

Orange Polska Code of Ethics





our conviction

The fundamental ethical standards and values people should follow in their mutual relations – both private and business – have been known and unchanging for centuries. Large communities and organisations specify the standards and values in order to show their members and people around their own strategy and individual way of acting – based, on the other hand, on the commonly applicable rules.

Orange Polska Code of Ethics indicates the standards and values which are most desired in the current situation on the market, and which allow the most effective support for implementation of business tasks as well as building the best possible relations with the local community. It also presents the ways of behaviour and conduct most expected by our shareholders, customers and business partners. Adoption of similar standards and values by closely cooperating companies facilitates their common development, supports faster and more effective achievement of ambitious goals, and supports building a positive image. That is why values presented in the Orange Polska Code of Ethics are very similar to those indicated by other companies from the France Telecom – Orange Group. The market environment expects that we will be honest and dynamic. We can achieve this by building direct friendly relations. Combining these values with the inspiring approach to business will guarantee the market success for us and our shareholders, and at the same time, ensure customer satisfaction with their business relations with us.

By following the rules specified in the Orange Polska Code of Ethics, we prove our membership in the community which finds them a key for achievement of the goal and a standard of actions.



Maciej Witucki

President of Orange Polska

our values

straightforward

We are direct and easy to understand. We keep things simple. We focus only on what's important.

honest

We are open. We say what we do and we do what we say. We are happy to share.

refreshing

We are brave. We dare to do things differently, to find a better way. We give colour to all that we do.

friendly

We take the time to listen. We treat everyone as individuals. We enjoy working and succeeding together.

dynamic

We are passionate, confident and focused on the future. We push the boundaries. We make a difference to people's lives.

straightforward

friendly

dynamic

refreshing

honest

our commitment



Our ambition is to make a difference in people's lives by helping them to communicate effectively through innovative high-quality services.

How we do this is guided by a set of simple and universally shared values. They are fundamental to the way we behave, and the reputation and relationships we build with our customers, employees, shareholders, and the communities in which we operate.

All our decisions are guided by our values.

By striving to be refreshing, dynamic, straightforward, friendly and honest in everything we do, we show all our stakeholders that we can be trusted and are innovative and responsible.

Our commitment to living our values shows that we wish to be recognized as responsible, respecting the needs of both present and future generations.

We respect individuals and their right to privacy. We champion diversity – in terms of origin, race, gender, culture, age and marital status as well as in terms of religious beliefs or support for political or trade union activity.

Our values, and the principles underlying our actions are in line with fundamental principles such as the Universal Declaration of Human Rights, and those drawn up by the International Labour Organisation and by the OECD (and the fight against corruption in particular), and the commitments to which Orange Polska has subscribed.

our relationships

with our customers

We have built our success on the ability to deliver quality products and services that satisfy customers. Ever attentive to customer needs and expectations, we constantly evaluate and improve our products, services, technologies and methods. Our commitment to putting quality and innovation to work for our customers is the driving force behind every product we design and bring to market. We understand that public concerns and demands with respect to safety and security are of paramount importance.

with our shareholders

We aim to create value for our shareholders by earning their trust. We provide our shareholders with intelligible, relevant and reliable information on a regular and timely basis, and actively solicit investor feedback. We also make every effort to ensure that Warsaw Stock Exchange rules and regulations and its principles of good corporate governance are honoured.

with our employees

We believe in the loyalty, integrity, motivation, skills and sense of initiative and accountability of our employees. We are committed to ensuring a healthy and safe workplace for everyone, and we work to create conditions that are conducive to developing their professional strengths and sense of individual accountability. We also encourage knowledge sharing, the development of partnerships, and the capacity to innovate. Teams are made up of people from diverse cultural and professional backgrounds. We do not tolerate discrimination in any shape or form, especially in hiring and promotion.

We expect all Orange Polska entities to establish and enforce procedures that enable employees to report any cases of non-compliance with this Code that may come to their attention. In addition, we require that all such reports are investigated appropriately and with due diligence.

with our suppliers

We actively build lasting relationships with suppliers and subcontractors to ensure the best possible service for our own customers. We expect them to abide by ethical standards that match our own, as set out in this Code.

with our competitors

We subscribe wholeheartedly to the notion of healthy competition – a key driver of growth and innovation – which means playing fair, being honest, and winning on the strength of product and service quality.

with respect to the environment in countries where the group operates

We respect the natural and cultural environments of the countries in which we operate. Accordingly we take steps to be environmentally aware by controlling our use of energy and other natural resources, and by taking environmental concerns into careful consideration in all our businesses.

Being an innovative organisation, we promote the use of information and communication technologies to support sustainable development and contribute to the well-being of the local communities in which we operate. We comply with the laws and regulations in force in the countries where we do business.

Whenever we provide universal service or services in the public interest, we undertake to commit the resources required to faithfully fulfil our mission.

In no circumstances do we finance political parties or organisations whose purpose is primarily political.

Orange Polska does not tolerate corruption.





our promises

individual conduct

Every single employee is expected to demonstrate loyalty, integrity, impartiality and professionalism in the performance of the duties and tasks entrusted to them.

Everyone who works for Orange Polska, no matter what their line of business or level of responsibility, is expected to aspire to excellence and continuous improvement in terms of skills, performance, and the ability to innovate. Everyone is expected to contribute to creating and maintaining a high quality, productive work environment, and to facilitating communication, initiative and team spirit.

How do I, as an Orange Polska employee, put these principles into practice in my professional activity?

in my relationships with customers and suppliers

I behave with loyalty, impartiality and integrity in my dealings with customers and suppliers. I refrain from accepting gifts or perks, and do not accept anything of more than token value. I abstain from engaging in illegal practices of any kind and do not participate in acts of corruption.

If I negotiate agreements with third parties, I take adequate and appropriate measures to ensure that the information provided and representations made are accurate. Moreover, before making commitments that are binding to the group or one of its affiliates, I make every effort to ensure that the technical, legal and other aspects of the agreement are properly set out.

In protecting corporate assets

I make every effort to protect intellectual property and property rights, projects and know-how of Orange Polska. I am responsible for ensuring that the Orange Polska resources are used appropriately and its assets are safeguarded, and that waste and misuse are avoided.

In using the resources made available to me to do my work, I am expected to act in the best interests of Orange Polska and in accordance with the applicable rules.

If I am privy to confidential information in the course of my work or by accident, I take reasonable precautions to ensure that this information remains confidential. This obligation continues in full force, even if I cease to be employed by Orange Polska.



primacy of group principles and values

If I learn that an act of fraud or some other prohibited act has been committed against Orange Polska, I will report the matter to my immediate manager, and if this was not possible – to their manager. I can also refer to an Ethical Advisors, Orange Polska Ethics Committee or the Internal Audit.

in case of a conflict of interest

I avoid situations in which my individual interests (or the interests of individuals or legal entities I am related or close to) conflict with those of my company. If this is unavoidable, I act in accordance with my conscience and with my duty to Orange Polska and I inform my immediate manager and the appropriate manager in the HR function.

stock trading conduct

If I am in possession of material, non-public information that, if it were made public, could impact the future value of a publicly traded security of any of Orange Polska entities, I shall refrain from disclosing this information, from directly or indirectly trading on the basis of this information in a financial marketplace, and from allowing third parties to do so before such information is made public whether purposely or not. Failure to comply may be grounds for personal liability and may entail sanctions, up to and including criminal sanctions.

A set of guidelines pertaining specifically to stock trading supplements this Code, in accordance with regulations in force.

questions

Why is the Code of ethics important?

What is the relation between the Code and the law?

This Code is not intended to replace the laws and regulations in force. Our business ethics guides the professional conduct of Orange Polska. This includes all employees of Orange Polska, regardless of their line of business or level of responsibility. All Orange Polska employees, in particular senior managers, are expected to promote and practice these values and principles. Non-compliance with these values and guidelines may be treated as a serious breach of basic duties.

Where appropriate, special-purpose codes of conduct may supplement this Code.

Who guarantees compliance with the Code of Ethics?

The Orange Polska Ethics Committee is responsible for handling issues related to the compliance with the Orange Polska ethical standards. Its Chairman and members are appointed by the President of the TP Management Board.

The Committee continually monitors the ethical standards in Orange Polska. The Committee advises Orange Polska entities on the implementation of the guidelines contained in the Code. Acting in the strictest confidentiality, the Committee considers individual matters submitted to it for review by group employees or their managers.

The Committee submits recommendations to the President of the TP Management Board aimed at increasing compliance with and understanding of the Code. It also proposes whatever additions and amendments to the Code may be required. The Committee reports on its activities annually to the President of the TP Management Board and to the Audit Committee of the TP Supervisory Board.



