

CODE OF CONDUCT FOR SUPPLIERS

Gas Transmission Operator GAZ-SYSTEM S.A.



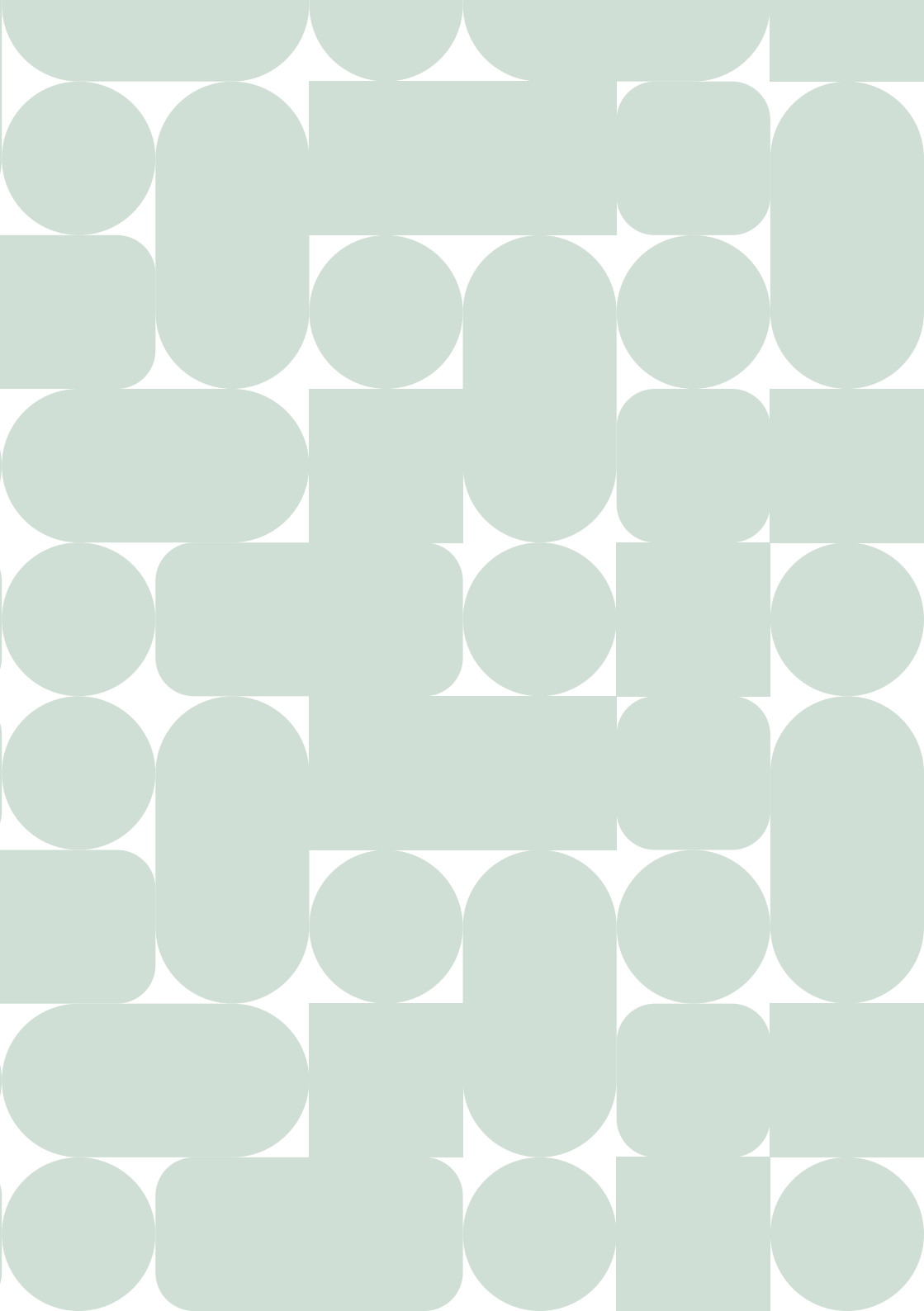


TABLE OF CONTENTS

I. INTRODUCTION	3
Our Commitments And Values	3
Application of the Code	5
Compliance with the Provisions of the Code	5
Objectives of the Code	7
Scope of the Code	7
Cooperation with Suppliers	7
II. STANDARDS OF CONDUCT EXPECTED FROM SUPPLIERS	8
1. Occupational health, safety and fire protection	8
2. Human rights and labour law	11
3. Local communities	12
4. Environmental protection	15
5. Business ethics	16

I. INTRODUCTION

Our Commitments And Values

Gas Transmission Operator GAZ-SYSTEM S.A. („GAZ-SYSTEM“), as a strategic company, develops natural gas transmission system by combining customer expectations with the development of the Company and the gas market in Poland. The Company’s mission is to ensure safe and secure transmission of natural gas in Poland and actively create an integrated transmission system in Europe, as well as to care for the environment and be guided by the principles of sustainable development in its daily operations.

GAZ-SYSTEM is committed to respecting human rights, labour relations, environmental protection and preventing corruption in its operations. The Company endeavours to operate in accordance with the principles of socially responsible business.

In its business practice, GAZ-SYSTEM acts in accordance with the key values contained in the Code of Ethics, setting out the expected attitudes and behaviours, including but not limited to: professionalism and credibility, placing importance on cooperation, safety and social responsibility. The company is committed to implementing the concept of responsible business; it builds lasting and transparent relationships with its stakeholders based on credibility and transparency.

GAZ-SYSTEM is aware of its material influence on the procurement market and shaping the highest business standards in its business environment. Guided by a concern for the quality of business relations, promoting good market practice and positive impact on the society and the environment, the Company has decided to devise this Supplier Code of Conduct for Suppliers of the Gas Transmission Operator GAZ-SYSTEM (the „Code“).



Application of the Code

GAZ-SYSTEM expects all its Suppliers to acknowledge this Code and implement its provisions. In particular, the company requires that:

- the principles and provisions of the Code be incorporated in its own and the subcontractors' business activities,
- all business, ethical, social and environmental risks arising from their activities be identified and managed,
- continuous improvement be achieved through the implementation of corrective actions,
- any incidents causing a breach of the Code be reported immediately to GAZ-SYSTEM.

Compliance with the Provisions of the Code

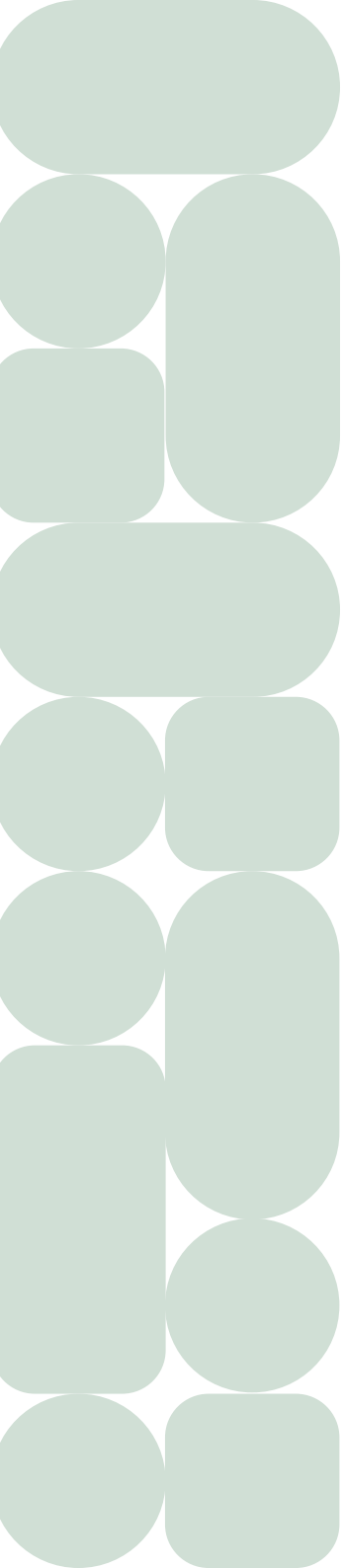
GAZ-SYSTEM reserves the right to review the application of the Code by the Suppliers and to check the compliance of the performance of the subject matter of the agreement with contractual requirements, as well as to review the fulfilment of the occupational health and safety and environmental protection requirements.

GAZ-SYSTEM employees can audit the Suppliers. The Company may use third parties to carry out the audit.

In case of any breach of the principles of the Code, GAZ-SYSTEM expects the Supplier to devise and implement corrective measures. In justified cases, the Company reserves the right to suspend the Supplier's activity until the non-conformities are removed.

GAZ-SYSTEM reserves the right to terminate the contract in accordance with terms and the manner stipulated in the concluded contract, if the Supplier believes that the compliance with the provisions of the Code is not possible.





”

We believe that building long-term relations with Suppliers based on the principles of social responsibility is pivotal to the company's growth.

Objectives of the Code

The Code describes the minimum compliance requirements for Suppliers in accordance with the values and principles of social responsibility and sustainable development.

The Code aims to:

- ① harmonise the Supplier standards of conduct,
- ② indicate good practices in the Suppliers' conduct,
- ③ improve the quality of the products and services provided,
- ④ reduce the likelihood the occurrence of ethical, social and environmental risks associated with the Suppliers' business activities,
- ⑤ implement GAZ-SYSTEM's social responsibility principles throughout the entire supply chain.

Scope of the Code

This Code has been developed on the basis of Polish and international law, international standards and best business practice.

GAZ-SYSTEM's Suppliers include natural persons, legal persons or organisational units without legal personality that have concluded an agreement, submitted a bid or applied for the award of a Contract.

Irrespective of the provisions of this Code, all GAZ-SYSTEM Suppliers are obliged to comply with the laws, rules and regulations generally applicable in the country in which they operate.

Cooperation with Suppliers

GAZ-SYSTEM implements the Code based on dialogue and partnership relations with Suppliers with the intention to actively participate in raising their awareness and social responsibility. The Company is looking to the establishment of the Suppliers' own social responsibility policies and their implementation by employee training. GAZ-SYSTEM expects the Suppliers to be open and cooperative when observing the principles contained in the Code.

II. STANDARDS OF CONDUCT EXPECTED FROM SUPPLIERS

GAZ-SYSTEM expects the Suppliers to comply with the provisions of applicable law and regulations, including but not limited to the principles set out below.



1. OCCUPATIONAL HEALTH, SAFETY AND FIRE PROTECTION

GAZ-SYSTEM is committed to pursuing its business dealings in compliance with all principles of occupational health and safety and fire protection. The main objective is to protect life and health by striving to minimise risks up to the complete elimination of accidents and near miss occurrence in the course of contract performance, as well as to protect assets and property from fire and other local hazards. This objective is confirmed by the HSE policy and internal regulations in place at GAZ-SYSTEM. In relation to its commitment to a high safety culture, the company expects the Suppliers to provide safe and healthy working environment and to operate responsibly to the highest industry standards.

GAZ-SYSTEM's Suppliers are obliged to:

Comply with the requirements of occupational health, safety and fire protection

- ① provide all employees with safe working conditions that meet occupational health and safety and fire protection standards, in accordance with legal requirements and applicable industry standards, making appropriate use of scientific and technical developments,
- ② organise the work in a manner ensuring safe and hygienic working conditions for employees and third parties' safety,
- ③ respond to safety needs and adapt the measures adopted to improve the existing level of protection of workers' health and life, taking into account changing working conditions,
- ④ provide safe tools, machinery and equipment necessary to perform the work, as well as collective and individual protection materials and equipment,
- ⑤ ensure that the products and services provided meet the quality and safety standards stipulated in applicable legislation.



Be prepared for accidents and emergency situations

- ① have work and service quality standards in place that meet the requirements of occupational health and safety and fire protection in accordance with GAZ-SYSTEM guidelines,
- ② ensure that the skills and qualifications of employees in occupational health and safety are properly documented,
- ③ train the employees periodically, familiarise subcontractors and sub-suppliers with applicable safety rules, including how to co-
interact hazards at the worksite,
- ④ check and duly document the employees' and subcontractors' know-
ledge of the procedures related to the occurrence of emergency si-
tuations and near misses in the course of performing the work for
GAZ-SYSTEM and inform the company immediately of any:
→ accidents at work, near misses,
→ any fires, natural disasters or other local hazards,
- ⑤ carry out a professional risk assessment taking into account the
hazards that the performance of work for GAZ-SYSTEM entails,
- ⑥ cooperate with GAZ-SYSTEM to increase the level of skills and
knowledge of workers in the area of safety at work, health pro-
tection and fire safety,
- ⑦ comply with safety rules and occupational health and safety in the
activities performed and in the course of performance of orders
for GAZ-SYSTEM.





2. HUMAN RIGHTS AND LABOUR LAW

As a socially responsible company, GAZ-SYSTEM communicates its requirements with respect to human rights and labour law in a transparent manner.

GAZ-SYSTEM expects its Suppliers to respect applicable national and international legislation, including but not limited to: The Constitution of the Republic of Poland, the Labour Code and the Universal Declaration of Human Rights. Suppliers should take steps to ensure that these rights are respected in their own operations and those of their counterparties also when performing orders for other entities.

GAZ-SYSTEM's Suppliers are obliged to:

Respect human rights

- 1 meet the requirements of compliance with the Universal Declaration of Human Rights with regard to all employees and subcontractors,
- 2 eliminate all cases of human rights violations by the Supplier and its subcontractors.

Comply with labour law

- 1 abide by working time regulations and keep accurate working time records,
- 2 formally regulate labour relations with employees and subcontractors,
- 3 ensure that the form of employment or establishing cooperation with a natural person is in accordance with applicable regulations,
- 4 ensure timely payment of wages or other benefits due to the employee and subcontractors,
- 5 ensure equal treatment and non-discrimination of employees,,
- 6 counter all forms of discrimination against employees on the basis of gender, age, disability, race, religion, nationality, political opinion, trade union membership, ethnic origin, religion, sexual orientation, and employment on the basis of fixed or indefinite term or full or part-time employment contract,
- 7 refrain from applying penalties to employees other than those stipulated in the disciplinary responsibility regulations,
- 8 observe the prohibition of child labour, forced labour and other forms of exploitation of workers,
- 9 meet the requirements concerning respect for workers' freedom of association.



3. LOCAL COMMUNITIES

One of GAZ-SYSTEM's core values is respect towards its stakeholders, manifested in a form of constructive dialogue and activities for the benefit of social environment. According to GAZ-SYSTEM Strategy, the Company is committed to becoming a trusted partner at the local level. Building good relations with local communities is crucial for the success of investment projects and good image of GAZ-SYSTEM.

In cooperation with its business partners, the Company cooperates with representatives of local communities on the basis of dialogue and mutual respect.

In cooperation with local communities, Suppliers of GAZ-SYSTEM should:

Respect the rights of local communities and their members

- 1 take into account and understand the consequences and the impact of the pursued activity on local community,
- 2 act safely and responsibly, taking into account the needs of local communities and their members,
- 3 limit the nuisance to local communities and their individual members caused by the pursued activity,
- 4 endeavour to minimise the negative impact on the surrounding environment and, in the event of changes, make sure that they are compensated and reinstated,
- 5 avoid situations involving negative impact on the local community that may adversely affect the reputation of the Supplier and/or GAZ-SYSTEM,
- 6 maintain polite relations with communities.

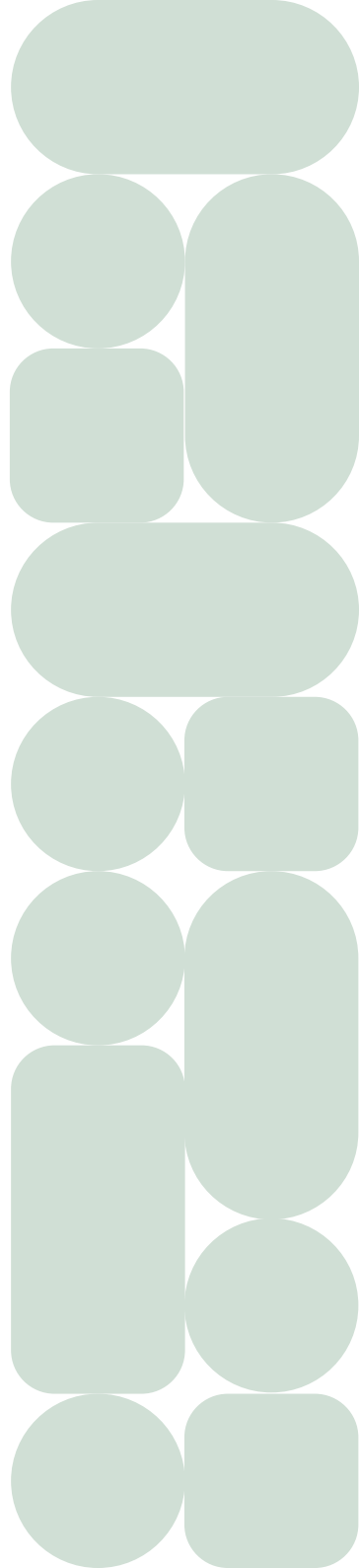
Cooperate with stakeholders

- 1 establish cooperation with local authority representatives and community organisations in the course of the investment project,
- 2 maintain reliable communication and dialogue with representatives of local authorities and local communities, in accordance with GAZ-SYSTEM values,
- 3 improve internal competences in the scope of principles and skills of maintaining dialogue with stakeholders.

GAZ-SYSTEM encourages its Suppliers to cooperate in the area of enhancing social communication competencies and building relationships with local communities.

”

One of GAZ-SYSTEM's core values is respect towards its stakeholders, manifested in a form of constructive dialogue and activities for the benefit of social environment.







4. ENVIRONMENTAL PROTECTION

One of the main objectives of GAZ-SYSTEM is to conduct business operations while limiting the negative impact on the environment. Therefore, the Suppliers are also obliged to minimise environmental impact of their activity. The Company expects its Suppliers to comply with environmental legislation in connection with contract performance, to implement best practice and to monitor their impact on the environment.

GAZ-SYSTEM's Suppliers are obliged to:

Have all the necessary documents related to environmental protection in place

- ① have up-to-date environmental permits, licenses, notifications, declarations, agreements and decisions related with their activity and comply with the requirements stipulated therein.

Comply with current environmental legislation and minimise negative impact on the environment

- ① in the course of contract performance, they shall act in accordance with applicable environmental legislation, administrative decisions, its own regulations and those imposed on GAZ-SYSTEM,
- ② take measures to minimise the negative environmental impact of the work performed in connection with the contract,
- ③ apply systems and procedures reducing negative environmental impacts and safeguarding against environmental damage,
- ④ be prepared in the event of an environmentally hazardous situation and assume responsibility for own actions.



5. BUSINESS ETHICS

GAZ-SYSTEM's core values, contained in the company's Code of Ethics, include:

→ PROFESSIONALISM



We are committed to the highest standards of management, operational efficiency, process, systems and technology improvement and competence development. We expect our business partners to ensure high quality standards and to meet substantive criteria to guarantee that contracts are duly performed.

→ RELIABILITY



We are a reliable, solid and stable partner – we abide by our commitments, ensure compliance with laws, regulations and industry standards and guidelines. We are adjusting regulations and establishing controls on an ongoing basis. We assume responsibility for our environmental impact.

We expect analogous actions and attitudes from our business partners.

→ COOPERATION



We build partnerships with our stakeholders, establish clear principles of cooperation based on respect, trust and open communication. We ensure a friendly working environment, respect diversity and we do not tolerate discrimination in any form whatsoever. When selecting the Suppliers, we exercise due diligence based on a fair and impartial evaluation.

We expect our business partners to foster sustainable business relationships based on trust and mutual benefit. While respecting the regulations in place at our partners, we also expect that our regulations are respected.

→ SAFETY & SECURITY



Our mission is the safe and uninterrupted transport of gaseous fuels. Reliability and security of gas infrastructure is our priority. Notwithstanding the above, we also provide safe working conditions to our employees and co-workers. We build awareness of safety as a priority and create conditions to minimise risks. We promote cyber-security culture and keep personal data secure.

We expect our business partners to ensure a similar level of care and to extend their knowledge in terms of occupational health and safety as well as physical security and digital data security.

→ SOCIAL RESPONSIBILITY



We pursue our business objectives in accordance with the principles of sustainable development, in cooperation with various stakeholder groups, with due respect for social and natural environment. We promote pro-environmental attitudes, pursue activities promoting education and environmental protection, and encourage initiatives for the benefit of those in need.

We expect our business partners to operate in accordance with the principles of socially responsible business and respect for local communities and in dialogue with social partners.

We also expect our Suppliers to ensure high ethical standards in business dealings.

GAZ-SYSTEM's Suppliers are obliged to:

Prevent corruption and bribery (including giving gifts)

- ① notify appropriate representatives of GAZ-SYSTEM of identified irregularities, violations of applicable rules and policies or instances of corruption or bribery,
- ② refrain from engaging in any form of corruption or bribery, in particular involving any payment or other form of advantage to any representative of another entity with the aim of influencing his or her decision in breach of the law in force,
- ③ not to offer or give GAZ-SYSTEM employees monetary gifts in any form or amount, material or immaterial benefits, advantages or the promise of advantages, the offer of which could be interpreted as an attempt to influence the decision of GAZ-SYSTEM regarding the selection of a Supplier. Giving gifts of a marketing nature to GAZ-SYSTEM's employees should take place on the basis of the defined rules in force at the Supplier, while GAZ-SYSTEM's employees are obliged to comply with Company internal rules in force in this regard,
- ④ establish a system to enable employees to report any violations of corporate ethics and to respond quickly and eliminate such violations.

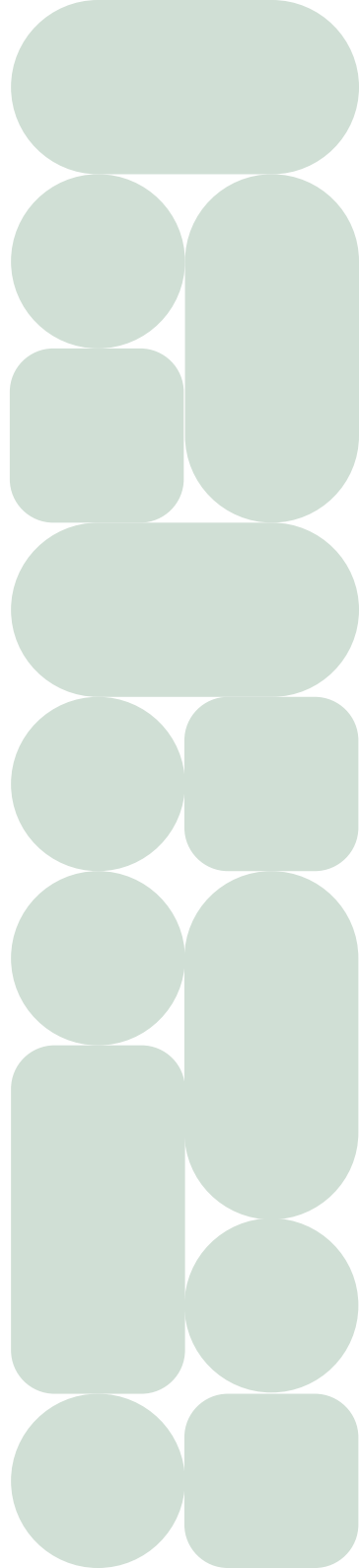
Act in accordance with the principles of fair competition

- ❶ avoid conflicts of interest and, should they occur, apply adequate preventive measures and conduct business activity in accordance with the principles of fair competition and all applicable antitrust laws,
- ❷ incorporate fair trading conditions and prices,
- ❸ ensure timely payment of liabilities and other financial obligations towards associates/third parties,
- ❹ avoid any conflict of interest that might affect the level of transparency and integrity of cooperation or that could have a negative impact on the image and reputation of the Supplier, thus negatively affecting the perception of GAZ-SYSTEM.

Ensure security and proper use of

- ❶ sign a non-disclosure agreement or confidentiality commitment prior to commencing cooperation with GAZ-SYSTEM,
- ❷ ensure confidentiality in the course of processing information provided by GAZ-SYSTEM and use it only in a legitimate manner and ensure security of data used by subcontractors in accordance with the applicable law and GAZ-SYSTEM's confidentiality obligations and internal regulations,
- ❸ undertake to protect and properly secure tools and other resources made available by GAZ-SYSTEM, including technical assets and intellectual property,
- ❹ do not abuse tangible and intangible property made available by GAZ-SYSTEM and use it only for the purpose of performing specific orders.

” GAZ-SYSTEM encourages its Suppliers to cooperate in the area of enhancing social communication competencies and building relationships with local communities.



CONTACT

Should you have any questions about the Code, please contact:

→ **Gas Transmission Operator GAZ-SYSTEM S.A.**

ul. Mszczonowska 4
02-337 Warsaw
Procurement Division
Phone 22 220 18 09

→ kodeks.dostawcow@gaz-system.pl