



Team Point Sp. z o.o.
39-300 Mielec
ul. Partyzantów 19a

Mielec, 01.06.2018r.

Code of Business Ethics and Conduct

Table of contents

Part I: Business ethics

General standards and customs
Conflicts of interest
Books and records
Protection of company assets
Confidential information
Email and Internet policies

Part II: Human Resources Policy

Equal employment opportunities
Harassment
Threats of violence
Bullying
Alcohol and drugs

Part III: Anti-corruption policy

Purpose of anti-corruption policy
Corruption , bribery
Principles of anti-corruption policy
Prevention of corruption
Good habits
Control

Part IV : Final provisions

BUSINESS ETHICS

I. General standards and customs

Team Point Sp. z o.o. strives to comply with the laws, rules and regulations concerning the conduct of business. Employees must avoid anything that threatens to entanglement of the company or its personnel in illegal activities. Employees must, in the performance of their duties, observe the highest standards of business and personal ethics. They should always act honestly and ethically ethically, whether they are dealing with other employees, third parties, business entities, companies or individuals.

Whether they are dealing with other employees, third parties, businesses, customers, suppliers or administrative or supervisory bodies. supervisors. Employees should avoid any questionable relationships with individuals or companies with whom Team Point transacts business or may do business, not disclosing confidential information obtained in the course of their work , as well as avoiding situations that may create a conflict of interest to the possible detriment of the employee and/or the company.

II. Conflicts of interest

A conflict of interest exists when a person's private interest may in any way conflict with the interests of the company in any way. Conflict situations can occur , when an employee takes actions or has interests that may hinder him or her from performing work for the company in an objective and efficient manner. A conflict of interest can also arise also occur when a board member or an employee, or someone in their family, derives an improper personal benefit as a result of their position in the company. Conflicts of interest can also arise also arises if you work for a customer, supplier or competitor of Team Point, or have an improper personal interest in your position with the company. competitor of Team Point, or has an interest in a competitor.

Any potential conflict of interest must be reported. If Team Point assesses that a potential conflict of interest could impair the performance of the employee's duties employee, it may take such action as it deems appropriate to eliminate the conflict. These actions may include, for example, requiring the employee to divest his or her interest or terminate a contract with a customer, competitor or supplier, changing the scope of duties or requiring an employee to refrain from making decisions on certain matters.

If circumstances arise that create a risk of a real or apparent If circumstances arise that create a risk of actual or apparent conflicts of interest, before taking any action, the employee should contact his or her supervisor or the Chairman of the Board of Directors.

Any employee who becomes aware of a conflict of interest, or of any transaction or relationship or other circumstance any transaction or relationship or other circumstance that he or she reasonably believes will give rise to a conflict), should bring it to the attention of his or her supervisor.

III. Books and records

Team Point Ltd. requires honest and accurate recording and reporting of information in order to make responsible business decisions, comply with applicable laws and regulations, and to ensure completeness, truthfulness, accuracy, timeliness and transparency of reports and documents.

All books, records, accounts and financial statements of the company must be maintained with must be maintained in reasonable detail, accurately reflect the company's transactions and be in compliance with applicable laws and regulations. Company, and must comply with applicable laws and regulations, accounting rules and the company's internal control system.

IV. Protection of company assets

The use for personal purposes, without the consent of the Board, of company property or information obtained by employees in the workplace is prohibited. No employee use Company property, information or position for improper personal gain or advantage or to compete directly or indirectly with the Company. Personal gain, nor compete directly or indirectly with Team Point. Employees have a duty to the company to advance its legitimate interests whenever the opportunity arises.

V. Confidential information

Team Point Sp. z o.o. employees may not, without specific authorization, disclose confidential information to anyone outside the company. Different types of information may be subject to confidentiality information, including all internal, confidential, proprietary or secret information, related to the company's operations. Most of the company's procedures, expertise and experience of the company are protected as trade secrets. Confidential information also includes among others, production processes and methods, passwords, financial data, financial forecasts, plans, strategies, customer price lists, profits and production costs as well as other information relating to our business, customers and suppliers. Regarding our business, customers and suppliers. Unauthorized disclosure of trade secrets. Unauthorized disclosure of trade secrets can cause them to lose their value and may constitute a criminal offence or be tantamount to a breach of contract. Prohibition on disclosure of business secrets. The prohibition on disclosing trade secrets applies to employees during and after employment.

VI. Rules concerning e-mail and the Internet

E-mail should be used primarily for business purposes. All e-mail messages are the property of Team Point Ltd. The use by employees of computer systems to send or receive e-mail or to access the Internet is not covered by the principle of respect for privacy. Team Point may monitor the use of computer systems computer systems to prevent their inappropriate use, as well as to reduce the costs resulting from storing large amounts of data. Employees may not use email for personal gain, advertising, solicitation of funds, to send chain letters or to send any other messages that could damage the reputation of the company. Given that email is not secure

and its messages are essentially the electronic. As e-mail is not secure and its messages are essentially the electronic equivalent of a postcard, appropriate discretion must be exercised when sending confidential or proprietary information by e-mail. Appropriate discretion should be exercised . Employees should also exercise reasonable discretion when using the Internet at work. Z Internet should be used primarily for business purposes. Due to the public the public nature of the Internet, care should be taken not to divulge confidential information or obtain illegal information through the Internet. Obtain illegal information through the Internet. The Company may monitor the Company can monitor its employees' use of the Internet to see what sites and information they access. information. Accessing pornographic or obscene material or distributing them via the Internet or e-mail is strictly prohibited. When writing about business matters, remember that company data is subject to disclosed to government authorities or to private individuals in the course of litigation. More importantly, such material may be used by the media to shape public opinion about your company's image. Regardless of who you write to , what you write can have significant consequences. Any message you send can easily be printed, modified and disseminated.

STAFF POLICY

I. Equal employment opportunities

Team Point Sp. z o.o. does not discriminate against any employee or applicant for employment on the basis of race, colour, religion , ethnic or national origin, gender, sexual preference, age, disability, political beliefs. This principle applies to recruitment, hiring, training, promotion and other conditions of employment. employment. Discrimination against an employee or applicant for employment is a serious breach of employment law, equal employment opportunity and company policy. Every supervisor has a duty to ensure that acts of discrimination do not occur. Team Point Sp. z o.o. is committed to taking steps to guarantee equal employment and promotion opportunities to eligible candidates. All personnel actions human resources should be conducted without any acts of discrimination.

II. Harassment

Team Point Sp. z o.o. has the ambition to provide employees with a work environment free from any form of discrimination or harassment. Harassment includes, but is not limited to, verbal harassment, such as offensive comments, jokes or slander , physical harassment such as unnecessary or rough touching, physical harassment such as unnecessary or coarse touching, obstructing or preventing movement and visual harassment such as offensive or rude posters, postcards, calendars, cartoon jokes, graffiti, drawings, messages, notes or faces. Sexual harassment consists of unwelcome advances, requests for sexual favours or other verbal or physical acts of a sexual nature, where submission to or rejection of such an act or rejection thereof is intended to form the basis of an employment decision or the purpose or has the purpose or effect of unreasonably interfering with someone's work performance or creating creating an intimidating, hostile or offensive working environment.

III. Threats of violence

Verbal threats of violence are not acceptable and should be reported to a superior or to a representative of the Human Resources Department. Violent acts or threats of violence will be subject to disciplinary action.

IV. Bullying

The company shall take the necessary steps to counteract any behaviour that constitutes bullying. Bullying means actions or behaviour concerning an employee or directed against an employee, consisting of verbal or physical intimidation, humiliating, harassing an employee. It also includes verbal ridicule of an employee, which, in the opinion of an employee, causes him to have a low opinion of his professional suitability is also regarded as mobbing.

V. Alcohol and drugs

Abuse of alcohol and drugs seriously jeopardises safety and performance at work, as well as may also be associated with criminal activity. There is an absolute prohibition in the workplace prohibited from being under the influence of alcohol or drugs. This rule applies to all employees, while on the premises as well as while working outside the premises. An employee under the influence of drugs or under the influence of alcohol or other substances chemical agents which limit his or her ability to perform his or her job, disciplinary action will be taken against him or her, including possible dismissal. Disciplinary action up to and including possible dismissal will be taken against them. Employees who have a significant problem in maintaining the quality of their work or who cause serious incidents or accidents will be sanctioned with dismissal if medical examinations reveal the presence of drugs. Medical examination reveals the presence of drugs in their system. The following may also be dismissed employees who, while at work or on company premises, distribute, sell, purchase, manufacture, distribute, possess or use drugs.

ANTI-CORRUPTION POLICY

I. Purpose of the anti-corruption policy

The purpose of introducing the document is to establish for all employees, employees, contractors, co-workers and business partners to establish equal and transparent rules, while emphasising the principle of "Zero Tolerance for Corruption".

II. Corruption, bribery

CORRUPTION- promising, offering, giving or accepting in any form, regardless of value, of any benefit. A "benefit" is considered to be not only a benefit of a material nature, but also of an intangible nature - e.g. a donation, an employment contract, insider information, preferential treatment, gifts, prizes, invitations. **TRANSFER** - is in particular, an offer, promise or giving, solicitation, requiring, agreeing to receive a bribe in any form, of any value, which may be considered an instance of inducement to bribe, which is contrary to the any form of bribery, of any value, which may be

considered an inducement to bribe, which is contrary to accepted principles of conduct, illegal, corrupt, unethical or violates the law.

III. Principles of the anti-corruption policy

- The principle is the transparency of the Company's activities, which translates into actions aimed at eliminating any corrupt practices which may occur in connection with the functioning of the Company.
- The principle is to take care to act in compliance with the law and international conventions, including compliance with the Company's internal rules and policies.
- It is a principle that the Company does not accept or give bribes (financial gratuities).
- The Company's Clients and Contractors must not accept an offer or request for an advantage material or immaterial benefit from a Company Employee.

Clients and Contractors of the Company are not allowed to offer employees of the Company any financial or personal benefits.

IV. Prevention of corruption

1. Preventing, detecting and reporting cases of bribery as well as other forms of corruption is our responsibility. All employees of the Company are under an obligation to avoid any action that could lead to a breach of this principle.
2. All violations in which, for example, a customer or potential customer offers something through which he or she, All violations in which, for example, a customer or potential customer offers something to gain a business advantage or suggests that the giving of a gift or monetary benefit is a condition for a transaction.
3. The anti-corruption policy obliges business partners, suppliers, customers and employees to act with integrity without any corrupt intentions or activities and to adhere to the following principles:
 - not to offer or give any financial, material or other advantage to
 - employees must not engage in any conduct amounting to conspiracy, demand or request any financial or material benefit
 - no employee will be subject to demotion, fines or any other
 - no employee will be subject to demotion, fines or any other adverse consequences for refusing to accept or pay a bribe, even if such refusal results in the loss of an opportunity to do so.
 - if such refusal results in a loss of business opportunity for the Company.
 - do not accede to requests, demands for financial or material benefits
 - in cases of corruption, the bribe giver, bribe taker and bribe receiver are treated equally taking a bribe.

V. Good practices

1. The Company implements an anti-corruption policy through compliance by its Employees with its assumptions and generally accepted appropriate social norms.

2.The Company ensures that the awareness of the Company's Employees is raised regarding the possibility of identifying and preventing corrupt activities.

3.The Company's policy requires that registers, books and records are kept and maintained in detailed so that they accurately represent the transactions carried out by the Company and the use of its financial resources

4.The company undertakes to take appropriate, adequate and proportionate actions with regard to the risks and corrupt practices that have occurred.

5.The Company ensures that all relationships with public officials, private individuals and businesses are open and transparent so as to exclude the possibility of the appearance of corruption risks.

VI. Control

1.The regulations mentioned above oblige each organisational unit of the Company to demonstrate compliance with applicable regulations and relevant procedures. Therefore each organisational unit should be guided by the principle of full transparency in the its operations and apply adequate control processes.

(2) The Company's management will periodically monitor and review compliance with this Policy.

(3) A breach by an Employee of the principles set out in the Anti-Corruption Policy constitutes a breach of a fundamental employee duty, with legal consequences under applicable laws.

FINAL PROVISIONS

1.Every employee of the Company is obliged to familiarise himself/herself with this document and to strictly comply with its contents.

2.An Employee who becomes aware of or suspects a violation of any point of this Code should report his/her suspicions or concerns to his/her Supervisor, Human Resources, the Human Resources, the CEO or anonymously by dropping a written communication into a box.

3.Any information, complaint or suspicion will be thoroughly investigated and, depending on the results of the investigation appropriate action will be taken.

4.All matters will be dealt with confidentially so that no one experiences retaliation or reprisals for reports or complaints.

This Code of Ethics is implemented by the Chairman of the Board.