



CODE OF ETHICS

PREPARED BY: Maciej Malik, Management Board member
Date: 18/10/2017
Issue: 02

DOCUMENT MODIFICATION SHEET

No.	date	basis	Action/amendment
1			

Ladies and Gentlemen,

Our mission is to provide our Customers with appropriate solutions that they can always trust, while the vision is to become a global Company of the first choice. We operate in a way that strengthens our Customers trust and improves the market position of the leader and the best Company of the sector.

In order to ensure the appropriate approach towards the rights of our employees, associates, Customers and suppliers, business partners and other stakeholders within our business activity, this code of ethics has been prepared and adopted. Observing its rules aims at building our image of a reliable partner and counterparty caring not only for their own business objectives but also considering the objectives and expectations of all the stakeholders. Also, a partner conducting sustainable business activity and enabling achieving objectives to all the stakeholders.

The Code of Ethics is a foundation of the company's operation and abiding by its rules is an essential element of constant development and success.

Our objective is to help our products quality catch up to the level of the best competition so that as a result customers will choose our company for their target supplier. We want to achieve this image by abiding by the code of ethics. We are fully aware that our staff's work outcome can be found in millions of cars used by people throughout the world. This fact makes us to understand that the priority is not only the highest product quality but also the ethical image of the company that is a foundation of quality. Thanks to that the company's name will be known and will become the Company itself.

We are trustworthy, open and we follow steely principles - respect for human rights and dignity, integrity of cooperation and adhering to the existing social and legal standards. Therefore, the Company, underlining the values it is driven by in business, has established the Code of Ethics.

The document is a set of rules observance of which is an obligation for all the Employees and Associates of the Company. The Code of Ethics defines international standards of conduct in all fields of operation. Thanks to the code, the Company encourages its supplier, representatives and other business partners to adopt certain rules of ethical conduct.

Table of Contents

1.	Policy and Strategy of the Company.....	5
2.	The most important values the Company fosters	6
2.1	Compliance with the law	6
2.2	Professionalism.....	6
2.3	Respect towards entity, society and environment.....	6
2.4	Our Customers' satisfaction	6
3.	Rules of Conduct	6
3.1	Respecting human rights.....	6
3.2	Relations with Customers.....	7
3.3	Employees and their relations.....	7
3.4	Human resources management.....	8
3.5	Conditions provided for the Employees	9
3.6	Provision of services	9
3.7	Protection of the organisation's interests.....	10
3.8	Quality of services provided.....	11
3.9	Competition law	11
3.10	Environmental protection.....	11
3.11	Respect for health and occupational health and safety.....	11
4.	Whistleblowing policy	11

1. Policy and Strategy of the Company

We provide services aiming at full Customer satisfaction.

The basis for ethical conduct of SAGA is doing business in a manner which is ethical and lawful in every aspect of our operation.

SAGA applies one universal canon of business principles to the entire company. The whole staff has to adhere to them in letter and in spirit and has to avoid creating even just the appearance of improper conduct. It is absolutely mandatory to abide by the set of ethical principles and the applicable law.

The strategy devised by us defines objectives and tasks for particular employees and associates.

The strategic objectives being their basis are:

- constant improvement of our Customers' satisfaction of provided services,
- care for well-established image of a reliable and trustworthy business partner,
- providing security of information entrusted within the implemented projects,
- ensuring the implemented projects' resistance to events which may impede the continuity of implementation,
- guaranteeing development of our employees and associates, flexible forms of cooperation and proper quality and working conditions so that they can feel as a part of the organisation.

Those objectives are pursued by, among others:

- application of proper tools and systemic solutions related to provision of particular services and their strict supervision ensuring meeting all the Customer requirements accepted for performance; also, applicable provisions of law;
- constant development of the Company's Employees potential and broadening the offer in line with our Customers' expectations by hiring new Employees who meet our high qualification requirements,
- continual improvement of our services thanks to regular trainings carried out for the team and exchange of experience amongst the Employees,
- constant improvement of workflow and internal processes affecting the effectiveness of our operation and contributing to increase in our share in the market,
- cooperation only with proven specialists and external experts who meet our requirements, our Customers' needs and who comply with the requirements of the applicable law, carrying out tasks and programmes aiming at constant improvement of quality of services provided and resilience to events which may impede the continuity of implemented projects.

2. The most important values the Company fosters

2.1 _Compliance with the law

The Company is exceptionally committed to abiding by the highest standards of ethical conduct with full respect for the applicable national and international laws. They comprise, among others, regulations in terms of: combating monopolistic practices, support for fair competition and management rules in the company, counteracting bribery practices and corruption, providing safety of our products delivered to our Customers, labour law and policy, environmental protection, protection of human rights and copyrights, the company's assets and other forms of intellectual property.

SAGA treats the matters of privacy and independence of counterparties with due respect and strives for strict observance of confidentiality rules in relation to personal data and products data. Processing of all personal data, gathered and possessed ones, is conducted by the Company in a fair, lawful and diligent manner what ensures the privacy protection.

2.2 Professionalism

We provide our services in a professional and reliable manner. We put emphasis on quality in our every measure. We aim at improving standards and work quality so that the formulated objectives are met. We have knowledge and skills necessary to perform our tasks with professionalism. We are consequent in our actions.

2.3 Respect towards an individual, society and environment

We respect the basic human rights laid down in the Universal Declaration of Human Rights by showing respect to religious and beliefs differences of the employees. We respect the rights of an individual, the rights of society and environment we operate in.

2.4 Our Customers' satisfaction

Satisfaction of our customer is always an overriding objective of our operations. We try to build long-term relations with customers based on trust and clear cooperation rules. We fulfil commitments and execute agreements concluded with our customer. Our high-quality services are tailored to the Customer's needs.

In many countries there are regulations governing international business transactions. The company's policy includes compliance with legal directives of the country we conduct our business operation in, including provisions in terms of import, export and tax law.

3. Rules of Conduct

3.1 Respecting human rights

As a company driven by ethics and respect for law, SAGA fully acknowledges and supports the provisions laid down in the Universal Declaration of Human Rights and the Convention for the Protection of Human Rights and Fundamental Freedoms, and it expects ethical conduct of its employees. The company's employees are obliged to respect and promote values fostered by the company by supporting and promoting team work rules and individual responsibility. The company aims at ensuring its employees equitable remuneration and safe and healthy work conditions. The company acknowledges the fact that certain rights are applicable as fundamental and universal. These are, among others: freedom from discrimination on grounds of race, colour, nationality, origin, age, religious beliefs, sexual orientation, marital status, disability or any other entity's status; freedom from arbitrary deprivation of liberty, freedom of assembly, freedom of thought, freedom of conscience and religion and freedom of speech and expression.

The company will not use child labour or forced labour. The company will not approve such working conditions or employees treating that is violating the international law or customs.

The company will put every effort to conclude agreements only with subcontractors or suppliers who abide by the international human rights and practices.

3.2 Relations with Customers

The Company ensures:

- respecting the applicable law during the process of serving the Customer, in particular the high-quality provision in terms of human rights and employment rights, consumer rights and fair competition rules,
- within the tender procedure, the company will not engage in unlawful practices, in particular in terms of price fixing,
- within the Customer servicing, the company will accept for performance only such orders and projects that it is able to perform within the declared time limit and upon the terms and conditions agreed with the Customer,
- the company will not mislead its Customers by concealing elements adversely affecting the competitiveness of the offer/contract or agreement in documents wording,
- all documents presented to the Customer in the course of their servicing will include reliable, clear and explicitly interpreted regulations.

3.3 Employees and their relations

We believe that our company's success depends on all associates and is possible only when the relations among the employees are based on mutual respect, collegueship and cooperation. To that end:

- we create equal development opportunities for all employees, we ensure healthy and safe working conditions, we facilitate professional qualification improvement, we apply objective assessment criteria and competitive remuneration policy,
- we create a friendly atmosphere at work and we try to resolve every conflict amicably so that it can be a lesson how to avoid such situation in the future,

- we appreciate truthfulness and we take responsibility for our actions disseminating good practices, we respond to reprehensible conduct,
- discrimination, harassment or mobbing are impermissible and unacceptable in the company. Each employee is obliged to prevent such cases,
- we constantly and actively seek improvement by gaining new knowledge and caring for skills development,
- we create conditions for innovation.

3.4 Human resources management

The company provides equal opportunities of employment based on competencies and skills, it does not discriminate on grounds of race, colour, religious beliefs, sex, ethnicity, age, health condition, disability, military service, marital status or sexual orientation. The Company undertakes to:

- employ upon meeting clearly and precisely set and communicated criteria,
- ensure that the criteria for selection of a new employee are clearly and precisely specified based on actual requirements due to the nature of work to be performed by a new employee/associate,
- ensure that before commencing external recruitment, an internal recruitment will be conducted first and the current employees/ associates will be considered as candidates and in case they meet the criteria, the internal promotion or transfer will be carried out,
- offer employees and associates work upon flexible forms of employment enabling reconciliation of private and professional life,
- provide candidates and all interested parties full transparency, independence and reliability of the recruitment process,
- abide by the applicable law during the recruitment process and at the stage of hiring a new employee or associate,
- conduct appropriate communication in terms of presenting employment conditions, remuneration, motivation and benefit systems and possibilities of career development,
- conclude agreements and contracts including conditions that are transparent, fair and acceptable for both parties,
- give candidates enough time to learn the conditions of the agreement and contracts to be concluded before the final declaration of willingness to cooperate and sign the agreement/contract,
- specify the scope of tasks, duties and powers for new employees, adequately to the actual organisation's requirements and needs,
- enable internal communication in terms of scopes of responsibilities and powers of all positions (for all employees and associates) in order to ensure organisational and competence transparency,
- provide an adequate initial training programme (internal and external ones) in order to ensure a professional onboarding training for a new employee,
- guarantee that during the process of personal competencies improvement the provisions of the code of ethics will be abide by, in particular in terms of equal treatment of employees regardless the origin, race, sex, religious beliefs, age or any other features which do not affect personal competencies,

- provide the employees with the possibility of professional development if it is compliant with the company's strategic objectives,
- provide adequate communication in terms of organisation's objectives and those of processes based on which the training purposes have been defined,
- express accolades and reprimands in a manner compliant with the Management principles,
- devise a motivation and benefit system with the employees'/associates' participation or with the participation of their chosen representatives,
- ensure full equality in application of the motivation and benefit system,
- ensure full transparency and explicitness of regulations in terms of motivation and benefit system.

3.5 Conditions provided for the Employees

All our Employees are treated with full equality in respect of access to the infrastructure and equipment entrusted to the employees and associates for use.

We also ensure a relevant preparation of the employees, associates and representatives of other interested parties to use particular elements of infrastructure by trainings and instructions chosen and carried out with consideration of particular persons' aptitude.

3.6 Provision of services

When it comes to planning and providing services, the Company guarantees:

- respecting the applicable law during the process of planning and providing the services, in particular the customers provision in terms of human rights and employment rights, consumer rights and fair competition rules and others,
- that within the tender procedure, the company will not engage in unlawful practices, in particular in terms of price fixing,
- that the services will be always provided in compliance with the best business practices and available knowledge, regardless the type and characteristics of the Customer, their business activity and the project's type, complexity and value. All the Customers will be treated equally by the company: they will be provided with the highest quality of services at the level agreed upon with the Customer,
- that the analyses of non-compliance will be directed to the analysis of the situation, not to searching for someone to blame for its occurrence,
- within the analyses and decisions, application of principle of searching for and implementation of systemic solutions instead of personal ones as an effective tool for remedying the non-compliance,
- determination of compensation for the affected Customers that are corresponding to losses incurred by them with consideration of the positive image in the eyes of the Customer, the image of a reliable and trustworthy partner.

3.7 Protection of the organisation's interests

Each associate, regardless the work performed, is responsible for the organisation's welfare and protection of its interests. Their responsibilities are in particular:

- protection of the organisation's confidential information - confidential information must not be disclosed to persons outside the organisation, other employees who do not have access to it due to the work performed, confidential information are not to be used for personal purposes, e.g., in own business activity or the one of close relatives or the family; equipment, systems and information are to be used in line with the internal procedures and applicable law. We care for entering information into the systems and transferring only accurate data,
- caring for the company's welfare - the welfare of the organisation is a common interest of the employees; we use the working tools properly and we rationally manage the company's resources, the Company's good name and positive image are the value for which we are all responsible,
- avoiding competitive activities - without prior explicit consent of the Company the employees may not conduct any competitive activity,
- shunning activities leading to a conflict of interests, a conflict between the Company's interest and the one of the employees or a person related to them, avoidance of potential conflict of interests enables us to avoid situations where we could be accused of lack of objectivity or taking unfair advantage of the position in order to achieve a gain for oneself or others. Possible social contacts of the employee with the Customer's employees or those of a competitive entity should not affect the cooperation terms and conditions or the work performed. We do not knowingly create a situation of conflict of interests. Such a fact cannot be concealed. Occurrence of such a situation should be reported to the supervisor,
- in compliance with the company's policy, its employees may give and accept appropriate, provided for by the law, business gifts related to the work performed for the commercial customer or other entities, provided that their value is specified and the fact of their giving or accepting is transparent and is not connected with the intention to affect business decisions to be made by the receiving party,
- not to pay or offer to pay any bribe or other forms of corruption to a public officer or other entities in order to receive a business benefit. The company's policy does not allow corrupt practices in any form, including bribery,
- not to give or accept business gifts (in cases permitted under the law) if that means violation of provisions hereof or the company's policy,
- our decisions in terms of procurements have to be based only on quality assessment, efficiency and price. Therefore, relations with suppliers should be kept at an objective level and they have to be free from any influencing by gifts and benefits,

- recognition of key values by the company - integrity, faithful upholding the principles and respect for people have to determine every aspect of our actions and they are the basis for the Principles of Ethical Conduct Policy. Those principles apply to all undertaken transactions - large and small ones - and they determine the conduct that is expected from each employee representing the company's interests,
- deceits prevention - all data regarding the company's operation and reports drawn up by the employees must be true and be reflected in relevant Company's documents. All the costs generated by the employees must be true and well-documented and justified from the company's interests' perspective.

3.8 Quality of services provided

All activities are carried out in compliance with the devised and implemented procedures, binding agreements concluded with the Customer and other Company's regulations. Thus, we maintain the highest standards of operation compliant with the Customers' expectations, what makes our services credible and prestigious.

3.9 Competition law

The company operates in line with all provisions of the applicable competition law, with consideration of the applicability of law under jurisdiction of countries whose economy might be harmed due to restrictive effects on competition within the applicable regulations and laws.

The company will not conclude or perform agreements in terms of competition restrictive practices between competing parties.

3.10 Environmental protection

Employees, associates and other interested parties are obliged to observe the laws and principles on the environmental protection. They are obliged to minimise the negative impact on the environment and to eliminate environmentally harmful activities.

The company puts every effort to conclude agreements only with subcontractors or suppliers who abide by the international environmental rights.

3.11 Respect for health and occupational health and safety

Employees, associates and other interested parties are obliged to observe occupational health and safety principles. The company stands for strict observance of the OHS recommendations, taking care for own health and the health of others.

4. Whistleblowing policy

The organisation has defined methods of lodging anonymous personnel complaints and their reviewing as it is aware that the employees should have an opportunity to report their issues and complaints in case they suspect a prohibited practice has occurred.

It is the management staff's duty to provide the employee with relevant confidential and safe tools for expressing their issues, doubts or concerns, also for giving information on possible situations of failure to comply with the Ethical Principles. On the other hand, it is the Employees' duty to impart information on situations non-compliant with the Business Ethics Principles.

One should immediately disclose any action or transaction purporting to violate the Company's Code of Ethics. Nobody will be held responsible for acting in good faith and reporting a suspected violation.

We invite to report (also anonymously) any situation of violation of the code of conduct included herein by: sending a written description of the situation to the registered office of the Company, via e-mail to the e-mail address of the office; or via phone by calling to the Company's publicly available phone number.

A person having access to the e-mail box and the phone number will regularly check the mail, e-mail and will pick up the phone. This person will also take note of all reports and will immediately give them to an appropriate person for assessment.

The ultimate responsibility of guaranteeing that the Company operates in line with provisions, regulations and ethical standards influencing our business activity lies with all of us.

Those laws, regulations, standards and the Company's policy (and the guidelines thereto) should be read and strictly observed.