

Topsil Global Code of Ethics

The purpose of the code is to convey to all Topsil employees three principles of conduct at Topsil:

1. Compliance with legal regulations.
2. We operate in accordance with Topsil internal guidelines.
3. We believe in our own values and beliefs and demonstrate it through our competences.

What to do if you are concerned about violating the three TOPSIL rules?

IF YOU THINK THAT THE CODE OR THE LAW HAS BEEN VIOLATED YOU MUST TALKED ABOUT IT IN OPEN WAY.

Who should I talk to?

1. Your immediate supervisor is always the person you should talk to first, unless you think he has violated the Code.
2. If you cannot speak openly with your line manager, you can do it with the Personnel Manager.
3. You can also talk to someone from the Board or co-owners.
4. If you have to report your concern in complete confidence, you can use a box hung in the dining room.

There, you can post a note to:

- a) Report any concerns about events / behaviors at work that you believe may be unlawful, violate the Code of Conduct, or are contrary to Company Policy.
- b) Report anything that you think is a danger to colleagues at work and clients or the public.
- c) Share any concerns that the above information has been intentionally hidden.

Occupational Health and Safety

Everyone should be able to do their job in a safe environment. We are all responsible for this.

What should you do for health and safety at work?

1. Follow and try to understand the safety instructions and guidelines and the Company Policy, OHS procedures that apply to your position.
2. If you are a Manager, you must be an example of security leadership and create a workplace where employees follow your example.
3. To ensure that hazards are understood and that there are adequate plans to minimize any damage caused by them.
4. Safety is everyone's responsibility. If you see something that you think is dangerous and could cause an accident, take action.
5. If you see a colleague working in a way that can harm him or herself and others, intervene and remind him of a safe way of doing work.
6. Never agree to do anything unless you have the proper knowledge or training to do it safely.

Fraud, abuse, corruption

Fraud or corruption is a serious crime that damages our company and can have a significant impact on our costs and profits. The term 'fraud' or 'corruption' is commonly used to write theft based on a variety of dishonest behaviors such as misleading, forgery, lying or concealing material facts, and giving and receiving bribes.

What should you do about this?

1. The basic principle is simple. If you suspect theft or other unlawful activity is taking place, you must be open about it. Report it to your immediate supervisor, Personal Manager or Owners.
2. Always remember to correctly settle expenses for business trips and for using company cars.
3. Never give bribes, payments or gifts such as money or other benefits to convince someone to do you a favor.
4. Never accept bribes such as gifts or hospitality to ensure cooperation with a new or existing contractor.
5. Handing and receiving modest gifts with a value below PLN 100 is not a fraud, abuse or corruption if it is incidental, not cash and has been reported to the Manager or Personal Manager or Owners.

The Document is accepted by:

The Management Board of TOPSIL Sp. z o.o. SK

Document Owner:

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