





CODE OF CONDUCT for Staff members

What is the Code of Conduct for Staff and what is its purpose?

Our Staff Code of Conduct and associated policies are guides that help us:

Act in compliance with our values. By working within the rules, we maintain the trust we have gained from all the stakeholders who have made our Group successful -- ourselves, our colleagues, our customers, the companies we work with and all our partners.

Comply with the laws and guidelines set out in our Code of Conduct. These help us do our jobs in accordance with the laws and regulations in force. Where the rules set out in our Code of Conduct differ from local rules due to custom or business practice, we have to apply the highest standards.

Make decisions that are consistent with our ethics. Our Code of Conduct helps us understand rules and policies that we may not be familiar with. This is why we have put in place a comprehensive training programme through which each of us can certify having understood and adhered to our Code of Conduct. In short, our Code of Conduct helps us always follow our golden rule: "No commercial reason will ever justify any wrongdoing".

Who is the Code of Conduct addressed to?

Everyone who works at Polca or who works self-employed with Polca has a duty to read, understand and comply with this Code of Conduct.

This means that:

- All employees (regardless of the nature of their employment contract)
- All corporate officers and members of the Management Board

Have to uphold the principles and values expressed by our company.