access to work resources e.g. company computer, to unauthorized persons e.g. household members.
- You do not report personal data breaches i.e. you do not inform the DPO or a person designated in the company, in accordance with the applicable procedures.

10 | Image of Amica Group employees as an asset

Why is this important to us?

As employees, we are the Amica Group, and our conduct and our brands shape its reputation, build our and the Group's image, and influence the trust of the outside world in us and our brands.



How we act:

- Each of us represents the Amica Group. We are obliged its and our (employees') good reputation, especially during contacts with third parties.
- Representing Amica Group means professional behaviour, appropriate clothing, professional statements, being prepared for meetings.
- Our standard is to meeting our obligations reliably and on time and we do not deviate from this standard in external or internal contacts.



You are in breach of the Code of Ethics when:

- You abuse alcohol at business meetings (whether internal or external).
- You are unprepared for a meeting.
- You do not live up to the arrangements.
- You share information that should not be disclosed.
- You do not treat our business partners with due respect.
- You speak unfavourably about Amica Group, its employees and business partners instead of reporting your concerns and comments to your supervisor, HR or other individuals responsible for a given business area.

11 | Gifts and hospitality

Why is this important to us?

We want to make the best decisions to promote the business development of the entire Amica Group. The best decisions are those which do not create a sense of obligation, and are based on professional guidelines and criteria.

A sense of obligation may arise after accepting a gift or it may be felt by our business partner to whom gift or other hospitality is offered.

We understand that Amica Group operates in various business cultures, both where business is built on personal relationships and where relationships are strictly business. However, we are of the opinion that a stable position on the market is one that is built on our commitment, ethical, fair and equal competition. Sales, purchases, supplier selection and other business and employment decisions must not be influenced by or appear to be influenced by personal preferences.



How we act:

- Amica Group employees do not accept or offer gifts or hospitality which exceeds the amounts specified in internal procedures.
- If a business partner offers a gift above this amount, you should refuse to accept and clarify our policy (see below) so as not to offend our business partner.

Statement to include when returning gifts:

Thank you very much for your trust and our collaboration. Our company's policy obliges us not to accept gifts above a certain value. Therefore, acting in accordance with our policy, I would like to return the gift (enclosed) while looking forward to further fruitful cooperation..

Kind Regards, xxxx"

- Accepted gifts and hospitality must not sway a business decision, or give such an impression. Employees make decisions based solely on objective criteria, such as price, quality and other terms of collaboration.
- Accepted gifts and gratuities should not arouse a sense of obligation on the part of the recipient.



*The rules for accepting gifts and gratuities are laid down in the local **Gift Policy**.*



You are in breach of the Code of Ethics when:

- You accept or offer a gift to a business partner with a value exceeding the amount indicated in internal procedures.
- You conceal or do not report the above fact and you do not follow the procedures.

12 | Respect for the natural environment

Why is this important to us?

We consider the natural environment to be an asset that serves us all. It is an asset and resource that is also used by business. Access to a clean natural environment is also important for the local communities in which we operate as Amica Group and our employees. Therefore, we conduct our business activities with respect for nature and its resources.



How we act:

- In our daily work, we conserve the environment; in making decisions, we consider how they will impact the environment
- We follow the internal regulations of Amica Group and the local environmental protection guidelines.
- We are attentive and report to our supervisor any situation that is potentially harmful to the environment.
- We actively participate in the efforts to protect the environment by submitting to Amica Group any ideas that support and help protect the natural environment.
- We participate in communication and educational campaigns on environmental protection organised by Amica.

Compliance with applicable laws and internal policies is our top priority. Identification of breaches and irregularities helps us avoid financial loss and harm to Amica Group companies, our employees and business partners. This is only possible if we comply with applicable laws, regulations and standards, which we expect our employees, colleagues and business partners to follow.

Any misconduct should be quickly identified and promptly rectified. Persons reporting breaches are subject to special protection to ensure an adequate level of safety and confidentiality.

To identify breaches, we have implemented a whistle-blower policy, which allows not only employees but also external business partners to report irregularities. In order to ensure protection of whistle-blowers, we have introduced an anonymous reporting channel, which guarantees confidentiality of the disclosed information and full protection of personal data.

At Amica Group, we oppose any retaliation in connection with a whistle-blower's disclosure. The investigations undertaken are aimed at identifying possible perpetrators and resolving the reported issues, while the whistle-blower is informed about the outcome and can communicate with the investigators, even if issues were reported anonymously. Each case ends with conclusions that help us improve Amica Group operations in all areas.

Depending on the type of reported irregularities or breach, the case is considered by the units and functions established for that purpose:

- The Infringement Team and The Ethics Committee, which deals with cases of non-compliance by employees and managers of Amica Group with the rights and obligations.
- Data Protection Officer deals with cases related to personal data breaches.
- Compliance Unit deals with violations of law, financial violations, tort and fraud, corruption, or violations of regulations on money laundering and financing of terrorism.

Detailed information on the types of cases considered by these company bodies can be found in the Whistle-blower Policy.

Each investigation is conducted confidentially, taking into account the whistle-blower's rights and protection of personal data.

How do I report issues?

You have the option to report any issue anonymously on our whistle-blower platform (we will not identify your personal data) or you can disclose your personal data to us. You will find a box on the platform where you can check one of the above options.

Whistle-blower platform:

report.whistleb.com/pl/amica

Remember that you can also report breaches of the Code of Ethics by one or more of the following methods, which do not have to be followed in the order presented. It is important that you act!

- Report the issue to **your supervisor**. If you do not feel comfortable e.g. the issue concerns your supervisor, or you do not want to do so for other reasons, then...
- Report the issue to **your supervisor's line manager** or...
- Report the issue to your **HR Business Partner** or to **HR Director** or...
- Depending on the type of issue, report the issue to the **Compliance Unit, Data Protection Officer, The Infringement Team or The Ethics Committee**.
- Report the issue via **the online Whistle-blower platform: report.whistleb.com/pl/amica**


Units and functions established to investigate breaches:

- The Infringement Team or The Ethics Committee, e-mail: ethics@amica.com.pl
- Data Protection Officer, e-mail: info.dane@amica.com.pl or gdpr@amica.com.pl
- Compliance Unit, e-mail: compliance@amica.com.pl

In order to meet in person with either of the above-mentioned bodies, find out who is responsible for a given function within the organisation and contact them on their business phone number or e-mail address.

Response time is vital

In some cases **time is very important to us!** This applies especially to personal data breaches. **In this case we only have 72 hours to investigate** and make a decision regarding the notification of a breach to the supervisory authority. A delay may result in a financial penalty.



Please note that the obligation to report breaches without delay results from the established procedures on reporting personal data breaches.

