



CODE OF
CONDUCT
for the Selena
Group

Table of contents

Foreword	3
Letter from the President	
Letter from the Head of Legal	
Introduction	5
Selena Group values	
What is the Code of Conduct and what is the purpose of the document?	
What does the Code of Conduct cover?	
Who does the Code of Conduct apply to?	
Areas of the Code of Conduct	
Employee area	8
Key principles	
Work Regulations	
Diversity Policy	
Anti-Bullying Procedure	
Area of relations with contractors	12
Anti-Corruption Policy	
Gift Procedure	
Anti-Money Laundering and Countering the Financing of Terrorism	
Attention to information	14
Personal Data Protection Policy	
Information Security Policy	
Cybersecurity	
Let's not be passive about violations	16
What to do if a violation is identified?	
What are violations?	
Where to report violations?	
Dress Code	17



Dear Colleagues,

Relationships are the foundation of any business. They are built on many levels, e.g. with the market, with shareholders, with the business environment, with partners and suppliers, and also internally - among the company's greatest assets, which are its employees. The foundation of these relationships is trust and the observance of business etiquette.

The Selena Group has been building relationships in Poland since the early 1990s and in international markets since 2000. Global opportunities are opportunities for international growth and overseas expansion. On the other hand, they may create a risk of compromise solutions and behaviours that have never been tolerated at the Selena Group. Only by following honest and transparent business principles can we build lasting relationships with our partners that enable us to live up to Selena's values and with ourselves. Our reputation, as well as the image of a trusted business partner is confirmed by our presence on the Warsaw Stock Exchange (since 2008), the title of top 4 polyurethane foam manufacturers in the world, as well as a wide interest in Tytan Professional products - in over 100 markets worldwide.

We gain recognition in the business and economic environment as a partner worthy of cooperation also thanks to awards in prestigious competitions. In 2020, we received the "Teraz Polska" Emblem for our innovative product - Tytan 60 SECONDS foam adhesive and the "Investor Without Borders" title awarded by the European Economic Congress. A year ago I received the "Medal of Poland's 100th Independence Anniversary" in recognition of my contribution to the Polish economy.

Good business practices have so far functioned as an unwritten contract. It is part of our corporate culture and is actively followed in 35 companies in 17 countries. Today, I am giving you a written "guide" to business conduct - a must-read for every current and future employee, which defines the framework of behaviour and patterns of action in situations often problematic for each of us. Only joint and unified action can lead us to full compliance within the company, so thank you in advance for your personal respect for the applicable principles in this Selena Group Code of Conduct!

Krzysztof Domarecki
President of the Management
Board of Selena FM S.A.



Dear Colleagues,

For almost 30 years, the Selena Group has been successfully building its reputation as a company driven by integrity and fairness in business. Every day we face a challenge, an opportunity, but also a responsibility to maintain and enhance our reputation. We know that trust with our employees, shareholders, clients and communities is an unwavering value.

Our reputation depends on our conduct. What we say and do, our products, the services we provide, and the way we operate define our company. As a global company, we face new opportunities every day, which often involve additional risks. Properly assessing each situation and knowing all the rules is not an easy thing to do. This is why collaboration is so important. We trust one another and help one another when needed. We are open to the principles of good conduct. Executive staff has a particular responsibility in this regard. It provides support to employees and sets an example of how to apply the principles in practice.

The Selena Group Code of Conduct is a guide for each of us - Selena employees. Use it to answer questions and resolve ethical issues when the right choice may not be obvious. We are all collectively responsible for making sure everyone knows the principles and follows them. The principles in the Code of Conduct are based on our company values, which remain constant in a rapidly changing environment: responsibility, innovation, leadership, simplicity, and user focus. They define Selena's culture and are the foundation for the success of our business.

Every employee must be trained to know the Global Code of Business Conduct and every employee is personally responsible for complying with it.

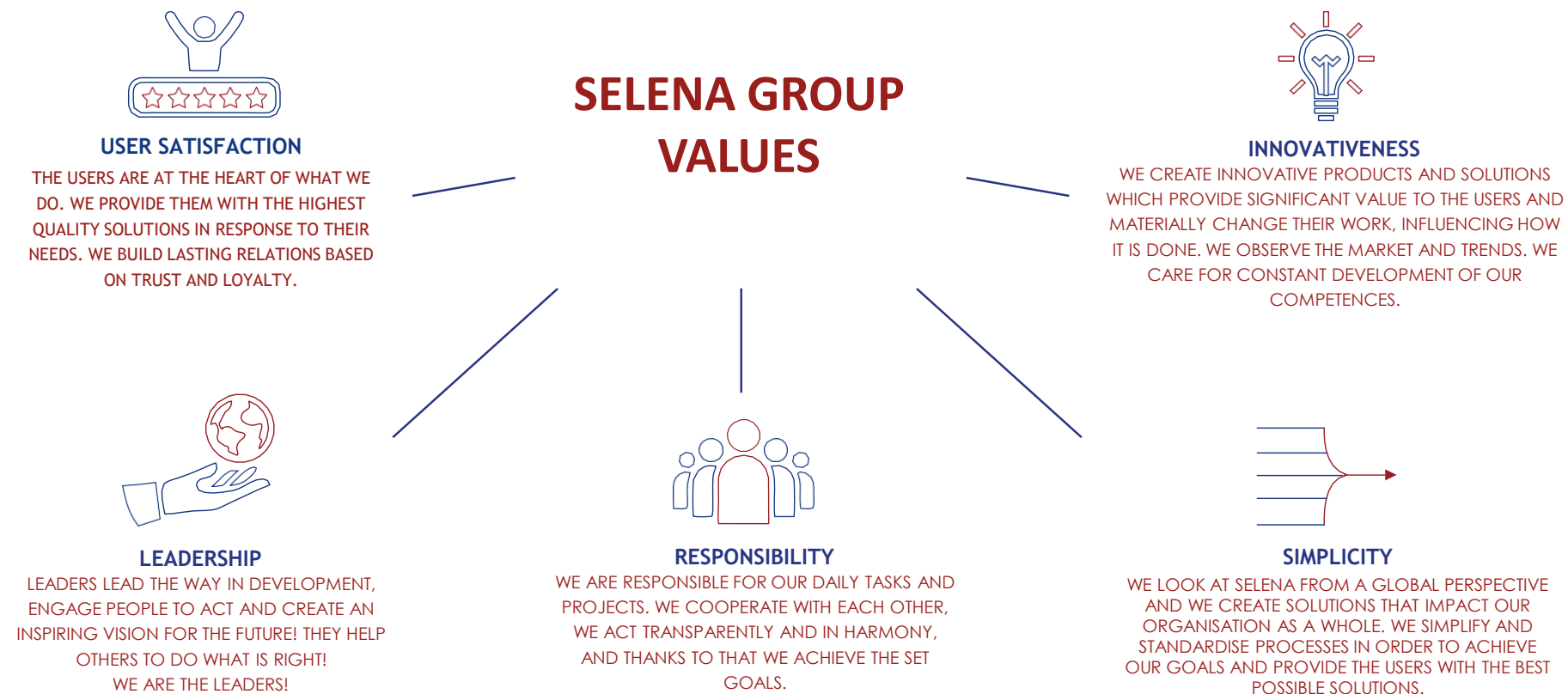
It takes a concerted effort by each of us to make the right decisions every day, even when the choice is difficult and not obvious. Speaking up and asking questions is always the right choice.

Michał Westerlich
Head of Legal and Corporate
Audit at the Selena Group
Headquarters



Currently, Selena Group has defined the following values: User Satisfaction, Innovation, Responsibility, Leadership, and Simplicity.

Employees not only contribute their experience to the company, but also develop the company's culture together. This way, we have created intellectual capital, which is a source of competitive advantage and gives us a perspective for the future.



What is the Code of Conduct and what is the purpose of the document?

The Code of Conduct is nothing but an internal set of principles and values governing the entire Selena Group.

The document outlines the views to be followed by Selena Group employees, including areas related to basic employee rights, the general scope of the most important policies, procedures and regulations.

The primary purpose of the document is to define the desired values and behaviour patterns of employees towards employees and employees towards contractors. You will also find answers to basic questions: "What is a violation?" "What should I do, if I identify a violation?" "Where to report a violation?"

What does the Code of Conduct cover?

The Code of Conduct covers the employee area, the area of cooperation with contractors, attention to information, and indicates where we can seek help if we discover violations.

The Code of Conduct is based on the company's regulations, procedures and policies. So, what is new about the Code of Conduct? Let us consider how well we know these documents, and whether we even know where to look for answers to basic questions. The Code of Conduct is a nutshell of what employees and contractors should be guided by when engaging in cooperation with the Selena Group.



Who does the Code of Conduct apply to?

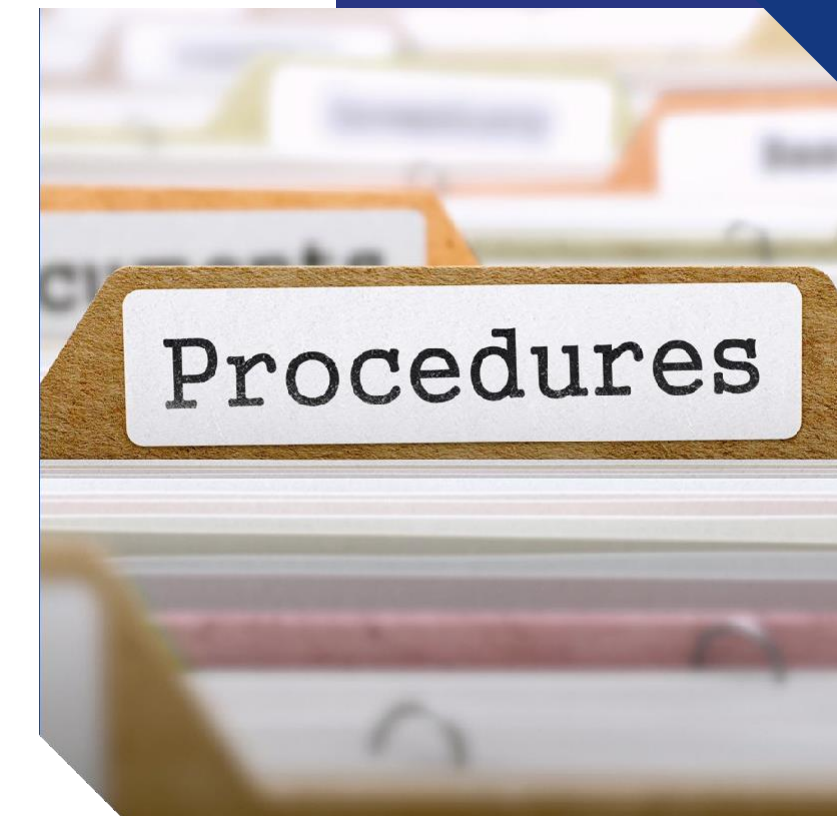
The Code of Conduct applies equally to employees, associates and contractors engaging in cooperation with the Selena Group.

Everyone, regardless of political views, religion, education, position held has access to the same Code of Conduct, which they are expected to follow.

Areas of the Code of Conduct

This Code of Conduct has been based on the Selena Group's policies, procedures and regulations, such as:

1. Work Regulations
2. IT Regulations
3. Anti-Bullying Procedure
4. Anti-Money Laundering Procedure
5. Procedure for the Management of Reports on Irregularities
6. Recruitment and Selection Policy
7. Personal Data Protection Policy
8. Information Security Policy
9. Anti-Corruption Policy



Employee Area - key principles

The employee area concerns all Selena Group employees and associates, regardless of their position. The rights and obligations set out in the Code of Conduct are universal, regardless of the country of origin of those who work with the Selena Group.

EMPLOYEES OF THE SELENA GROUP

Employees should:

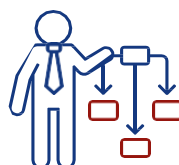
1. Know the contents of the policies, procedures, regulations and other acts that have been published and are applicable to the Group.
2. Apply the above when performing their duties.
3. Not allow deviations from the Standards adopted in the Group, including in particular the prevention of corruption and workplace bullying.
4. If they become aware of irregularities, immediately report the incident to the appropriate units.
5. Cooperate with supervisors regarding the application of or concerns about the application of applicable regulations.



MANAGERS OF THE SELENA GROUP

Managers should:

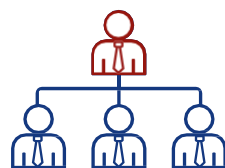
1. Know the contents of the policies, procedures, regulations and other acts that have been published and are applicable to the Group.
2. Apply the above in achieving business objectives.
3. Set an example to those in your team.
4. Particularly observe anti-bullying principles towards its employees and other employees of the Selena Group.
5. Communicate the values that guide the Selena Group.
6. Respond promptly to incidents that do not comply with the Group policies.



EXECUTIVES OF THE SELENA GROUP

Executives should:

1. Manage by the values set in the Group.
2. Take responsibility for reports received.
3. Enforce compliance with standards.
4. Provide appropriate means of communication and training to employees and managers on the Group's principles, values and changes to key documents in this area.



Employee area

Work Regulations

The Work Regulations are a set of basic principles and obligations of each person employed under a contract of employment with the Selena Group. The Regulations specify issues related, inter alia, to work organisation, work time system and schedule as well as health and safety procedures. The purpose of the Work Regulations is to define the rights and obligations of employees arising from the employment relationship. The Work Regulations are a superior document, based on the provisions of the Labour Code.



WE OBSERVE

1. The official orders of the supervisor and carry them out with particular care.
2. The diligent performance of our duties.
3. Business secrets, the disclosure of which would be likely to cause damage to the employer.
4. The general OHS and fire protection regulations.
5. The defined working time.
6. The regulations, procedures and instructions applicable at the employer.
7. The principles of social coexistence.



WE AVOID

1. Failing to turn up for work, being late, or leaving the workplace without permission.
2. Falsification of documentation.
3. Making false statements for the purpose of obtaining benefits.
4. Appearing at work under the influence of alcohol or drugs.
5. Committing misconduct or crimes in the workplace.
6. Disturbing associates.



WE ARE NOT SURE

1. Contact with the supervisor.



Employee Area

Diversity Policy

The Selena Group is made up of people of different nationalities who are different in terms of religion, political views, sexuality, origin, race, age or gender. From the very beginning, the creation of such a large Group was guided by the principle of equality and care for non-discrimination. At this point, interpersonal cooperation in the Group on 3 continents of the world can be evaluated with success.



WE OBSERVE

1. Equal treatment for all.
2. Fundamental human rights.
3. Respect for religious differences.
4. Tolerance of views.
5. The above principles when working with other employees and in customer relations.



WE AVOID

1. All forms of discrimination.
2. Violence against associates.



WE ARE NOT SURE

1. Contact with the supervisor.
2. Contact with the HR Department of the Selena Group Headquarters.
3. Contact with the person responsible for the code of ethics.



Anti-Bullying Policy

The Selena Group does not condone any workplace bullying practices. The Group has the Anti-Bullying Procedure, which, if followed, guarantees work in a friendly environment that develops employees' competences. The Procedure makes it possible to react quickly in the event of workplace bullying, through preventive measures. Anti-bullying efforts start with executives and end with employees. Everyone working at the Selena Group should be familiar with preventive measures to monitor the phenomenon of workplace bullying and undertake possible anti-bullying efforts.



WE OBSERVE

1. The basic principles of social coexistence towards employees and supervisors.
2. Respect for our own work and that of our associates.
3. The rules for reporting workplace bullying towards ourselves and associates.



WE AVOID

1. Ignorance, disrespect, malice and ridicule.
2. Forms of pressure, including threats.
3. Behaviour with sexual overtones.
4. Failing to react when we become aware of a person being bullied.
5. Disseminating information about bullying to unauthorised persons.



WE ARE NOT SURE

1. Contact with the supervisor.



Relations with contractors

The Selena Group operates in accordance with the principle of zero tolerance for any corrupt activities.

All employees and associates of the Selena Group are obliged to act in compliance with the applicable laws, internal regulations and accepted customs insofar as they are in line with the mandatory provisions of law. The principles in place apply to all contracts, transactions and agreements concluded, carried out and performed by the Selena Group in all countries where the Selena Group operates. There are no factors which may affect exemption from compliance with the provisions of the Policy. It is an absolutely binding document and any violation of it constitutes a violation of the employee duties and of the basic principles of cooperation applied in practice.

Anti-Corruption Policy



WE OBSERVE

1. The provisions of the Anti-Corruption Policy.
2. Applicable laws.
3. Transparency in our relations with contractors.
4. The transparency and legality of the transactions concluded.
5. The obligation to participate in prepared training.
6. The obligation to inform contractors about the provisions of the Anti-Corruption Policy.



WE AVOID

1. Giving/accepting bribes in any form.
2. Manipulation of tenders/procurement.
3. Bribery.
4. Activities that constitute a conflict of interest.
5. Concealing the irregularities identified.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the Head of Legal at the Selena Group Headquarters.
3. Contact with the supervisor.



Gift Policy

WE OBSERVE

1. The general principle - the giving/receiving of gifts that can influence business decisions is prohibited as inconsistent with the Selena Group policies.
2. Gifts, the giving/receiving of which is accepted on a given market as an expression of care for relations with a contractor may be used, provided that their value in the local currency does not exceed EUR 50 (e.g. notebook, calendar, gadgets with a company logo).
3. In a situation when an employee cannot refuse a gift worth more than EUR 50 (for the sake of maintaining good relations with the contractor), they inform their superior about this fact.



WE AVOID

1. Accepting and giving gifts with a value of more than EUR 50. In the case of a special occasion (jubilee, official company event, anniversaries), the necessity of giving a gift should be agreed with the immediate superior.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the Head of Legal at the Selena Group Headquarters.
3. Contact with the supervisor.

Anti-Money Laundering and Countering the Financing of Terrorism

The Selena Group sets out and implements in practice the anti-money laundering and countering the financing of terrorism policy. All employees and associates of the Group are required to exercise due diligence with respect to anti-money laundering and countering the financing of terrorism. As this is an extremely sensitive area, any suspicion of such action must be reported immediately.



WE OBSERVE

1. Principles on risk analysis.
2. We identify the client/beneficiary in terms of holding a politically exposed position.
3. The principle of the need to notify detected irregularities to the persons indicated in the procedure.



WE AVOID

1. Concealing the irregularities detected.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the Head of Legal at the Selena Group Headquarters.
3. Contact with the supervisor.



Attention to information

The Selena Group treats all kinds of information as the basis for competitiveness and advantage in the market.

Both internal data and data processed by employees, associates and contractors is strictly protected through the implementation and execution of security procedures.

Information Security Policy (ISP)

The Selena Group implements ISP to ensure that all information is processed in compliance with regulations and good practices, to maintain business continuity and efficiency of processes. Any irregularities in this respect may adversely affect the image of the Selena Group Companies.



WE OBSERVE

1. The classification of information in accordance with the prescribed principles.
2. The protection of information according to its classification.
3. We process data in those systems that are intended for the specific type of information.



WE AVOID

1. Transferring data to anyone without proper authorisation.
2. Processing data for a purpose other than that specified in the documentation.
3. Modifying data.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the IT Department.

Personal Data Protection Policy

The Selena Group implements rules on the processing of personal data to ensure the security of such data and to adapt its processing to the applicable legal requirements. The protection of employees' and contractors' personal data is a key prerequisite for maintaining the Selena Group's strong market position and established image.



WE OBSERVE

1. We only process data on the basis of an authorisation to process it.
2. We only process data in IT systems that are intended for this purpose.
3. Personal data is processed in accordance with the purpose and scope for which it was made available.



WE AVOID

1. Transferring data to unauthorised persons.
2. Processing data for a purpose other than that specified in the documentation.
3. Data processing outside the Selena Group IT systems.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the Head of Legal at the Selena Group Headquarters.

Cybersecurity

The Selena Group attaches particular importance to information and the protection of both its own and its contractors' know-how, and therefore it implements regulations to secure its operations in networks and IT systems.



WE OBSERVE

1. We regularly change the password for the systems.
2. We protect sent files containing sensitive data with a password.
3. We forward any suspicious files or emails to the IT Department.
4. Before opening any file/message we carefully check the sender.
5. We make copies of key files.



WE AVOID

1. Opening messages/files from unknown senders.
2. Sharing system passwords with third parties.
3. Using public Wi-Fi networks (train stations, shopping malls, airports).
4. Installing software and making changes to systems or repairing company equipment ourselves.



WE ARE NOT SURE

1. Contact with the Compliance Department.
2. Contact with the IT Department.



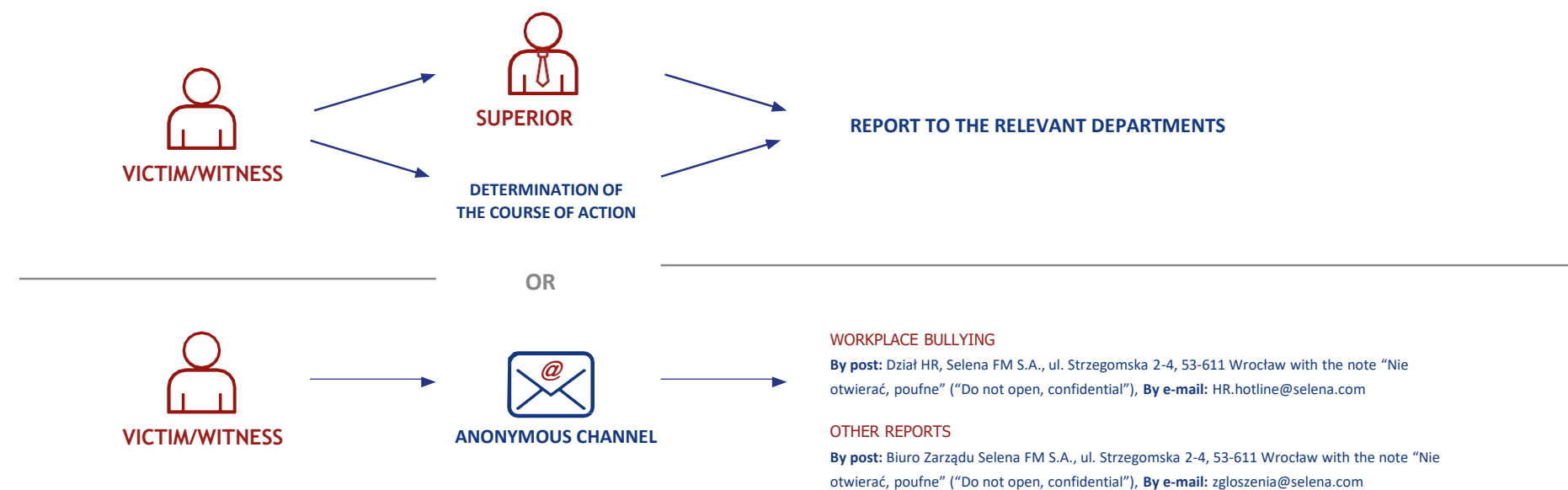
Let's not be passive about violations

The Selena Group has procedures in place which enable employees and associates to report violations in the event of irregularities or workplace bullying.

WHAT IS A VIOLATION?

1. Failure to observe the rights and obligations arising from the Selena Group's regulations, procedures and policies.
2. Infringement of the fundamental rights of associates.
3. Failure to comply with the Code of Ethics
4. Especially important - **corruption, workplace bullying!**

HOW CAN WE REPORT A VIOLATION?



STILL HAVING DOUBTS?

It may turn out that the Code of Conduct will not always provide answers to all questions. If the above rules do not provide an answer to the problem, it will be necessary to go to the Selena Group Headquarters - to the HR Department or to the Legal Department. Those responsible for creating the Code of Conduct in both departments have the necessary knowledge and tools to help.

What to do if a violation is identified?

If you are a victim or witness of a violation, it is important that you report it.

You can speak to your immediate superior and agree an appropriate course of action with them, or if this is not possible, or you feel you would prefer to contact an independent person, you can use the anonymous whistleblowing channels identified below:



CONTACT - SELENA GROUP HEADQUARTERS:

WHISTLEBLOWING

By post: Biuro Zarządu Selena FM S.A., ul. Strzegomska 2-4, 53-611 Wrocław with the note "Nie otwierać, poufne" ("Do not open, confidential")

By e-mail: zgloszenia@selena.com

WORKPLACE BULLYING

By post: Dział HR, Selena FM S.A., ul. Strzegomska 2-4, 53-611 Wrocław with the note "Nie otwierać, poufne" ("Do not open, confidential")

By e-mail: HR.hotline@selena.com

Dress Code

Corporate attire should inspire confidence and respect from clients and employees. It should reflect competence and professionalism. It cannot be too casual and should be subject to certain regulations. A good tip for office attire is the saying: "You don't know how to dress - dress classically."

In order to make it uniform, a set of simple rules has been presented, which should be followed by all Selena Group employees and associates when choosing an outfit for work or a business meeting. When choosing an outfit, always be guided by your position, sensibility and neatness.

Formal

When? When a ball or gala invitation says: "black tie", "cravate noire", "dinner jacket".

What? Women - a cocktail dress is allowed, in practice a long evening dress (preferably floor-length) - "long dress"

Men - a tuxedo

When? When a ball or gala invitation says: "white tie", "full evening dress", "cravate blanche"

What? Women - a long evening dress (preferably floor-length) - "long dress"

Men - a tailcoat

In this style, we avoid: short, above-the-knee dresses, a lot of jewellery, black, brown or navy suits, flashy colours.

Formal day wear for ladies: formal wear for ladies can be divided into "day wear" and "evening wear". These are often dependent on the gentlemen's outfits (accompanying persons) - see above. "Cocktail dress" - is a versatile outfit for ladies used for formal parties, daytime and some evening occasions, including business meetings or afternoon parties. Colours: navy blue, blue, black and pastel colours).



"When speaking in front of the camera, on television, avoid black, white, certain shades of red that tend to "vibrate" unpleasantly to the eye, and stripes (so-called screen interference). Avoid large patterns and inscriptions, e.g. flowers, logos of famous brands. It is best to choose a colour that is eye-catching but not bright. Blue is recommended as a colour with "character". Classic elegance will work very well. Avoid accessories - anything that catches the eye, shines and... sounds. Discreet accents and modest jewellery."

(K.J.Gross, J.Stone)

Dress Code

Business casual

When ? Every day for the office, especially on a day when having meetings with clients or executives, including all kinds of business events. A style intermediate between formal and smart casual. It gives a sense of comfort and safe adaptation to different office situations.

What? Women - subdued colours - black, white or pastel, knee-length dresses and skirts, elegant jackets, suits, two-pieces, fabric trousers. Shirts, covered shoulders, modest necklines. Footwear - ballet flats, moccasins, mid-heeled pumps

Men - checked, brown and navy suits, sports jackets, cardigans, white and blue long-sleeved shirts, elegant, creased suit trousers. Low shoes, Oxford shoes, suede shoes, plain ankle boots.

In this style, we avoid: jeans, loose trousers, flashy colours or patterns, gym shoes, open shoes, trainers, sneakers, wide necklines, bold and excessive jewellery.



Smart Casual

When ? Every day for the office, when not having meetings with management or clients. This style is characterised by more freedom

What ? Women - trousers, skirts, jeans. Sweaters, looser shirts. Moccasins, ballet flats.

Men - chinos, black or navy blue jeans, sports jackets, sweaters, polo shirts, loose-fitting shirts.

In this style, we avoid: flashy sports shoes, combat boots, regular flip-flops, shorts and skirts, vulgarity, defiant character, elements of clothing, which could offend others because of their views, origin or religion. Special attention should be paid to the inscriptions on T-shirts.



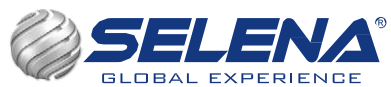
Casual Friday

In other words, Friday without a tie, or Friday at ease - is a day when we treat the dress code at work with a bit more freedom.

During Casual Fridays there is a strict division between the front and back office areas. Meetings with contractors or direct contact with clients do not allow for too much freedom in terms of outfit, and here on Fridays business casual is a year-round mandatory set.

In the back office area, the introduction of Casual Fridays is most welcome. It's not about complete freedom when it comes to choosing an outfit, of course, but about a certain balance between taking care of your own comfort and good taste. For gentlemen who normally dress according to the rules of business casual, casual Friday may mean cords or classic, dark jeans, combined with elegant polo shirts or sports shirts. For ladies, the casual style is definitely more leeway. It is possible to replace classic costumes and dresses with skirts and so-called cigarette trousers combined with elegant shirt-blouses or sweaters. Ladies can also opt for dark jeans matched with sports jackets, and instead of classic shirts, choose slightly more feminine blouses and tops.





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