

Edition I

Code of Conduct for Suppliers and Subcontractors of ROBYG Group

Introduction

We are a developer who has been changing Polish architecture for years, shaping trends in the housing industry. Years of experience in sales of apartments and creation of living space allows us for optimal adaptation of constructed housing estates to the needs of the modern customers.

We aspire to be the natural choice for any person looking for an apartment in a good standard and location for a satisfying price. We want to create friendly and safe places to live. Therefore, we design them following the idea of sustainable development, with natural environment as well as needs of specific people and entire communities in mind.

As one of the leaders on the market, we feel the responsibility that rests with us. Therefore, due to the significant scale of our business and its high impact on the surrounding, ROBYG focuses greatly on the environment, society and corporate governance. We put strong emphasis on responsible management.

The pillars of our conduct are: care, support and responsibility.

Care - protection of natural resources and care for the environment are very important for us, hence we implement ecological solutions in our housing estates.

Support - we provide support for foundations, communities and for those in need within our communities, we cooperate with local businesses and we take part in local cultural and sporting events.

Responsibility - we act responsibly, choosing to cooperate with local businesses, caring for the environment, and adopting best corporate governance practices.

The Code of Conduct for Suppliers and Subcontractors of ROBYG Group is a set of principles, that we also expect our Partners to follow.

For the purposes of this Code, Suppliers or Subcontractors shall also be referred to as Partners.

ROBYG Group means ROBYG S.A. with registered office in Warsaw, as well as commercial law companies in which ROBYG S.A. holds its shares or participates personally (hereinafter: ROBYG Group or ROBYG).

Scope and Purpose of the Document

As one of the market leaders, we continuously strive to achieve the highest standards of business conduct and we constantly demand from ourselves the implementation of the best solutions. With this attitude, we also meet the expectations of our Stakeholders. In this context, we want to build a culture of shared responsibility and support our Partners in respecting and promoting business practices compliant with the principles of occupational health and safety, human rights, care for employees and local communities, care for the natural environment as well as ethical principles in all aspects of our activities.

Therefore, by creating the *Code of Conduct for Suppliers and Subcontractors of ROBYG Group*, we want to incorporate the principles of corporate social responsibility and sustainable development also in the cooperation with our Suppliers and Subcontractors. The Code is intended to be an integral part of cooperation with Suppliers and Subcontractors also in the scope of assessment of their qualifications and capacities.

We are convinced that such an approach based on dialogue and mutual respect of the parties, will allow for the development of awareness and building of sustainable development and corporate social responsibility practices, also among our Partners, which will have a positive impact on our common surroundings.

We believe that this approach will be beneficial for us, as well as the broad group of our Stakeholders and our environment.

General Principles

We make every effort to cooperate with the best Suppliers and Subcontractors, selected based on objective criteria, in order to fully meet the expectations of our social and business environment. By creating and implementing this Code in our relations with Suppliers and Subcontractors, we strive to develop and promote responsible business practices in daily conduct of our Partners, while setting an example in terms of their application.

Aware of our role and impact on our surroundings, we strive to deepen and develop good practices among our Partners in key areas, such as:

1) Ethics and Corporate Governance Area

1.1. Responsible Management

- a) The Partners undertake to pursue their business goals with respect for the rule of law, ethics and human rights,
- b) The Partner ensures the protection of confidential information received from ROBYG and makes every effort to prevent its use for purposes other than resulting from the terms of cooperation,
- c) If personal data are provided to the Partner, it ensures their protection according to the generally applicable law,
- d) The Partner shall refrain from any actions that may expose the ROBYG Group to loss of reputation.

1.2. Anti-Corruption

The Partner has become familiar with ROBYG's regulations on preventing corruption and other forms of abuse and will implement them to the best of its ability, and in particular:

- a) The Partner does not use corruption practices in its business activities,
- b) In the case of any corruption incident, the Partner will take decisive action to repair any inflicted damage and prevent such occurrence in the future, and shall notify ROBYG of such an incident.

1.3. High Ethical Standards

- a) The Partner applies the highest ethical standards, in all aspects of its functioning,

- b) The Partner strives to raise awareness of ethical conduct in the workplace among its employees and management (e.g. through training),
- c) The Partner conducts its business activities in compliance with the law,
- d) The Partner avoids situations that could be interpreted as a conflict of interest or that could be detrimental for its reputation,
- e) The Partner refrains from any actions perceived as unfair competition and commits to comply with the legal standards for the protection of competition principles.

2) Social Impact Area

2.1. Care for health and safety of Employees at work

- a) The Partner follows all obligations resulting from law on occupational health and safety,
- b) The Partner aims at minimisation and, in consequence, complete elimination of accidents, injuries, diseases and other harmful effects for its employees resulting from performance of any activities for the benefit of ROBYG,
- c) The Partner keeps records in the scope of occupational health and safety for the purpose of minimisation of threats and continuous improvement of safety at work.

2.2. Respect for Human Rights and Providing Dignified Working Conditions

- a), The Partner in its relations with employees, promotes a dialogue focused on understanding, cooperation and feedback,
- b) The Partner, within its capabilities, aims to provide its employees with the opportunity to participate in trainings improving their professional qualifications and increasing job satisfaction,
- c) The Partner does not tolerate any behavior typical for discrimination or mobbing of employees, including:
 - unacceptable forms of verbal communication (e.g. offensive language, mockery),
 - distortion of the work environment (e.g. isolation of employees, unrealistic expectations or task deadlines, constant excessive supervision, downplaying achievements),
 - psychological manipulations (e.g. unreasonable blaming, unreasonable criticism, especially public, underestimating own opinions),
 - any forms of violence.
- d) The Partner does not admit work of minors and makes every effort not to use in its business activity any produces or services form minors' work, while ensuring compliance with the provisions of the International Labour Organisation regarding underage workers,
- e) The Partner does not use forced labour, slavery or any form of involuntary work. It is strongly against any illegal forms of employment, concurrently promoting diversity at the workplace,
- f) The Partner respects the employees' right to association,
- g) The Partner respects diversity at work.

3) Environmental Impact Area

3.1. Environmental Impact

- a) The Partner strictly complies with the legal regulations regarding the impact of its activities on the natural environment,
- b) The Partner will make every effort to ensure that the energy used by him is generated with the use of renewable sources.

3.2. Striving to minimize greenhouse gas emissions

- a) The Partner strives to minimize greenhouse gas emissions, including carbon dioxide, resulting directly or indirectly from its business activity, in the scope appropriate for the scale and type of its business.

3.3. Responsible Waste Management

- a) The Partner observes the legal regulations regarding waste management,
- b) The Partner strives to minimize the production of waste in its business,
- c) The Partner ensures proper management of generated waste, including cooperation with authorised recipients of generated waste for the purpose of minimize the negative impact of waste on the natural environment.

Summary

This Code is not an exhaustive set of standards, therefore risk assessments should always be made in specific circumstances to avoid doubtful or ambiguous situations that could jeopardize the reputation of ROBYG Group and its Partners. It should be emphasised that the risk assessment should regard a broader context of the situation causing doubts and should not only be a legal analysis resulting from the governing law (i.e. the spirit of the law and not the letter of the law).

All Partners must submit written statements of familiarisation with this Code. Any breaches of this Code can be reported to the following e-mail address: zgloszenia.naruszen@robyg.com.pl or anonymously on the following website: opinie.robyg.pl.

We believe that this approach will be beneficial for us, our Stakeholders as well as our social and business surrounding.

The Management Board of ROBYG S.A. is responsible for reviewing and updating the content of the Code.