

## COMPLIANCE POLICY OF PLL LOT S.A.

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# Compliance Policy Objectives

Polskie Linie Lotnicze LOT S.A. (PLL LOT, Company), recognizes activities aimed at ensuring the compliance of the organization with the provisions of generally applicable law and internal ethical principles and standards of conduct as an important element of responsible and effective management in PLL LOT.

Through functioning and development of the Compliance system, PLL LOT strives to achieve and maintain organisational level that ensures the maximum possible degree of potential threats elimination that may affect the Company, in particular, by counteracting the risks of:

- corruption,
- way of conduct in conflict with the applicable laws and regulations, e.g. violation of the Personal Data Protection Act or the use of competition-restricting practices,
- way of conduct in conflict with standards and procedures in force at PLL LOT,
- conflicts of interest,
- theft or damage to the property of PLL LOT,
- and all other events involving our employees/associates and contractors that may exert adverse consequences for the Company.

PLL LOT will conduct its business in an effective and responsible manner, ensuring compliance with the legal provisions and adopted market standards as well as ethical principles. The implementation of this Compliance Policy by PLL LOT confirms the will to conduct business in an honest, transparent and trustworthy manner.

All PLL LOT associates are obliged to perform their official duties and to provide services in accordance with the law, as well as to act in accordance with the internal procedures and rules of conduct reflecting Companys' values.

Applying the values set out in this Compliance Policy should exchange into dynamic and sustainable development of PLL LOT, meeting the expectations of our customers, markets and responding to economy needs. Efficiency, economy, thriftiness and responsibility for our common resources will constitute the foundations of our development, necessary to obtain capital for its implementation.

# PLL LOT Values

## What rules do we follow?

The foundation of PLL LOT's Compliance Policy are legal standards and values we share, which will ensure compliance with the supreme ethical and industry standards, sustainable development and safe and friendly terms of cooperation.

### Life Protection Principle

Life is valuable itself, which is why we care about people and our environment. We strive to provide employees/associates, co-workers and passengers with the highest level of safety at every stage of our activities, starting with a thorough risk analysis. We respond to all received threat signals and prevent all life safety risks. We care about our environment and we implement solutions to protect it in all aspects of our business.

### Respect for Other Human Being Principle

We respect ourselves and everyone around us, we firmly oppose all manifestations of discrimination, in particular, due to race, gender, sexual orientation, religion or social affiliation. Each of us has obligation to constant self-development, drawing conclusions from mistakes made both by us personally and by our colleagues. In this spirit, we openly accept words of constructive and objective criticism, and we express comments and reservations regarding the other person's behavior while respecting the principles of culture and social coexistence. We want to build a community where differences are forum for discussion, not conflicts. We trust each other and we do not build a narrative based on baseless allegations. The conducted explanatory proceedings are based on the principle of objectivity and require, in particular, listening to the person against whom potential allegations are made.

### Professionalism and Honesty Principle

Functions and tasks are assigned to certain people. We perform the functions and tasks entrusted to us using the best knowledge and experience, and the division of duties should be commensurate with the capabilities of a given person. We expect from each staff member full commitment in achieving individual goals and a sense of responsibility for achieving corporate goals by providing support as needed. We strive to apply the highest standards and share our knowledge and experience.

We focus on developing and improving qualifications of ourselves and those we work with. Cooperation is the key to the effective performance of each task - therefore, when cooperating, we are always guided by the benefit of the organization, we use professional and precise language, striving to avoid unnecessary emotions and misunderstandings. We are ready to accept criticism and we clearly formulate our messages. We act honestly and with commitment. We strive to eliminate all manifestations of dishonesty, including the allocation and fulfillment of duties. We care about the image of PLL LOT and we conduct a discussion based on substantive arguments.

### Transparency Principle

We implement transparent processes ensuring the possibility of identifying and eliminating undesirable phenomena. We operate transparently.

All activities subject to procurement procedures are performed in compliance with the adopted regulations, rules and clear criteria. We do not favour any bidders during the ongoing procurement processes, and no one can influence the outcome of the proceedings outside the process.

### Principle of Fair Competition and Compliance with the Rules of Consumer Protection

We adhere to the principle of fair and equal competition's conditions. We do not enter into prohibited agreements with competitors that could have purpose or effect to restrict competition. In particular, we do not enter into the agreements the subject of which would be determining prices, offers, terms of sale, division and the allocation of customers, territories, markets or products. We do not exchange information with competitors that could in any way distort the competition. We do not engage in activities that constitute acts of unfair competition.

In contacts with consumers, we care about their interests, and we are grateful for any comments and suggestions regarding our service standards. We constantly implement solutions aimed at continuous improvement of the quality and punctuality of services we provide. We comply with the consumer protection provisions.

## Promotion of Poland as a Country and Brand

Using the opportunity of the global nature of our business, we want to promote the Polish brand, tradition and culture, as well as to take care of their good image in the world. In our activities, we remember about the Polish culture and tradition.

In our activities, we support Poland at home and abroad, we care for the Polish community and preservation of the Polish heritage around the world. We feel responsible for how PLL LOT is perceived in the immediate and distant environment. We engage in cooperation with institutions promoting the Polish national heritage.

## Information and Personal Data as well as Intellectual Property Rights Protection Principle

We respect trade secrets and we provide standards for protecting the information of our customers and suppliers. We do not publish false information that requires the consent of the interested party.

We protect the right to privacy, and we do not process personal data related to the private sphere.

We make sure that all operations on personal data are carried out in adherence to applicable regulations. We respect the right to protect personal data and make sure that unauthorized persons do not have access to it. All cases of personal data breaches are reported to the Personal Data Protection Office.

Intellectual property rights are the intangible value of every entrepreneur, therefore we respect the intellectual property rights and do not infringe the intellectual property rights of any third party. If you have information about the potential infringement of intellectual property rights belonging to PLL LOT – please contact us. We engage in activities in which the protected trademarks of PLL LOT and other intellectual property rights may only be used for lawful purposes agreed.

## Safety in business and in workplace

Safety above all. In the aviation industry safety is not compromised. We know how to ensure the safety of our customers and subcontractors, which is why we implement the supreme safety standards and expect compliance with them at all the levels of activity. We manage risk effectively and express our full confidence in the application of the *Just Culture* principle, as well as in building trust and fair treatment of people in the scope of reported incidents that may constitute the violation of safety principles. We implement the procedures and actions aimed at constant improvement of safety levels.

We care about safety and comfort in the workplace. Appropriate occupational health and safety procedures, tailored to the needs of employees/associates and the scope of activity, are intended to reduce or eliminate potential accidents and promote healthy and safe working conditions.

We focus on risk analysis and we act based on the basis of identified or possible threats in order to avoid repeating mistakes and to ensure the safest possible working conditions. Each person knowledgeable about possible threats that may occur in the workplace is obliged to communicate this fact to the person supervising the given area.

We want to build positive atmosphere in the place where work or services are provided and react to undesirable situations, in particular when the provisions of labor law or OHS law are violated, or anyone is subjected to a pressure exceeding the limits of social coexistence. We do not tolerate mobbing, or other form of harassment, intimidation or mistreatment.

## Property protection and reasonable resources management

PLL LOT owns fixed assets and intangible goods. Taking care of the Company's property ensures its stability and demonstrates respect for our common property. We will use the property entrusted to us in accordance with its intended purpose, and only for official and statutory purposes. We protect this property against damage, theft, loss or any other form of unauthorized interference.

It is prohibited - without prior consent of the person supervising the area - to use resources, intellectual property, knowledge, know-how, working time or facilities belonging to the Company to conduct competitive activities or for one's own benefit, unrelated to the performance of cooperation for PLL LOT, including especially office equipment, email and software applications.

We use resources rationally. We plan our expenses and optimize the costs related to investments implementation without compromising the quality of services and products offered.

## Environmental protection

We implement solutions minimizing greenhouse gas emissions through the deployment of modern technologies, which are more effective tools in combating environmental pollution. We use the available resources responsibly, and each area of our business takes into account aspects related to caring for the environment and our planet.

Care for the environment is synonymous with a voluntary and active commitment, therefore we willingly participate in initiatives supported by international organizations or entities representing the areas of our activity.

## Conflict of interests

The "conflict of interest" should be understood as all circumstances relating to persons cooperating with PLL LOT that may undermine the honesty and transparency of these persons' work. It is important for us that people and the third parties cooperating with the Company avoid the conflict of interest and if it occurs manage it in the manner adopted in PLL LOT.

PLL LOT's business partners should avoid the conflict of interest that could reduce their credibility or the trust of PLL LOT or the trust of third parties towards the Company.

Persons employed or cooperating with PLL LOT should strictly avoid investing, engaging in additional employment in companies that are customers, suppliers or other business partners of PLL LOT, and above all competitors, in order not to lead to the conflict of interest with PLL LOT.

## Customer relations

Our reputation depends largely upon relations with Customers, which is why we focus on professionalism, cooperation and dialogue. We want to be better and more effective in action, which is why we are not afraid of criticism and we analyze the objections raised. We build our relationships with Customers based on the principles set out in this Policy, and we expect the same from our Customers. We care about the quality of services ensuring full professionalism - taking special care of people with disabilities and making every effort to ensure that the needs of our service recipients are met.

## Reporting disturbing situations – whistleblower protection

Compliance with the values and principles provided in this Policy depends solely upon the individual and collective sense of responsibility of persons cooperating with PLL LOT. We will respond to any violation of the rules, in particular to situations with the features of an offence or crime.

Please remember that you are responsible for reporting suspected or known violations of the law and misconduct that violates the values and principles set out herein. You can make a notification:

1. directly to person supervising relevant area (who is obliged to take appropriate action),
2. by sending relevant information to e-mail address: [compliance@lot.pl](mailto:compliance@lot.pl) or by sending correspondence to the following address: ul. Komitetu Obrony Robotników 43, 02-146 Warsaw, with “Compliance” note on it,
3. by reporting (also anonymously) via Whiblo application at: <https://pgl.whiblo.pl/>.

Please remember that any violation of the law or internal procedures must be reported in order to properly explain and eliminate undesirable situations. If any information having the feature of violation is known to you, please report it to your supervisor. If for any reason you do not find yourself comfortable and you want to remain anonymous, we will take certain steps to protect you from possible retaliation.

## Counteracting corruption and money laundering and compliance with applicable international sanctions

### Anti-fraud and anti-corruption Policy

Our goal ensures the fair, honest and transparent model of the Company’s business, guaranteeing the trust, security, fair competition and positive value for all PLL LOT stakeholders. The company strives to ensure the highest possible level of compliance with the applicable regulations and best international practices in the area of combating corruption and fraud.

The *Anti-Fraud Procedure of PLL LOT S.A. and The Code of Combating Corruption and Conflict of Interest of PLL LOT S.A.* describe the principles of operation as a part of PLL LOT’s obligation to combat and prevent all forms of corruption, identify corruption related technological, financial, image threats, and other actions or omissions of employees/associates or third parties that caused or might cause unjustified damage to the Company or threaten the economic and image-related interests of PLL LOT.

Please remember that all frauds (in particular of a corrupt nature) entails the risk of legal, financial and image liability for the Company and its employees or associates.

Under no circumstances may business partners of PLL LOT be involved in corruption, abuse, bribery, extortion, embezzlement, or other behaviour of similar nature. The business partners must not directly or indirectly offer or accept any undue advantage or promise thereof, including property, financial, personal, unauthorized gifts, etc., in exchange for any specific act or omission.

### Business gifts and invitations

We understand that in some cases gifts and invitations may support the process of establishing, maintaining and developing significant business relationships and in some countries, refusing to accept the gift or invitation may be considered as impolite. As a principle, accepting gifts or invitations is prohibited if it does not fall within the limits of customarily accepted standards. We keep the benefits’ record in order to eliminate potential undesirable behaviour.

## Compliance with applicable international sanctions

International organisations and states may introduce specific foreign policy retaliation measures with the purpose of prohibiting or limiting commercial transactions with specific individuals, entities or sectors. The Company exercises its best efforts to ensure that cooperation with contractors is in line with the applicable international sanctions, whereas in the case of entities subject to sanctions, cooperation may only be carried out to the extent permitted by the applicable restrictions pertaining to international trade.

## Media Policy

- a) We care about the image of PLL LOT, therefore a press spokesman and employees of the Marketing and Communication Office of PLL LOT S.A. are responsible for external communication.
- b) Journalists or other media representatives (e.g. publishers, presenters, producers, photographers, camera operators, etc.) are asked to contact the Marketing and Communication Office of PLL LOT directly via e-mail: [media@lot.pl](mailto:media@lot.pl) or the press spokesman. We care about the quality of our statements, therefore each person speaking on behalf of PLL LOT should first contact the Marketing and Communication Office of PLL LOT to arrange a public appearance. Speeches not agreed with the Marketing and Communication Office of PLL LOT cannot be considered a stance or opinion of the Company.
- c) We do not comment on any matters related to the operation of other airlines, in particular, when incidents or aircraft accidents occur. In the industry, we know that only final findings and reports from investigations of such events are binding. We do not speculate, nor do we comment on media rumours. Professionalism and ethics above all!
- d) We care about our image, reputation and the privacy of our employees/associates. The line between professional and private life can be difficult to define. If you make use of PLL LOT's image or our employees/associates, remember that you cannot infringe the rights of the Company and its employees/associates. In case of any doubts related to the potential infringement of the rights of these people when using the image, please contact the Marketing and Communication Office of PLL LOT.
- e) We do not engage in behaviours which would be unacceptable at our workplace or which are unlawful. If you speak publicly, respect the rights of the third parties and protect the good name of the Company and its partners, refrain from offensive remarks, threatening, bullying other media users, using insults or posting slandering, threatening or discriminatory content. We value critical opinions, yet we do not accept hate speech, and we will consistently fight its manifestations.
- f) No employees and associate of the Company may not set up or manage accounts or profiles on social media – on behalf of the Company - even on the closed ones.
- g) Information constituting a trade secret cannot not be published. Its publication may cause an irreparable loss, so in the event of unlawful disclosure of information constituting the trade secret, we will pursue our rights in court. Any information and internal documents that do not constitute the trade secret may be made public only after obtaining consent of the Marketing and Communication Office of PLL LOT.



## Final provisions

1. Our business is subject to specific legal requirements, and our credibility is based primarily on compliance with the law and detection of possible non-compliance with the applicable regulations. No practices or actions may violate the priority of applying the provisions of generally applicable law.
2. Our internal procedures must comply with the law, and in the event of possible non-compliance, we will take remedial action to restore a lawful state.
3. The principles described in this Compliance Policy constitute the minimum standard to be adhered to in the Company.
4. Person responsible for supervising compliance with this Policy or procedures adopted under the principles described herein is Director of the Compliance and Regulation Office of PLL LOT – and this is the first point of contact in case of any doubts or reports on violations related to application of this Policy.
5. This Compliance Policy was prepared on the basis of the provisions of Polish law, however, in the case of activities prohibited under provisions in force in PLL LOT market area, more restrictive provisions may apply.