

CODE OF CONDUCT 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 of ROBYG Group is a set of principles that we expect our Employees and Partners to follow.

1. SCOPE AND PURPOSE OF THE DOCUMENT

This document defines the standards the employees and co-workers of ROBYG and subsidiaries belonging to ROBYG Group should follow, both in the workplace and outside the workplace, including social media.

ROBYG Group means ROBYG S.A. with its 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).

The Code of Conduct is a summary of the system of values essential for the operations of ROBYG Group, based on high ethical standards and respect for human rights and freedoms resulting, in particular, from the Universal Declaration of Human Rights adopted by the United Nation and Declaration of the International Labour Organisation.

We believe that this approach will benefit us, our Stakeholders as well as our social and business environment.

2. GENERAL PRINCIPLES

The Code of Conduct, together with the adopted Policies and Procedures, define a set of standards applicable to all employees and co-workers of ROBYG S.A., regardless of their position or scope of responsibility. It sets the standards of conducting business in a responsible and sustainable manner, with respect for human rights and freedoms. Employees are obliged to familiarise themselves with this document and related documents. The Company has implemented measures aimed at permanent raising of awareness and creation of appropriate attitudes of the employees in the scope of matters described in the Code. The management staff of ROBYG Group companies, understood as the Management Board, managers of organisational units and subsidiaries, are obliged to promote attitudes compliant with the values and standards prescribed in the Code. The management staff make every effort to prevent and detect breaches of the obligations resulting from the Code and to react to breaches of the Code, in particular to provide employees and third parties with a free and anonymous method

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of reporting potential problems or irregularities without fear of retaliation.

Employees responsible for cooperation with business partners are obliged to inform them about the standards observance of which ROBYG expects to comply with and about the commitments of ROBYG in the scope of ethics and business values.

Employees should report any potential issues or irregularities via agreed communication channels.

More detailed regulations are described in related documents.

3. EMPLOYEE RELATIONS

The employees of ROBYG Group should treat each other with mutual respect. This means equal treatment of people, acting in a transparent way, appreciating people for what they do and who they are, regardless of their position, seniority, age, gender, disability, health condition, family status, ethnic background and gender identity, orientation, beliefs or nationality. The fundamental principle of respect is care for dignity of the individual.

In its relations with employees, ROBYG promotes dialogue focused on understanding, cooperation and feedback-oriented dialogue. Effective communication is key for the effective performance of tasks, therefore management staff are obliged to strive to ensure active communication, not only as an element of team management, but also to build friendly interpersonal relations at the workplace, based on mutual trust and respect. ROBYG provides its employees with opportunities to participate in trainings improving their professional qualifications and increasing job satisfaction.

ROBYG does not tolerate any conduct 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, continuous excessive supervision, trivializing achievements),
- psychological manipulations (e.g. unreasonable blaming, unreasonable criticism, especially public, underestimating own opinions).
- any forms of violence.

ROBYG does not accept child labor. It also makes every effort to ensure that its subcontractors do not use child labour or any produces or services derived from child labour in its business operations, while taking care to comply with the regulation of the International Labour Organisation regarding to child labour.

ROBYG does not use forced, slave or any form of involuntary labor. ROBYG is also strongly against any illegal forms of employment, while promoting diversity in the work environment.

4. RELATIONS WITH CUSTOMERS, BUSINESS PARTNERS AND PUBLIC ADMINISTRATION AUTHORITIES

ROBYG builds relations with customers and business partners based on compliance with the law, effective and fair business practices and respect for their expectations.

ROBYG expects its business partners to comply with these obligations and standards and to apply them in their relations with employees, administrative authorities and subcontractors. The quality of relations with business partners has impact on ROBYG's relations with its customers as the quality of partners' work also influences the quality of products and services offered by the ROBYG Group.

In relations with public administration authorities, ROBYG employees or persons presenting the Company and its subcontractors t act in a transparent and well-documented manner.

Responsibilities and standards with regard to ethics and business values:

- running the business activity in compliance with the law,
- avoiding situations that could be interpreted as a conflict of interest or that could be detrimental for its

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- reputation,
- refusing to accept and not giving any financial or non-financial benefits that could be perceived as acts of corruption,
- take care to create a safe working environment and protect the natural environment,
- promote an organizational culture where all employees recognise and appreciate ethical conduct and are role models for ethical behaviour,
- refraining from any actions perceived as unfair competition and commitment to ensure compliance with legal standards for the protection of competitive principles.

5. ENVIRONMENTAL PROTECTION AND OCCUPATIONAL HEALTH AND SAFETY

ROBYG is an integral part of the society, therefore, it keeps searching for new methods to minimize the negative impact of its business on environment. The Company makes every effort to provide its employees with the necessary measures to accomplish the above goal.

ROBYG strictly complies environmental, occupational health and safety (OHS) regulations and strives to continually improve the quality of OHS procedures for its employees, employees of its contractors and any other persons performing any tasks for the Company.

All employees are responsible for full compliance with the rules of occupational health and safety. They are also obliged to use the equipment entrusted to them in an appropriate manner when performing any works, share their knowledge in the scope of occupational safety with their colleagues and subordinates as well as apply all and any safety measures. The employees should use the Company's resources responsibly, sort waste and, if possible, apply a savings-oriented approach to use of utilities.

ROBYG implements actions to continuously improve employees' knowledge on occupational safety at work. To minimise the number of accidents occurring within the operations conducted by ROBYG, any actions resulting in breach of the effective procedures of safe work and accident prevention must be reported immediately as a breach via the agreed communication channel.

6. AUDIT ACTIVITIES

The employees, co-workers and representatives of ROBYG Group must submit written or electronic declarations of familiarisation with this Code and understanding of its provisions.

The ROBYG Group has the right to monitor the compliance of the employees' behaviour with this Code and to assess individual employees' behaviour in relation to the company's values.

7. FINAL PROVISIONS

This Code is non an exhaustive set of standards, therefore, each risk assessment should be performed in specific circumstances to avoid doubtful or ambiguous situations that could endanger the reputation of ROBYG Group.. It should be emphasised that a risk assessment should relate to the broader context of the questionable 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).

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.

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