



# CODE OF ETHICS

of the JSW Group

December 2019



# TABLE OF CONTENTS

1.	Declaration of the JSW S.A. Management Board	2
2.	To whom is the Code of Ethics addressed and what does it contain?	4
3.	Values by which the JSW Group is guided	6
4.	Standards of the activity conducted by the JSW Group	14
5.	What contractual clause following from the Code of Ethics do we apply?	30
6.	How to recognize unethical behavior or abuse?	32
7.	Where to look for support in the case of ethical dilemmas?	34
8.	Reporting irregularities, abuses and conflicts	36
9.	Selected situations	38

# 1

## DECLARATION OF THE JSW S.A. MANAGEMENT BOARD

The position of Jastrzębska Spółka Węglowa S.A. (JSW) and the entire JSW Group entails a huge ethical commitment, including, in particular an obligation to develop appropriate responsible and ethical models of behavior.

As the JSW Group, we want to join the world leaders in corporate social responsibility, observance of human rights, environmental protection and prevention of corruption and abuse both within the JSW Group and around it.

The responsibility for attainment of this objective rests on all of us, working for the JSW Group, regardless of our position or period of service.

We impose high requirements on ourselves and we expect that both our employees and customers,

suppliers, subcontractors and third parties with which we cooperate will undertake this effort together with us through recognizing the principles and complying with the standards laid down in this Code.

This document reflects the ethical values that the JSW Group follows and complies with, and sets the standards of conduct in the JSW Group with regard to employees, collaborators, managers as well as customers, partners and local communities, both in business and business-related relations.

We want to conduct our activity in the “Fair Play” spirit and we expect that this Code will inspire you to actively join the execution of the common objective – building an ethical and lawful business environment, free of abuse and corruption.



# 2

## TO WHOM IS THE CODE OF ETHICS ADDRESSED AND WHAT DOES IT CONTAIN?

The Code of Ethics is addressed to all employees and persons cooperating with the JSW Group, regardless of the form, duration or subject matter of the cooperation. The values and standards contained therein may be also relied upon by third parties, not cooperating with the JSW Group. This pertains in particular to situations in which the activity of the JSW Group or its representatives would raise ethical or legal concerns.

The Code of Ethics aims to name the most important principles and standards of behavior which the JSW Group accepts and approves and present information on how to act in circumstances in which a decision or situation may give rise to ethical dilemmas.

The document contains the most important elements of ethical, antidiscrimination and anticorruption policies of the JSW Group. It also defines procedures of reporting violations and irregularities, non-compliance with legal obligations, threats to occupational health and safety, health of customers and bystanders, environmental safety, unfair competition practices and attempts to conceal any of the above.

The Code of Ethics lays down the key values and standards respected and applied in the JSW Group.

This act is JSW Group's constitution in the area of ethics and compliance. The Code of Ethics is one of the elements of an extensive system of internal regulations making up the JSW Group Compliance System. The specific values pursued by the JSW Group have been additionally defined in the Compliance Policy, Anticorruption Policy, Conflict of Interest Management Policy, Charity and Promotion Policy, Relatives Employment Policy, Gift Acceptance and Offering Policy and Business Partner Verification Policy.

We realize that it is not possible to anticipate all situations in which ethical problems or suspicions of irregularity may appear. This Code has been devised to provide you with information on how to resolve such doubts and where to look for assistance and guidance.

Should you have any doubts, the first contact person is your manager. Also the Compliance Unit and the Compliance Coordinators in individual JSW S.A plants and JSW Group Companies are at your disposal.

It is also possible to obtain advice from the HR, CSR or OHS expert or the legal advisor, depending on their availability in the given Company.

# 3

## VALUES BY WHICH THE JSW GROUP IS GUIDED

### 3.1. RESPECT FOR OTHER HUMAN BEINGS

Regardless of the position, all employees, collaborators and partners have the right to respect of personal dignity and protection and privacy of their personal and family life.

### 3.2. DIVERSITY AND TOLERANCE

We believe that people are the foundation of running a modern and stable company. Together we create our workplace. We respect and comply with international standards concerning human rights and international work standards, treating them as fundamental and universal. We guarantee freedom of expression, conscience and religion and freedom of belief and speech. The JSW Group is a place free of any practices tarnishing the dignity of other human beings.

Discrimination, assessment or ridiculing of other persons, in particular due to their gender, race, disability, nationality, ethnic origin, sexual orientation, age, religion, political and world-view convictions, economic position and social status, cultural otherness, relationship or political membership or marital status are not acceptable in the JSW Group. Any forms of discrimination, intimidation, mobbing or sexual harassment of co-workers are not acceptable and will be unambiguously branded and combated.



### 3.3. OCCUPATIONAL HEALTH AND SAFETY

Safety has been JSW Group's priority for many years. We prevent dangerous situations through introduction and application of internal regulations and external generally applicable provisions of law. We conduct extensive monitoring of hazards and apply prevention adequate to the hazards in order to make work safe. At the same time, we require our co-workers as well as subcontractors and companies cooperating with the JSW Group to comply with the prevailing principles. Human safety is a priority in the JSW Group.

Each employee is obligated to comply with the OHS principles defined by law and internal regulations prevailing in individual JSW Group Companies and inform managers of identified threats to occupational health and safety and detected irregularities in this respect, including subcontractors and suppliers of the JSW Group.

### 3.4. CUSTOMER RELATIONS

The key principles of the JSW Group in relations with customers include transparency, respect and openness. We provide our customers with top quality products and services, being the outcome of the work of people with unique competences, skills and experience. We cooperate with leading research and academic institutions, both in Poland and abroad. We make all efforts to ensure that our products and services satisfy the highest standards and expectations of our customers.

### 3.5. ENVIRONMENTAL AWARENESS

We draw from the natural resources which are our joint heritage, remembering that our negative impact on the natural environment should be as low as possible. We promote environmental lifestyle among our employees and business partners, by conducting pro-ecology educational campaigns. We care for the environment – this is one of the most important corporate social responsibility criteria of the JSW Group.



### 3.6. EFFICIENT MANAGEMENT

We want to efficiently manage all of JSW Group's operations, to best satisfy the expectations of our stakeholders. The management methods we have introduced contribute to building trust between the JSW Group Companies and their customers and suppliers. The principles we apply also strengthen our image in the eyes of all entities interested in the effects of our activity in the area of quality of our products and services, environmental impact, ensuring occupational health and safety and guaranteeing security of information and personal data protection.

### 3.7. CORPORATE GOVERNANCE

The JSW Group complies with the Code of Best Practice for WSE Listed Companies and the Standards recommended for compliance management systems as regards preventing corruption and protection of whistleblowers in WSE listed companies. The above principles are subject to annual reports on observance of corporate governance and compliance principles.



### 3.8. RELATIONS BASED ON TRANSPARENT PRINCIPLES

Our priority is to build relations based on the principle of fair competition. Our decisions are based on the business case. We actively prevent corruption, abuse and practices contrary to the principles of transparency and fair competition in selecting employees, collaborators and business partners.

### 3.9. CONTACTS WITH THE PUBLIC SECTOR

We attach particular importance to good relations with local governments in the areas where we conduct our operations.



# 4

## STANDARDS OF THE ACTIVITY CONDUCTED BY THE JSW GROUP

### 4.1. AVOIDING UNETHICAL ACTIONS

Employees should be guided by honesty and avoid actions which would put them or the JSW Group in unfavorable light. In particular, this means acting in compliance with the rules of social coexistence, good practices and unconditional respecting of the prevailing law and internal regulations.

### 4.2. IMPARTIALITY

The JSW Group guarantees impartiality, independence and reliability in the process of delivery of its products and services. As part of our activity, we promote impartial and organized management and we do not allow commercial, financial or other pressures threaten the impartiality.

### 4.3. COMPETENCIES AND RELIABILITY

JSW Group employees are aware of the importance of the work they perform and the duties they have been entrusted with. Assigned tasks are performed reliably and conscientiously, using the competences, knowledge, skills and gathered experience. The assigned responsibility and powers obligate the employees to act with diligence, precision, honesty and reliability. Each employee is obligated to impartially execute their duties, observe confidentiality and act in accordance with the rules of this Code. If the situation so requires, JSW Group employees submit a declaration on impartial and reliable performance of their work as regards the services provided by the JSW Group Company.

## 4.4. COMPETITIVE ACTIVITY OR ACTIVITY CONTRARY TO JSW GROUP'S INTERESTS

Employees should refrain from taking, by themselves or in cooperation with third parties, any actions which would be competitive or harmful to the JSW Group.

Employees shall not purport to act on behalf of the JSW Group or its individual Companies for attainment of goals that are not the goals of such Companies. They shall not claim to have influences in the JSW Group for personal gain.

Employees shall unconditionally avoid presenting opinions being their personal convictions as the position of the JSW Group, including, for example public involvement in political disputes from the position of a representative of the JSW Group Company and voicing opinions that may have the features of libel.

## 4.5. FAIR COMPETITION

As the JSW Group, we are aware that we have to compete to win business in compliance with the rules of fair competition. We create our image in a fair, reliable and conscientious way. We make sure the information on our image, employees and provided products and services is true and unambiguous.

## 4.6. PROTECTION OF JSW GROUP'S AND ITS BUSINESS PARTNERS' INFORMATION

Employees are obligated to unconditionally protect confidential information, constituting the company secret, and other confidential information of persons cooperating with individual JSW Group Companies. All attempts of unlawful acquisition of such information by third parties, or situations in which there is a suspicion of information leakage should be reported by employees to their managers, Data Protection Officer in individual JSW Group Companies or other person in accordance with the established whistleblowing channels.

## 4.7. CONFIDENTIALITY

To secure sensitive information, employees and other persons who, in connection with the performed work or in connection with concluded agreements, obtain or may obtain confidential information, are obligated to keep secret any and all confidential information used in joint ventures and projects. This applies also to keeping secret any and all results of the actions taken.

Among the data requiring confidentiality one should also list: personal data of the employees, data on the business activity conducted by the JSW Group, financial data of the JSW Group, areas of operation of the JSW Group, information obtained from customers, collaborators, suppliers and business partners, as well as information generated during conduct of activity belonging to customers collaborators, suppliers and business partners.

The aforementioned information may not be disclosed. Court orders or pending criminal or tax proceedings are exceptions to the above rule. In such a case the JSW Group applies all measures to keep such information confidential.

Information obtained from our customers, collaborators, suppliers and business partners may be disclosed upon obtaining their prior consent.





## 4.8. COMMUNICATION WITH THE MEDIA

Communication with the media is the responsibility of the Management Boards of JSW Group Companies or their spokespersons. An employee may not undertake such contacts on their own, without consultation with the aforementioned persons. If the media make a contact attempt, the employee should immediately contact the Spokesperson (in the case of JSW Group Companies - management board members or persons authorized for contacts with the mass media).

## 4.9. CONFLICT OF INTEREST

All employees are obligated to avoid situations in which their personal interests or the interests of their relatives would be in conflict with the interest of the JSW Group Company or potentially could give third parties the basis to suggest that such conflict exists. If there is a risk of such situation the employee shall immediately notify their direct manager about the potential conflict.

Each employee has the right to expect unambiguous resolution of their doubts regarding the potential conflict of interest and thus being freed of the risk of potential allegations of unethical behavior.

## 4.10. RELATIONS WITH RELATED PARTIES AND EXTERNAL PARTNERS

The most important principles in relations with customers and suppliers are honesty and transparency. We comply with all prevailing regulations pertaining to acceptance of financial gains and prevention of corruption. We exercise due diligence to make sure our business partners also comply with them, therefore in our contracts with the business partners we use, among others, the clause specified in item 5 of the Code.

## 4.11. TRANSPARENCY OF ACTIONS AND PROPAGATION OF ETHICAL PRINCIPLES

All employees, especially persons on managerial positions, are obligated to:

- accurately inform the managers and the Management Board of the JSW Group Company about the actual deliverables and the existing risks, including social and environmental risks,
- propagate the application of ethical principles described in this Code in the reporting teams, in particular care for compliance with fundamental rights of the employees and communities which JSW Group Companies may affect,
- share with the manager all information in their possession which may attest to unethical behavior of JSW Group employees and persons cooperating with the JSW Group,
- act transparently, making it possible to determine the motives behind the decision made.

## 4.12. SUPPLIER RELATIONS

Employees who are responsible for contacts with suppliers are obligated to:

- select suppliers based on objective criteria for assessment of their offers and service quality, and make sure that all offers are compared and considered in a fair and unbiased manner and that the entire procedure is accordingly recorded and transparently documented,
- make sure that the selection of the offer is made in an atmosphere of openness and bidders who have not been selected for cooperation receive honest, reliable and tactful reply,
- provide suppliers with opinions about their work, formulated on the basis of objective, transparent and consistently applied indicators,
- prefer cooperation with suppliers who reliably fulfill their obligations, act ethically, comply with environmental protection, OHS and human rights regulations, and avoid cooperation with suppliers who do not respect these principles,
- disclose any and all information in their possession that could have an impact on the cooperation of the JSW Group Company with the supplier, also with respect to the supplier's possible unethical behavior.



## 4.13. CUSTOMER RELATIONS

Employees who participate in the JSW Group product and service sales process shall:

- select business partners based on objective criteria,
- not apply unethical actions to win business or discredit competitors,
- not disclose to third parties any information obtained from a business partner during negotiations, keep trade secrecy and company secrecy,
- deal with all buyers, both strategic and minor ones, in an equally professional manner,
- exercise due diligence to make sure that commercial arrangements are executed,
- develop and deepen their knowledge about JSW Group's products and services, in order to present them in a professional manner to buyers,
- prefer cooperation with business partners who reliably fulfill their obligations, act ethically, comply with environmental protection, OHS and human rights regulations, and avoid cooperation with suppliers who do not respect these principles,
- disclose to their managers any and all information in their possession that could have an impact on the cooperation of the JSW Group Company with the customer, also with respect to their possible unethical behavior.



## 4.14. CORRUPTIVE ACTIONS

The JSW Group rejects all forms of corruption and unfair influence. One should refrain from offering or accepting gifts or other additional benefits, favors and acts of hospitality, except for gifts of token value, where a refusal could be taken as an insult or violation of common cultural norms. One should never offer or accept gifts in the form of cash or cash equivalents, regardless of the amount. One should also avoid any behavior that could be interpreted as expecting or demanding bribes or other benefits.

It is prohibited to promise or give any benefits to public functionaries, in particular to award a public functionary for making any decision.

## 4.15. CHILD LABOR AND FORCED WORK

Child labor, slave labor or any other form of forced labor (i.e. any form of forcing anyone to work) by the JSW Group and third parties working for it or for individual JSW Group Companies is unacceptable under any circumstances.

## 4.16. LOCAL COMMUNITIES AND NATURAL ENVIRONMENT

We attach particular importance to good relations with local governments of the municipalities and cities where we conduct our operations.

We support social and economic development in the areas where we conduct our operations. We care for good relations and maintain dialogue with the local communities on the basis of transparency and respect. We do this on the basis of the JSW Group's Sustainable Development Strategy prevailing in the JSW Group.

JSW Group Company employees are obligated to care for good relations and dialogue with the local communities on the basis of transparency and respect for their dignity and rights, including heritage and tradition.

All employees are obligated to act in a manner minimizing the negative impact on the natural environment and local communities and respect all materials, resources and energy.

Employees are obligated to inform their managers about potential threats to the natural environment and breaches of the aforementioned principles by other employees or subcontractors' employees.





# 5

## WHAT CONTRACTUAL CLAUSE FOLLOWING FROM THE CODE OF ETHICS DO WE APPLY?

Our main assumption is to optimize the operation of the JSW Group, therefore in our activity we strive to unify the business standards, which is equivalent to application of adequate templates. We want to use harmonized agreements as we develop and grow our organization. This is possible with the use of a uniform contractual clause with the following wording:

*"The Contractor / Supplier / Buyer represents that it has become familiar with the "JSW Code of Ethics" prevailing in the JSW Group available at [www.jsw.pl/odpowiedzialny-biznes/kodeks-etyki-grupy-jsw/](http://www.jsw.pl/odpowiedzialny-biznes/kodeks-etyki-grupy-jsw/) and undertakes, in connection with performance of this agreement, to comply with the principles laid down in the aforementioned Code and procure that its subcontractors and any and all other persons it uses to perform the agreement*

*as well as persons to whom it entrusts the performance of the agreement (in full or in part) comply with these standards. The Contractor / Supplier / Buyer undertakes to prevent and not to take any actions which could cause a breach of these principles by its employees. The Contractor / Supplier / Buyer undertakes to procure the compliance of its actions with the principles above and in response to the other party's request it shall promptly notify the company of the procedures employed in this respect. The Contractor / Supplier / Buyer shall be liable for the actions or omissions of its subcontractors, persons the Contractor / Supplier / Buyer uses to perform the Agreement as well as persons to whom it entrusts the performance of the Agreement (in full or in part) as for its own actions or omissions."*



# 6

## HOW TO RECOGNIZE UNETHICAL BEHAVIOR OR ABUSE?

Success in the attainment of the common objective, i.e. building an ethical work environment, free of abuse and corruption, depends on the commitment of each of us. For nearly each of us comes across situations which may cause doubts.

When assessing the given situation by yourself, try to answer the following questions:

1. Am I or is anyone around me not treated equally with other co-workers?
2. Do I or does anyone around me not feel comfortable because of the actions of other people?
3. Do I or does anyone around me act not in compliance with generally accepted moral norms?
4. Does my manager assign to me or anyone around me tasks that breach work discipline?
5. Have I ever witnessed or participated in situations that had the features of corruption or abuse?
6. Are my actions or the actions of my co-workers illegal, unfair or dishonest?
7. How would this problem look if it was publicized in the media?
8. How will I feel if my family and friends find out about these actions?

# 7

## WHERE TO LOOK FOR SUPPORT IN THE CASE OF ETHICAL DILEMMAS?

Ethical issues are a very important topic for us, because the Code of Ethics we have devised is an expression of the values illustrating the standards that the JSW Group is guided by. The collection of principles presents the norms and rules guiding the JSW Group and the entities it has relations with. During performance of daily duties and business processes there may be numerous moral dilemmas, therefore, as the JSW Group, we are not passive about them. As a consequence, we propagate and popularize the consultation culture within our organization. To implement the ethical assumptions, we propagate the stance that all disputable issues appearing during the decision-making in different situations should be resolved with the use of competent units. General

problems associated with the performed work (not necessarily irregularity, abuse or conflict) may be consulted at the level of established internal relations. Considering that the range of disputable issues and moral dilemma may turn out extensive, we present exemplary methods for obtaining help and support:

1. Contact with the Compliance Unit located at the JSW level,
2. Contact with the relevant Compliance Coordinator acting at the JSW Group or JSW Plant level,
3. Contact with the relevant Legal Department,
4. Contact with the relevant Department Director.

# 8

## REPORTING IRREGULARITIES, ABUSES AND CONFLICTS

UNIVERSAL EMAIL ADDRESS  
FOR SUBMITTING REPORTS:  
COMPLIANCE@JSW.PL

Everyone has the right to report irregularities, abuses or conflicts, understood as a breach of the rules and standards described in this Code. This pertains to both employees and regular collaborators of the JSW Group and external entities - business partners and others.

Reporting irregularities or potential irregularities is an obligation of all persons and entities working for the JSW Group or remaining in permanent relations with it. Failure to perform this obligation may constitute the basis for liability.

A report may be filed using the JSW Group whistleblowing procedure, available on the JSW Group Company websites. Each correct report, including an anonymous one, shall be reviewed. However, clarification

of an issue reported anonymously may be more difficult or even impossible due to the impossibility of obtaining additional information.

A report should be submitted to the Compliance Unit, Compliance Coordinator in individual JSW S.A. plants and in individual JSW Group Companies or your manager. The reporting person has the right to select the most convenient form and person whom they trust.

A person submitting a report in good faith is subject to protection. If the report is submitted in good faith then, even if it turns out untrue, there may be no grounds for holding the reporting person accountable or drawing consequences with regard to such person.

# 9

## SELECTED SITUATIONS

**M**y brother is the owner of a company that wants to take part in a tender announced by a JSW Group Company. Should I admit that I am a family member of a future contractor, if he is selected?

Yes. You are obligated to notify each possible or existing conflict of interest, even if you do not have influence on the outcome of the tender.

**T**he Company's regular customer brings me gifts during the Christmas season (e.g. good coffee, box of chocolates, wine). Can I accept such gifts?

The JSW Group has in place a separate regulation defining the rules of conduct in this regard, entitled JSW Group Gift Acceptance and Offering Policy. Generally, you should refrain from offering or accepting gifts, regardless of their value, intended use or reason for offering or accepting. First of all, you should not accept gifts or invitations in a situation

where the intentions of the person offering the gift are unclear, or if there are pending procedures in which the person takes part.

**A** repair shop servicing our car fleet offered me a free service for my private car. The owner of the repair shop knows that I have influence on resolution of tenders in our company, but the next tender will be announced in many months' time. Can I take accept the offer of free repairs in this garage?

No. It does not matter that the next tender has not been announced yet. As a person that has influence on the outcome of the tenders, you cannot accept any gains which could obligate you to reciprocate or affect the criterion of impartiality in the making of future decisions. In the situation you described there is a potential conflict of interest.



**I have a lot of tasks to do. The weekend is approaching and I thought I would take the work home. Can I save the documents on my memory stick and work on them at home on my private computer?**

No. All materials and information you have while performing your official duties are the property of the JSW Group. Non-open documents cannot be under any circumstances “taken out” of the workplace. In other cases it’s best to ask your manager.

**A person who introduced herself as an employee of the Prime Minister’s Office called me and asked for some confidential Company data. I know that I’m not allowed to disclose such information, but I think I have the right to disclose them to such an important person?**

In a phone call we cannot verify who is calling. It is irrelevant whether it is an employee of the Prime Minister’s Office or not. If you are not sure whether answering the question you will disclose an official secret, ask the caller to e-mail the question to your manager or ask the question in writing.

**An industry association asked me to deliver a lecture at a conference it organizes. Can I take part in this undertaking**

Yes, if you obtain your manager’s consent and agree on the scope of the presented information

**I’m running a recruitment process for a responsible office position. One of the best candidates admits that she is married. Can I ask her about the number of children and/or family plans (e.g. pregnancy)?**

No. The family situation and the plans of the recruited persons are their private matter, we are not allowed to ask about them and they cannot influence the outcome of the recruitment. As a person deciding about the hiring of the candidate you should use only be guided by an objective assessment of their qualifications and fitness for the position. Information about the number of children can be asked only of a person who is already employed, when this is related to access to entitlements, e.g. insurance, health care etc.

**The Company has just announced recruitment for a new position in my organizational unit. My daughter has great qualifications for this job. Can we work together? I could do with a trusted reporting employee.**

The circumstances where you would have influence on the outcome of the recruitment process in which

a member of your family is involved and the “manager - reporting employee” relation with a closest family member is not possible.

**I instructed an employee to do an urgent task overtime, because I believe he will do it best. The employee objected, saying that somebody else can do it and I chose him because I don’t like him. He threatened to accuse me of discrimination and mobbing. Should I be concerned about his accusation?**

Instructing an employee to work overtime in principle does not amount to discrimination or mobbing. Discrimination could take place only in a situation where selecting an employee to perform a task you apply discriminatory criteria (rather than the employee’s substantive competences). However, in this case none of such things happened. The employee is obligated to perform a work instruction overtime if there are specific circumstances defined by the Labor Code, e.g. the employer’s special needs. Refusal to perform a task assigned by the manager may be the basis for application of disciplinary measures against the employee.

**My colleague often tells rude jokes, he/she calls me “honey” and pays me bold “compliments” and sometimes even sends erotic videos. Can his/her behavior be deemed harassment, even if there is no physical contact?**

If you feel hurt, humiliated or disgusted by your colleague's behavior, such behavior may amount to sexual harassment. You should report such a situation as soon as possible in accordance with the whistleblowing line described in the Code of Ethics.

**My colleague every day wears jewelry with a religious symbol. According to the Code of Ethics, does such practice amount to ostentatious manifestation of views and should I attract their attention to it?**

No. Use of small symbols (jewelry, pendant, small sticker on the car etc.) is generally acceptable in our culture and is not deemed to amount to imposing your views on others. Ostentatious presentation of one's world-views may include e.g. propagation of a religion or ideology in the workplace, wearing T-shirts with controversial images or texts, decoration of a room with a poster expressing someone's views or

parking in the company car park a car conspicuously marked with ideological (e.g. religious, political, antiglobalist etc.) symbols.

**I noticed that my colleague not always complies with OHS rules. He/She claims it's his/her own business because everybody is responsible for themselves. Should I attract his/her attention to it or report the matter to the manager?**

Definitely. We work in a team and we have to take care of our safety and for the safety of our co-workers. Breaking OHS rules by one person may cause a threat not only to him/her but also to the rest of the team. One should also remember that the costs associated with incompliance with OHS rules are charged to all of us.

**My colleague who has a personal profile on a social portal linked to the Company's brand publishes controversial photographs and very often uses vulgar language in the posts and comments. How should I react if I know that this has negative impact on the image of our company?**

You should report the situation in accordance with the established whistleblowing procedure. The obligation to behavior properly outside the workplace in situations where it may have impact on the image of the company applies to all circumstances that may influence the image of the JSW Group, also those associated with activity of the employees online.

**The Company announced a tender for services provided by my friend. Can I tell him/her about the tender and encourage him/her to take part?**

You may encourage your friend only when you don't disclose any non-open information about the tender and thus don't influence its outcome. Informing about a tender and referring your friend to become familiar with the content publishes on the website is by all means ethical.

**I just got a job in the JSW Group. Am I obligated to disclose to my manager information which was subject to official secrecy in my previous job? I think I owe loyalty to my current employer.**

Do not answer any questions of your co-workers which would require disclosing information constituting the property of your previous employer. Don't disclose such information at your own initiative, either. Our Company respects the rules of fair competition and respects data confidentiality.





**Jastrzębska Spółka Węglowa S.A.**

Aleja Jana Pawła II 4  
44-330 Jastrzębie-Zdrój

**Contact:**  
**[compliance@jsw.pl](mailto:compliance@jsw.pl)**

