

CODE OF CONDUCT

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1 Word from the Management Board

Play has been built on fundamental values which have guided us throughout the life of our company and continue to do so today. Our values have shaped our culture, and they underpin our reputation.

Our company has had tremendous success and we devote part of this success to our value set and the "Play Spirit". With this edition of Code of Conduct, we aim to capture this spirit in a set of guidelines that reflect what we believe should be common practice. We have also implemented some additional guidelines, providing higher transparency and securing avoidance of conflict of interest. At the same time we would like to point out that the same principles and values apply in the Iliad Group - [Iliad Group Code of Ethics](#).

Play as a company is seen as a role model. We need therefore even stronger to be able to express clearly, how we are living up to our responsibilities in practice. It brings and precises our values which should be respected in our daily work and attitude. Moreover it shows how they inspire and inform the decisions we make in our day- to-day work. We all have a responsibility to follow these rules of conduct which drive Play's integrity, honesty and ethical standards. We are counting on each and every one of you to respect them and to pass them on.

We believe that our commitment to live up to these powerful values, and to demonstrate our high ethical standards in all that we do, will more than ever ensure that Play is an organization which inspires trust and respect.

Each of us, as ambassadors of Play and as members of our community, makes a personal commitment to follow this Code - both in letter and in spirit.

Integrity and respect are paramount to the way we work.

Kind regards

Management Board

2 Foreword

2.1 Play Values

The PLAY Group, defined according to appendix no 3, ("Play Group", "Play") develops itself and operates based on values and rules of conduct ensuring respect of all involved parties: Employees, clients, investors and providers. We expect that each Employee and Coworker of PLAY will act following our common principles that support our development.

- **Clear** - With us, every touch point is easy. We communicate in a clear way. Clarity is in our DNA. The world is complicated enough. Sometimes less is more.
- **Close** - We are close to our clients, Employees and business partners. We listen to and care about their needs. Good relationships are important for us.
- **Can do** - We are the Play Team. For us nothing is impossible. Teamwork and passion are significant differentiators between us and our competitors. We act fast and do more to meet our clients' needs.
- **Passion for better** – I want and can do better – We are open and ready for new things, we care about the quality of what we deliver, we improve and simplify, we treat mistakes and failures as learning, we look for inspiration and initiate actions.
- **Joy** - I feel good here – We notice and appreciate small and big successes, we care about our energy to act, we care about being part of the team, we are ourselves and we appreciate diversity, we have distance to ourselves,
- ... **With Passion.**

2.2 Respect for individuals

We expect all employees ("Employees"), contractors, freelancers and entities ("**Co-workers**") to work together in a respectful, open manner and dignity. In this way, we will maintain a culture of loyalty, trust and solidarity throughout our business.

Teamwork is to be encouraged and successes, as well as failures, should be shared. We should listen with generosity and share information as needed, subject to the Group's rules on confidentiality. Finally, disparagement of colleagues is contrary to Play's values.

2.3 Respect for the law

As a basic rule, we as a business and as individuals in the performance of our duties, must always respect the laws.

Play is particularly attached to the spirit and the letter of laws governing:

- Human rights; prohibition of child labour and forced labour; discrimination; working time and remuneration; Employees' collective representation
- Quality, health and safety standards
- The environment
- Corruption and bribery
- Taxation and the accurate communication of financial information
- Fair competition

3 Code of Conduct

All Employees are obliged to act in line with the provisions of the Code of Conduct, regardless of the occupied position and scope of responsibility, and the management is expected to promote, by their own example, the principles of the Code amongst Employees, to comply with the proclaimed values in practice, and to create an environment that enables Employees to comply with the Code. The actions of Employees who intentionally breach the indicated principles will be treated as actions against the interest and to the

detriment of Play.

4 Chief Compliance Officer

The Head of Ethics and Compliance, acting as Chief Compliance Officer ("Chief Compliance Officer"), is appointed by the Management Board of the Company. The Chief Compliance Officer's main tasks include, in particular:

- managing and supervising the work of the Compliance and Ethics Committee;
- P4 Group's compliance reporting responsibilities;
- investigating whistleblower reports of identified irregularities, conducting investigations in relation to reports, including HR compliance (in particular, conducting investigations into mobbing and discrimination);
- verifying third parties and overseeing due diligence in the investigation of third parties;
- conducting compliance training and education activities for employees of P4 Group companies in the area of compliance;
- ensuring compliance with P4 Group standards by P4 Group entities;
- preparing and updating compliance procedures;
- defining the direction of compliance policy in the P4 Group;
- providing ongoing support and advice in the area of compliance.
- cooperation with the Iliad Group Compliance Department, reporting on major compliance issues;

5 Ethics and Compliance Committee

The Ethics and Compliance Committee is a consultative and advisory body. Its role is to assist and support the Chief Compliance Officer on an ongoing basis in the performance of her tasks in promoting the ethical principles contained in this Code and ensuring compliance with the provisions and operating principles expressed in the Code. The members of the Ethics Committee, representing each of the organisation's divisions, are nominated once every 2 (two) years by the Management Board. The Commission is composed of 10 (ten) members and a Chairman, who is the Chief Compliance Officer. The composition of the Committee is published on the intranet in the Rules of Procedure for the organisation of the Ethics and Compliance Committee ([LINK](#)). Once a year, the Chief Compliance Officer presents a report on the activities of the Commission to the Management Board.

The Ethics and Compliance Committee's tasks include, in particular:

- assisting the Chief Compliance Officer in undertaking and implementing ethics and compliance initiatives in the P4 Group (implementing and updating necessary procedures and policies, conducting education, training and information activities for employees),
- assessing, in cooperation with the Chief Compliance Officer, the propriety of the actions of persons and entities required to comply with the Code,
- taking action, in cooperation with the Chief Compliance Officer, to eliminate acts and behaviours contrary to these principles.

6 Management responsibility

Being a manager, you are responsible for creating an atmosphere consistent with the ethical principles in Play, therefore you should act in accordance with the following rules:

- You set the example and promote ethical conduct
- If you notice misconduct inform the Chief Compliance Officer - compliance@play.pl or use the

- platform for reporting (also anonymously) - [Play VCO](#),
- You take actions to counteract mobbing and harassment
 - Should you note a conflict between business goals and the ethical principles, the latter must prevail,
 - Be open to information received from your Employees regarding unethical behaviour. Never ignore nor punish your Employees for reporting ethical problems. Always promote the standpoint of reporting ethical problems.

7 How to use this Code

The PLAY Code of Conduct sets standards of Employees behaviour. These standards will neither replace our personal responsibility and relevant judgements nor will they solve every problematic business situation. The Code of Conduct does not replace the law and valid regulations. It is based on the principle that conducting ethical business requires higher standards than just observance of the law.

Of course, no document can anticipate and address every situation that may arise, particularly since many ethical dilemmas take place in "grey areas", where the solution is not readily apparent. So, whenever you are faced with what you feel is an awkward ethical decision, always ask yourself the following questions:

1. Is it legal?
2. Is it in line with the Play Values?
3. If I am not sure, have I asked for help?

We recognise that some situations are not easy. When in doubt, the GOLDEN RULE is to disclose the matter and to discuss it openly. If you have any doubts, please report to the Chief Compliance Officer - compliance@play.pl.

8 Principles of reporting abuses and ethical conflicts

Should any Employee know about any case of breach of ethics, fraud, abuse or other action to the detriment of Play that Employee is obliged to inform his/her direct superior about such a fact, and - should this be impossible - to inform a higher level superior and a member of the Ethics Committee or HR Business Partner. Such behaviour can be reported electronically to the email address: compliance@play.pl or by mail to the postal address of P4 Sp. z o.o. with the following annotation: the "Chief Compliance Officer".

Play will never take measures against persons who, acting in accordance with the guidelines for reporting abuses, comply with these principles, and in good faith report to authorised persons irregularities, abuses, breach of legal and accounting regulations or binding ethical standards. The person reporting such a situation is entitled to anonymity and legal protection.

At Play, we ensure that reports of irregularities and abuse can be made in a completely secure and anonymous manner. If you want to make a *bona fide* notification, you should use a dedicated tool - the platform [Play VCO](#).

All reports of ethics violations will be investigated by appropriate individuals while maintaining the confidentiality of the information obtained. In justified cases, Play, as a result of reports of ethics violations, will take appropriate measures to prevent violations, and verification of such reports will be fully documented.

9 Use of company resources

Company resources are intended to help Employees achieve Play's business goals. Misused or wasted Company resources, including Employee time, hurt us all and damage the operational and financial performance of Play.

We are all expected to:

- As a general rule, avoid personal use of company assets. Limited use of communication tools such as e-mail, telephone and the internet may be acceptable so long as it does not incur any unreasonable costs and does not interfere with our job responsibilities
- Respect and protect Company assets to ensure that they are not lost, damaged, misused or wasted, nor loaned to others, transferred, sold or donated without authorisation
- Avoid inappropriate use of Computer systems, corporate e-mail accounts and the internet
- Recognise that all company assets and documents belong to Play

9.1 Taking care of the interest and assets of the Company

Play's assets include all components of the P4 Group's estate, in particular tools of trade, offered goods, Office and showroom equipment, as well as the information regarding the activity of the employer, the Company's business partners and clients.

Remember that the property of Play may be utilized for personal use only, but it must not be used for conducting business activities or for pursuing unethical or illegal activities. You are responsible for Play's resources entrusted to you. Hence you should take rational and lawful actions aimed at the protection of these resources against theft, destruction, sabotage etc. In particular, remember that the intentional omission of actions aimed at the protection of these resources is a serious breach of law and internal regulations related to the safety of conducting Play's business.

Remember that your time is also an asset of the firm - use it for performing work. Managers are not authorised to involve subordinates in private matters.

9.2 Compliance with law - IT/IP compliance with law

Play acts in accordance with the law and respects copyrights. Therefore, make sure that the works you use when performing work have been purchased legally and do not install or use illegal software on the equipment owned by Play.

Q: I suspect that one of my team members has been running an outside consulting business on Company time, using his Company laptop and e-mail to do so. I mentioned it to a friend in IT. He can access the guy's e-mail and has offered to help me do a bit of sleuthing to find out what's going on. Is this OK?

A: No. If you have suspicions of this kind, you should raise them directly with your manager. The Company has specific procedures for accessing Employee e-mail accounts in connection with an investigation of misconduct or for other legitimate reasons. Even though your friend in IT has access to these

accounts, he should not use it for this purpose without proper authorisation through official Company channels.

Q: At work, we can buy products from the Company at discount prices. I also sometimes get free products from my friends in Marketing. I have some of these products to my aunt and she suggested that we could sell them on the internet. Is this OK?

A: No, you cannot sell the products. Employees have access to free or discounted products because we feel that it is important for all Play Employees, whatever their functions, to be able to know and enjoy our products. This means that the products are for your personal use. You can also offer them as a gift to your family and friends, but this should be exceptional.

10 Confidential information

Any non-public information regarding Play's activity is subject to protection and an Employee should take into account that disclosing such information to third parties may compromise Play. The Employees should protect such information, and in particular make sure that it is appropriately secured.

Having access to information classified as a Telecommunication Secret can take place only in cases required by law and by authorised persons in Play.

Business secrets may be disclosed not only as a result of deliberate actions, but also as a result of negligence or carelessness, e.g. as a result of losing a laptop with files concerning Play's activity. Therefore, Employees are obliged to observe the rules regarding the flow of business documents as well as pertaining to disclosing, copying, keeping and destroying them. Particular attention should be paid when conducting business phone calls in public places.

In case of doubts, before disclosing information to a third party, contact a superior, Information Security Administrator or the Legal Department to ascertain whether it is necessary to sign a confidentiality agreement.

We are all expected to:

- Secure all confidential customer and supplier records, both paper and electronic
 - Prevent disclosure of confidential information to third parties outside Play (including family members of Employees)
 - Avoid discussing or working with confidential information in a public area where conversations can be overheard or data compromised
 - Return all confidential information (including all copies of original material) upon leaving Play.
-

Q: My friends often ask me about my work at Play. They're curious as to just what new launches we've got up our sleeve. Obviously, I know quite a lot of the answers through my work -so how much can I tell them?

A: Any information (written, electronic or any other form) which is not publicly available and to which you have had access as a Play's employee, should be considered confidential. Revealing such information, even to trusted friends, is not appropriate. It may harm Play's interests.

Q: The other day, I was taking a potential supplier to a meeting. On the way to the meeting room, we walked past a colleague's desk. He was talking to another supplier about our pricing conditions on his speakerphone. Just as we passed, we could hear him offering some special deals - all within my supplier's hearing! Surely, he should be more careful?

A: We all need to take the necessary measures to protect the confidentiality of information, even within the workplace: for example, by following the "clean desk" policy, locking files away, changing passwords regularly and exercising caution when using speakerphones. You never know who may be passing, and even amongst Play employees, commercially sensitive information should only be shared on a "need-to-know" basis.

Remember: If you're facing an issue around confidentiality, take the appropriate steps to resolve it. You'll get help and support from discussing it with your management, the Legal Department or Data Protection Officer.

11 Representing the company

11.1 Play reputation

Play's reputation depends on the behaviour of each and every one of us. Our clients, providers and partners trust Play due to our Professional competence and fairness - the features on which our reputation and credibility are based. We make an effort to maintain this.

We are all expected to:

- Act with PLAY's best interests at heart
- Demonstrate PLAY's values in our Professional behaviour
- Avoid speaking or writing on behalf of PLAY unless duly authorised
- Avoid speaking or writing on subjects falling outside our personal expertise
- Ensure there is no confusion between our personal views and those of the Company. (So, for example, we should avoid the use of PLAY letterhead or e-mails to express personal views or for personal business.)
- Content that is offensive or violates personal dignity, e.g. of racist, political or religious nature, must be avoided when posting on social media platforms, as such statements may influence the image of Play.

11.2 Contact with investors

Only authorised persons, i.e. the Chief Executive Officer, Chief Financial Officer, Treasury and Investor Relations Director and Chief Marketing Officer, may speak on behalf of Play when contacting investors and representatives of financial institutions. The Management Board may authorise other persons to contact investors.

11.3 Contact with the media

Only authorised persons, i.e. the Chief Executive Officer, the Chief Corporate Affairs Officer, the Corporate Communications Director, the Press Office Team, may speak on behalf of Play when contacting the media. The Management Board may authorise other persons to contact the media.

12 Conflict of interest

12.1 What is a conflict of interest?

The basic duty of Employees is to act reliably and honestly and in the best interest of the employer. A conflict of interest is a situation in which there is an actual or potential contradiction between the interest of a Client, a third party or an Employee's personal interest and the best interest of the employer.

12.2 Examples of a conflict of interest

A conflict of interest may refer to an Employee in any position, although Employees responsible for the selection of Company's suppliers are particularly exposed to it. Acting in a situation involving a conflict of interest does not have to imply a breach of Employee duties, as even in such a situation an Employee can and should act loyally to the employer and make a choice in the employer's best interest.

Examples of a conflict of interest:

- Financial interest in existing or potential Play's suppliers, if you have direct or indirect involvement in our business with that vendor;
- Substantial financial interest in a competitor;
- Receiving personal direct or indirect compensation, any employment agreement or any other arrangement/investment opportunity with a third-party vendor, if you have direct or indirect involvement with our business concerning that vendor;
- Preparing an offer for the sale of services or goods to a person or company in which an Employee has (directly or indirectly) shares or influence on the decision-making process or such influence may be exerted by a close friend or relative;
- Any employment agreement of your family member or your relative with a direct competitor, in particular in a similar functional area;

12.3 Responding to a conflict of interest

It is up to you how you respond to a conflict of interest and whether it will result in a breach of the employer's interest. In the event of an actual or potential

conflict of interest, you should proceed as follows:

- Avoid the conflict, e.g. by withdrawing from the tender procedure, disposing of shares in a competitive company; and/or
- Disclose the conflict - inform the employer by notifying your direct superior, Department Director (if not the same) and HR Director, which will enable the company to take appropriate measures to secure its interests.

Should you have any doubts whether a conflict of interest exists in a given situation, report this to your direct superior, HR Business Partner or Chief Compliance Officer.

Remember that a conflict of interest may significantly compromise the interest of the employer. Thus, should an Employee conceal the fact that he/she is involved in a situation where there is a conflict of interest, it is treated as grounds for losing trust in such an Employee.

12.4 The statement for Conflict of Interest

Board Members, directors and managers reporting directly to directors are obliged yearly to submit the statement for Conflict of Interest according to appendix no 1 to the Code of Conduct. The statement is submitted by Board Members to Internal Auditor and by other Employees to HR Director each year, within 10 calendar days of the end of the year. Board Members and directors have the right to ask each of their subordinates to submit the same statement. Declarations are made electronically to the person designated by the HR Division Director. The Director of the HR Division has the right to pass on information about a declared conflict of interest to the relevant Member of the Management Board, to his/her immediate superior and to his/her superior acting as departmental director, to the Chief Compliance Officer, to the Director of the Legal Department and, in the case of a conflict of interest that may affect the process of selection and negotiation of commercial terms and conditions with Play suppliers, to the Director of the Procurement Department.

Q: My father owns a really good local hotel, and lots of companies in the area use it for lunches and functions. It would be an obvious choice for our event. Given that it compares well on price and quality with other options, is there any obstacle to me making a booking?

A: Given the competitive price and popularity of the venue, it may well be acceptable for the Company to arrange functions there. However, it would not be right for you to have a say in the matter, as there is an obvious conflict of interest here. As with all such cases where a close family member works for a current or potential supplier or other business partner, you should disclose this fact to your line manager. Then he or she can take the necessary steps to avoid placing you in an awkward situation.

Q: My wife works for one of Play's competitors. We don't talk about work at home, and I can't see it's any business of the Company what my wife does in her Professional life. Yet some of my colleagues have suggested that I am in a compromising situation. So, what should I do?

A: This could create the appearance of a conflict of interest. To protect both yourself and the Company, you should disclose the facts to your management or HR Business Partner. Additionally, you and your wife should continue to avoid discussing business and take steps to ensure that confidential or proprietary information of both companies is protected.

13 Gifts and entertainment

Exchanging gifts and entertainment can help build understanding and improve working relationships, but they can also cause a conflict of interest between personal interests and Professional duty.

When receiving gifts or entertainment, the "Golden Rule" is fully disclosure.

When giving gifts or entertainment, the "Golden Rule" is reasonableness and how this would be perceived by the wider public.

We are all expected to:

- Never give or accept cash gifts or their equivalents (e.g. gift coupons, vouchers, securities)
- Ensure that all gifts and entertainment offered are appropriate and in line with Play values
- Make sure that when establishing a new business relationship, all parties are aware from the outset of Play's guidelines on gifts and entertainment. In turn, find out what our business partner's policy is on these issues. That can go a long way to avoiding any misunderstandings
- Immediately disclose to our management any gift or invitation we have received before he or she accepts the invitation.

13.1 Entertainment

One may accept invitations from suppliers only to the events of a strictly business nature. They may be accompanied by entertainment events, but with the proper proportions being observed. If an invitation is linked with an attractive entertainment event, we ought to follow the rule of full transparency and, if possible, propose that Play shall participate in the costs. If a supplier offers a ticket, e.g. to a sporting or cultural event, it needs to be ensured that a representative at the corresponding decision-making level will participate too. That being based on the premises that the business nature of the meeting is ensured. The purpose of all invitations to social events and meetings should be to facilitate the achievement of business goals. It is allowed for providers to sponsor and participate in off-site events and business workshops, however after the previous consent of the Management Board and compliance with the Golden Rules.

13.2 Pure socials entertainment versus working time

If an invitation is linked with a purely social entertainment event, it should not take place during working hours. In other cases, Employees should take vacation for that time.

13.3 Gifts

We accept reasonable and symbolic gifts and signs of hospitality provided that they neither create a feeling of obligation on the part of a beneficiary nor does it create, on the part of a supplier, any unjustified feeling of expected reciprocity in the form of a business decision that is favourable to that supplier. The said gifts may be reciprocated, if possible, in a similar form, and the only reason for offering them should be the feeling of building honest business relationships.

It is unacceptable that any Employee receives personally, or through their next of kin, any personal gains, such as financial gratification, monetary gifts or

their equivalents (e.g. gift coupons, vouchers, securities), loans, services, excursions, holiday trips or special privileges. We are not allowed to accept gifts or gratification that are illegal or cannot be clearly evidenced. It is not allowed to accept gifts or gratuities that are illegal or cannot be clearly documented and that are given for the purpose of obtaining a business advantage or that are given to entities/affiliates of contractors and customers.

Gifts, regardless of their value, to state and local government officials in connection with their functions are prohibited. This prohibition applies to employees of state offices, employees of local government administration (municipal, communal, district or provincial) and persons performing public functions.

It should be remembered that irregularities in the acceptance of benefits, as referred to above, may constitute a form of corruption, which is not accepted in Play.

13.4 Cases that raise doubts

If there are any difficulties with assessing whether a given gift or entertainment falls within the accepted standards of business ethics, one should answer the following question:

- Is it directly related to business activities?
- Is the gift of small value, appropriate and in good taste?
- Would I feel comfortable telling other clients and suppliers that I have accepted or offered such a gift, or participated in such entertainment?
- Would I feel comfortable telling other Employees about it? Superiors? Family? the Media?
- Would I feel comfortable that I have no obligation to do a favour in exchange for the received gift, or participation in entertainment?
- Am I certain that accepting this gift or participating in the entertainment will not be illegal or inconsistent with the rules in force at the Company?

If the reply to any of these questions is "NO", you should not accept or create a gift. In case of any doubts, please remember the "Golden Rule" - You can always consult your superior or Chief Compliance Officer (compliance@play.pl).

13.5 Testing of equipment (e.g. handsets, tablets, etc.)

Testing of equipment is aimed at the verification of the suitability, functionality and possibility of its use in Play's business activity ("Testing"). Should the Testing of equipment be related to some additional duties (such as completing equipment assessment forms), the Employee is obliged to perform such duties. Commercial Department and Terminals Development Department are responsible for Testing procedures. The Equipment Testing process is the responsibility of the Service Development and Subscriber Equipment Department. Handing over equipment for using by suppliers or potential suppliers to Employees disregarding Testing procedures mentioned above is treated as gift.

13.6 Gifts, Events and Benefits given or received register

Gifts and benefits received or given with a retail value of more than PLN 200 Employees are required to disclose in a register filed at the end of each year in accordance with the template set out in Appendix 2 (the "Register"). Members of the Management Board, persons acting as departmental directors and managers reporting to directors are required to submit the Register even if they have not received or given gifts. Members of the Management Board and

Employees shall submit the Register to the Director of the HR Division or his/her designee within 10 calendar days after the end of the year.

Q: May I offer a Play customer tickets to a concert that I cannot attend?

A: Someone from Play must be present and be able to conduct business with the customer as part of any such outing. The same rule applies when accepting entertainment from a supplier. It is only permissible if the entertainment is reasonable, usual and customary for your business relationship, and the provider is in attendance.

Q: In order to sell off obsolete products, a supplier Just offered me a 15% personal discount. Can I accept it?

A: No, you cannot accept the discount unless it is on offer to all Play Employees.

Q: >As part of my Job, I organize numerous business meetings, trips and conventions. Now a hotel where I often book rooms for Play Employees has offered me a free weekend for my parents' wedding anniversary. It's a sweet gesture. Can I accept it?

A: No. Even if you are not personally going to benefit from the gift, accepting the offer makes it difficult to remain impartial when you arrange future hotel accommodations for Play. Even the appearance of such a conflict of interest is inappropriate and should be avoided by politely declining the offer, making clear why you're doing so.

Q: A supplier has Just offered me a large hamper of his products. Can accept it?

A: You can only accept gifts and invitations which are symbolic in value. For example, products with the supplier's company logo or a box of chocolates is usually fine. In this case, you should thank the supplier for his generosity, but politely decline the gift. If you think it would harm the relationship were you to refuse, seek advice from your management to find an appropriate way of dealing with the gift.

Q: What are some examples of gifts and benefits?

A: Examples of gifts and benefits (including but not limited to):

- Handsets, tablets or any other equipment handed over by supplier for using disregarding Testing procedures*
- Gifts of alcohol, clothes*
- Gifts of travel or accommodation*
- Preferential treatment such as queue Jumping, use of facilities, hospitality or benefits generally*
- Free use of facilities such as gyms, holiday homes or SPA resorts*
- Awards or prizes including lucky door prizes or similar*
- Tickets to the theatre, cultural events, sporting and other events*
- Sumptuous restaurant meals and beverages*

14 Relations with suppliers

Play's relationship with its suppliers extends beyond the purchase and delivery of goods and services. It is integral to the long-term success of our business. We

will be judged by the quality of the relationships we have with our suppliers. In particular, we will be scrutinised on how we select our suppliers, and how they demonstrate their commitment to doing business responsibly.

In order to assure the best service for our customers, we actively establish durable relations with providers, requiring from them the adherence to ethical business standards. We do not involve ourselves in any unlawful actions, in particular in actions of a corruptive nature. When negotiating agreements with providers, we take every action to assure the reliability of statements and provided information.

The Employees of P4 Sp. z o.o. are obliged to treat suppliers in compliance with the principles of integrity and in a manner that does not restrict or limit free competition. They are strictly banned from offering or accepting financial gains of corruptive nature to or from suppliers. Play does not tolerate any corrupt practices.

Corruption means requesting, offering, giving or accepting, directly or indirectly, a bribe or any other unjust advantage or prospect thereof, which distorts the proper performance of any duty or behaviour required of the recipient of the bribe, the unjust advantage or the prospect thereof (Art. 2 of the Civil Law Convention on Corruption).

The detailed rules on prevention of corruption in P4 have been stipulated in [Anti-Corruption Code](#). The purpose of the Anti-Corruption Code of Conduct is to limit and eliminate the risk of corruption in the operations of the P4 Group companies in any aspect, in which they operate, in compliance with the “zero tolerance for corruption” principle.

15 Discrimination

Play's employment policy is committed to equal opportunities. We take proper measures to make sure that every candidate or Employee is not treated less favourably than other Employees when it comes to recruitment method, remuneration, employment terms, training possibilities, gaining Professional experience and promoting possibilities, as well as in terms of advancement, regardless of gender, age, disability, race, religious beliefs, nationality, political convictions, trade union membership, ethnic background, faith, sexual orientation, as well as permanent or temporary employment.

All Employees will be recruited, promoted and treated exclusively on the basis of their competences and involvement in performing the work and results achieved. These principles apply to the recruitment process, advancement process, trainings, transferring to other positions, as well as to determining remuneration rules.

Harassment is also a form of gender discrimination, i.e. each undesired behaviour of sexual nature or pertaining to the Employee's sex that is aimed at or resulting in the violation of dignity, in particular in creation of an intimidating, hostile, humiliating or insulting atmosphere; such behaviour may take a physical, verbal or non-verbal form.

Depending on the circumstances, certain behaviours may, because of their gravity or frequency, be considered inappropriate, such as:

- Unwelcome physical contact, looks and other gestures, comments, invitations or requests
- Distributing or displaying offensive material, including inappropriate pictures or cartoons

The condition to consider harassment to be illegal is lack of acceptance of such a behaviour clearly expressed by the victim. Any behaviour or action likely to infringe on this right is not acceptable.

Giving in to harassment or sexual harassment by an Employee, as well as taking actions against harassment or sexual harassment, cannot cause any adverse consequences to the Employee.

Any discrimination-related issues, including sexual harassment, were provided for in the excerpt from legal provisions on equal treatment of employees in employment. Such excerpt from legal provisions on equal treatment of employees in employment is provided to employees at the moment of employment and is available in the HR Department.

16 Mobbing

P4 prevents mobbing. The company will not tolerate any act or conduct constituting mobbing. The detailed rules on prevention of mobbing have been stipulated in the [P4 Group Anti-Mobbing Policy](#). The P4 Group Anti-Mobbing Policy is provided to employees at the moment of employment and is available in the HR Department and on P4 Intranet sites ([playnet.pl](#)).

17 Family and personal relations

Business relations between two persons who are next of kin or otherwise related may give rise to a lack of objectivity in terms of treating Employees, and particularly favouring one person over the remaining Employees. Play does not accept situations in which the persons that are next of kin or related with each other remain in direct Professional relations (superior-subordinate).

Play does not object to hiring close friends or relatives, but in order to maintain objectivity and fair play principles and to exclude uncomfortable situations in which other Employees may find themselves, such relations need to be strictly monitored and Solutions need to be found to prevent such situations. Therefore, notify the HR Business Partner if you remain in a direct Professional relation (superior-subordinate) with your next of kin or a relative.

A close friend or relative is to be construed as: spouse, parent, siblings, children, grandchildren, in-laws,

persons running a common household or financial dependents.

Play does not tolerate any relations of a sexual character with superior subordinate relationship, even if such situations occur with their consent.

18 Amendments to the Code

Any amendment to the content of this Code requires the prior opinion of the Ethics and Compliance Committee and is then subject to the approval of the Management Board.

19 Appendix no 1. Statement for Conflict of Interest

20 Appendix no 2. Received or given gifts, events and benefits register

21 Appendix no 3. Play Group

The Play Group (P4 Group) is a capital group consisting of P4 sp. z o.o. and its subsidiaries, with P4 sp. z o.o. as the parent company, established and operating under Polish law, with its registered office in Warsaw at 1 Wyalazek St.

Appendix no. 1

Statement for Conflict of Interest

Note of guidance

Before you fill in the form, please read the applicable **Code of Conduct** (the "Code") and then answer questions from 1 to 7 on page 2 and fill in sections A and B below. Making any untrue or incomplete statements may result in legal consequences, including those arising from the provisions of civil and labour law.

When answering the questions, please take into consideration your own interest as well as interest of your relatives, persons running a common household with you or other friends. If you disclose any data when answering the questions provided below, you should also inform your superior about it.

The Company will process your personal data collected through this form to verify and resolve any actual or possible conflicts of interest which are of detriment to the Company's operations. For any further information on the processing of your personal data, see section B below and any information on the protection of data provided by the Company.

Information on data protection in connection with filling in this form

The Company does not intend to use this form to collect any personal information on other persons or your sensitive personal data.

If you mention any other individual in the information disclosed by you, do not provide his/her first and last name, your relation with that individual or any other information allowing for his/her identification. Instead, please use the following expressions: "my relative", "a person running a common household with me" or "my close friend" to refer to any of your relatives, persons running a common household with you or other persons, with whom you have close personal relationship. If you mention one of such persons as a person working for Play's business partner or for another company, please do not state the position held by such person in the company, if it results in his/her identification. For instance, it is sufficient to state: "My *relative* works as a sales representative for ABC Company, which submits offers to Play." You should not state: "My *wife/husband* is the *Marketing Vice-President* in ABC Company, which submits offers to Play."

You should not provide your sensitive personal data or any sensitive personal data of another person, and in particular information regarding (a) racial or ethnic origin, (b) political opinion, (c) religion or other beliefs, (d) trade union membership, (e) health or physical or mental condition, (f) sexual life, (g) illegal acts (whether actual or presumed), or (h) proceedings or judgements on any illegal acts.

A. To: Chief Executive Officer

Re: Compliance with the Code of Conduct

I certify that I read the Code, I understand my duties or scope of services and undertake to comply with the standards of business and ethical conduct set forth in such Code. I undertake to inform the Chief Executive Officer or another designated person in the Company of any changes to the information referred to in this form. My answers provided above take account of the duties, scope of services and positions held by me in any companies being members of the Play Group.

Yes

Full name:

.....

No

Title:

Date and signature

B. Data protection

I consent to the processing by the Company of the information disclosed in this form and otherwise obtained by the Company to review my compliance with this Code, including by assessment and resolution of any actual or possible conflict of interest and the related risk to Play's operations.

Save as provided below, I understand that within the Company, only my direct superior, the Chief Executive Officer, Director of HR Division and certain employees of the HR Division will have access to this form, and solely to the extent the Company needs to know the information contained in the same and provided that such information will be subject to the confidentiality obligation and protection.

I accept that the information provided by me in this form may be disclosed and provided to Play as well as used to the extent that the information contained herein is necessary and subject to the confidentiality obligation and protection, including subject to relevant data protection mechanisms, so that the Company could ensure due compliance with this Code, applicable laws and regulations and protection of Play's operations. The Director of the HR Division is entitled to provide information on any reported conflict of interest to a relevant member of the Management Board, Chief Compliance Officer, Director of the Legal Department and Director of the Procurement Department (if the reported conflict of interest could affect the process of selection and negotiation of terms and conditions with suppliers), his/her direct superior and Director of the relevant Department.

Full name:

.....

Title:

Date and signature

Questions

<p>1. In addition to your work or services, do you perform or have any relationship or relations with any external organization, company or business that may put you in the conflict of interest with the interests of the company¹? If yes, please provide the details:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>2. During the previous year, did you hold any financial interest or shares in any company competitive towards Play or any telecommunications company? (You are not required to disclose holding of securities of a public company, if you hold less than 0.5%). If yes, please provide the details:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>3. During the previous year, did you obtain a loan, give or receive a gift, benefit or entertainment expense of the value exceeding PLN 200 from any person doing business or seeking to establish a business relationship with Play? If YES, please fill in Appendix no. 2. Received or given gifts, events and benefits register.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>4. During the previous year, did you hold the position of a director or management board member or advise any company or organization that may have a business relationship with Play or handles matters relating to the telecommunications sector? If yes, please state the name of the organisation, the position held by you as well as the amount and type of the remuneration you received in consideration for your services:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

¹ Examples include performance of external work, including:

- work for an external company, an IT company
- sale of any type of products competitive towards products sold by Play
- work for an external enterprise supplying goods or services to Play's clients or competitors

<p>5. During the previous your, did you or any person running a common household with you supply goods or services to the Company outside the normal course of your work for the Company or have significant financial interest in a company supplying goods or services to Play? If yes, please provide the details, stating the remuneration received in consideration for the goods or services:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>6. Do you work in a position or provide services in which you may have a business relationship with a relative, a person running a common household or another close friend or his or her company that provides goods or services to the Company or that may otherwise do business with the Company? If yes, please provide the details:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>7. Do you have any connections or engage in any external work or activities that you believe may not be in conflict with the interests of Play but which may create the appearance of such a conflict and as such you wish to disclose it for full transparency? (You are not required to disclose any of your relatives working for Play or its competitors, if you or your department have no business relations with them). If yes, please provide the details:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No

Full name:

.....
Title:

.....

Date and signature:

Copy for the person submitting the statement

RECEIVED BY
DATE

Appendix no. 2

Received or given gifts, events and benefits register

<p>During the previous year, I obtained a loan, gave or received a gift, benefit or entertainment expense of the value exceeding PLN 200 from any person doing business or seeking to establish a business relationship with Play:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No
<p>If yes, fill in section A below</p>	

A. INFORMATION ON RECEIVED GIFTS, BENEFITS AND EVENTS						
NO.	DESCRIPTION	VALUE (ESTIMATED OR ACTUAL)	PERIOD	GIVING/RECEIVING PARTY	REASON FOR ACCEPTING/GIVING A GIFT, PARTICIPATION IN THE EVENT OR BENEFITS (THE BENEFIT FOR PLAY)	DECISION ON THE USE OF THE RECEIVED GIFT
1						
2						
3						
.						
.						

Full name:

Title:

Date and signature:

Copy for the person submitting the statement

RECEIVED BY

.....
 DATE