

POLITYKA

POLICY

KODEKS  
POSTĘPOWANIA  
KONTRAHENTÓW  
PLL LOT S.A.

CODE OF CONDUCT  
FOR BUSINESS  
PARTNERS  
OF PLL LOT S.A.

2025

The regulation defines business standards in relations between PLL LOT S.A. and its Business Partners.

/ GLOSSARY OF TERMS AND ABBREVIATIONS /

Definition/Abbreviation	Explanation/details
<b>Code</b>	Code of Conduct for Business Partners of PLL LOT S.A.
<b>PLL LOT or the Company</b>	Polskie Linie Lotnicze „LOT” S.A. with its registered office in Warsaw
<b>Business Partners</b>	natural person or business entity with whom/which the Company establishes or maintains a business relation, regardless of the nature of that relationship (e.g., marketing cooperation, making a donation, provision of services or supply of goods, an equity transaction, barter).
<b>Sanctions</b>	Any sanctions, export controls, embargoes, or other similar restrictive measures adopted, administered, imposed, or enforced by any governmental, regulatory authority, or international organization that may have jurisdiction due to the nature of the cooperation with the Business Partner or its affiliated entities, or whose statutory or executive regulations may apply due to the subject of the agreement or cooperation

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## INTRODUCTION

The Code reflects the principles and values adopted as part of the Compliance Policy of PLL LOT, which are the foundation for all other policies and procedures adopted within the Company, taking into account market standards and expectations. We would like our principles and values, which constitute the pillars of our business and are an expression of our expectations of others, to be also shared by our Business Partners we establish business relations with.

Bearing in mind maintaining the highest possible standards in business relations, we expect the services provided to PLL LOT to comply with generally applicable laws, as well as the market and ethical standards.

## OBLIGATIONS TOWARDS BUSINESS PARTNERS

This Code expresses the principles and values we obey in relations with our Business Partners and customers. The business activities we carry out are in compliance with the generally applicable laws. We will promote the same values and principles in relations with Business Partners.

## EXPECTATIONS TOWARDS BUSINESS PARTNERS

We are keen to work with Business Partners that understand and share our approach to responsible business, strive to improve and develop their good practices in the areas in which we set ambitious goals for ourselves. Compliance with the law, above all means for us: having permits, licenses and concessions required by law.

We expect our Business Partners to comply in particular with the provisions on the protection of business secrets, personal data protection, and fair competition.

The model statement on compliance with the principles of this Code is attached as Annex 1.

## SUSTAINABLE DEVELOPMENT

PLL LOT operates based on the principles of sustainable development, combining the achievement of economic goals with care for society and the natural environment.

We expect similar commitment from our Business Partners, demonstrated, among others, by minimizing the negative impact of their activities on the surroundings, including the climate, by responsible resource management, implementation of environmentally friendly technologies, and by support for social and ecological initiatives.

Business Partners should adhere to recognized international standards of responsible business, striving for continuous improvement in their contribution to sustainable development.

## STANDARDS RELATING TO HUMAN RIGHTS

When carrying out our cross-border operations, we are committed to ensuring that Human Rights are respected in our relationships with Business Partners.

In our supply chain, we monitor potential threats and we respond in order to counteract human trafficking.

We expect our Business Partners to take measures in order to increase the awareness of the existing threats in this regard, and to cooperate with the relevant authorities to prevent such crimes.

We also care about the rights of people with disabilities, and in doing our business we are guided by the principle of non-discrimination so as to ensure maximum comfort in using our services.

## WORK AND SAFETY STANDARDS

PLL LOT also places emphasis on mechanisms which protect the Company's employees and co-workers against unacceptable and unlawful behaviour. We expect our Business Partners:

- a) to fulfil mutual respect among employees and co-workers;
- b) not to discriminate against employees and co-workers on grounds of sex, age, origin, religion, orientation, beliefs or disability;
- c) to create safe and lawful working conditions;
- d) to supply products and services that meet safety and quality standards.

## ENVIRONMENTAL STANDARDS

As part of our activities, we take initiatives to promote environmental protection. We use available resources responsibly. We want to cooperate with Business Partners who are involved in environment and climate protection.

We expect our Business Partners to continuously strive to improve efficiency, to act with consideration for the environment and to ensure that their activities are in compliance with generally accepted standards.

## CORPORATE GOVERNANCE

PLL LOT follows the principles of corporate governance, taking into account the principle of proportionality arising from the scale and nature of its activities and the responsibility arising from the public nature of the Company.

PLL LOT encourages Business Partners to:

- 1. Promote values, principles, standards of conduct and ethical conduct that allows for conscious shaping of the internal environment of the organization as well as its external environment;
- 2. Promote awareness-raising activities in the area of digital security among employees, with a view to protect information, devices and digital resources;
- 3. Systematic control of all processes in its area of activity and maintain documentation in a fair, transparent and accountable manner.
- 4. Make decisions within the limits of the respective powers and registered activities.

## SUPPLY CHAIN LIABILITY

The Business Partner of PLL LOT is obliged to ensure that the entities acting on their behalf, or supplying goods or services for the performance of the agreement with PLL LOT, comply with this Code.

The Business Partner is expected to exercise due diligence in managing their supply chain - to identify potential violations of human rights, labor standards, and environmental protection principles among their subcontractors, and to take appropriate preventive measures.

The Business Partner should require their subcontractors to comply with standards consistent with this Code and monitor their fulfillment. PLL LOT reserves the right to verify how the Business Partner supervises compliance with these standards within their value chain.

## ANTI-CORRUPTION AND CONFLICT OF INTEREST STANDARDS

The employees and co-workers of PLL LOT are forbidden to accept any private financial or personal benefits, including those from Business Partners, which due to their nature, value or situational context, could disrupt the performance of duties in terms of ethics and objectivity and affect the decision-making process unlawfully.

We oppose all forms of corruption. We are also aware of the fact that, in certain jurisdictions, there are cultural and customary standards, which are interpreted in a manner that differs from the regulations which our activities are subject to, therefore there are anti-corruption procedures in place within PLL LOT.

Each Business Partner should:

1. Take anti-corruption measures as the part of the conducted activities;
2. Take preventive action in order to avoid conflicts of interests in business relations with PLL LOT;
3. In the event of such conflict, this fact must be reported immediately to the following addresses: <https://pgl.whiblo.pl>, [biurocompliance@pgl.pl](mailto:biurocompliance@pgl.pl) or [naduzycia@pgl.pl](mailto:naduzycia@pgl.pl)
4. Respect the rules for accepting and providing private financial and personal gains, including:
  - a. oppose all forms of corruption and bribery;
  - b. refrain from offering, avoid providing and refuse to accept any private financial or personal benefits which would affect the decision to establish or maintain potential cooperation or to appoint a contractor in proceedings conducted by PLL LOT.

The benefits offered and received from Business Partners will be accepted in relations with PLL LOT, only in accordance with the rules set out in the anti-corruption policies of PLL LOT.

## STANDARDS IN PROTECTION OF COMPETITION AND CONSUMERS' INTERESTS

PLL LOT expects its Business Partners to act in accordance with the competition and consumer protection law. All anti-competitive arrangements are prohibited, and PLL LOT does not engage into talks regarding cooperation, which may potentially constitute the violation of anti-competitive prohibitions, in particular cooperation concerning pricing arrangements or market sharing. We also care for our customers' interests.

Moreover, Business Partners should refrain from any practices that may involve:

- abusing their market position and unfair pricing practices;
- misleading as regards the markings of the enterprise, goods or services;
- breaching business secrets;
- inducing termination or non-performance of an agreement unlawfully.

## SANCTIONS

### DUE DILIGENCE

PLL LOT complies with the Sanctions in force, as well as the laws and regulations on the Sanctions in force in the countries in which it operates.

Sanctions, otherwise known as restrictive measures, are one of the instruments used to influence entities whose activities constitute a violation of the principles and standards of international law and which pose a threat to global or regional peace and security.

Our aim is to minimize a risk associated with the potential violation of the Sanctions in force. Due to the fact that Sanctions may constitute a serious obstacle in building trade relations, PLL LOT applies the required level of due diligence in assessing both entity-related and business-related compliance. For this reason, at the procurement stage, it is essential to obtain a bidder's statement confirming that they are not listed on Sanctions Lists and that they comply with applicable Sanctions. A model statement is provided in Annex 2.

Due to the varying degrees of prohibitions and restrictions imposed on the basis of the Sanctions, the assessment covers agents, suppliers and Business Partners and, in certain cases, also the recipients of the services provided by the Company.

In order to maintain an adequate level of compliance with the Sanctions, PLL LOT may require its Business Partners to comply with special clauses in the agreements concluded with business partners throughout the entire period of cooperation. Sanction clauses specify in detail what happens to the agreement, when international sanctions prevent its performance in whole or in part. They may also predict that the performance of the agreement is suspended or specify in detail when such situation may be the basis for withdrawing from the agreement. Additionally, the Company expects the Business Partners to immediately inform about any changes that may affect compliance with the Sanctions.

## BAN ON RE-EXPORT TO RUSSIA AND BELARUS

Based on the sanctions adopted by the EU, pursuant to Council Regulation (EU) No 833/2014 and, respectively, Council Regulation (EU) No 765/2006, when selling, supplying, transferring, or exporting certain goods, products, or technologies to a third country, excluding partner countries listed in the annexes to these regulations, contracts should include provisions prohibiting exporters from re-exporting to the Russian Federation and Belarus, as well as from re-exporting for use in those countries.

Regardless of the provisions of concluded contracts, PLL LOT expects compliance with this ban and may require the inclusion of appropriate contractual clauses or the submission of the relevant statement.

## USE OF SUBCONTRACTORS

Where the nature of the obligation does not preclude it, Business Partners may engage subcontractors. In such cases, Business Partners must ensure that the services provided to PLL LOT by subcontractors are performed in compliance with the standards set out in this Code.

## WHISTLEBLOWING

Any violations of the Code, as well as the generally applicable laws and the ethical standards related to the Company's activities should be reported through a dedicated communication channel indicated on <https://pgl.whiblo.pl>, by e-mail to: [biurocompliance@pgl.pl](mailto:biurocompliance@pgl.pl) or by surface mail to **the Compliance and Regulations Office (Biuro Compliance i Regulacji) of PLL LOT S.A., Komitetu Obrony Robotników 43, 02-146 Warszawa.**

## CODE VIOLATION CONSEQUENCES

In the event of the violation of the Code by Business Partner, PLL LOT may request this Business Partner to discontinue the violations and to take action to remedy the violations identified.

In case of serious violations, including in particular, a suspected offence, PLL LOT reserves the right to take appropriate measures, including reporting the violation to the relevant institutions, administrative bodies or law enforcement authorities, as well as the right to terminate cooperation, if necessary.

## FINAL PROVISIONS

The Code of Conduct is addressed to all Business Partners cooperating with PLL LOT. We expect our Business Partners to respect the standards and rules set out in this document.

Any doubts as to the interpretation of the Code of Conduct for Business Partners should be sent by mail to the following address: **the Compliance and Regulations Office (Biuro Compliance i Regulacji) of PLL LOT S.A., Komitetu Obrony Robotników 43, 02-146 Warszawa** or via e-mail to: [biurocompliance@pgl.pl](mailto:biurocompliance@pgl.pl).

## ANNEX 1

### BUSINESS PARTNER'S STATEMENT OF ACKNOWLEDGEMENT OF THE CODE OF CONDUCT FOR BUSINESS PARTNERS OF PLL LOT

I hereby declare, as an authorized representative of (*name of the Business Partner, address*), that I have read and understood the contents of the Code of Conduct for Business Partners of PLL LOT S.A. (hereinafter: the "Code").

☐ I also confirm the application of the principles and values set forth in the Code in the activities conducted by the entity I represent.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_



## ANNEX 2

Oświadczenie o zgodności sankcyjnej na potrzeby procesu zakupowego	Sanction compliance statement regarding procurement process
<p>1) Oświadczam, że podmiot nie jest umieszczony na listach sankcyjnych Polski lub UE oraz listach sankcyjnych innych krajów mogących znaleźć zastosowanie w przypadku nawiązania współpracy oraz nie jest własnością lub nie jest kontrolowany przez osoby lub podmioty wymienione na ww. listach.</p> <p>2) Oświadczam, że ani ja, ani beneficjent rzeczywisty, ani inna osoba upoważniona do reprezentowania podmiotu nie jest umieszczony(a) na listach sankcyjnych Polski lub UE oraz listach sankcyjnych innych krajów mogących znaleźć zastosowanie w przypadku nawiązania współpracy.</p> <p>3) Bezzwłocznie powiadomię o wszelkich okolicznościach mających wpływa na zmianę niniejszego oświadczenia.</p> <p>4) Oświadczam, że jestem upoważniony do złożenia niniejszego oświadczenia w imieniu podmiotu.</p>	<p>1) I declare that the entity is not included on the Polish or EU sanctions lists or sanctions lists of other countries that may be applicable in case of cooperation and is not owned or controlled by persons and/or entities listed on the above-mentioned lists.</p> <p>2) I declare that neither I, nor the beneficial owner, nor any other person authorized to represent the entity is included on the Polish or EU sanctions lists or sanctions lists of other countries that may be applicable in case of cooperation.</p> <p>3) I will immediately notify of any circumstances that may lead to a change in this statement.</p> <p>4) I declare that I am authorized to submit this statement on behalf of the entity.</p>
<p>Data i podpis</p> <p>_____</p>	<p>Date and signature</p> <p>_____</p>