

Professionalism and ethics

GC RULES:1,2,3,5,7,8,10

*We build the trust of customers and investors, our employees' pride in the affiliation with our organisation as well as relations with the local communities by conducting fair and honest business, ensuring transparency and mutual respect. We treat these values as extraordinary company assets. Ethical principles do not substitute our own responsibility. In addition, they do not release us from continuous seeking for the proper conduct, not only in business. In this area, our collective wisdom, knowledge and the ability to share our experiences are crucial. I believe that **professionalism and ethics**, as guiding values in the life of our organisation, are the proper choice, which allows both the company and people working in it to further develop.*

A quote from a letter of the President of the Management Board of Grupa Kęty S.A.

Values

Our values comprise moral standards, business ethics and culture, innovative solutions and social responsibility, reflecting the way the Grupa Kęty S.A. Capital Group operates

Ethical principles, Anti-bribery policy

GRI:102-16,205-2



The supreme document of the Company regulating the ethical aspects and comprising a presentation of moral standards followed by our organisation and our employees is the [Code of Ethics](#) accompanied by detailed subject-matter policies, including: Anti-bribery Policy, Conflict of Interest Prevention Policy, Dignity at Work Policy, and which jointly create a platform of guidelines and operating standards, as well as the supreme values of the Grupa Kęty S.A. Capital Group.

An integral part of the Code of Ethics is the Anti-bribery Policy, which clearly presents our approach to the subject of corruption. In 2018 there was no training provided in corruption prevention due to the fact that the plan of such training has been prepared and approved for the year 2019. Our objective is to get 100% of employees acquainted with the Code of Ethics and the Anti-bribery Policy.



Ethical processes

GRI: **102-17, 103-2, 406-2, 103-2**



The ethical processes monitoring structure remained virtually unchanged as compared to 2017.

In 2018, **Business Ethics Committees** operated within the main business segments (appointed by Grupa Kęty S.A., Aluprof S.A., Alupol Packaging S.A.) as well as the **Business Ethics Ombudsman** at the Capital Group Level, **making it the total of 15 people**.

The Business Ethics Ombudsman's major role is to ensure compliance with the standards and values provided for in the Code of Ethics, treated by the GRUPA KĘTY S.A. Capital Group as the guiding principles of its business. The main tasks of the Business Ethics Ombudsman are as follows:

- receiving official reports on violations of the Code of Ethics from employees and business partners (the reports may be submitted through a number of channels, for example to the Business Ethics Ombudsman personally, or in the form of a letter or e-mail sent to a special e-mail address – all these channels are listed in the Code of Ethics);
- participation in the development of ethical systems at the GRUPA KĘTY S.A. Capital Group;
- participation in information and educational campaigns to popularise the Code of Ethics and the Company's organisational culture.

The work of Business Ethics Ombudsman at the GRUPA KĘTY S.A. Capital Group as well as participation in the work of the Business Ethics Committees are functions performed free of charge for the sake of the employees.

The Code of Ethics provides for the methods of reporting official violations and behaviours doubtful with regard to ethics. The Company does not operate any separate helplines or hotlines.

In 2018 the Business Ethics Ombudsman received two reports on the Code of Ethics violations with regard to dignity at work. One of the reports, upon preliminary consideration by the Business Ethics Ombudsman, was returned – in accordance with the provisions of the Code of Ethics – to the internal path within the organisation, which has not been properly utilised in the opinion of the Ombudsman. The other case was directed for consideration to the respective Business Ethics Committee. Following the procedure, the Committee has not confirmed the fact of any violation. No reports on violation of human rights or anti-bribery policy were filed.

GRI: **415-1**

The Code of Ethics also clearly defines and governs the organisation's approach to the participation in public life, namely: *'We maintain transparent relations with local government officials and representatives of the political stage, free from corruption and improper pressures'*.

In 2018, the Company did not make any donations to political parties.