



# BOP Group Code of Conduct





## Letter from the Management Board

Dear Colleagues,

In BOP Group, we are committed to conducting business in an ethical, responsible manner in compliance with the law. This approach creates a safe working environment, which allows us to achieve our business goals and helps us to be even more effective.

This document describes the values and practices that should guide us in our everyday work. The **BOP Group Code of Conduct** is a compass that sets the same direction for all BOP Group employees. Let us always use it so that we have no doubts about the decisions we make.

As the Management Board of BOP, we are a team that upholds ethical business standards and that expects the provisions contained in this document to be followed.

Please read the **BOP Group Code of Conduct** carefully and use it in your everyday life. This is the updated edition of this document and is a response to the current needs and requirements of the environment in which BOP Group operates.

The Management Board of Basell Orlen Polyolefins Sp. z o.o.

The Management Board of Basell Orlen Polyolefins Sprzedaż Sp. z o.o



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## Vision

**We are the recognized leader in the polyolefins industry in Poland.**

**We contribute to the sustainable development of society and help to improve the comfort of life.**

## Mission

**We are the leading supplier of products and services in the Polish polyolefin market creating value for our customers, employees and shareholders.**

**We set the highest standards in the industry through safe and reliable production processes and superior customer service.**

**We strive for excellence in everything we do.**

**We foster development of our employees.**

**Safety is our first priority.**

## Our Values

All the decisions and activities in BOP Group are in line with our fundamental values. These values are the pillar of our Company. They not only describe who we are and what is important to us but also govern our relations with stakeholders.

They are our internal compass and guide our actions.

### Our Values:

#### **Safety and Sustainable Development**

*We work safely. We take care of the natural environment.*

#### **Integrity**

*We act honestly and conscientiously, we keep our word.*

#### **Responsibility**

*You can rely on us. We take personal responsibility for our actions.*

#### **Respect**

*We respect human dignity and other personal rights of each individual.*

#### **Partnership and Teamwork**

*We are open to cooperation. We are committed to common goals.*

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## What is BOP Group Code of Conduct?

BOP Group **Code of Conduct** sets the norms, expectations and principles of BOP Group that every BOP Group employee should follow. It refers to all the areas of our Company's activities, with regard to our internal and external relations. BOP Group **Code of Conduct** also establishes our core values.

Regulations and standards of conduct described in BOP Group **Code of Conduct** complement all other internal Company documents that are in force in BOP Group (e.g. internal procedures, regulations, instructions).

Polish law prevails over all the terms and provisions of BOP Group **Code of Conduct**.

BOP Group **Code of Conduct** applies to all employees of BOP Group, regardless of their position and function. It is also addressed to all our associates, consultants and people acting on behalf of BOP Group.

We expect our business partners to follow similar principles when working with BOP Group.



## Fundamental Principles of BOP Group Code of Conduct

- We run our business in accordance with the binding laws and all applicable regulations.
- We act in compliance with the good practices and principles of life in community.
- We are guided by the principle of respect and dignity of every individual.
- We act in line with the highest ethical standards.
- We work safely. We are committed to preventing all situations threatening the safety of our Company, our employees or other stakeholders.
- We care about the natural environment. We continuously work on reducing pollution and waste.
- We are honest, we act diligently and conscientiously.
- We understand the importance of open communication. We create conditions for the efficient and smooth exchange of information. We treat confidential information responsibly and in accordance with applicable law.
- We are reliable and professional. We do business in accordance with best business practices.
- We compete fairly.
- We are active and responsible participants of life in the community.
- We protect our Company's assets.

BOP Group **Code of Conduct** specifies the following areas of responsibilities:

- Company and Employees,
- Shareholders,
- Business Partners,
- Society.

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## Guidance and support

Should you have any questions or concerns regarding the matters regulated by BOP Group **Code of Conduct**, please contact your supervisor or Management Board Member or BOP Group Ethics Office.

Boxes for letters to BOP Group Ethics Office are located within the premises of our Company in the following locations:

- NPP Building
- NPP Logistics
- PE-1 Building
- Administration Building at 39 Ignacego Łukasiewicza Street in Płock
- Warsaw Office.

BOP Group **Code of Conduct** specifies the following areas of responsibilities:

- Company and Employees
- Shareholders
- Business Partners
- Society.

### Where to report concerns

A report can be made via the telephone voice message (+48 24 364 7210) directly to BOP Group Ethics Office or via the email to [etyka@basellorlen.pl](mailto:etyka@basellorlen.pl) or via Ethics blue boxes. If you choose to make an anonymous report, the Company will not attempt to identify you. When you make a report to BOP Group Ethics Office, your report will be translated and forwarded to BOP Management Board.

### What should be reported

Any violation of BOP Code of Conduct or other policies,

Any violation of laws and regulations,

Any cases of fraud, bribery or corruption,

Misbehavior with regard to accounting and reporting.

## No retaliation

We have a responsibility to our Company and each other, and we are expected to report our concerns when we believe something improper or inappropriate has or may have taken place. BOP Group will not discriminate or retaliate against any employee, who reports a complaint or concern in ‘good faith’. When you make a report in good faith, it means you provide all of the information you have and you believe to be true. When made in good faith even if an investigation prompted by your report does not confirm that misconduct has taken place, no action will be taken against you.

You should feel comfortable making a report to any of the resources listed in the “Where to Report Concerns” section. If you believe that you or someone else has been retaliated against for raising a concern, you should bring this matter to the BOP Group Ethics Office.

## Company and Employees

### Safety and GOAL ZERO

#### **Working safely is a core value for BOP Group**

**We express our commitment to achieve safety perfection with our motto “GOAL ZERO – ZERO MISTAKES, ZERO ACCIDENTS”.** It means that we make every possible effort to avoid mistakes and accidents. GOAL ZERO is a principle that we live by every day. We achieve that through a proactive approach to safety and health protection. Our goal is to create an accident-free workplace.

We comply with all applicable laws in the field of health and safety at work, as well as with our internal policies and health and safety procedures. We all actively participate in monitoring our workplaces and inform our supervisors and health and safety personnel about every incident which could potentially pose a threat to safety. We are active participants of safety trainings and implement safety tools such as *“Check Signals” – every time I am about to perform a task I think how to perform it safely.*

Safety is all about behaving in a responsible and attentive manner and about the

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right attitude and way of thinking. It is the ability to anticipate potential threats and to eliminate them before they actually occur. In BOP Group, we all strive to achieve excellence in that scope, in order to exclude the risk of any undesirable incidents.

Each of us is responsible for their own safety as well as for the safety of their colleagues, including the representatives of business partners performing tasks within the premises of our Company.

## Respect

We respect dignity and the personal rights of each individual. We treat all our employees with the same respect, regardless of the function that a person performs, the position they occupy, or the situations that occur. We are dedicated to respecting gender, age, nationality, race, religion, or sexual orientation. We encourage the open sharing of ideas. We believe that following the principles set out in our Code of Conduct will help us to achieve success.

Managers, heads of departments and supervisors have a duty to act as ethical role models for all those who report to them. They should create a platform that enhances the free exchange of views. The management team is obliged to support their subordinates and make sure that their relations with them are based upon partnership and co-operation.

We consider any form of discrimination, molestation, mobbing unacceptable and do not tolerate any patterns of behavior infringing dignity or personal rights. Employees who are victims or witnesses of such practices are requested to immediately notify their supervisor, Management Board Member or BOP Group Ethics.

## Development

We are a constantly developing organization, open to improvement and conscious of the fact that success depends on the commitment of all employees. We create opportunities for employment, career advancement and professional development. We promote personal development and the best possible use of employees' professional aptitude.

## Protection of Personal Data

We protect the personal data of our employees.

The access to personal data is only granted to those persons who hold the required authorisation in connection with their professional duties. Such persons are under obligation to guarantee the security of such personal data in accordance with the binding legal provisions and the internal regulations. We never pass any personal data to unauthorised persons.

*Details regarding the principles on personal data protection in BOP Group are defined in the Policy of Personal Data Security as well as in the Instruction on the management of IT systems used for personal data processing.*

## Protection of Company Assets and Confidential Information

We are all responsible for taking care of the Company's assets. This includes buildings and facilities belonging to BOP Group as well as Company funds, equipment, documents, IT systems, technologies and all the intangible and legal assets. We do not misuse the Company's equipment and resources for the purposes that are unrelated to the performance of our professional duties. We do not use the Company entertainment allowance funds for private purposes.

### Acquisition and the Protection of Data

We acquire all the information needed for the performance of our professional duties in an official and safe manner. As part of our obligation to protect the Company's assets, we protect confidential information to which we have access in connection with our professional duties. We protect all information that constitutes BOP Group trade secret, as well as the information the protection of which is guaranteed by BOP Group regulations and internal provisions. We use confidential information related to BOP Group, its customers and vendors only within the scope necessary for the execution of the given tasks. The data protection covers relations with our employees as well as with all other partners with which BOP Group enters into co-operation.

We do not use information and materials which do not belong to BOP Group without prior consent from the owner of such information.

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*All confidential information in possession of BOP Group is protected in accordance with the principles of Information Security Management System.*

### Intellectual Property

The intellectual property of BOP Group includes logos, trademarks, patents, copyrights, know-how, etc. Within the scope allowed by the law, BOP Group owns intellectual property rights in all the works created with the use of BOP Group's materials, time or at its cost.

### Reputation

We care about BOP Group's reputation through carrying out activities in a manner that is both ethical and compliant with the law. We all influence the opinion of our stakeholders about BOP Group in the course of our daily relations with our business partners. Therefore, all our actions are aimed at strengthening the positive image of BOP Group and fostering the good name of our Company.

Our reputation as a reliable company depends to a great extent upon the manner in which we communicate with the public opinion. Only authorized persons may deliver all BOP Group official statements and standpoints outside the Company.

If you receive a request for information from the media, you should forward it to BOP Public Relations. If you receive a request from an outside legal representative or government agency, you should forward it to the Legal Advisory.

Do not take the following actions:

- a) Speak on behalf of BOP unless you have authorization to do so,
- b) Disclose any confidential information,
- c) Refer to BOP customers, suppliers or business partners without their approval.

*The details regarding BOP Group external communication are set out in the internal procedure 'Information policy – external stakeholders'.*

## Avoidance of Conflicts of Interest

Employees and persons acting on behalf of BOP Group should avoid situations in which conflict of interest arises between their personal interest and that of the Company.

- We do not perform work or enter into any form of co-operation upon any principles with entities running a business competitive to BOP Group, or to entities-operating with BOP Group.
- We do not hold stocks/shares of entities running a business competitive to BOP Group or to entities co-operating with BOP Group, in such a proportion that could influence in any way the decision-making process in those entities.
- BOP Group employees refrain from taking part in the decision-making process regarding those entities (including natural persons) co-operating with BOP Group:
  - in favour of which we perform work or render services,
  - in governing bodies of which we perform duties/functions,
  - in which we hold stocks/shares.

The rule is applicable also when a person close to us is employed or renders services for entities cooperating with BOP Group or in cases when such a person performs duties/functions in governing bodies of those entities or owns their stocks/shares.

- In BOP Group we avoid a direct reporting relationship between family members.
- In case of additional employment outside BOP Group structures, we do not take advantage of our position, working time, or other Company assets while performing work outside BOP Group.

In a situation when we suspect that the action that we undertake may result in a conflict of interests, we should immediately disclose that fact to our supervisor, Management Board Member or BOP Group Ethics Office.

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## Acceptance and Offering of Gratuities

We do not accept or offer any material or non-material benefits (financial gratuities, gifts, or any other free of charge services, colloquially called bribes), which could affect the impartiality of decisions made by us or by other persons.

We are allowed to accept and offer only such gifts which are of usual nature and of small value (100 USD) and which do not oblige us to any form of mutuality and thankfulness. We can accept or offer gifts that are commonly accepted as marketing or business gifts.

We do not accept or offer invitations to participate in meetings of entertainment nature or in informal meetings with our business partners, if our participation in such events may in any way affect the impartiality of our decisions with regard to those partners.

If any questions arise about the acceptance or the offering of any gifts, such a matter should be discussed with our immediate supervisor, Management Board Member or BOP Group Ethics Office.

## Zero Tolerance to Corruption

We run our business ethically and in compliance with the applicable laws. BOP Group respects the rules of fair competition, prevents bribery, improper payments, acceptance of material benefits (bribes) and corruption. Doing business the right way means we never offer or accept any form of bribe, payment or kickback. We must take caution to avoid improper payments. We should always determine the ownership structure of our third party representatives by performing due diligence as required by applicable BOP policies. You must also ensure that you do not allow third parties to make or receive any improper payment on our behalf.



BOP Group employees, associates and persons acting on behalf of BOP Group are forbidden to accept any material or personal benefits as well as promises of such benefits; moreover, they are forbidden to request, or to condition the performance of professional duties upon the receipt of a material benefit.

We do not gain any benefits or help others to gain benefits from opportunities that may arise as a result of taking advantage of information or position in BOP Group..

### **Preventing money laundering**

BOP Group is committed to detecting and preventing money laundering. Money laundering means engaging in financial transactions that conceal the identity, source or destination of money gained through illegal means. As part of our commitment to identifying and stopping money laundering activity, we must comply with all applicable anti-money laundering regulations.

We must ensure that we only do business and engage in financial transactions with persons conducting legitimate and lawful activities. We should always confirm the identities of persons or firms with whom we conduct business and be comfortable that any funds we receive are derived solely from lawful and legitimate sources..

### **Consumption of Alcohol and Substance Use**

It is forbidden to perform work under the influence of alcohol, illegal drugs, or other abusive substances.

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## Obligations Towards Our Shareholders

Main target of BOP is building value for Shareholders. Acting in accordance with the applicable law, BOP Group ensures reliability of its financial statements and allows its shareholders access to information about BOP Group.

### Maintenance of Books of Accounts and Submission of Financial Statements

BOP Group acts in accordance with the accounting and fiscal law in the area of maintaining the books of accounts.

The process of registering invoices and making settlements is made in a clear and transparent manner so that all our transactions are reflected in details and in accordance with the law.

All of us are obliged to observe the above principles, but members of the BOP Group Finance Department are especially responsible for correctness of our accounting entries.

- We create correct accounting records in our accounting documents.
- We accurately and fairly reflect the state of all our transactions and accept only those documents that have been verified and are in accordance with the actual state.
- We reliably present the documents for inspections and audits, and never impede or delay such procedures.

## Obligations towards our Business Partners

### Quality of Products and Services, Safety Standards

We owe our success to the highest quality of our products and services rendered to our customers. BOP Group is a customer-driven company in all its actions. We give full and reliable information about services and products offered by BOP Group to an extent allowed by the confidentiality principle.

As a supplier of polyolefins, a product that plays a vital role in improving the quality of life, we make sure that our customers receive products that meet the highest quality and safety standards.

While doing business with our customers we act in a transparent and honest manner, in line with the principles set out in our internal procedures. We treat our customers fairly and in accordance with the laws and regulations in force and on the basis of content-related criteria.

## Honesty

The information about our Company that we provide to our customers, vendors and other business partners is always accurate and reliable. We act fairly, ethically and legally. We never disclose confidential information regarding our business partners. Furthermore, we do not take unfair advantage through manipulation or abuse of privileged or proprietary information. We do not make false representations.

We never resort to bribery and never offer or accept material benefits when competing for orders.

## Compliance with anti-trust and competition laws

We adhere to the principle of fair competition. BOP Group obeys all anti-trust and competition laws that are in force in Poland and in the European Union. The use of illegal, or unethical measures in order to take an unfair advantage over our competition is forbidden. The following examples illustrate prohibited practices: Entering into price fixing agreements; Allocating market share—either formally or informally—among competitors; Bid rigging or Restricting or limiting production in order to reduce competition.

BOP Group does not get involved in any activities such as entering into collusive agreements, or making arrangements aiming at preventing or hindering fair competition.

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## Safeguarding third party information

While performing our duties, we may receive access to confidential information about our business partners. Therefore, we are obliged to keep such data confidential and to meet obligations resulting from agreements signed with BOP Group business partners. This means that we are obliged to protect all third party intellectual property (e.g. inventions and software) from disclosure or misuse.

## International trade controls

We co-operate with companies all over the world and strive to follow all applicable laws and regulations that govern international trade.

## Social Responsibility

BOP Group is a socially responsible company. We pursue the policy of sustainable growth, combining our business activities with the support for the local community and with the care for the natural environment.

### Local Community

As an active member of community, we participate in the life of the city and the region and willingly support initiatives aimed at improving the quality of life of citizens.

### Protection of the Natural Environment

We pay special attention to environmental protection. We adhere to all the applicable laws and regulations governing this field. We strive to exceed the current environmental standards. We actively work on increasing the general knowledge on polyolefins and their role in protecting nature.

### Effective Resource Management

In BOP Group, we are fully aware that effective resource management has a favorable impact on the natural environment. Therefore, we are doing our utmost to consume less and less resources such as energy or water and at the same time to increase the efficiency of our production processes. We also aim at responsible conduct when it comes to emissions and waste as well as at minimizing their

quantity during production processes and logistic operations.

Effective resource management also involves supplying products that are beneficial for society and the environment.

## Politically Neutral Attitude

BOP Group does not engage in any political activity. We do not express our personal political views when we represent BOP Group and we refrain from posting this type of information on blogs, or on social networking portals using Company networks or computers. Such activities can be pursued only during nonworking hours and only with the use of private means.

## Violating BOP Group Code of Conduct

All the employees and associates of BOP Group have the obligation to get acquainted with **BOP Group Code of Conduct** and adhere to its provisions. Any violation of the standards of conduct described in **BOP Group Code of Conduct** can be interpreted as a violation of the basic duties of the employee or rules of cooperation with BOP Group.

**BOP Group Code of Conduct** is available in an electronic form in BOP Group's Intranet as well as on the website: [www.basellorlen.pl](http://www.basellorlen.pl)

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## Definitions

**BOP Group** – Basell Orlen Polyolefins Sp. z o.o. and Basell Orlen Polyolefins Sprzedaż Sp. z o.o. BOP Group consists of employees employed in those two companies.

**BOP Group Ethics Office** – designated manager reporting directly to the President of BOP with access to blue boxes, email and phone lines

**BOP Group Stakeholders** – entities that have an impact on BOP Group as well as entities on which BOP Group has an impact. BOP Group's Stakeholders are its employees, affiliated entities, consultants, advisors, shareholders, customers, partners, vendors, financial institutions, offices, companies, organisations and other business partners directly or indirectly co-operating with BOP Group, media, local community and all recipients of our services and the final users of products manufactured from polyolefins offered by BOP Group, etc.

**Sustainable Development** (according to the Law on Environmental Protection, act of 27 April 2001, Journal of Laws from 2013, item 1231, as amended) is a socioeconomic development in which the process of integrating political, economic and social actions occurs, taking into account preservation of the equilibrium of nature and stability of basic natural processes, to guarantee the possibility of fulfilling basic needs of societies or citizens not only of the present generation, but for future generations as well.

**Close person, family members** – spouse, cohabitee, parents, siblings, children.





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Registered in the register of entrepreneurs maintained by the District Court for Łódź - Śródmieście in Łódź,  
20th Commercial Division of the National Court Register,  
KRS No: 0000143578  
The Authorized Capital of the Company is 907 398 000,00 PLN,  
NIP: 774-27-45-992

Basell Orlen Polyolefins is a member of the LyondellBasell and ORLEN family of companies.  
It is a joint venture between LyondellBasell Industries Holdings B.V. and PKN ORLEN S.A.