

---

## COMPLIANCE POLICY OF PGL S.A.

Objectives of the Compliance Policy .....	2
PGL Values.....	3
What rules do we follow? .....	3
Principle of Protection of Life .....	3
Principle of Respect for Other People .....	3
Principle of Professionalism and Honesty .....	3
Principle of Transparency.....	4
Principle of Fair Competition and Compliance with the Rules of Consumer Protection .....	4
Promotion of Poland as a Country and Brand .....	4
The Principle of Protection of Information and Personal Data as well as Intellectual Property Rights .....	4
Safety in business and in the workplace.....	5
Property protection and reasonable management of resources.....	5
Environmental protection.....	5
Conflict of interest.....	6
Relationships with Customers.....	6
Reporting compliance violations – whistleblower protection .....	6
Counteracting corruption and money laundering practices as well as compliance with applicable international sanctions .....	7
Anti-Fraud and Anti-Corruption Policy.....	7
Business gifts and invitations.....	7
Compliance with applicable international sanctions.....	7
Media policy.....	8
Final provisions.....	9

---

## Objectives of the Compliance Policy

Polska Grupa Lotnicza S.A. (PGL, Capital Group, PGL Group) recognises the actions aimed at ensuring the compliance of the organisation with the generally applicable provisions of law, as well as with internal rules of ethics and standards of conduct, as an important element of the responsible and effective management of the PGL Group companies.

Through the functioning and development of the Compliance system, PGL strives for achieving and maintaining the organisational level that ensures the maximum possible degree of elimination of potential threats that may affect the Capital Group, in particular, by counteracting the risks involving:

- corruption,
- way of conduct in conflict with applicable laws and regulations, e.g. violation of the Personal Data Protection Act or the use of competition-restricting practices,
- way of conduct in conflict with the standards and procedures in force in the Capital Group,
- conflict of interest,
- theft of or damage to the property of companies from the Capital Group,
- any and all other events involving our employees/associates and contractors that may exert adverse consequences for PGL.

PGL will conduct its business operations in an effective and responsible manner, ensuring compliance with the law as well as adopted market standards and ethical principles. The implementation of this Compliance Policy by PGL is a statement to conduct business in an honest, transparent and trustworthy manner.

All PGL employees and associates must perform their official duties and provide services in accordance with the law, as well as adhere to internal procedures and rules of conduct reflecting the values of the Capital Group.

If we apply the values set out in this Compliance Policy, this should translate into the dynamic and sustainable development of PGL, addressing the expectations of our customers and markets and responding to the needs of the economy. Efficiency, saving, economy and responsibility for our common resources will constitute the foundations of our development, necessary to obtain resources for its implementation.

## PGL Values

### What rules do we follow?

The cornerstones of the Compliance Policy of the PGL Group rest with legal standards and the values we share, which will ensure compliance with the supreme ethical and industry standards, sustainable development, as well as safe and friendly terms of cooperation.

### Principle of Protection of Life

Mere life is a value, thus we exercise due care for people and our environment. We strive for providing employees, associates and passengers with the highest level of safety at every stage of our activities, starting with a thorough risk analysis. We try to respond to all signals about threats and to prevent all risks related to the life safety. We want to take care of our environment and implement solutions that ensure its protection in all aspects of our business.

### Principle of Respect for Other People

We respect ourselves and everyone around us, we firmly oppose any forms of discrimination, in particular, in terms of race, gender, sexual orientation, religion or social affiliation. Each and every one of us must be guided by constant self-development, learn from mistakes made both by us personally and by our colleagues. In this spirit, we openly accept the words of constructive and objective criticism, whereas any comments and reservations regarding the behaviour of another person we express with respect for the principles of culture and social coexistence. We want to build a community where differences raise an issue for discussion, not conflicts. We trust ourselves and do not build a narrative based on unfounded allegations. The conducted explanatory proceedings are based on the principle of objectivity and require, in particular, the hearing of the person against whom potential allegations are made.

### Principle of Professionalism and Honesty

Functions and tasks are assigned to specific people. We perform the functions and tasks entrusted to us while making use of the best knowledge and experience, and the division of duties should be commensurate with the capabilities of a given person. We expect each and every member of our staff to be fully committed to achieving individual goals and to feel a sense of responsibility for the execution of corporate goals by providing everyone with support according to their needs. We strive for adhering to the highest standards, we share our knowledge and experience.

We lay our focus on the development and improvement of both personal and professional qualifications. Cooperation is the key to the effective performance of each task – that is why when working together, we are always guided by the welfare of the organisation, we use professional and precise language while striving to avoid unnecessary emotions and misunderstandings. We are ready to embrace criticism and formulate messages clearly. We act honestly and with commitment. We strive for eliminating any and all manifestations of dishonesty, including the allocation and performance of duties. We take care of the image and reputation of the Capital Group and conduct a discussion based on substantive arguments.

---

## Principle of Transparency

We implement transparent processes ensuring the possibility of identifying and eliminating undesirable phenomena. We want to be as transparent as possible.

Any activities subject to procurement procedures are performed in observance of the adopted regulations, rules and clear criteria. We do not favour any bidders during the ongoing procurement processes, and no one can influence the outcome of the proceedings outside the process.

## Principle of Fair Competition and Compliance with the Rules of Consumer Protection

We adhere to the principle of fair and equal competition conditions. We do not enter into prohibited agreements/contracts with competitors, the object or effect of which could be to restrict competition. Specifically, we do not enter into agreements/contracts the subject of which would be the fixing of prices, offers, terms of sale, division and allocation of customers, territories, markets or products. We do not exchange information with competitors that could in any way distort fair competition. We do not engage in activities that have the features of acts of unfair competition.

When dealing with consumers, we exercise due care about their interests, we are grateful for any comments and suggestions regarding service standards. We constantly implement solutions aimed at continuous improvement of the quality and punctuality of our services. We comply with the provisions on consumer protection.

## Promotion of Poland as a Country and Brand

Taking advantage of the global nature of our business, we want to promote the Polish brand, tradition and culture, as well as to take care of their good image in the world. In our activities, we remember about Polish culture and tradition.

In our actions, we support Poland at home and abroad, we care for the Polish diaspora and preserve Polish heritage around the globe. We feel responsible for how the Capital Group is perceived in its both closer and more distant surroundings. We engage in cooperation with institutions promoting Polish national heritage.

## The Principle of Protection of Information and Personal Data as well as Intellectual Property Rights

We respect trade secrets and provide standards for the protection of the information of our customers and suppliers. We do not publish any information that is false and requires the consent of the interested party.

We protect the right to privacy, and we do not process personal data related to the private sphere. We make sure that all operations on personal data are carried out in adherence to applicable regulations. We respect the right to the protection of personal data, as well as we make sure that unauthorised persons do not have access to it. Any cases of personal data infringement are reported to the Personal Data Protection Office.

Intellectual property rights are the intangible value of every entrepreneur, therefore we respect the intellectual property rights, and do not knowingly infringe the intellectual property rights of any third party. If you have information on a potential infringement of intellectual property rights belonging to the Capital Group – please contact us. We engage in actions as part of which the protected trademarks of the Capital Group, as well as other intellectual property rights, may be used only for lawful purposes agreed with us.

---

## Safety in business and in the workplace

Safety and security is an absolute priority. In the aviation industry, safety and security are not subject to any compromises. We know how to care for the safety of our customers and subcontractors, which is why we implement the supreme safety standards and expect them to be complied with at all levels of activity. We effectively manage risk and express our full confidence in the application of the *Just Culture* principle, as well as in building trust and fair treatment of people in the scope of reported incidents that may constitute a breach of security principles. We implement procedures and actions aimed at constantly increasing the level of security.

We care about safety and comfort in the workplace. Appropriate health and safety procedures, tailored to the needs of employees/co-workers and the scope of activity, are to alleviate or eliminate potential accidents, as well as to promote healthy and safe working conditions.

We lay our focus on risk analysis and we act on the basis of identified or possible threats, so as not to repeat mistakes and ensure as safe as possible working conditions. Each and every person knowledgeable about possible hazards that may occur in the workplace must communicate this fact to the person supervising the given area.

We want to build a positive vibe in the place where work or services are provided and react to undesirable situations, specifically when the provisions of labour law or OHS law are violated, or anyone is subjected to a pressure exceeding the limits of social coexistence. We follow a no-mobbing policy, nor do we tolerate any other form of harassment, intimidation or mistreatment.

## Property protection and reasonable management of resources

The PGL Group owns fixed assets and intangible goods. If we take care of the Capital Group's property, this will ensure its stability and proves that our common property is respected. We will use the property entrusted to us in accordance with its intended purpose, and only for official and statutory purposes. We protect this property against damage, theft, loss or any other form of unauthorised interference.

It is forbidden – without the prior consent of the person supervising the area – to use, for the purposes of conducting competitive activity or for own benefit, not related to the performance of work/cooperation for the PGL Group, any resources, intellectual property, knowledge, know-how, working time or facilities belonging to companies of the Capital Group, especially office equipment, email and computer software.

We use resources rationally. We plan our expenses and optimise the costs related to the execution of investments without compromising the quality of services and products offered.

## Environmental protection

We implement solutions minimising greenhouse gas emissions through the deployment of modern technologies, which are more effective tools in combating environmental pollution. We use available resources in a responsible manner, and each area of our business takes into account aspects related to caring for the environment and our planet.

Caring for the environment is synonymous with a voluntary and active commitment, therefore we are willing to participate in initiatives supported by international organisations or entities representing the areas of our activity.

---

## Conflict of interest

A “conflict of interest” should be construed as all circumstances relating to persons employed in the PGL Group companies and cooperating with them, or to third parties, that may undermine the integrity and transparency of these persons’ work. We want people employed in the Capital Group Companies and third parties cooperating with the Capital Group Companies to avoid a conflict of interest; whereas if the conflict of interest emerges, we want these people to manage it in the manner adopted in the PGL Group.

Business partners of the PGL Group Companies should avoid a conflict of interest that could reduce their credibility or the trust of the Capital Group Companies or the trust of third parties towards the Capital Group Companies.

Persons employed or cooperating in the Capital Group Companies should avoid investing, engaging in and additional employment in companies that are customers, suppliers or other business partners of the Capital Group, and above all their competitors, in order not to give rise to a conflict of interest with the Capital Group.

## Relationships with Customers

Our reputation largely depends upon relations with Customers, which is why we lay our focus on professionalism, cooperation and dialogue. We want to be increasingly better and effective in action, which is why we are not afraid of criticism and analyse the objections raised. We build our relationships with Customers based on the principles set out in this Policy, and we expect the same from our Customers.

We care about the quality of services while ensuring full professionalism in customer service practices – with special care for consumers, therefore all actions taken for passengers will be carried out with respect for the rights of consumers. We take care of our Customers and their needs, therefore disabled persons and others requiring special care are served without undue delay. In the event of irregularities, we exercise our best to react quickly in order to minimise the inconvenience and provide services required by law and the accepted standard of service.

## Reporting compliance violations – whistleblower protection

Observance of the values and principles provided for in this Policy depends solely upon the individual and collective sense of responsibility of persons cooperating with the Capital Group. We will respond to any violation of the rules, and in particular, to situations with the features of an offence or crime.

Please be advised to remember that you are responsible for reporting suspected or known violations of the law and misconduct that violates the values and principles set out herein. You can make a notification directly to the person supervising the relevant area (who is obliged to take appropriate action), send relevant information to the email address: [sygnalista@pgl.pl](mailto:sygnalista@pgl.pl) or by mail to the following address: ul. Komitetu Obrony Robotników 45A, 02-146 Warsaw.

Please be advised to remember that any violation of the law or internal procedures must be reported in order to properly explain and eliminate undesirable situations. If any information having a feature of violation is known to you, please report it to your supervisor. If for any reason you do not find yourself comfortable and you want to remain anonymous, we will take certain steps to protect you from possible retaliation.

---

## Counteracting corruption and money laundering practices as well as compliance with applicable international sanctions

### Anti-Fraud and Anti-Corruption Policy

Our goal involves the provision of a fair and transparent model of the Capital Group's business, guaranteeing trust, security, fair competition and positive value for all stakeholders of the Capital Group. Polska Grupa Lotnicza strives for ensuring the highest possible level of compliance with applicable regulations and best international practices in the area of combating corruption and fraud.

The Anti-Fraud and Anti-Corruption Policy of the Capital Group describes the principles of operation as part of the PGL Group's obligation to combat and prevent all forms of corruption, identify technological, financial, image-related threats, and other actions or omissions of employees/associates or third parties that have caused or might cause unjustified damage to the Company, or threaten the economic and image-related interests of the Capital Group.

Please be reminded that any abuse (in particular of a corrupt nature) entails the risk of legal, financial and image liability for the Capital Group Companies and their employees or associates.

Under no circumstances may business partners of the PGL Group Companies be involved in corruption, abuse, bribery, extortion, embezzlement, or other behaviour of similar nature. The business partners must not directly or indirectly offer or accept any undue advantage or promise thereof, including material, financial, personal, unauthorised gifts, etc., in exchange for any specific act or omission.

### Business gifts and invitations

We understand that in some cases gifts and invitations may support the process of establishing, maintaining and developing significant business relationships; what is more, in some countries, refusing to accept a gift or invitation may be viewed as impolite. As a principle, accepting gifts or invitations is prohibited if it does not fall within the customary standards. We keep a benefit record in order to eliminate potential undesirable behaviour.

### Compliance with applicable international sanctions

International organisations and states may introduce specific foreign policy retaliation measures with the purpose of prohibiting or limiting commercial transactions with specific individuals, entities or sectors. The Capital Group exercises its best efforts to ensure that cooperation with contractors is in line with applicable international sanctions, whereas in the case of entities subject to sanctions, cooperation may only be carried out to the extent permitted by applicable restrictions pertaining to international trade.

## Media policy

- a) We care about the image and reputation of our Capital Group, therefore the Group's spokesperson and employees of the PGL Communication Office are responsible for external communication;
- b) Journalists or other media representatives (e.g. publishers, presenters, producers, photographers, cinematographers, etc.) are asked to directly contact the PGL Communication Office at [media@pgl.pl](mailto:media@pgl.pl) or the press spokesperson. We care about the quality of our statements, so each and every person speaking on behalf of the Capital Group should first appear at the PGL Communication Office to agree upon a public speech. Any speeches not agreed upon with the PGL Communication Office cannot be considered a stance or opinion of the Capital Group;
- c) We do not comment on any matters related to the operation of other airlines, in particular, when there are air incidents or accidents. In the industry, we know that only final findings and reports from investigations of such events are binding. Therefore, we do not speculate, nor do we comment on media rumours. Professionalism and ethics are priority!
- d) We care about our image, reputation and the privacy of our employees/associates. The borderline between professional and private life can be difficult to define. If you make use of the image of the Capital Group or our employees/associates, you must remember that you cannot infringe the rights of the Capital Group and employees/associates. In case of any doubts related to the potential infringement of the rights of these people by using their image, you must report to the PGL Communication Office;
- e) We do not engage in any behaviour which would be unacceptable at our workplace or which is illegal. If you speak in public, you must respect the rights of third parties and protect the good name of the Capital Group and its partners, refrain from offensive remarks, threatening, bullying other media users, using insults or posting slandering, threatening or discriminatory content. We value critical opinions, yet we do not accept hate speech, and we will consistently fight any manifestations thereof;
- f) No employees and associate of the Company from the PGL Capital Group may set up or manage accounts or profiles on social media on behalf of LOT – even on the closed ones;
- g) Information constituting a business secret of the Capital Group must not be published. Its publication may cause an irreparable loss, so in the event of unlawful disclosure of information constituting a trade secret, we will pursue our rights in court. Any information and internal documents that do not constitute a business secret may be made public only subject to the consent of the Capital Group's Communication Office.



## Final provisions

1. Our business is subject to specific legal requirements, and our credibility is primarily based on compliance with the law and detection of possible non-compliance with applicable regulations. No practices or actions may violate the priority of applying the provisions of generally applicable law.
2. Our internal procedures must comply with the law, whereas if we identify a possible non-compliance, we will take remedial action to bring it back to legal compliance.
3. The principles described in this Policy constitute the minimum standard to be adhered to by all Companies belonging to the PGL Group. Each and every Company that is part of the PGL Group has in place a person responsible for supervising compliance with this Policy or the procedures adopted under the principles described herein, whereas doubts or reports of violations related to the adherence to this Policy should be addressed to them in the first place.
4. This Compliance Policy has been prepared on the basis of the provisions of Polish law, however, in the case of activities prohibited under the provisions in force in the market area of the operations of the Capital Group or a given company being part of the PGL Group, more restrictive provisions may apply.