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ETHICAL CODE

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INTRODUCTION

Bora Poland Sp. z o.o. (hereinafter referred to as “Bora Poland” or “Company”) is committed upholding high standards for human rights, labour rights, environmental responsibility and anti-corruption in all of its business practices.

Illegal or unethical behaviour or actions by Bora Poland or any representative of the Company can not be tolerated because they can undermine its long-standing reputation of honesty and integrity.

To prevent these consequences, Company has adopted the Ethical Code (hereinafter referred to as “Code”). This document is composed of important principles which are a guide for all business decision and strategy.

AREA OF APPLICATION OF THE ETHICAL CODE

The Code applies to all activities carried out all over the world by all the employees of the Company (hereinafter referred to as “Employees”), manager and board members of Bora Poland and all the other representatives acting on behalf of the Company (e.g., consultants, advisers).

The Code shall be respected by all the clients and suppliers of Bora Poland.

All the subject who shall respect the Code are defined “Recipients” or “Recipient”.

All the Recipients shall ensure compliance with Code to all the people who interact with Bora Poland.

BREACHES OF THE ETHICAL CODE

Company does not accept any breach of the Code as it harms the trusting relationship established with Bora Poland.

Employees who do not act ethically or violate this Code may be subject to disciplinary action, claim for internal regulations.

Bora Poland may include in the contracts/agreement with the Recipients how to regulate the cases of breach of this Code.

KNOWLEDGE OF THE ETHICAL CODE

Bora Poland shall ensure to promote this Code to all the Recipients through the Company web site.

ETHICAL PRINCIPLES

Company adopts ethical principles (hereinafter referred to as “Principles”) which are based on international ethical standards, such as principles set forth in Guide Principles of United Nations, United Nations International Chart of Fundamental Human Rights, International Labour Organization Conventions, European Convention on Human Rights, Ethical Trading Initiative (ETI) Base Code.

Bora Poland adopts the following Principles.

COMPLIANCE WITH LAWS AND REGULATIONS

Employees, suppliers and clients of Bora Poland shall operate in full compliance with all applicable laws and regulations of all the countries in which they operate and also in full compliance with this Code.

This principle is a minimum requirement of all the Principles in this Code.



RESPECT FOR INDIVIDUAL AND WORKERS’ RIGHTS

Bora Poland respects all the rights of human beings directly or indirectly involved in the business. The Company is constantly committed to build a virtuous system where the business’s growth meets the growth of people and the improvement of social relations.

Human resources are for the Company a key aspect for its growth and Bora Poland supports professional growth of its employees respecting physical and psychologic integrity.

That vision is based on values that are inspired by fundamental rights of the individual and labour. Bora Poland works within the framework provided by the Universal Declaration of Human Rights, the ILO (International Labor Organization) Conventions and the Polish laws, promoting the protection of workers’ rights and trade union freedoms.

The Company explicitly rejects any form of labour exploitation and embraces the universally rights and prohibitions set forth for labour relationship.

Free employment

Bora Poland does not resort to forced, bonded or involuntary prison labour.

Workers are not required to lodge “deposits” or their identity papers with their employer and are free to leave their employer after reasonable notice.

Freedom of association and the right to collective bargaining

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

Bora Poland adopts an open attitude towards the activities of trade unions and their organisational activities.

Worker’s representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, Bora Poland facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Safe and hygienic working conditions

Bora Poland put a safe and hygienic working environment at workers' disposal, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

Workers receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and to potable water and to appropriate premises for food consumption are provided to workers.

Bora Poland assigns responsibilities for health and safety, observing the Code of Ethics, internal procedures and the law in force.

Prohibition of child labour

Bora Poland selects and hires workers in compliance with the law in force and the provisions of the relevant ILO standards ("International Labour Organisation").

Bora Poland rejects and prohibits the child labour and, in particular, of minors under the age of 16 (sixteen) years.

Appropriate living wages

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

All workers are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

Deductions from wages as a disciplinary measure are not permitted nor any deductions from wages not provided for by national law are permitted without the expressed permission of the worker concerned.

Appropriate working hours

Working hours adopted by Bora Poland complies with national laws, collective agreements, and the provisions of Ethical Code, whichever affords the greater protection for workers.

Working hours, excluding overtime, is defined by contract and is not exceed 48 hours per week.

All overtime is voluntary. Overtime is used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It is not used to replace regular employment. Overtime is always compensated at a premium rate.

The total hours worked in any seven-day period is not exceed 60 hours, except the case in which all conditions below meet together:

- this is allowed by national law;
- this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- appropriate safeguards are taken to protect the workers' health and safety; and
- the employer can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents or emergencies.

Workers are provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

Prohibition of discrimination

Bora Poland does not tolerate discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular employment

All employment relationship between Bora Poland and each worker are in compliance with national law and practice.

Bora Poland performs all the obligations to employees, also referred to labour or social security laws and regulations, without resorting to elusive measures.

Prohibition of harsh or inhumane treatment

Bora Poland does not tolerate and it prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or any other forms of intimidation.

Equality and Non-discrimination

Bora Poland adopt decisions and do actions without age, gender, race, ethnic, nationality, political or religious discrimination, neither discrimination based on associationism.

All the Employees must be treated equally, respecting their abilities and skills.

Mutual respect

Mutual respect is a basic requirement for Bora Poland in the relationships with any subject or entity.

Company does not tolerate bullying, abuse, threats or any action enable to offend people or get people or entities to break the law or the Code.

Ban of harassment and abuses in the workplace

No worker shall be subjected to physical, sexual, psychological or verbal harassment and abuse or intimidations.

Harassment and abuse can take the form of written and verbal remarks, gossip, jokes and banter, defamatory or offensive language and comments or bullying in which people in authority abuse their position through insulting, intimidating or malicious behaviour.

In particular, sexual harassment or abuse can take form of any inconvenient request of sexual favours and/or other requests relating to private relationships, from people in authority, in return for a benefit and/or career development.

Working hours

Bora Poland adopts an appropriate working hour, promoting a balance between work and private life.

The Company respects working hours weekly limit, according to international and national labour law. Increase in working hours can be admitted if there are some exceptional circumstances, respecting the law.

Health and Safety

Health and Safety is a top priority in the organization of Bora Poland, which has adopted internal policies to identify and prevent any risk for accidents at workplace and occupational illnesses.

Bora Poland respects local law and the international health and safety standards, as it has adopted health and safety policies.

Child Labour and Ban of Forced Labour

Bora Poland respects local law and international law about the regulation of working activity.

Company does not tolerate child abuses and minors can be employed respecting the minimum age allowed by the law.

Bora Poland does not tolerate any type of involuntary or forced labour, which does not respect free will and auto determination of people.



LEGAL AND ETHICAL BUSINESS

Bora Poland promotes and runs business based on legality and ethic principles and it is awareness that any breaches of the rules can have relevant consequences with negative impacts.

Competition

Competition is for Bora Poland a key element for Company development and a contribution for economic and social progress of the country.

Therefore, Company promotes a fair model of business based on the respect of free enterprise and the equal opportunities for market access.

Bora Poland protects its customers through the free competition, because it makes possible to keep prices down and improve the quality of the products.

Ban of Corruption

Company does not tolerate bribery or unethical and illegal business practices in contrast with existing law in all countries where it operates.

In addition to the specific previsions of the law of the countries where Bora Poland operates, bribery can be described as offering or giving, demanding or receiving something of value to influence a transaction or a decision.

Bora Poland does non tolerate that all the Employees or anyone representing the Company and also the business partners participate in or endorse any corrupt practices.

Business gifts and hospitality should be acts of goodwill and not rewards for doing business with Bora Poland, complying with normally accepted business practices.

Bora Poland bans to the Employees or anyone representing the Company to give to public officials gifts of any kind, including gifts with moderate value.

Quality and Safety of products

Satisfaction of business partners is a top priority for Bora Poland, which offers them products and services compliant to legal requirements and the highest quality standards.

This is demonstrated by the ISO 9001:2015 e IATF 16949:2016 certifications that Bora Poland has obtained for its quality management system.

Environment

The protection of environmental is a key aspect for Bora Poland e it promotes a sustainable and balanced Company growth.

Company protects the environment through the use of the best technologies and the continuous monitoring of business processes as to find industrial solutions with the least environmental impact.

Bora Poland does not tolerate any type of breaches or potential breaches of environmental law, including any intentional or negligent breach.

Bora Poland has adopted environmental policies.

Honesty and Fairness

Bora Poland refrains from committing illegal or dishonourable and undignified actions and it act according to diligence and good faith.

Transparency

All the internal and external information, decisions, operations and transactions of the Company are based on principles of truth, accuracy and comprehensiveness.

Any kind of operation is properly documented, in order to facilitate any potential future audit.

Bora Poland has adopted fair and clear criteria also for choosing the suppliers.

Cooperation

Bora Poland promotes relationships with third parties based on trust and cooperation.

A priority for Bora Poland is the respect for contractual obligations and the correspondence between what it was promised to its business partners and what it has them manufactured, except in cases of *force majeure* and unforeseen circumstances.

Company strictly observes all the prescriptions issued by the authorities in accordance with the existing law and its relationships with Authorities and Institutions are guided by the principles of cooperation and transparency.

In the case of inspective activities by the Authorities, Bora Poland does not deny, hide or delay the disclosure of information.

Employees, Board members and Auditors should cooperate to pursue the Company mission, respecting their field of activities and responsibilities.

Conflict of interests

Situations where a personal or private interest of an employee, a Board member or an Auditor appears to be incompatible with the interests of Bora Poland, there is a conflict of interest.

Recipients can not perform activities which can be considered conflicting or potentially conflicting with interests of Bora Poland.

In the case of conflict of interests, the parties involved must be open and transparent about this situation, immediately reporting to competent business area (Human Resource Office, Commercial Department, Purchase Office, C.E.O.).

Company does not admit that Recipients use, for their personal or private interests, sensitive information about Bora Poland and any other data about Bora Poland known performing their activities in/in favour of/with the Company.

Relationships with political organizations

Bora Poland does not tolerate that the Employees and any other representing the Company make political contribution or expenditure of any such nature on behalf of Bora Poland.

Company observes neutrality with regard to political parties and candidates and it does not tolerate that Bora Poland name or any other resource shall be used to promote the interest of political parties or candidate.

If Employees or any other representing the Company are personally engaged in political activities, they must not act or appear to act in the behalf of Bora Poland.

“Non profit initiatives”

Bora Poland can make contributions in favour of non-profit organisations and cultural or charities entities.

Sponsorships made by Bora Poland can concern social, environment, sport, environmental and art topics but Company must avoid any conflict of interests anyway.



PROTECTION OF COMPANY'S ASSETS

Company's Assets

All Recipients must safeguard company's assets and protect all the properties, including IT resources, the final products, information and know-how of Bora Poland.

Bora Poland does not tolerate fraud and misuses of company's assets, including any act with the purpose to deceive others (e.g., the Company, the stakeholders) taking actions which can cause an economic harm to them.

Company's assets must be used only for business purposes and not for personal gain.

Bora Poland respects the accounting law and the internationally accepted accounting rules, because the integrity for the financial statements is essential to maintaining the trust of customers, suppliers and other stakeholders.

Intellectual property

Bora Poland intellectual property (patents) are valuable assets for the Company.

Company does not tolerate any misuse or wrongly disclosure of Company's assets liable to compromised these assets.

These assets are protected through any procedures allowed by the law.

Reputation

Bora Poland protects good reputation and the image of the Company because they are an immaterial and essential Company's asset.

Bora Poland does not tolerate any action liable to harm the reputation and the image of company.



PROTECTION OF CONFIDENTIAL INFORMATION AND PERSONAL DATA

Personal Data

Personal data of all individuals who interact with Bora Poland are processed by the Company respecting the European and local law.

Company adopts all necessary technical and organisational measures for a proper protection of personal data, reducing the risk of harmful disclosure of these data.

Bora Poland has adopted specific tools and devices to protect internal informatic system.

Confidential information

Business activities involve the acquisition, storage, process, communication and exchange of data and documents referred to negotiations, operations, projects and contracts between Bora Poland and third parties (Customers and Suppliers).

This information can be confidential and their disclosure may cause a damage.

Bora Poland protects confidential information trough the use of specific and proper technical and

organisational tools and devices.

Employees and any other person who represent Bora Poland must protect all confidential information that they became aware of while performing their functions.

Confidential Information about Bora Poland, Customers and Supplier must be protected, handled carefully and not shared with unauthorized third parties or publicly unless they have been specifically authorised to do so.