



Code of Conduct

Warsaw, September 2020

Introduction

What each of us does at BBT impacts our collective reputation as a Company.

So *how* we conduct our business is as important as *what* business we conduct. This Code of Conduct emphasizes our core values, sets out our expectations and guides our everyday actions.

The Company will administer the Code equitably and responsibly.

General Requirements

You are obliged to comply with all applicable local, national and international laws and regulations wherever we do business. It is critically important to the success of our Company.

Familiarize yourself with the basic laws, regulations and corporate policies and procedures that are relevant to your areas of responsibility.

Comprehensive knowledge of applicable laws, Company policies and procedures is especially important for these employees who, because of their specific functions, have a special responsibility for ensuring compliance.

In specific countries or markets as well as with specific business partners, stricter rules than those described in the Code may exist. In such cases, you should assume that the stricter standard applies.

Workplace Environment Behaviour

Treat others with respect and never engage in any behaviors that could be perceived as harassing, hostile or disrespectful.

Never make inappropriate jokes or comments. If you are unsure whether something is inappropriate assume that it is.

Be particularly sensitive to actions or behaviors that may be acceptable in one culture but not in another.

Ethical Sales and Marketing Practices

Always make truthful statements about the products and services we offer.

Misleading or false information regarding the products and services we offer can harm our customers as well as our reputation.

Give a factual comparison of our Company's product and service and a competitor's product. Ethical sales do not require blatant or overblown criticism of competitor products.

Remember that ethical sales techniques produce enduring and profitable relationships with customers, while unethical sales techniques damage those relationships and long-term profits.

Competition Law and Practices

Observe anti-trust and competition laws. These laws are complex and vary from country to country. In general, however, all competition laws prohibit agreements or actions that unreasonably restrain trade or reduce competition.

Violations of competition law include, but are not limited to agreements between competitors to:

- fix or control prices or to set other terms and conditions of sale;
- boycott specified suppliers or customers;
- allocate customers, products, territories or markets;
- limit the production or sale of products.

Gather information about Company competitors only by using proper means, and never by theft, misrepresentation, or using another person to improperly gather this information.

National Trade Laws, Export and Import Control Laws

Due to the international nature of our business and the nature of goods and services we offer, the detailed knowledge of, and compliance with the National Trade Laws and the Export/Import Control Laws is of paramount importance to the success of our business.

The Company's policy and procedures regarding compliance with National Trade Laws and Export and Import Control Laws is laid out in our "Internal Control System" management system. You must follow it closely.

Keep up to date with changing rules.

Anti-Corruption

The Company prohibits any provision or offering or accepting of bribes of any variety to any person, whether private or public. It is also strictly prohibited to offer or make facilitation payments.

Bribery occurs when you offer, pay, seek or accept an improper payment, gift or advantage to influence a business outcome.

Facilitation payments are payments aimed at expediting or securing the provision of products or services to which the company is legally entitled.

Gifts and Hospitality

The Company permits the giving and accepting of business gifts of token or reasonable value that are consistent with customary business practices.

You shall under no circumstances give or accept a gift if:

- prohibited by law;
- prohibited by policies of the employer of the potential recipient/donor;
- it puts the recipient under any obligation that might influence a business outcome;
- it can impact your or any other person's business judgment;
- its public disclosure may cause embarrassment to the recipient/donor or the Company;
- it is too costly or too frequent to be within the customs of the marketplace or business situation.

Reasonable and bona fide hospitality and promotional or other business expenditures, which seek to maintain cordial relations or present products or services, are recognized as a legitimate part of doing business as long as they do not serve to obtain or grant an improper advantage.

Additional care, sensitivity and restraint should be taken on gift and hospitality matters when a government official is involved. In some cases providing gifts and hospitality to a government official might be prohibited altogether.

Gift and hospitality principles apply even when personal funds or assets are used and no reimbursement from the Company is sought.

Conflict of Interest

Ensure that your personal activities and interests do not conflict with your responsibilities to the Company.

Company Assets Protection

Company assets can be financial, physical or intangible and include buildings, equipment, funds, software, know-how, data, patents and other intellectual property.

Protect Company assets against waste, loss, damage, misuse, theft, misappropriation or infringement.

Use Company assets appropriately and responsibly.

Respect the physical and intangible assets of others.

Records Management

A record contains information that is evidence of a business activity or required for legal, tax, regulatory and accounting purposes or is important to Company business or corporate memory. It is the content which determines a record not its format.

Records are valuable Company assets and must be properly managed.

All records must be kept according to the requirements of the law and Company guidelines.

The records should be protected from unauthorized access and/or interference.

The Company must be able to retrieve records quickly and reliably.

Business Communications

Business communications concerns all communications by Company's employees within the Company or with third parties. The principles apply to every kind of correspondence including mail, electronic documents, instant messages, websites, social media tools, paper documents, facsimile, voice and voice mail recordings.

In your business communications:

- do not mislead;
- do not write speculative opinions;
- do not engage in 'casual conversation' on sensitive or confidential matters.

Compliance with the Code of Conduct

All Company employees must comply with the Code and its implementation.

Violation of the Code may result in disciplinary action, up to and including termination of employment.

Reminders

- The Code serves as our guide for conducting business with integrity. It is not an employment contract.
- The Code is not a complete list of company guidelines. You are expected to know and comply with all company guidelines and procedures related to your job.
- Significant changes to the Code will be communicated broadly to all employees.

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