

Business Partner Code of Conduct

1. Definitions

- a) **Company** - Vantage Development S.A. with its registered office in Wrocław, at 44 Dąbrowskiego Street, 50-457 Wrocław, entered into the Register of Entrepreneurs of the National Court Register kept by the District Court for Wrocław-Fabryczna, 6th Commercial Division of the National Court Register under the number KRS: 0000030117, NIP: 8960000701, REGON: 930778024,
- b) **Group Company** - a company with capital ties to Vantage Development S.A,
- c) **Vantage Development Capital Group** - the Company and Group Companies,
- d) **Employee** - a person employed in the Vantage Development S.A. Capital Group on the basis of an employment contract,
- e) **Permanent Associate** - an individual providing services to the Vantage Development Capital Group on the basis of a civil law agreement, including within the framework of a one-person business activity conducted on a permanent basis,
- f) **Counterparty** - an individual, legal entity or organisational unit not having legal personality, which has entered into an agreement with a Group Company, which has submitted an offer to a Group Company or received a request for quotation from a Group Company, or which is negotiating with a Group Company with a view to entering into an agreement, or which is seeking to establish a business relationship with a Group Company.

2. Introduction

Long-term business relationships based on transparency and honesty, as well as adherence to mutual agreements and obligations, are crucial to the successful and sustainable conduct of business by the Vantage Development Capital Group.

The purpose of this Business Partner Code of Conduct is to ensure that Counterparties of the Vantage Development Capital Group also act in accordance with all applicable laws and ethical standards and that they comply with the basic principles of cooperation set out in this document.

This Code of Conduct shall apply to all Counterparties and their employees and shall constitute a binding element of any business relationship between the Vantage Development Capital Group and its Counterparties. Vantage Development Capital Group reserves the right to adapt and amend this Business Partner Code of Conduct, if necessary.

3. Compliance with law and ethical standards

The Counterparties undertake to comply with all applicable laws and regulations, including generally applicable social and environmental standards, and to ensure that human rights and human dignity are respected.

4. Prevention of corruption and money laundering

All legal requirements concerning the prevention of money laundering shall be observed. The Vantage Development Capital Group does not tolerate any form of corruption or business behaviour that could give the impression of improper influence on Employees, Permanent Associates or Counterparties.

5. Health and safety at work, fair treatment of employees, permanent associates and subcontractors

The Counterparties undertake to observe the applicable regulations governing health and safety at work with respect to their employees and permanent employees and to provide them with a safe working environment. All employees and permanent associates shall perform their duties under lawful working conditions; the use of illegal or unethical forms of employment (e.g. illegal employment, child labour) is prohibited. All forms of discrimination are excluded. Labour laws and regulations regarding wages, working hours and rest time for employees, permanent co-workers and subcontractors are complied with.

6. Protection of personal data

Personal data, entrusted and processed in the framework of business relations and joint activities, shall be subject to data protection legislation and shall only be used for the purposes indicated in the agreement.

7. Compliance with antitrust law and principles of fair competition

In the Vantage Development Capital Group, anti-trust regulations and principles of fair competition are observed. All anti-competitive behaviour, abuse and dishonesty shall be avoided.

The current version of the Business Partner Code of Conduct is communicated to Counterparties prior to conclusion of the contract. Vantage Development Capital Group has a whistleblower system, which offers Counterparties, their employees, regular co-workers and subcontractors a possibility of reporting any suspected or identified violations of law and internal regulations, also in an anonymous way. Contact details for reporting can be found on the website at <https://vantage.zalezymi.pl/>

Any violations of this Business Partner Code of Conduct will not be tolerated. Violations may lead to the Counterparty's exclusion from future contracting. A proven breach of the presented principles may result in immediate termination of the existing business relations and contracts with subcontractors. Moreover, in such a case Vantage Development Capital Group reserves the right to claim damages.