

Code of Conduct
NetWorkS 

1. Admission

Each of us has our own system of values and principles that guide us in everyday life – both private and professional. Being a member of a corporation, employees have a common goal: support the implementation of business tasks in the most effective way and build the best possible relationships with the surroundings.

The Code of Conduct of NetWorkS! (“Code of Conduct”) sets out the norms, values and rules of conduct for all employees. It combines the foundations of respect for law and regulations with the ethical behaviour and attitudes that are most required by our shareholders and business partners.

The adoption of similar standards and values by companies cooperating with each other facilitates joint development, helps to achieve the set goals more effectively and supports building a positive image. Therefore, the principles indicated in the Code of Conduct are consistent with the rules adopted by companies that are shareholders of our company.

To meet the needs of the market, we are a dynamic and honest company. We want to constantly improve our operations, build trust and friendly relationships. Therefore, it is important that we apply the principles contained in the Code of Conduct, as well as communicate them outside the company.

At the same time, we are aware that even a single violation of applicable laws can destroy our success and that of our colleagues and the company's reputation gained through joint work.

We are obliged to comply with the adopted standards – violation of them will not be tolerated.

2. Validity of the Code of Conduct

The Code of Conduct applies to all employees of NetWorkS!: from members of the Management Board and managing directors, to managers and employees of all levels. Equally applies to our contractors and co-workers, whose work is equivalent to the tasks performed by the company's employees. Each person is responsible for ensuring that their conduct is ethical and lawful and the surrounding environment must support these efforts – therefore business performance should not be prioritized over the value of honesty. In other words, we want to achieve our goals and at the same time act responsibly and exemplarily.

The managerial staff is expected to use their own example to promote the principles of the Code of Conduct among employees and to apply the proclaimed values in practice. It is also the manager's responsibility to ensure that employees are familiar with the Code of Conduct and apply its recommendations.

In the event of a deliberate breach of the Code of Conduct, appropriate action will be taken within the framework of applicable laws and regulations. Violation of the provisions of the Code of Conduct may be treated as a violation of basic employee duties. To ensure effective reporting of such cases, we create conditions in which employees can report a policy violation without fear of negative consequences.

3. Our mission, vision and values

3.1. The vision of NetWorkS!

Providing professional services related to radio networks, contributing to the construction of the best and most effective mobile networks in Poland.

3.2. Mission of NetWorkS!

- We are the first and largest company in Poland dealing with planning, construction and operation of interoperable radio networks.
- We offer services to the largest operators in the country, providing them with an optimal technological base to compete.
- We implement innovative technologies.
- We care about cost efficiency for our customers while maintaining high quality.
- We provide employees with unique professional development opportunities and attractive employment conditions.

3.3. Values of NetWorkS!

EFFECTIVE SOLUTIONS:

- Every day we draw conclusions from yesterday's lessons and thanks to that we act more efficiently.
- We are looking for optimal solutions. We boldly present ideas.
- We find solutions where others see only difficulties.
- Delivering results gives us joy.
- We care about high quality and cost optimization.

SIMPLICITY OF OPERATION:

- We do not multiply entities beyond measure.
- We are looking for the simplest.
- We give ourselves feedback on an ongoing basis when we see opportunities for improvement.
- We respect time through efficient processes, meetings and exchange of information.
- We communicate according to the principle: intention = effect.

CLEAR RULES:

- We clearly talk about expectations and account for their implementation.
- We create rules of the game that we will follow.
- We focus on facts, not opinions and interpretations.
- We have precisely defined tasks and responsibilities.
- We are clear about our position.

KEEPING COMMITMENTS:

- We set priorities and act accordingly.
- The stages of the project and partial objectives are important to us.
- We do not retreat in the face of difficulties. We effectively manage risk.
- In our activities we focus on its area of influence.
- We support each other in pursuing the goal and make commitments responsibly.

4. Our promises

4.1. Mutual relations

We believe in the loyalty, sincerity and motivation of our employees. We have confidence in their skills, initiative and duty. We strive to ensure proper health and safety conditions at work and at the same time we create an environment that is conducive to the development of professional qualifications and a sense of individual responsibility. In addition, we promote knowledge sharing, partnership development and the ability to think innovatively. That is why our teams are made up of people with different professional and cultural experiences.

We do not allow any form of discrimination, especially during hiring and promotion procedures. We strive to create an atmosphere of acceptance and mutual trust by respecting the individuality of individuals, openness and sincerity in action and promoting diversity on a personal and cultural level. As a result of diversity among employees we are successful in terms of age, gender, religion, skills, background and sexual orientation. The different cultures, languages and marital statuses of the company's employees increase this diversity.

We respect our customers, partners, suppliers and partners, as well as society as a whole.

We do not tolerate any form of discrimination or harassment - either within the company or in business contacts.

We subject our actions and behaviour to a detailed analysis and consistently condemn unethical, rule-breaking and illegal behaviour.

4.2. Working conditions

Good employees are the key to success. That is why we offer our employees attractive career opportunities, in which personal development and support for talented people are the most important.

We acquire qualified experts, management staff and talented specialists and then we inspire them and develop their possibilities. In this way, we care for the future of our company in the long term.

We create a work environment in which everyone feels appreciated, in which we can develop personally and professionally for the good of the company and in which employees like their work. We support behaviours that emphasize and reinforce both the value of our company and its values. It is therefore extremely important to entrust the right tasks to the right people. Managers support employees by allowing them to maintain a work-life balance. They also lay the foundation for productive work by providing employees with offers that provide this balance and healthcare services. By doing so, they form the basis for effective work.

Our company is focused on the effectiveness of activities and focused on achieving the best results. We recognize and reward the achievements of employees, while taking into account their individual abilities and competences. This is an extraordinary responsibility that applies to all managers.

4.3. Communication

We are able to listen to others, we discuss problems openly and by consulting we look for the right solution in a professional and active way. If we criticize something, that criticism focuses on the

problems, not the people. The best solution can only be found by looking at different points of view.

We strongly support team decisions and do our best to put those decisions into practice. We focus on open communication within the company and whenever possible involve employees in developing new ideas, making decisions and solving problems.

We are loyal to our company, both within it and in external contacts. We always act in such a way as not to harm her image with our behaviour. We approach justified criticism of the company constructively. We never engage in polemics.

4.4. Delivering on promises

We strive to achieve our goals and promises in order to gain the trust of customers and survive in a competitive market. It also means taking responsibility for the performance of the tasks entrusted to us, which we delegate to colleagues only in cases where we are sure that in this way a given problem will be properly solved.

If we discover errors in business processes, we establish an active dialogue with colleagues and superiors in order to find the right solution together. We can rely on each other and our customers, internal and external can rely on us.

5. Integrity requirements

The basis for building trust and positive relationships is in reverence and mutual respect. Achieving these goals is possible by working in accordance with the law, accepted values and corporate policies and procedures.

5.1. Business contacts

Our contacts with business partners are based on trust, honesty and loyalty. All business decisions made within the framework of our business are independent of the interests and personal interests of our employees. Taking care of the company's image, we always act ethically and in accordance with the regulations.

5.1.1. Business contacts with customers

The key to success is to meet the expectations of our customers. We constantly pay attention to the needs and challenges of the market in order to evaluate and improve our products, services and technologies.

We do not tolerate corruption in all its forms and we also avoid actions that could potentially be interpreted as corrupt. We must not propose, promise or provide illegal services to national or international public officials or decision-makers operating in the private sector in order to obtain a privileged treatment or to influence a favourable decision. Compliance with this principle is particularly important when dealing with giving and receiving gifts and invitations to business meals and business events.

If a public official or a decision-maker in the private sector tries to persuade us to break this rule, we inform our managers directly or through a portal for reporting this type of abuse.

Along with the development of the company, we will expand our activities and the scope of cooperation with business partners. Then customers from the public sector will be important for our company. We are committed to comply with the rules on public procurement procedures in particular strict laws and regulations to avoid undue influence.

5.1.2. Business contacts with competitors

We recognize open and fair competition as a fundamental component of a free market that promotes efficiency, economic development and innovation. We promote market winning thanks to high-quality products and services.

We pay special attention to compliance with legal parameters regarding the protection of open competition in business agreements and contacts with third parties.

We strongly and unequivocally oppose the use of economic espionage to obtain information about our competitors.

5.1.3. Business contacts with suppliers

In order to provide the best possible service to our customers, we actively create lasting relationships with suppliers and subcontractors by requiring them to apply the ethical standards of our corporation.

Purchases are made in accordance with the law and local regulations. We prefer cooperation with environmentally friendly and socially responsible suppliers.

When making business decisions, we are guided solely by the interest of NetWorkS! and our shareholders – we put aside personal gain. We do not allow our decisions to be influenced by offers or supplier promises about illegal competitive advantages. We never accept or demand such offers.

We also want to avoid the impression that such offers could influence our decisions. In case of doubt, e.g. whether we are allowed to accept a gift, an invitation to a business meal or event from the supplier, as well as another form of gratification or not, we seek advice on the advisory portal. If we receive illegal benefits, an offer or promise of such benefits, we inform our direct superiors or report via the portal used to report such abuses.

The Purchasing Department is responsible for making purchases of goods and services on the best possible terms. Each unit in the company is obliged to make purchases through that Department in accordance with appropriate procedures. Failure to bypass established purchasing procedures may cause damage to the company and will constitute a violation of applicable rules.

5.1.4. Contacts with third parties

Society and environment

As an organization aware of ecological threats, we try to control the consumption of energy and other natural resources in our operations, as well as take into account environmental protection issues. Being an innovative company, we promote the use of information and telecommunications technologies for sustainable development and thus contribute to the development of local communities.

Shareholders

Shareholders provide the necessary capital and bear the business risk. They expect and trust that we will manage and supervise the company in accordance with applicable legal regulations and comply with international standards of responsible business management. We act with the interest and good of the company in mind, remembering that the company's shareholders are market competitors.

Transparent financial reporting

An important element of internal control in the company is to maintain the reliability of preparing financial statements, which are periodically presented to our shareholders. A high standard of reporting is ensured by regularly conducted financial audits. Each of us is responsible for ensuring that the prepared financial statements are up-to-date, complete and reflect the true state of the transaction.

Donations

As part of our responsibility, we support, taking into account legal and financial constraints, education, science, culture, social initiatives, sport and environmental protection through our services and donations in cash and in kind. We do not make donations for business gain. All donations must be granted in accordance with the law and internal policies and in addition, all of them are registered along with the name of the beneficiary and the purpose for which they are intended. We do not make donations to individuals or private accounts or to individuals or organizations that could potentially threaten the interests or image of the company.

Involvement in politics

Public opinion, as a rule, negatively perceives companies associated with donations to political parties. NetWorkS! does not transfer money to political parties or elected officials and does not provide them with additional cash benefits beyond what is legally permissible and socially acceptable.

Laundering

NetWorkS! takes all necessary measures to prevent money laundering within its sphere of influence.

5.2. Information processing

Data security

We place particular emphasis on maintaining data security – this issue has a significant impact on commercial success and the company's image in the eyes of the public. Therefore, we protect the data of our company, its customers and employees with all appropriate and appropriate technical and organizational measures at our disposal to prevent unauthorized access to misappropriation, loss or premature deletion of data.

Data Privacy

We exercise the utmost discretion and caution when processing the personal data of our customers, employees, shareholders and suppliers. Each employee of our company is responsible for maintaining a high level of security as part of their daily duties. These efforts are facilitated by a variety of technical and organisational measures to ensure the confidentiality of personal data. Our internal regulations ensure uniform and high standards of data protection.

We collect and process data only with the consent of its owner, in cases where legal standards clearly allow it or in order to comply with contractual obligations. In addition, we collect, process and use this information only to the extent necessary to achieve the respective purpose. We respect the rights of the persons whose data we collect, process and use.

General Privacy Policy

In addition to the use of technical and organizational measures to maintain data privacy, all employees of the company are obliged to protect its interests and the interests of our shareholders. Therefore, we do not share company information with external persons unless required and we treat the data of our shareholders with extreme caution.

We maintain the confidentiality of information exchanged during personal conversations or telephone conversations in public places (e.g. public transport). We also protect company and shareholder documents from outsiders.

Processing of confidential information

Making confidential information about a company public can significantly affect the company's reputation. In order to protect customer confidence, the exchange of confidential information is strictly regulated. Any person in possession of such information is therefore subject to special restrictions according to which he may not make transactions or give advice or suggestions regarding transactions. The dissemination of information without authorization is also defended.

In addition, employees who have access to information about our shareholders are obliged to maintain confidentiality and are thus prohibited from exchanging such information, both inside the company – between colleagues and outside – between all entities.

5.3. Prevention of conflicts of interest

We trust that the personal interests of our employees do not conflict with the interests of the company.

Employees should avoid situations in which their personal interests or the interests of legal or natural persons with whom they are related or associated would conflict with the interests of NetWorkSI.

Conflict of interest arising from additional employment

Additional employment is any employment outside the main workplace where the employee is part of the third-party workforce, regardless of whether he or she is paid for the work performed or not. Self-employment also falls into this category.

It is not allowed to engage in additional employment that harms the interests of the company and its shareholders, especially if the employment in any way interferes with the performance of the employee's tasks or if such employment is not allowed for reasons related to competition.

Private investment

Holding shares in competitive companies or being business partners of NetWorkSI, which allow to exert business influence, is not in the interest of the company.

Use of company ownership for private purposes

As a rule, the use of the company's property for private purposes is not allowed, unless the rights of individual employees, collective agreements, operating procedures or regulations contain a different provision.

6. Compliance with the Code of Conduct

Based on the accepted values of the company and applying the principles of the Code of Conduct, we implement our vision and mission.

Breaking the rules and violating the norms of conduct related to respect and honesty, as well as breaking the law, can have serious consequences not only for individuals but also for the entire company. That is why such behaviour will not be tolerated.

We take care of the assets of our company and shareholders and avoid cases of corrupt behaviour. NetWorkS! applies effective disciplinary measures against persons who intentionally violate the rules and break the law, regardless of the position and position occupied in the company by a given employee.

Particularly high standards apply to high-level employees who, due to their role, are expected to have a pattern of behaviour and behaviour adequate to their competences.

The provisions of the Code of Conduct are consistent with the Codes of Conduct of our shareholders.

NetWorkS! expects all employees to comply with the principles of this Code of Conduct.

6.1. Questions, advices and abuses

The Code of Conduct! provides a framework for all employees of the company. In everyday work, however, there may be questions to which the Code of Conduct does not provide detailed answers. In this case, you should first turn to your immediate superior or senior supervisor. In addition, employees can direct their inquiries to the consulting portal, whose name and exact address will be communicated using NetWorkS! internal communication channels.

6.1.1. Advisory portal

The advisory portal helps to find answers to questions about situations in which the employee is not sure how to behave. Questions can be submitted electronically to the following address: Compliance.Desk@networks.pl.

6.1.2. Whistleblowing portal

Each employee is responsible for reporting a violation or potential violation of the law, the rules of conduct and internal policies and procedures. Persons reporting such cases, acting in good faith and in accordance with their knowledge, do not have to fear negative consequences if they have not themselves violated the applicable rules of conduct.

Employees should first turn to their supervisor, as this is the first person responsible for providing support in this type of situation. If this is not possible, violations of the rules can also be reported by phone, e-mail or a simple letter. Anonymous reporting is also possible through the portal for reporting irregularities, the name and exact address of which will be communicated via NetWorkS! internal communication channels. However, this method of reporting should only be used in specific cases where workers are concerned about their personal, professional and social safety.

Any reported information is strictly confidential and is considered only by specially trained employees who are bound by secrecy.

Persons who use the whistleblowing portal to disseminate slander about other employees in order to damage their reputation become guilty of violating the applicable rules themselves.

Address for reporting irregularities: Compliance.Zgloszenie@networks.pl

Phone for reporting irregularities: 501 663 024 (Joanna Milo)

Address for reporting irregularities:

Joanna Milo

NetworkS! Sp. z o.o.

Józefa Piusa Dziekońskiego 3

00-728 Warsaw, Poland

Please add: Secret! – deliver to the recipient's own hands without opening it!

6.1.3. Perspective

Corporations are evaluated specifically based on how they represent and what their representatives say.

Having the Code of Conduct will not in itself bring positive results – such results can only be achieved by living according to its recommendations on a daily basis. There is no other possibility: only in this way can we build and cultivate lasting trust.

Acting in accordance with the Code of Conduct is our ambition and duty!

More information about the Code of Conduct can be found via the intranet and the advisory portal.

Company record:

Address:

NetworkS! Sp. z o.o.

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Share capital of PLN 30 million, paid in full.

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