



Professionalism and ethics

The Capital Group of Grupa Kęty S.A. runs business in accordance with the highest ethical standards, following a developed system of values based on **professionalism, ethics and mutual respect**.

The ethical processes at our organisation have been constantly developed. The changing business culture, increased standards with regard to respecting human rights or corruption prevention obliged the Capital Group of Grupa Kęty S.A. to apply even higher diligence with regard to building professional and ethical business.

The ethical issues fall within the competence of the CSR area. The Business Ethics Ombudsman and the CSR Director submit to the Steering Committee for Sustainable Development and Corporate Social Responsibility their proposals of actions for the popularisation of the [Code of Ethics](#) and corporate culture, based on ethics and respect for the generally assumed values, as well as initiate and participate in the process of creating training schemes in the areas related to ethics and the organisational culture of the Capital Group of Grupa Kęty S.A.



The ethical processes monitoring structure remained virtually unchanged as compared to 2019. In 2019, on the level of business segments there were operating Business Ethics Committees (appointed by Grupa Kęty S.A., Aluprof S.A., Alupol Packaging S.A.), whereas on the Capital Group level the issues were handled by the Business Ethics Ombudsman, making it the total of 16 people engaged.

The work of the Business Ethics Ombudsman at the Grupa Kęty S.A. Capital Group as well as participation in the work of the Business Ethics Committees are functions performed free of charge for the sake of the employees.

In 2020, the Company revised the Code of Ethics document, i.e. the Principles of Business Ethics and Conduct at the Capital Group of Grupa Kęty S.A., which along with the detailed policies including Anti-bribery Policy, Conflict of Interest Prevention Policy, Dignity at Work Policy, and Diversity Policy, is a superior document of the Company regulating the ethical issues and, at the same time, a collection of values and moral standards followed by our organisation and our employees.

In effect, the Business Ethics Committee By-law was updated, as well as the Code of Ethics provisions with regard to contractors verification.



Continuing the ongoing process of ethical education, on the International Anti-Corruption Day (9 December), the Company prepared an original training scheme in legal liability and documents binding at the organisation. The training was directed to the managerial staff and other participants of corruption-sensitive processes. In 2020, **29 employees** took part in the training. Owing to the time of launching (December 2020), the final number of people trained in that regard will be disclosed in the report for 2021.

In the new Strategy for the years 2021–2025, prepared and announced in 2020, we had put great emphasis on the environmental and climate-change prevention aspects.

'We assume full responsibility for the influence of our actions on the environment. We abide by the ecological limitations imposed by legal regulations. We concentrate on searching for solutions, which eliminate the negative impact at its source. We invest in research and development as well as searching for environmentally-friendly technologies', this is one of the clauses of our Code of Ethics. In the [Environmental policy](#) Section, we present our commitments and actions taken for the protection of the natural environment.

In the new Strategy, we had also put emphasis on a broader impact of the Grupa Kęty S.A. Capital Group with regard to responsibility within the supply chain. The organisation has commenced work on the document entitled the 'Code of Conduct for the Suppliers of the Grupa Kęty S.A. Capital Group'. The code specifies the major requirements for the suppliers of the Capital Group of Grupa Kęty S.A. with regard to running ethical and fair activities, ensuring safe and hygienic working conditions, respecting human rights, assuming liability for the quality of products and for the natural environment.

The provisions of the Code of Ethics binding at the Capital Group comprise a method for reporting official breaches and a possibility to share any doubts regarding behaviour – messages may be submitted through a number of channels: directly to the Business Ethics Ombudsman, in the form of a letter, or e-mail sent to a special e-mail address – all these channels are listed in the Code of Ethics. The Company does not operate any separate helplines or hotlines, but there is an electronic channel enabling direct contact between the employees and the appointed Member of the Management Board.

In 2020 the Business Ethics Ombudsman received no reports on the Code of Ethics violations with regard to human rights infringement.



The Code of Ethics clearly defines and governs the organisation's approach to the participation in public life, namely: 'We maintain transparent relations with local government officials and representatives of the political stage, free from corruption and improper pressures'. **In 2020, the Company did not make any donations to political parties.**