



**PRESSGLASS**  
GROUP

# CODE OF CONDUCT

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## 1. GLOSSARY

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**Business partner** – a customer, a supplier, a recipient, a contractor.

**Close relative** – i.e. a spouse, a life partner, parents, siblings, relatives, children, grandchildren, children of partners.

**Corrupt practices** – offering and accepting, in a non-transparent and illegal way, of financial benefits in relation to the business activities, in exchange for preferential terms of cooperation or own business benefits.

**Ethics Committee** – a committee established by the company's order to receive and resolve reported violations and concerns in relation to the areas contained in the Code of Conduct.

**Anti-mobbing policy** – an internal document adopted by the company regulating the anti-mobbing issues.



## *2. Our Code of conduct*

I would like to present our Code of Conduct, that is the ethical principles which are the foundation of our behaviour. The desired rules and practices described in the Code have been defined based on the PRESS GLASS vision, mission and values that guide us. Our Code takes into account the essential areas of employee and employer responsibility, as well as business responsibility. Responsibility is the hard-line principle in our business.

From the very beginning, employees have been very important for PRESS GLASS. It is thanks to our crew that we conquer new markets and manufacture top quality products. The attitudes, values and beliefs that accompany us lead to the development of the company and can inspire the way we act in many areas of our lives.

The reputation that we build every day has a significant impact on our company, because the way we operate translates into the company's external and internal image. I am convinced that our behaviour shapes PRESS GLASS - its future, organisational culture and beliefs. I believe that if we do what is right, act in accordance with the company's values both in our private and professional lives, and take responsibility for our behaviour, we will build trust, which will translate to our credibility as an employer and a business partner.

It is our duty to know the internal and external regulations on the basis of which PRESS GLASS operates. I want us to act in accordance with the law, and to immediately react to violations of the commonly agreed rules. Let us not tolerate behaviour that goes against our values. Let us not ignore unethical behaviour. Let us be brave in observing, respecting and promoting our values and principles.

I hope that this Code will help us make everyday decisions and resolve ethical dilemmas, both in respect of our business partners and colleagues, and in our private lives.

I fully support the principles of conduct described in our Code and am sure that identification with them and their observance by all employees is the key to PRESS GLASS development.

*Arkadiusz Muś*

### 3. CHECK OUT OUR GUIDING LIGHTS

From the date of our creation, we have been driven by a clear vision.

#### OUR VISION

We are building a modern and dynamic organisation with a global reach, which contributes to the development of its business partners by giving new, better features and values to the offered products, services and solutions. We are creating more and more valuable jobs.

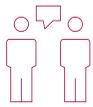
#### OUR MISSION

Our task is to understand the needs and requirements of our business partners, meet them and, thus, support their competitiveness.



# OUR VALUES

Our responsibility as an employer and an employee, as well as our business responsibility, is to act in accordance with the PRESS GLASS values, which are essential to us. We are committed to implementing them in our daily relationships with our employees and business partners. We want the people who work with us to share our values.



## RESPECT

We are convinced that open and honest communication based on respect contributes to the best results. We care for effective exchange of information, which affects the atmosphere of cooperation and development opportunities.



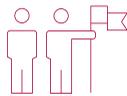
## HONESTY

We believe that by being honest with our employees and business partners, we are building a company focused on quality and reliability. Our actions are legal and based on transparent terms of cooperation.



## COMMITMENT

In our daily work we show initiative and openness to new ideas. We value simplicity and uncomplicated solutions. We act with passion and set new directions of development.



## TRUST

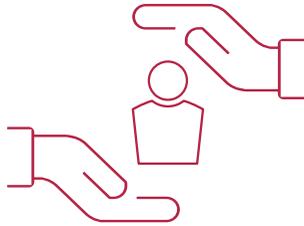
We are convinced that we work most effectively in an atmosphere of mutual trust. It is important for us to feel safe because we believe that together we can do more.



## DISCIPLINE

We consistently strive to achieve our common goals. We believe that courage in making decisions builds cooperation and supports creative initiatives.

## 4. OUR RESPONSIBILITY AS AN EMPLOYER



- Everyone at PRESS GLASS, i.e. the management staff and all employees, comply with the legal regulations related to our activities, which is in accordance with our values.
- We take responsibility for our safety and the safety of those around us.
- We observe and respect the principles according to which our business partners operate. We also expect them to comply with the law.
- We monitor changes in regulations and implement them on an ongoing basis.
- At PRESS GLASS, we do not tolerate and do not encourage violations of the law.
- Taking care of the work conditions and the health of our employees is of particular importance to us, therefore we make compliance with the provisions of the Labour Code and safety at work a priority.
- Our workstations guarantee safe work. Tasks are carried out according to the guidelines and instructions given.

### 4.1. EMPLOYEES ARE TREATED EQUALLY AND WITH RESPECT

- At our workplace, we treat other people with due respect, honesty, dignity and fairness. We do not tolerate and prevent any disrespect or discrimination.
- We do not accept mental and physical violence, intimidation and harassment. We eliminate all forms of mobbing. The PRESS GLASS anti-mobbing policy aims to ensure due respect for the human rights in all our activities.
- We do not judge people by age, gender, skin colour, health condition, ethnic origin, sexual orientation, religion, beliefs or other legally protected features.
- We judge people by their competence, merits and achievements, as well as commitment to work. Our decisions regarding recruitment, employment, promotions or remuneration are based on the employee's qualifications and are free from discrimination.
- What influences the success, performance and attractiveness of our workplace is the people who make up a mix of skills and personalities - we appreciate it, respect it and want to nurture it.



## 4.2. WE PROTECT PERSONAL DATA

We are aware of the consequences for our company and its employees of a loss or unlawful disclosure of personal data. Therefore, at PRESS GLASS we protect personal data of both current and former employees through a number of actions taken:

- We comply with current data protection regulations.
- We collect and use data only for the specific purpose for which it was collected.
- We store data observing the highest security standards.
- We comply with the IT security rules in order to maintain the durability of protected information and properly protect it from unauthorized access.
- We only disclose data to third parties if legally justified and after applying appropriate safeguards.
- We take care that the personal data processed by PRESS GLASS is not used by our employees for private purposes.

## 4.3. WE AVOID BUSINESS DEPENDENCY ON FAMILY MEMBERS

PRESS GLASS allows to hire related persons, however, excluding the superior-subordinate relationship, observing the principle of fairness, and based on the candidate's competence and predispositions to adjust to the organisational culture of our company.

One should avoid situations where an employee's superior is his/her close relative. This approach is to a large extent dictated by our company's values such as honesty and trust, which entail transparent conditions of cooperation. The above mentioned relations may negatively influence the sense of justice and objectivity of our team members (e.g. favouring certain persons).



## 5. OUR RESPONSIBILITY AS AN EMPLOYEE

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### 5.1. WE COMPLY WITH THE LABOUR CODE AND OTHER PROCEDURES

Our responsibility as an employee to comply with the provisions of the Labour Code and other procedures, including those related to work safety, is, at the same time, our responsibility as an employer, hence it has been described in Chapter 4.1.

### 5.2. WE RESPECT THE EMPLOYER'S PROPERTY AND CARE FOR ITS IMAGE

The property and assets of PRESS GLASS are the elements that help our employees perform their work and achieve the assumed goals, therefore we use it responsibly in our activities. The company property should be used only in accordance with its intended purpose. The company property should not be used for other than professional purposes and in an illegal manner. Caring for the company assets also means savings, that is eliminating unnecessary expenses.

At PRESS GLASS, we also care for our employer's image and do not engage in any activities that could damage our reputation and competitiveness among employers and business partners. Our company builds its brand by adhering to its values, taking into account its mission, vision and strategic plans.

### 5.3. WE PROTECT DATA AND DO NOT DISCLOSE CONFIDENTIAL INFORMATION

Non-disclosure of data and information concerning the company, its employees and business partners to unauthorized persons is a duty of every employee of PRESS GLASS.

Confidential information is any information that is not intended to be made public and concerns our products, processes, technological solutions, innovations, know-how, strategic plans, information

on the company's financial standing, pricing policies, scope of agreements concluded between PRESS GLASS and other entities. The information which we can use officially is the information made available on our website: [www.pressglass.com](http://www.pressglass.com).

## 5.4. WE AVOID CONFLICTS OF INTEREST

A conflict of interest is when a person is guided at work by their own interest or the interest of a person they have a close relationship with. Our employees should avoid situations in which their interests or the interests of their close relatives are at conflict with the PRESS GLASS business.

Conflicts of interest also arise in situations when an employee or his/her close relative has a significant financial interest in the relationship with our business partner.

## 5.5. WE CARE FOR THE QUALITY OF OUR WORK

As employees, it is our duty not only to perform our duties and undertake business activities in accordance with our position, but also to do this in a professional manner, as soon as possible, and while observing the highest quality standards. By taking care of the quality of our work, we have a positive impact on many aspects of our business, e.g. customer satisfaction, image, profitability, and we can eliminate, reduce or limit the effects of activities that

are unforeseen and risky for our company. The level and quality of our work should be monitored and analysed on an ongoing basis. Employees should engage in tasks aimed at continuous improvement of work and implementation of improvements, as this guarantees the continuity of the company's business.



## 6. OUR BUSINESS RESPONSIBILITY

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- We cooperate in a partnership-based, ethical, honest and legal manner, because it is through such actions that we create an environment based on mutual trust for our business partners.
- We promote mutual tolerance and respect, because our business partners are companies of different nationalities, characterised by different cultures, customs and mentality, hence the maintenance

### 6.1. WE CARE FOR RELATIONS WITH OUR BUSINESS PARTNERS

At PRESS GLASS, we care for good relations not only with the current, but also the former business partners and other people with whom we cooperate, which we also expect from them. In order to maintain good business relations, we take the following actions:

- of mutual respect is of particular importance and has a great impact on cooperation.
- We guarantee transparency of meetings, as well as transparency and compliance with the law of the signed agreements, and we strictly observe the provisions of such agreements.
- Our business partners are familiarised with our Code of Conduct.

### 6.2. WE SELECT BUSINESS PARTNER RESPONSIBLY

Decisions to select our business partners are made responsibly, i.e. in the best interest of the company and themselves. Our personal interests and relationships do not affect our judgement. Suppliers

and customers are selected fairly, objectively and impartially, paying attention not only to the price, but also to the quality and optimisation criteria.

### 6.3. WE DO NOT DISCLOSE CONFIDENTIAL INFORMATION

Our business partners are guaranteed that the personal data and confidential information entrusted to us as part of the cooperation are covered by the trade secret, i.e. they are protected and respected.

- We obtain, process and store information from companies and persons with whom we cooperate in accordance with the law and solely for the specific business purposes for which it was collected.
- With regard to the information we possess, we follow the provisions of the agreements we have concluded with our business partners. We do not transmit information to unauthorised persons, unless this is required by the concluded agreement. We observe the highest standards of care when transmitting data.
- We respect and comply with the data protection and confidentiality laws of the countries where our business partners operate.
- We do not use the know-how of our business partners and their other business secrets which are the subject of our cooperation.

## 6.4. WE COMPLY WITH ANTITRUST REGULATIONS

At PRESS GLASS, we strictly observe the applicable regulations concerning the fair and free competition and trade in every aspect of our activities.

We do not engage in activities that could restrict or hinder effective competition, or adversely affect the market economy. We do not enter into unwritten agreements with competitors, e.g. regarding market shares or customer allocation, and we do not interfere with the relations of our competitors with their customers.

## 6.5. WE FOLLOW THE RULES FOR GIVING AND ACCEPTING GIFTS

PRESS GLASS does not exclude the application of the principles of mutual hospitality in the area of our business, as these are common practices in the trade relations. However, we are transparent and very careful in accepting and giving gifts or other benefits, therefore we have established rules governing these issues. These rules apply both to the acceptance and giving of gifts and other benefits.

- It is forbidden to offer or accept benefits in the form of money.
- Gifts and other benefits are always given and accepted with the consent of PRESS GLASS, in a transparent and open manner.
- In case of doubt as to whether a gift or another benefit is unlawful, one should always refrain from accepting or giving it.

## 6.6. WE FORBID CORRUPTION

Corrupt practices are behaviours that lead to business decisions being made in an unethical, biased and unfair manner, so we do not participate in such activities. We do not make business promises in exchange for financial, material or other benefits that may be considered a corruption offence.

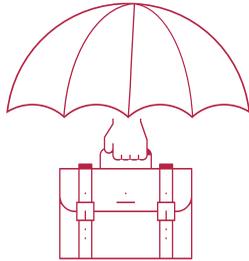
## 6.7. WE ARE ENVIRONMENTALLY FRIENDLY

Environmental protection is an important part of our business, not only in the process of manufacturing and delivering new products, but also in our daily work. We always make sure that our negative impact on the world around us is kept as low as possible and reduced on an ongoing basis. We comply with the environmental regulations that apply to us. Our company's environmental activities are monitored and evaluated on an ongoing basis, and then improved. In the manufacturing process, we focus on innovative technologies and processes that do not harm the environment. While performing their tasks, our employees are obliged to do this in an environmentally friendly way.



## 7. REPORTING INFRINGEMENTS AND CONCERNS

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All employees are obliged to and responsible for reporting any behaviour that violates our Code of Conduct. Therefore, we encourage you to react, i.e. to speak up, to raise concerns about the principles of conduct described in our Code.

Violations of our Code of Conduct may have significant consequences and lead to high losses, not only for our company but also for all of us as employees, and for our business partners. Therefore, every employee of PRESS GLASS, regardless of his/her position and level in our organisation, is responsible for every violation of the Code of Conduct and should expect relevant consequences. A confirmed breach of the above behaviour may give rise to disciplinary measures, including dismissal, as well as financial consequences.

If you suspect a breach of the rules, you should report the situation immediately. Each of us has the right and duty to do so. Remember that any delay or failure to report a violation of our company's principles may also constitute a violation of the law.

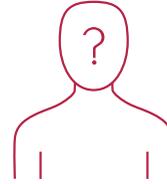


If you have observed behaviour that:

- violates the rights of another person, i.e. an employee or a business partner,
- violates the internal or external regulations under which we operate,
- is incompatible with our values,
- has a negative impact on our internal and external image,

you should take action,

i.e.: if you can influence the situation, you should take measures to address the problem, reprimand the person responsible, and show the right behaviour.



If you cannot directly influence the situation, you should contact our company's Ethics Committee directly, or send an e-mail to: [compliance@pressglass.com](mailto:compliance@pressglass.com), or ask:

- your immediate superior; or
- a senior manager; or
- the HR Department.

Violations of our Code of Conduct can also be reported by our employees or business partners through the [www.pressglass.com](http://www.pressglass.com) site, in the Code of Conduct section.

We ensure anonymity and confidentiality with regard to reported violations and concerns.

Measures will be taken in relation to those who:

- violate our Code of Conduct,
- retaliate against employees reporting violations of the principles described in our Code of Conduct.

## 8. SHORT SUMMARY

Our Code is not an exhaustive manual for our company. The areas covered by the Code are complementary to the provisions of the applicable law and internal regulations on the basis of which PRESS GLASS operates, and which relate in more detail to the issues covered by the Code.

The principles, rights and duties described in this Code are valid for the entire PRESS GLASS company and may differ in the individual countries where PRESS GLASS has its locations. Our employees and business partners should seek advice and support of the company's legal counsel in order to ensure compliance with the laws of each country.





[www.pressglass.com](http://www.pressglass.com)

07/2020