

Nowy Styl

*Code
of Ethics*

Nowy Styl Code of Ethics was adopted by
the Board of Nowy Styl Sp. z o.o. on 25 May 2017
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Table of contents

5	<i>Foreword by the President of Nowy Styl</i>
7	<i>Introduction</i> Nowy Styl mission statement Our values Organisational culture General rules Definitions
11	<i>Ethical policies in place at Nowy Styl</i> Relations within employees Combating modern slavery Company property Brand protection Protection of personal data and confidential information Customer relations Supplier relations Anti-corruption measures Conflict of interests Competition Health and safety Natural environment Local communities
17	<i>Adherence to the Code of Ethics at Nowy Styl</i> General rules The role of a supervisor in shaping ethical attitudes Ethics Officer Channels for reporting irregularities Dissemination of the Code of Ethics





Nowy Styl Code of Ethics is the result of many years of business practice and business operation. Our previous experience has taught us how important it is to develop our moral awareness, to protect our workers but also to warn them of unethical conduct.

By introducing the *Code of Ethics*, we are taking one more consistent step towards strengthening our global and local responsibility, as well as accountability and respect for one other.

The documents we have developed so far: the *Employee Charter of Values* and the *Code of Conduct* have shaped the growth of our organisation and determined the values we continue to follow at Nowy Styl. However, the progressive development of our entire organisation, the changes taking place, the knowledge and experience we keep acquiring mean that our ethical needs are developing too.

The *Code of Ethics* is a summary of everything we have learned so far, but also a look to the future and a way of setting goals for who we want to be in the future. As an element of our organisational culture, along with the values and characteristics defining it, it helps us stay on the paths of operation and responsible development we have worked out.

The policies of the *Code of Ethics* apply to all Nowy Styl employees, regardless of their function, rank and place of work, or the type of services performed, including the employees of our subsidiaries and individuals running a business under their own name, in contacts with both their colleagues and third parties. Our management staff at all levels are responsible for creating and fostering a culture of ethical business practices, building local relations, encouraging the flexibility of actions and observing transparency. The *Code of Ethics* harmonises the policies applicable everywhere our employees are present. It offers guidelines to proper conduct and shows how one can protect him- or herself against unwanted behaviour from others. We have introduced the role of Ethics Officer whose job is to supervise the conduct of the people mentioned above, help them deal with problems and resolve ambiguous situations.

At Nowy Styl, we set an example of conduct for each other, so that we have the strength to act as a coherent and moral organisation.

The following provisions define only some guidelines for ethical conduct. This Code does not in any way breach the provisions of the law. In any case, the appropriate regulations of the law of Poland, the European Union and international law apply in the first place. If required due to social, economic or other reasons referred to in this document, the *Code of Ethics* will be reviewed and updated.

Adam Krzanowski
President of Nowy Styl



Nowy Styl *mission statement*

With great passion and respect for the natural environment, we help people arrange offices and other public spaces. We make sure they respond to people's needs concerning health and comfort, increase job satisfaction and efficiency, and fulfil individual requirements regarding ergonomics and aesthetics. We want them to serve people as best they can.

Nowy Styl values

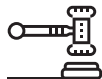
In building our relations inside and outside the company and in shaping our development we always aim to rely on the following values:



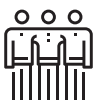
Ambition — our company is made up of ambitious and young-at-heart people who are constantly improving the way they work and looking for new solutions to achieve even better results.



Humility — appreciating other companies' experience and knowledge, we are constantly learning and improving our competences. We are able to admit to our mistakes and learn from them. At the same time, we are proud of what we have already achieved.



Honesty — by observing the law and our company's internal rules, as well as keeping our business promises, we maintain good relationships with people. We are of the opinion that ethical standards and decency are equally binding in business and in private.



Tolerance — we consider the cultural diversity in our company and the environment as great treasures. We treat each other with respect and strive for mutual understanding.

Organisational culture

The following key features of organisational culture do not constitute a mandatory standard or behaviour pattern, but rather they are our company's achievements: they describe the way our company works, which we perceive as a source of our success.



Teamwork — collaboration is the foundation of our success. Therefore, by respecting different points of view, we treat each other as partners and help each other out.



Openness to the world — without curiosity of the world and understanding other cultures, our solutions would never have reached 100 countries around the world. Working in international teams helps us grow, both personally and professionally.



Entrepreneurship — we closely watch our immediate and further environment and we propose solutions to problems. We focus on achieving goals relevant to the development of our organisation.



Openness to change — change is our everyday life. Responding quickly to the new around us is the source of our competitiveness, so we treat every change as an opportunity.



Willingness to keep learning — training, self-development and analysis of past actions. At our company, people want to learn regardless of their age and position.



Commitment — we strive to ensure our work environment encourages commitment, and we appreciate those who clearly identify with our organisation.



Balance — work is an important part of our lives, so it should be done with pleasure and satisfaction. Therefore, we make sure to keep a balance between private and professional life.

General rules

Nowy Styl adheres to the provisions of the *Universal Declaration of Human Rights* and the *European Convention on Human Rights*. As a member of the UN Global Compact initiative, the company actively seeks to implement the 10 Global Compact human rights, workers' rights, environmental protection and anti-corruption principles.

Nowy Styl operates in accordance with the law of the Republic of Poland, internal procedures and generally accepted ethical principles. At the same time, as a global company, Nowy Styl complies with the laws and regulations in force in any country where it operates

This *Code of Ethics* aims to serve as a set of general principles for building an appropriate culture of collaboration, especially a work culture within the company (employees) and cooperation between the company and its environment (local communities, natural environment, customers, suppliers and competitors).

Nowy Styl Code of Ethics is both universal and mandatory for everyone, regardless of their position in company hierarchy. The fact of pursuing the interests of the company may not be used to justify any conduct in breach of the ethical policies in place at Nowy Styl, much less any breach of the law.

In case of any disputable situation not regulated by this *Code of Ethics*, the direct supervisor or the Ethics Officer should be consulted. The *Code of Ethics* is supplemented by the *Anti-mobbing and anti-discrimination procedure*.

Definitions

Whenever the following terms appear in this document, they shall be understood as follows:

Nowy Styl — the company Nowy Styl Sp. z o.o. and other entities affiliated with that company,

Employee — a person employed by one of Nowy Styl companies, as well as persons cooperating with Nowy Styl under civil-law contracts (including sole entrepreneurs),

Competitor/competition — owners and employees of companies as well as individual entities carrying out business in the production and/or sale of furnishings for offices and public spaces and/or related support services, which are offered by Nowy Styl,

Suppliers — entities for which Nowy Styl is a customer,

Customer — entities, i.e. businesses and natural persons, who have used and/or have the intention of using Nowy Styl products and services,

Business partner — an entity (legal or natural person) with which Nowy Styl cooperates to achieve mutual benefits. A Business Partner can be a Customer at the same time.



Ethical policies in place at Nowy Styl

Nowy Styl guarantees equal opportunities for all employees as regards employment, salaries, benefits, promotions, discipline and termination of employment. All decisions regarding the employment or promotion of an employee shall be based exclusively on the candidate's knowledge and skills.

Relations within employees

All Nowy Styl employees have the right to professional development within the company's structures and to equal treatment regardless of gender, age, origin, religion, race, sexual orientation, nationality, political views, social background, type of employment, marital status, appearance, disability or other features distinguishing a specific person.

The criteria mentioned above must not affect Nowy Styl employees' relationships with suppliers, customers and other business partners of the company.

Respecting the health and safety of its employees, Nowy Styl complies with relevant laws in that respect and does not tolerate their infringement on or outside company premises.

Any physical or psychological violence, sexual harassment, mobbing or other behaviour involving the harassment or intimidation of an employee will not be tolerated by Nowy Styl. Detailed provisions on mobbing and discrimination counteract are described in the *Anti-mobbing and anti-discrimination procedure*.

In order to ensure equal opportunities for all groups of employees, Nowy Styl works for people from groups exposed to different treatment. The Organisation makes every effort to facilitate and increase women's access to information and education, and thus expand their knowledge, skills and development and promotion opportunities. Nowy Styl promotes

awareness campaigns, training and education programs to combat inequalities and discrimination against employees.

Nowy Styl condemns and guards against all forms of modern slavery – forced labour, child labour and human trafficking. These are blatant violations of human and labor rights. Nowy Styl does not use the work of persons who have been subject to coercion or restriction of freedom, except for situations where opportunity for rehabilitation through work is provided to the inmates of prisons under final verdicts of a criminal court, in accordance with the law. In addition, to ensure employment standards in accordance with legal norms, in Nowy Styl we care about that employees have mutual respect along with trust, and do not face any form of direct or indirect discrimination. The Organization manages employees so that they can maintain a work-life balance.

Nowy Styl does not employ children and does not benefit from child labour.. Workers under the age of eighteen may only be employed for work not involving any danger, under the terms laid down in the Labour Code and other generally applicable laws. All workers employed by Nowy Styl or its Suppliers should exceed the minimum age of employment in the specific country, or the minimum school-leaving age.

All Nowy Styl workers are required to strive to create a work environment based on honesty, mutual respect, tolerance and cooperation. As part of promoting ethical business standards, Nowy Styl, in order to prevent such activities, undertakes and supports initiatives to raise awareness of illegal employment, employment of minors and exploitation of employees.

Executives are required to shape an appropriate work atmosphere, in particular to:

- give a good example through their own conduct by promoting and presenting an ethical attitude,
- treat employees in an individual and partnership-based manner,
- provide the resources and information necessary for employees to carry out tasks entrusted to them,
- attentively hear out any problems employees may share with them, making sure there is adequate space and sufficient time to talk,
- treat every employee equally (without favouring or discriminating against any individual),
- provide assistance to workers who are new at the company by providing them with information about the company, the principles of cooperation, the scope of their responsibilities and rights related to their position, and any other information they may need,
- support their subordinates in difficult force majeure situations which might require special assistance.

Combating modern slavery

Nowy Styl applies a zero tolerance approach to all forms of modern slavery – in particular forced labour, child labour and human trafficking. We commit ourselves to act in ethical, honest and transparent manner in all business transactions and to implement effective systems and controls to protect against all forms of modern slavery in Nowy Styl or in our supply chain. In Nowy Styl, we make due diligence to ensure that employees are not exploited, that they are safe and that appropriate employment, OHS and human rights regulations and standards are observed, including freedom of movement and communication.

Company property

Every Nowy Styl employee is responsible for the welfare and development of the company. Therefore, it is the responsibility of every employee to protect company property from loss, theft, damage, waste or misuse.

Nowy Styl employees are required to use the company's property for appropriate purposes related to the company's business. Occasional use of company property for private purposes may be permitted with supervisor's consent, but it must be lawful and it may not interfere with official duties.

Nowy Styl employees are not allowed to:

- abuse company property (such as phones, company cars, fax machines, copiers, machinery, equipment and other products),
- abuse the Internet and e-mail for private purposes,
- perform their private obligations and activities during working time, except extraordinary situations justified by an absolute necessity, which have been notified to immediate supervisors,
- use the company's representation funds for non-business purposes.

Where permitted by the law and where relevant statements have been made, the company may monitor and analyse the use by employees of their devices.

Where an employee has witnessed an incident or suspects there has been a theft, fraud or other misconduct or abuse of company property, he or she is required to inform his or her supervisor or Ethics Officer.

Brand protection

All employees are required to protect Nowy Styl's intangible assets such as brand, reputation and confidential information.

Nowy Styl's image and reputation are affected by its employees' statements and behaviour. Any instance of social media use by a Nowy Styl employee (particularly LinkedIn and Twitter), even for private purposes, can be linked to the company and can negatively affect its image and reputation. Therefore, all employees using social media must use them responsibly.

Only authorised persons can speak on behalf of Nowy Styl in the media. Any unauthorised logo use as well as any doubts in that respect must be reported by email to brands@nowystyl.com.

Protection of personal data and confidential information

Nowy Styl attaches great importance to the protection of personal data in accordance with applicable laws, including regulations concerning the collection, use, transfer and disclosure of personal data.

Nowy Styl employees are obliged to take all necessary measures to protect the information and data they deal with in

the course of their duties. Employees are required to comply with the law and personal data protection procedures in place at Nowy Styl, including to comply with technical and organisational requirements to protect against unauthorised disclosure of personal data.

All employees are required to keep in confidence all aspects of production, sales and marketing activities, as well as the company's results, and to ensure security of information in the course of their cooperation with the company's partners.

Particular care shall be taken of information protected by the law and relevant clauses in contracts with the company's business partners, as well as the company's internal organisational documents issued on their basis.

Under no circumstances are Nowy Styl employees allowed to disclose data to any unauthorised person whose job description does not justify the need to have such data.

A supervisor may not issue instructions to his or her subordinates which might result in a breach of information security of the company, its employees or companies and persons cooperating with it.

Customer relations

In acquiring customers, Nowy Styl relies on the strengths of its commercial offer, ensuring the veracity of product information and compliance with the principles of honest marketing and advertising.

Nowy Styl provides its customers with full information about the company's products, services and activities, except for information constituting technical, technological, commercial or organisational secrets of the company, the disclosure of which could expose the company to damage.

In discharging their duties, Nowy Styl employees are required to use truthful and accurate messages. No company employee can in any event make false, unverified or misleading statements about the quality or availability of Nowy Styl products, or about the company's competitors.

Nowy Styl meets all of its obligations to customers, never abuses a customer's trust and never takes advantage of any ignorance or inexperience on the part of a customer.

Nowy Styl delivers orders in compliance with applicable regulations and the terms and conditions of bilateral contracts.

Nowy Styl honestly informs its customers about any extra costs, difficulties and delays in the performance of scheduled deliveries.

Supplier relations

The *Code of Ethics* sets out general ethical policies applicable to relations with Nowy Styl's suppliers. Detailed principles of cooperation shall be set out in a separate document *Nowy Styl Supplier Code of Conduct and General Terms and Conditions of Purchase for Nowy Styl Suppliers*.

Relations between Nowy Styl employees and suppliers shall be based on mutual trust and the striving for long-term positive cooperation.

Nowy Styl selects business partners based on accurate analysis of facts such as quality, safety, ethical standards, technical capabilities, experience, reliability, cost, schedule and availability.

All contacts with suppliers should follow generally accepted standards to ensure appropriate business relations are maintained. Any informal contacts between an employee and a supplier must not affect the terms of cooperation.

An employee may not, without the company's consent, work as an employee of or provide services to a Nowy Styl supplier company at the same time.

Anti-corruption measures

In conducting its business, Nowy Styl is committed to combating all forms of corruption. The quality of products and services is the only criterion for cooperation with customers and suppliers. Nowy Styl will not accept any actions impairing impartial business decisions. Nowy Styl employees may not accept any material benefits resulting from functions held or tasks performed.

Nowy Styl recognises that accepting gifts or any other benefits by employees may lead to situations perceived as an attempt to persuade a person receiving such gifts or benefits to offer certain benefits to the giving party in return.

The following are considered material benefits:

- financial payments,
- performance of a service free of charge or at a reduced, non-market price,

- a high-value gift in kind, in particular where its acceptance incurs a tax obligation on the part of the employee.

A gift can be accepted if:

- it is of negligible material value,
- it has no impact on the tasks performed and decisions taken,
- it does not oblige reciprocity,
- it is an advertising, corporate gift which has been presented officially, in public, at a ceremony.

Employees are not allowed to offer material benefits to the company's business partners.

To maintain a good business relationship with a customer or partner, an employee can hand in a corporate gift with a gross value of up to PLN 200* (not constituting a material benefit as defined above). Handing in modest gifts or signs of hospitality as a reasonable form of appreciating business contacts is generally allowed. Gifts must be presented in a way ensuring that the customer realises that he/she is receiving a gift from the company, not from a specific employee.

Participation in a sponsored event should be reported to a direct supervisor each time. If in doubt, you should consult your supervisor, the Legal Department or the Ethics Officer before taking any decision

Conflict of interests

Nowy Styl employees should avoid promoting any groups of interest. Employees should not demonstrate their familiarity with business partners and should not give in to any influences or pressures that might lead to them taking actions that are biased or contrary to company interests.

A person in a close relationship with an entity offering a service or products may not take decisions on the selection of a business partner. Employees should avoid situations which might lead to an actual or merely potential conflict of interest in the context of cooperation with a third party partner (e.g. where an employee's family member or a loved one is employed or cooperates with a customer or competitor of the company).

An employee is required to inform their immediate supervisor or Nowy Styl representative immediately of the following:

- a situation where a member of the employee's family (spouse, parents, children or siblings) or the employee's loved one is employed or cooperates or expresses an intent to cooperate

- with a customer, supplier or competitor of the company,
- the employee has private obligations towards customers, suppliers or competitors of the company.

Competition

Nowy Styl recognises fair competition to be a natural factor contributing to the development of the company and the market.

Nowy Styl commits itself not to enter into any agreements or understandings with competitive entities which would be aimed at or result in the restriction of free trade, in particular any understanding restricting competition or infringing the collective interests of consumers.

Collecting information about competitive companies from legally available sources in order to assess the strengths of their products, services and marketing methods is allowed under the law. Practices such as: industrial espionage, theft or disguise of identity in order to acquire confidential information from a competitor are prohibited.

Nowy Styl employees are not allowed to make any offensive statements about the nature, financial situation or potential legal problems of competitors to obtain business benefits. In their contacts with competitors, employees are required to stay alert and avoid situations which would make it possible for them to pass on any confidential information pertaining to the company.

Employees are not allowed to exchange information with competitors concerning prices, offers, costs, schedules and terms of sale, market share or any other information which would be against the company's interest or be in breach of generally applicable regulations (including in particular the Act of 16 April 1993 on combating unfair competition *Journal of Laws 03.153.1503, consolidated text*).

An employee is required to notify his or her immediate supervisor of any conflict of interest where a member of the employee's family or the employee's loved one works for a competitive company, supplier or customer, or any other obligations the employee may have towards those entities.

In the case of a conflict of interest, where a member of an employee's family or an employee's loved one works for a competitive company, the company reserves the right to restrict such employee's access to information, including to transfer such employee to a different position.

Health and safety

Nowy Styl constantly takes measures to improve health and safety at work in accordance with applicable laws, standards and internal regulations.

The company ensures the development of a consistent policy to prevent accidents at work and occupational diseases, taking into account technical issues, work organisation, social relations and the impact of work environment factors.

Nowy Styl provides all employees with regular and updated health and safety training. Out of concern for our employees' health, the company keeps setting new standards regarding workplaces, in particular to protect the health of young people, pregnant and breastfeeding women and workers with disabilities.

All Nowy Styl employees are required to work in accordance with health and safety rules and regulations and to follow their supervisors' instructions and guidelines in that respect.

Employees are required to take care of the right condition of machinery, equipment, tools and hardware as well as order and tidiness in the workplace, and to use collective protection measures and assigned personal protective equipment, protective clothing and footwear in accordance with their intended use.

Employees are required to report to relevant persons (immediate supervisor, Health and Safety service, Nowy Styl representative) every case of violation of regulations and rules regarding health and safety at work, accidents, injuries, diseases and every case of uncontrolled ingress of dangerous substances into the environment and the occurrence of other situations that pose a threat to the lives and health of persons and the property of the company.

An employee has the right to refrain from carrying out work or activity, notifying the supervisor or Nowy Styl representative about that fact forthwith, if the working conditions or conditions in which such activity is performed do not meet health and safety regulations and pose an imminent risk to the health or life of the employee, or if the work or activity performed by the employee poses such a risk in relation to other employees or colleagues. A situation of saving human life or health and the company's property is an exception to this rule.

Consuming alcohol and taking drugs or other intoxicants, as well as coming to the place of work or performing activities

under a civil contract under the influence of those substances is strictly prohibited at Nowy Styl.

Natural environment

Nowy Styl strives to minimise its adverse environmental impact. The company operates in accordance with environmental protection regulations adopted in the countries where it runs its business and constantly monitors the impact of its activities on the environment.

The company also promotes environmentally friendly attitudes in its external environment by involving its distributors and contractors in pro-environmental activities. Every Nowy Styl employee is required to take care of the environment, regardless of their place and type of work.

Employees are required to report every observed case of harm being caused to the natural environment to their supervisors or Nowy Styl representatives. Working for the protection of the environment, every employee has the opportunity to report ecological initiatives.

It is the job of supervisors and Nowy Styl representatives to shape the ecological awareness and responsibility of employees, in particular by popularising, controlling and enforcing internal company regulations in the area of environmental protection among employees.

Nowy Styl periodically prepares a sustainability report that provides information on the company's relations with the natural environment, environmental activities and commitments to develop such initiatives.

Local communities

Nowy Styl:

- supports local initiatives to improve the quality of life of residents,
- analyses the impact of its activities on local communities,
- engages in charitable activities, helping the poor and those in need,
- encourages its employees to do charity work for local communities,
- actively works to combat unemployment in local communities.



Adherence to the Code of Ethics at Nowy Styl

The standards set out in the *Code of Ethics* have been established for the common good of Nowy Styl and its employees. Observing its provisions is our responsibility, so every employee should disclose any non-compliance with the standards in place.

General rules

Nowy Styl does not tolerate any threats or retaliation against people reporting violations of the *Code of Ethics* in good faith.

Nowy Styl undertakes to protect its employees and business partners who disclose violations of the law or the *Code of Ethics* against any negative consequences of their decision to disclose irregularities, and to apply relevant laws in relation to those who infringe on the personal rights of employees and their business partners.

Misconduct includes false accusation, whether reported anonymously or openly.

The role of a supervisor in shaping ethical attitudes

A supervisor is required to apply the principles set out in the *Code of Ethics*, and to ensure they are disseminated and promoted among his or her subordinate employees.

It is the job of a supervisor and Nowy Styl representatives to raise employees' awareness about the importance of the *Code of Ethics* and associated requirements.

A supervisor is responsible for helping their team members to comply with Nowy Styl's ethical policies. It is their task to enforce the standards set out in the Code and monitor compliance.

A supervisor is required to hear out an employee reporting irregularities and refer them to the relevant persons in order for such irregularities to be clarified and to work out a solution compliant with the law and the *Code of Ethics*.

It is the responsibility of a supervisor and Nowy Styl representatives to support employees reporting irregularities, unethical or unlawful conduct and asking questions about honesty and compliance in good faith.

Ethics Officer

Ethics Officer is appointed to guard the principles of the *Code of Ethics* and to ensure its provisions are effectively implemented. In particular, Ethics Officer shall assume the role of a trusted representative to whom employees entrust their ethical dilemmas and report ethically questionable situations. As Ethics Officer reports directly to the Management Board, he or she can become a link between employees and Board members in justified cases.

The main tasks of Ethics Officer include:

- monitoring compliance with Nowy Styl's ethical policies,
- taking investigative measures in the event of a breach of the principles contained in this *Code of Ethics*, including reporting any observed infringements to Nowy Styl representatives,
- promoting ethical attitudes (including *Code of Ethics* and ethical policy training), and rules of operation under the *Anti-mobbing and anti-discrimination procedure*,
- promoting and building an organisational culture based on the highest ethical standards.

Ethics Officer's detailed manner of action: tasks, powers, appointment and dismissal procedure have been set out in the document *Ethics Officer Regulations*.

Channels for reporting irregularities

To report a violation of the ethical policies in place at Nowy Styl, an employee can:

- personally inform their immediate supervisor, Director, Nowy Styl representative or Ethics Officer,
- post a report into one of special boxes found at the company's plants, which can only be accessed by Ethics Officers,
- send an e-mail to **etyka@nowystyl.com**,
- submit a report by post to the address: Nowy Styl Sp. z o.o., Krosno, Pużaka 49, for the attention of Ethics Officer,
- make a report via Nowy Styl's intranet.

All reports will be forwarded to Ethics Officer.

Dissemination of the Code of Ethics

The provisions of this *Code of Ethics* and information about ethics at Nowy Styl are available:

- on bulletin boards in the company's organisational units,
- through internal communication channels,
- on the intranet (a PDF version of the Code for download, an ethics knowledge database),
- a printed version of the Code available to employees from the Ethics Officer,
- by familiarising new workers with the content of the document in the course of the hiring process or establishing a civil-legal relationship,
- training for immediate supervisors,
- e-learning training for employees.

Nowy Styl creates the right conditions for and allows all employees to comply with the applicable policies and regulations. Therefore, every Nowy Styl employee, regardless of their position in the company hierarchy, is required to familiarise themselves with *Nowy Styl Code of Ethics* and to observe its provisions.

Nowy Styl reserves the right to amend the Code or any of its parts at any time in order to adapt it to the growing needs of the company, its employees, customers or to applicable laws.

