

# Code of Ethics

Drabpol's standards of ethical conduct in business







## Introduction

One of the most important factors in long-term success of our company is the way we cooperate with our suppliers, customers, co-workers and competitors, as well as communities we deal with.

This Code of ethics provides guidelines on how to conduct oneself and refers to everyone in Drabpol, regardless of their position and level of responsibility as well as each person acting on behalf of Drabpol.

All employees, but in particular the management, are responsible for presenting the model of ethical conduct and promoting such work environment which encourages to follow the Code.

I encourage you to get familiar with the contents of this Code of Ethics. After having read this material you will be asked to acknowledge that you have understood this Code and that you will follow its guidelines. Please keep in mind that you are personally obliged to report any infringements or violations and you will never be punished for that. It is your watchfulness that will keep Drabpol's reputation as the company of the highest level of ethical standards, distinctive human potential and highest quality products and services.

Paweł Drabczyński  
President

...reliable by experience!

## Ethics and honesty – defining the rules

We would like to introduce to all Drabpol employees our idea of „ethics and honesty”. These are the rules describing “ethics and honesty” in our company:

### HONESTY

We are truthful, we do not cheat and we do not steal. If we make a mistake we never try to conceal it. We reveal it in order to limit negative consequences for the company and to implement corrective and preventive actions. We meet the commitments towards our colleagues and all business partners. Any ethically dubious conduct is contradictory to the policy of Drabpol.

### JUSTICE

We are always fair in our actions. Our products and services represent such a high level that there is no need to behave unethically in order to sell and promote them. We do not bribe nor make any false or offensive statements about our competitors for personal profits. Any person who cooperates with us is treated with respect.

### LOYALTY

We are loyal to our company and we act for its best interest. We avoid any conflicts of interest. We never misuse nor jeopardize the company's assets for personal or any other profit. At all times we are committed to support legal business of Drabpol.

### RESPONSIBILITY

We act responsibly on the basis of reasonable assessment of the situation and we do what is necessary to maintain a good reputation on the market. We always respect laws and regulations in our actions.

Our policy of ethics and standards described in this Code of Ethics are created to promote:

- Fair and ethical business conduct
- Laws, regulations and rules currently in force
- Honest cooperation with customers, suppliers, competitors and colleagues including proper handling of sensitive or confidential information
- Protection and proper use of company assets
- Prompt reporting of any violations of the law or guidelines included in this Code of Ethics
- Responsibility for obedience of standards described in this Code

## How to make decisions concerning ethics

DRABPOL Code of Ethics includes clear expectations concerning business conduct. However, it is important to pay attention to the fact that it is not always possible to define which proceedings should be followed in a given situation. Sometimes, the complexity of situation may cause difficulties concerning making the right decision. Each employee may experience situation considered ethically doubtful even if it does not violate the law or company's procedures. The following diagram has been worked out in order to support all the employees in the decision making process.

### Get familiar with facts

- What are the facts?
- Are they compliant with the Code of Ethics and suitable company's procedures?
- Do they violate legal regulations?

### Analyze the situation

- How the decision is going to influence you and the company in short and long terms
- Can your decision exact a toll on company's profits or destroy its reputation as a fair and ethical company?

### Consider possible consequences

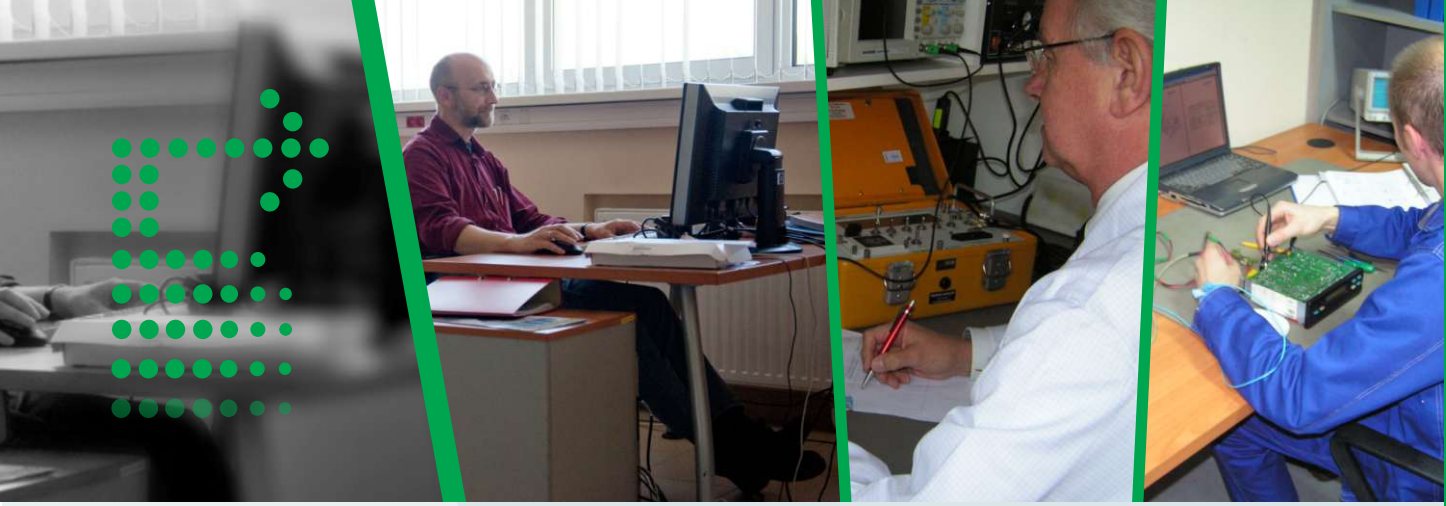
- Would your frame of mind be good in case of publicizing the situation you were involved in?
- How others will perceive your actions?

### Make use of resources

- To whom you may apply in order to obtain additional information, help or piece of advice?
- Are there any additional procedures introduced to your company apart from Code of Ethics which may be considered helpful while solving a problem?

# Table of contents:

<b>1.</b>	<b>Work environment</b>	<b>7</b>
1.1.	Training	7
1.2.	Non-retaliation policy	7
1.3.	Equal chances of employment	8
1.4.	Health and safety in work environment	8
1.5.	Drugs and alcohol free work place	8
1.6.	Discrimination, violence, stalking and sexual harassment at work place	8
1.7.	Favouritism	9
1.8.	Individual employees contribution to build ethical standards of the company. (making use of company's resources, gambling, larceny and unprofessional behaviour)	9
<b>2.</b>	<b>Product integrity, using information and company property, confidential information and audits</b>	<b>10</b>
2.1.	Product integrity	10
2.2.	Protection of confidential information	10
2.3.	Respecting intellectual property right of others	11
2.4.	Protection and using company's information	11
2.5.	Reporting	12
2.6.	External and internal audits- cooperation with auditors	12
2.7.	Documents storage	12
<b>3.</b>	<b>Relations with customers, suppliers, competition and authorities.</b>	<b>13</b>
3.1.	Business and private relations	13
3.2.	Conflict of interest	13
3.3.	Personal profits- gifts, entertainment, bribes	14
3.4.	Contractors	15
3.5.	Financial obligations	16
3.6.	Culture and customs of our business partners	16
<b>4.</b>	<b>Compliance with provisions</b>	<b>17</b>
4.1.	International Commercial Law	17
4.2.	Anti-Corruption Laws	18
4.3.	Antitrust Act	18
4.4.	Knowledge of regulations of The United States of America	



# 1. Work environment

DRABPOL makes efforts to provide safe, creative workplace which is free of any forms of unlawful discrimination and harassment. Any forms of unlawful discrimination during recruitment process, employment, remuneration changes, promotion, career development or notice of termination of employment contract is highly forbidden in DRABPOL. It is necessary to report each case of unlawful discrimination or harassment to the Ethics Specialist.

DRABPOL is obliged to keep the highest standards of safety, health and actions in aid of environmental protection in all its branches. All the employees are at the same obliged to observe the rules and procedures established by the company in order to achieve assumed aims such as safety, health and environment. Each case of any discrepancy or dangerous working conditions should be immediately reported.

## 1.1. Training

Apart from developing and making the Code of Ethics accessible, the company provides training cycle for its employees aimed at acquainting them with records respectively to individual job description.

## 1.2. Non-retaliation policy

DRABPOL company is obliged to keep up such a work environment in which each employee should report any violations of this Code of Ethics and binding law regulations as well as procedures. Employees who report the violation in good faith will not be subject to any retaliation actions for such report. If an employee reporting the violation was the one who committed it, it does not mean that he will not be subject to disciplinary actions implemented respectively to the level of violation. If an employee has his suspicions that he may have become subject to retaliation actions or he has been punished for reporting the violation or conveying information during inquiry, he should consult with the Ethics Specialist. This will be followed by immediate explanatory proceedings.

DRABPOL acts in accordance with legal regulations, rules and procedures which influence business conducted by the company. If they are not observed, it may be followed by serious consequences including dismissal or discontinuation of business relations with DRABPOL.

Each employee's duty is to read, understand and act in accordance with this Code of Ethics. What is more, each individual must be familiar with their job description and know how to act in order to work in accordance with binding legal regulations, rules and procedures. Both, management and directors as well as individual company's employees are held responsible for identifying training needs which are necessary to understand the rules of this Code of Ethics and legal regulations, rules and procedures.

## 1.3. Equal chances of employment

DRABPOL makes every effort in order to provide such work environment in which:

- Employees not only treat themselves and their business partners with respect and dignity but also meet their obligations.
- Employees have respect for different views and opinions
- We present ourselves as a company which acts on law-abiding grounds.

- Each employee feels safe, can develop their skills and improve competency.
- Transparent actions, honesty and reliable performance of assignment are extremely important.

During recruitment, all the applicants and future DRABPOL employees experience fair treatment.

Knowledge, qualifications, competence and experience are taken into consideration during recruitment process rather than age, sex, religion, political views, nationality, skin colour or disablement.

#### 1.4. Health and safety in work environment

FDRABPOL pays special attention to environment protection. In term of environmental protection DRABPOL bases upon legal regulations. Each employee is expected to be environment-friendly.

All the company's operations are to protect its employees from any threats they may experience at work. Regular OHS trainings are the basis to achieve this goal.

Our company's policy is to act in accordance with all provisions concerning environment, health and safety. We put all the efforts to go beyond health and safety standards of employees through:

- Assuring safe workplace to all employees and visitors
- Eliminating and limiting generation of hazardous materials (e.g. batteries, toners or other elements containing substances or chemicals dangerous for environment)
- Saving water, energy and natural resources

Governments of many countries we cooperate with set up strict standards concerning stocking, using, handling and disposing of different kinds of materials in order to promote safety and health of employees.

Any deviation to observe these standards may cause serious consequences and damages in our environment as well as negatively influence our employees and customers.

#### 1.5. Drug and alcohol free work place

The personnel is the highest value of DRABPOL company. Health and safety of all personnel is of the highest importance. Therefore, the company follows the rules of alcohol and drug free work place. It is forbidden to consume, produce, distribute and possess alcohol or other illegal intoxicants. It is also forbidden to perform work under the influence of alcohol or drugs. Anyone who fails to follow this prohibition will be subject to disciplinary actions including dismissal. Those who suffer from alcohol or drug addiction may rely on the company support to find professional help.

#### 1.6. Discrimination, violence, stalking and sexual harassment at work place

The following behaviour is strictly forbidden in DRABPOL:

- discrimination,
- sexual harassment,
- violence

This prohibition includes also any other behaviour that negatively influences the fulfilling of duties or that creates hostile and offensive work place or creates unfriendly atmosphere.

DRABPOL forbids any forms of discrimination based on age, race, skin colour, religion, political views, nationality, sex, sexual orientation and disability. This refers to all terms and conditions of employment as well as handling with business partners.

##### Violence

Employee who commits or threatens to commit the act of violence such as provoking the clash at work place or striking another employee becomes subject to disciplinary actions including dismissal. Any acts of violence committed during free time or outside the company are also subject to disciplinary actions, if the act of violence or violence threat is in connection with work.

##### Stalking and sexual harassment

DRABPOL is involved in making the work place free from any forms of stalking or sexual harassment which may include:

- Inappropriate behaviour (including words and actions) which is meant to threaten and embarrass or force to unwanted actions



- Insulting or ridiculing including nationality or religion related insults
- Repeated negative stereotypes
- Unwanted sexual advances, sexual demands or other sexual behaviours

### **1.7. Favouritism**

Recruitment, promoting and making other business decisions by DRABPOL board and employees is based on competence evaluation with the reference to required scope.

Any forms of prejudice and favouritism while making decisions are strictly forbidden.

Favouritism is a threat to honesty and trust while impartiality and honesty towards customers, suppliers and each other build trust. Each employee should make sure that his relations with superiors or subordinate personnel, suppliers and customers cannot be linked to favouritism. At the same, it is highly recommended to avoid exaggerated criticism or praising people who are in business relations.

### **1.8. Individual employees contribution to build ethical standards of the company**

#### **(making use of the company's resources, gambling, larceny and unprofessional behaviour)**

All the employees are obliged to protect company's property and use it effectively for the purpose of execution of their job duties. Employees must not make use of or knowingly misappropriate the company's property for personal use or other illegal purposes without their superior's approval. It is prohibited to remove, destroy or dispose of any valuable things which are DRABPOL's property without required superior's approval.

#### **Gambling**

Making use of company's properties for gambling purposes or personal profits e.g. using company computer for web gambling or illegal gambling games is highly prohibited.

#### **Larceny**

Misappropriation, larceny, embezzlement, appropriation of company's property and wasting work time as well as any other forms of larceny are highly prohibited and infringe legal regulations and DRABPOL procedures. Each larceny regardless of its relative value or damage made to company, supplier or customer, will result in serious consequences for the employee who committed the act.

#### **Unprofessional behaviour**

All DRABPOL employees are obliged to act professionally in accordance with company's values. Any unprofessional behaviour or work performance and company representation resulting in the infringement of company's reputation and businesses is prohibited.



## 2. Product integrity, using information and company's property, confidential information and audits

DRABPOL believes in fair market competition. We also believe that stable relations with our customers are based on honesty and trust. We try to exceed the competition by means of investments in new engineering projects, infrastructure as well as software and marketing. Our goal is to achieve success thanks to excellent products and services, not by means of unethical and doubtful business actions.

### 2.1. Product integrity

DRABPOL image is based on solidity and reliability with reference to contacts with customers, coworkers, business partners, suppliers as well as administrative authorities and society. Products we supply and services we provide are of the highest quality which is ensured by:

- Making certain that all the products and provided services follow: quality requirements, customers' expectations concerning technical data and safety standards before they are supplied to customers
- Acting in compliance with quality control procedures
- Observing legal regulations of binding law
- Following the company rules and procedures referring to product: storage, handling and transportation
- Raising qualifications of our employees by means of required trainings and audits
- Striving for self-improvement
- Performing tasks in required way at the first attempt

DRABPOL is able to meet the requirements of our customers by providing high quality products and services. This also makes our company more competitive and stronger on the market.

### 2.2. Protection of confidential information

Any confidential information possessed by DRABPOL is highly protected. Employees are obliged to protect confidentiality of information irrespective of its direct connection with DRABPOL and/or its suppliers, customers or third parties.

It is highly prohibited to disclose (even to the members of family) or use any confidential information for purposes other than resulting from ascribed tasks. It should apply to the entire period of employment or connections with the company as well as afterwards.

If, for the good of conducted businesses or with regard to binding legal regulations, it is considered appropriate to disclose confidential information outside the company, it is required to inform the management and Legal Department of the company about this in order to discuss and implement preventive actions before disclosure of information.

In case of any doubts concerning disclosed information, it is required to contact Legal Department of the company. Any illegal attempts to use or disclose confidential information are followed by criminal and civil responsibility.

Confidential information has the greatest value for each company. Therefore, it is not allowed to gain restricted and confidential information from any third parties such as: suppliers, customers or competitors without prior contact with

DRABPOL Legal Department. In case of signing non-disclosure agreement with any business partner, the company employees are obliged to respect all terms and conditions of this agreement

### 2.3. Respecting intellectual property right of others

DRABPOL company observes intellectual property right of others as well as expects them to observe its rights. DRABPOL employees are obliged to observe the following rules as a result of abiding the intellectual property right:

- Only legal or licensed software purchase is permitted. The employees are not allowed to make copies of any commercial softwares on company's computers
- In case of the purchase of business magazines or business literature the employees must not copy extensive parts of these publications without prior consent of the copyright holder.
- In case of using music records or videos, it is highly required to obtain proper concession or license. Using such records for commercial purposes without required licenses or the copyright holder's consent is strictly prohibited.
- Using trademarks and logos of other companies is acceptable only if the prior consent has been obtained.
- Workers of competitive companies who are employed by DRABPOL can count on respect for their liabilities to not disclose any confidential information of their former employer

### 2.4. Protection and using company's information

DRABPOL employees are obliged to protect company's property. It is prohibited to use any goods, properties, services or funds for other purposes than those associated with the company. Employees must take care of proper use of company's property and at the same observe legal regulations.

The market requires systematic gathering of information in accordance with applicable law.

According to DRABPOL's policy, employees may collect only information to which DRABPOL is entitled to. DRABPOL does not search for information which is legally protected from disclosure or protected by internal regulations by customer. DRABPOL also does not seek for any information including illegal descriptions which constitute part of or correspond to another company property on each level of competition.

Employees are forbidden to:

- Demand the access to reserved, secret, officially limited or other type of information if there is a reason for which DRABPOL should not be in possession of them. In particular, it is highly required to avoid information marked as „secret“, „confidential“ or „reserved“. Employees, consultants and other individuals who were employed by or were business-related to another company, are forbidden to use the property of this company or convey its confidential information to any individual in DRABPOL or people working for DRABPOL.
- Unfairly influence technical data in order to gain unfair advantage or limit the competition
- Exchange unauthorised or internal information as well as persuade government officials or competition employees into violation of their proceeding standards by extorting the access to information they are not allowed to disclose

In case of any uncertainty/doubts which information can be obtained and which is classified as confidential, it is forbidden to collect any information without prior consultation with DRABPOL Legal Department.

### 2.5. Reporting

DRABPOL policy prohibits any conscious attempts to create or to commission other people to make misleading or false entries into business records regardless of circumstances. In case of submission of expense accounts or other forms requiring reimbursement it is advisable to follow the company's procedures. Expense reports should only include information concerning charges which have been incurred with reference to DRABPOL business.

Destruction or falsification of any documents is recognized as violation of law.

Therefore, if there is an assumption that violation of law has been committed or regulatory investigation has been commenced, it is required to retain all records (including computer records) that may be relevant to investigation procedure.

### 2.6. External and internal audits- cooperation with auditors

DRABPOL is certified to Integrated Quality Management System including ISO PN 9001:2009 standards, AQAP 2110:2009 publication and Internal Control System. The company is also certified to Part 145 and Part 21. Internal and external audits are regularly conducted in the company. Employees are obliged to fully cooperate and

communicate with external and internal auditors. Employees are also forbidden to take any actions which are aimed at deception, manipulation and putting pressure on auditors. DRABPOL employees will cooperate with assigned authority representatives, state officials and governments of other countries in order to facilitate audits and inspections resulting from conducted business or business agreements. All the records and data are subject to internal quality system and should be approved before issue.

## **2.7. Documents storage**

In accordance with effective procedures, all DRABPOL documents under surveillance are archived for required period of time and kept in dedicated places.

It is prohibited to delete any documents which have significant importance for the company. Company's policy forbids to delete or introduce any changes to documentation as well as to take any actions which may disturb judicial or other proceedings.



## 3. Relations with customers, suppliers, competitors and authorities

### 3.1. Business and private relations

DRABPOL employees are expected to avoid any conflicts of interest between their private interest and company interest. Conflict of interest exists when businesses, duties and employee's actions are or may become contrary to DRABPOL's interests.

#### Business relations

Employees and their family members cannot work neither for the competitive company nor the company doing business with DRABPOL

#### Private relations

Employees should avoid any relations which may affect their judgement or decisions concerning DRABPOL.

### 3.2. Conflict of interest

DRABPOL depends upon its employees, officials, the board and people who act for company's good and want to avoid conflict of interest.

Conflict of interest exists any time we face the following choice:

- what is our personal interest?
- what is DRABPOL's interest?

When actual or alleged conflict of interest arises, some doubts concerning integrity may appear. Therefore, it is extremely important to avoid any inappropriate actions.

Examples of conflict of interest and when they may arise:

- DRABPOL employee or someone with a close relationship to them is interested in the company DRABPOL competes with, does or is going to do business with.
- DRABPOL employee or someone with a close relationship to him/her gain profits resulting from the position in DRABPOL.
- DRABPOL employee has other employment (including self-employment) or serves as an officer, board member, business partner or consultant for another company which enables them to act for DRABPOL good and requires using or disclosing confidential, proprietary or personally identifiable information of DRABPOL.

#### It is required:

- To be able to identify potential conflicts of interest when they arise
- To notify the supervisor and/or company President immediately when the objectivity of DRABPOL employee is questioned
- To make certain that any second job and all the aspects associated with this do not cause a conflict of interest or have a negative impact on public opinion concerning DRABPOL

- To treat DRABPOL interests as the most important even if the above criteria do not apply to a given situation

#### **You may not:**

- Use for own purposes the opportunities given by DRABPOL through the use of company property, available information or position in the company
- Use the position in the company for improper personal gain
- Undertake employment with or provide services as a consultant or representative to: companies which compete with, do business with or which plans to do business with DRABPOL unless approved by company President or designated person

DRABPOL employees, in particular the management are required to fulfill their duties resulting from employment in DRABPOL.

It is highly unacceptable for an employee to cause any situation which may result in conflict of interests. This may occur any time the employee's actions enable them to fulfill duties. Conflict of interest appears when employees or their family members undertake employment with competitive company, customer or DRABPOL supplier.

### **3.3. Personal profits- gifts, entertainment, bribes**

DRABPOL employees are always expected to act in the best interest of the company. At the same employees are not allowed to gain any personal profits or strive to achieve personal profits as a result of their employment in DRABPOL.

DRABPOL policy is based on a rule that all dealings with other companies should be conducted with the highest ethical standards and in accordance with applicable laws. Our business actions should be free from perception that favourable treatment, receiving or offering gifts, favours, hospitality, entertainment or similar gratuities have been observed. However, there are certain circumstances under which it is acceptable to offer or accept items of negligibly small value.

#### **Soliciting gratuities**

It is not allowed to solicit, directly or indirectly for your own benefit or for the benefit of another person, any gift, favour or other form of gratuity from a person or company with which DRABPOL does business or seeks to do business. It is prohibited to solicit a gift, favour or other gratuity excluding small value gifts which will not put DRABPOL in uncomfortable position.

#### **Giving and receiving gratuities**

It is not allowed to give or accept business benefits that might be considered unfair encouragement to cooperation or might violate the law and procedures of DRABPOL and its customers or can cause embarrassment or affect DRABPOL's reputation.

#### **Bribe prohibition**

DRABPOL employees are prohibited to offer bribes that make take form of payment, gift, loan or prize to any business or government entity or to any employee in exchange for attempt to gain profits for DRABPOL.

#### **.Special requirements in dealings with government representatives**

DRABPOL must meet the standards of conduct in negotiating and fulfilling government orders. It is forbidden to directly or indirectly offer valuable items to government representatives or state officials as their acceptance is prohibited by law. If not prohibited by law, it is acceptable to occasionally offer modest refreshments such as soft drinks, juice, coffee or cakes during official business meetings. Employees who deal with authorities are held responsible for compliance with and following the applicable rules and procedures. In exceptional circumstances, when diplomacy and customs of foreign visitors require traditional exchange of gifts, DRABPOL representatives are allowed to give their visitors gifts of negligible value.

#### **Proceeding according to safety guidelines**

DRABPOL also cooperates with government bodies e.g. by taking part in tenders. Therefore, we are obliged to provide effective protection of information, property or personnel.

## Employees are held responsible for:

- Observing all government and customer related requirements regarding safety
- Reporting any violations and situations which might threaten safety of DRABPOL personnel, property, information and agreements
- Observing procedures in order to secure government information
- Observing procedures in order to: protect safety of not only DRABPOL related but also customer related confidential information; business information containing contact details, phone numbers, personal and financial information, business plans and other related information. Any exchanged information cannot go outside the company (including family and friends) without prior approval.

### 3.4. Contractors

DRABPOL actions are always fair and transparent. The company relations with customers and business partners are based on honesty, fairness and always comply with the law. Our internal relations rely on the quality of our products and provided services as well as on our ability to fulfill our commitments.

Employees are prohibited to offer any financial profits which is considered the violation of the law. Any actions taken by representative of sales, purchase or infrastructure departments are based on objective judgements not subjective profits. It is strictly forbidden to accept or expect any financial profits which might have an influence on decisions to be made. As a competition we rely on the advantages of our products and high quality of provided services. All company's actions related to the choice of source from both customer's and supplier's point of view should be taken in accordance with the highest standards of business code and DRABPOL's procedures. Any information concerning contractors' choice should be confidential and might be disclosed only if supported by legal regulations and company's procedures.

### Supply

Our trained employees are entitled to acquire goods and services for the benefit of the company. All duties related to supply include applying for prices, receiving information from prospective suppliers and inquiring for orders related changes.

### Suppliers and contractors

DRABPOL cooperates only with those suppliers and contractors whose actions are based on the highest ethical standards. Our cooperation with all business partners, customers, competitive companies and suppliers is based on honesty. We also assure that all data concerning them has been acquired in compliance with applicable law and will not be disclosed to any third parties. The way and the character of our suppliers' selection reflects how DRABPOL conducts its business. Products, materials and components which are purchased from the best business partners, sold and used to provide services, help to sustain DRABPOL's image as a reliable business partner.

### Why DRABPOL?

DRABPOL, setting the bar high for the company's business partners, puts all the efforts to be itself an example of honest conduct. Offering to our customers many products and services, delivered to the market also by other companies, we know that apart from the price our customers care about other attributes of Drabpol. The most important are:

- **Reputation.** We do our best to make the customers who chose our company satisfied with services we perform, to perform work in due time and at agreed price. We put all the efforts to solve problems as soon as possible. Our desire is to make every casual customer a regular customer.
- **Personnel.** One of the most important activities of a company is to acquire the best possible personnel by offering technical training, good salaries and additional benefits to employees. HR department of Drabpol seeks for those employees who treat their work seriously and who professionally deal with their duties. All of DRABPOL employees are specialists highly competent in their scope.
- **Impression.** DRABPOL wants the customers who visit our company have the best impressions. We make efforts to serve every customer quickly and politely. Our customers are served by the personnel who possesses suitable knowledge of the works to be performed. Both office and workshop rooms are always clean and well-organized. We try to maintain a professional atmosphere.

- **Planning.** For every customer it is important that work starts on the day that was planned and finishes close to the agreed date. Works are scheduled by our employees to meet requirements of our customers.
- **Warranty.** DRABPOL as a representative of many international brands warrants excellent quality of products and services. All our works are covered with a warranty according to the legislation in force.
- **Insurance.** Not every problem that may appear in the course of service can be foreseen. It may happen that during work is performed an entrusted element gets accidentally damaged. DRABPOL's high insurance allows to solve the problem and mitigate consequences of an unfortunate event.

**The most important for DRABPOL is a satisfied customer, who will return to us and recommend us to others.**

### **.3.5. Financial obligations**

DRABPOL makes every effort to fulfill its payment obligations towards business partners accurately and in time. Being honest towards its suppliers by regular payment of dues DRABPOL expects the same from its customers. Therefore, whenever choosing a business partner we consider their reliability, honesty, punctuality and market reputation. Our care for these values in running the business allows for higher level of business relations, which in long term perspective contributes to stability and development of DRABPOL.

### **3.6. Culture and customs of our business partners**

DRABPOL conducts business on the basis of cooperation with many foreign suppliers who represent the following countries: the United States of America, the United Kingdom, France, Germany, Norway and Republic of South Africa. Due to large diversity of our business partners resulting from: legal regulations applicable in a given country, rules typical for different types of business and different cultures represented by them, we do our best to find our place in different business situations. In order to do so, we take care of the following:

- DRABPOL employees who are responsible for cooperation with our foreign partners get familiar with their requirements resulting from their position in the company
- DRABPOL employees get familiar with and know how to use the culture code valid in a given partner country
- Preparing for trades in which DRABPOL takes part as an exhibitor should not diverge from the rules required for this kind of events in given countries and violate rules of hospitality
- Preparing for trades in which DRABPOL takes part as a visitor should not put visited exhibitors in an awkward situation resulting from misunderstood code of culture and rules of hospitality. At the same it should not have bad influence on attaining goals assumed by DRABPOL





## 4. Compliance with provisions

### 4.1. International Commercial Law

DRABPOL would like to be considered as a law-abiding partner for all contractors it does business with, including foreign contractors. That is why DRABPOL employees are obliged to get familiar with, understand and observe international commercial regulations. They are also expected to act in accordance with required rules and regulations referring to both export and import. Providing, selling, sending, receiving and transferring products, services or company technical data to/from foreign entities which are subject to export control should be performed both in accordance with domestic rules concerning export and import as well as legal regulations of the countries where the transfer is made.

Employees should be also familiar with regulations on export control and valid procedures.

### Customs and import

DRABPOL observes the legal regulations regulating import rules. DRABPOL employees whose duties include the import of goods to the territory of our country are aware of the fact they are expected to act in accordance with the following rules:

- Goods which are subject to customs duties should be declared as soon as they are at the territory of our country. At the same it is required to make sure that required documentation has been attached
- Documents delivered to Customs Office should refer to declared products and relate to given transaction
- It is highly required to cooperate with DRABPOL Logistics Coordinator in case of any questions on determining the customs value of goods, qualification of customs tariff, country of origin of the goods and other formal requirements necessary to lay a custom duty on imported goods

With reference to DRABPOL cooperation with many suppliers from outside the European Union and the obligation to impose duty upon acquired goods, the company respects all the legal regulations of the countries where the business is conducted by DRABPOL contractors.

### Export

Law and export regulations are individually regulated by governments of particular countries. At the same, thanks to organizations and international treaties, both law and regulations meet at many common points.

It means that the main purpose of export controls is to identify and verify the subject of export, shipment destination, ultimate consumer and the use of goods. Each DRABPOL employee is obliged to check the above mentioned issues and consult them with DRABPOL Logistics Coordinator before exporting any goods.

With reference to DRABPOL's activity within military environment and dual use goods trade, the company is certified to Internal Control System. DRABPOL employees have been trained for that purpose and are obliged to observe company's procedures. The procedures describe all the steps that should be taken in order to act in accordance with the requirements of export control.

## Embargoes, sanctions and “contractors blacklists”

DRABPOL comes under the law and regulations which prohibit conducting business with some countries as well as with legal and natural persons who might be suspected of any connections with illegal or terroristic activities. It is regulated in detail by Internal Control System which requires as follows:

- Checking Refusal Lists
- Classification of goods and analysis of requirements concerning turnover permissions
- In case of requirements concerning turnover permissions, the risk analysis of usage inconsistent with declared purpose and checking the list of wake-up calls should be performed

DRABPOL also observes suppliers recommendations on limitations concerning sale to the countries or persons included in so called contractors blacklists.

### 4.2. Anti-Corruption Laws

DRABPOL employees got acquainted with and are obliged to observe the provisions of Government Program Against Corruption binding for the following years: 2012-2016. This document is available to all employees in Intranet in „Ethics” tab so they can get familiar with its guidelines.

### 4.3. Antitrust Act

Employees should avoid any contacts with competitive companies and their employees with the exception of situation when it is necessary and it is performed in accordance with law regulations. Any contacts with competitors should only have business character and should be made publicly and clearly in compliance with ethical rules. Any attempts to manipulate the competition for the purpose of collecting information on products or prices are forbidden.

DRABPOL observes regulations resulting from Fair Trading Act dated 16th of February, 2007.

DRABPOL complies with antitrust rules and laws resulting from Fair Trading Act as well as with Antitrust Acts of each country it does business with. This should include prohibition of price fixing, tender fixing, market division with regard to territory and customers, monopolization or its attempts and group boycotts.

Other unfair methods such as: bribery, industrial espionage, dissemination of false and defamatory information on competitors or their products which are introduced in order to eliminate the competition are not used by DRABPOL.

### 4.4. Knowledge of regulations of The United States of America

DRABPOL cooperates with many suppliers from the United States. As we feel obliged to get familiar with binding regulations in the USA and to observe those which may have influence on the cooperation with our suppliers, in particular within the scope of dual use goods and government contractors. DRABPOL's employees got familiar with the following law regulations:

- Federal Acquisition Reform Act from 1996 – act on protection of orders integrity
- Federal Acquisition Regulation – Federal Law regulations on Public Orders according to which any data concerning costs or prices should be exact, complete and current for the date of the Agreement.
- The AntiKickback Act– prohibits accepting any material gains and any form of gratification in exchange for favourable contract fulfillment
- The False Statements Act – prohibits falsifying or concealing a material fact, making false statements or using false writings
- The False Claims Act – prohibits any individual or company from submitting or causing the submission of false claims to the U.S. Government
- Use of Suspended/Debarred Individuals and/or Contractors - it refers to individuals or companies listed on the General Services Administration's List of Parties Excluded from Federal Procurement and Nonprocurement Programs
- The Byrd Amendment- prohibits the use of federally appropriated money in order to pay any person for influencing government officials



