

DOM DEVELOPMENT S.A.

CODE OF ETHICS



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1 PURPOSE



The Code of Ethics (the Code) is a set of guidelines, values and principles of ethical conduct in the daily performance of tasks and objectives of Dom Development S.A.. o.o. (hereinafter: **Dom Development** or the **Company**), which is addressed to all employees, associates and entities operating on behalf of each of the companies constituting the Dom Development S.A. Capital Group (hereinafter: the "**Capital Group**").



The Code also contains universal guidelines for ethical behaviour in internal and external contacts and in the case of incidents that are difficult to evaluate from an ethical perspective. The document also identifies persons who can be notified of an unethical or ethically questionable incident, as well as from whom information regarding ethics at Dom Development may be obtained.



2 OUR COMMON VALUES



Our daily activities and the pursuit of common goals, and thus our Code, are based on the values that guarantee us achieving the highest possible transparency and ethics in whatever we do.

Our common values include first and foremost:

- **HUMAN RIGHTS AND CHILDREN'S RIGHTS**

In performing our activities, we promote and respect the applicable provisions on the protection of human rights and children's rights as basic and universally applicable guidelines. We reject all forms of modern slavery, violation of human rights and labour rights. We commit to adhere to the international standards of humanitarian law, humanitarian principles in crisis or conflict situations, ensuring the safety of civilians and respecting international human rights standards.

- **INTEGRITY**

We comply with ethical and moral principles, applicable national and international laws and internal regulations and procedures, and in our work we are guided by professional ethics.

- **RESPECT AND EQUAL TREATMENT**

We treat all persons who form the Company, from its employees and customers through contractors and business partners, to stakeholders and shareholders, on an equal footing. We respect and appreciate the diversity of views, origin, race, gender, age, culture, marital status, faith, membership in social and professional organizations, beliefs of others and the right to their privacy, and treat everyone individually.

- **RESPONSIBILITY AND PROFESSIONALISM**

By fulfilling the common objectives and tasks of the Company, we meet the promise of timeliness, reliability and quality of offered apartments and service premises, we respond to the needs of customers and other stakeholders according to our best knowledge, and constantly improve our qualifications. In our everyday tasks we follow the principles of preventing and minimising our negative impact on the environment.

- **ANTI-DISCRIMINATION**

We categorically oppose any form and manifestation of discrimination against other persons for any reason.

All employees at Dom Development are treated fairly and respectfully by their superiors, subordinates and associates.

We take responsibility for creating a work environment free from all types of discrimination, persecution, abuse, unwanted sexual advances, and other inappropriate behaviour, including any forms of violence.

We do not tolerate any manifestation of humiliation, insult, sexual harassment or other forms of discrimination against employees based on gender, age, disability, health, race, nationality, ethnic origin, religion, political beliefs, trade union membership, sexual orientation, gender identity, family and social status, lifestyle, position at the Company, or other individual features.

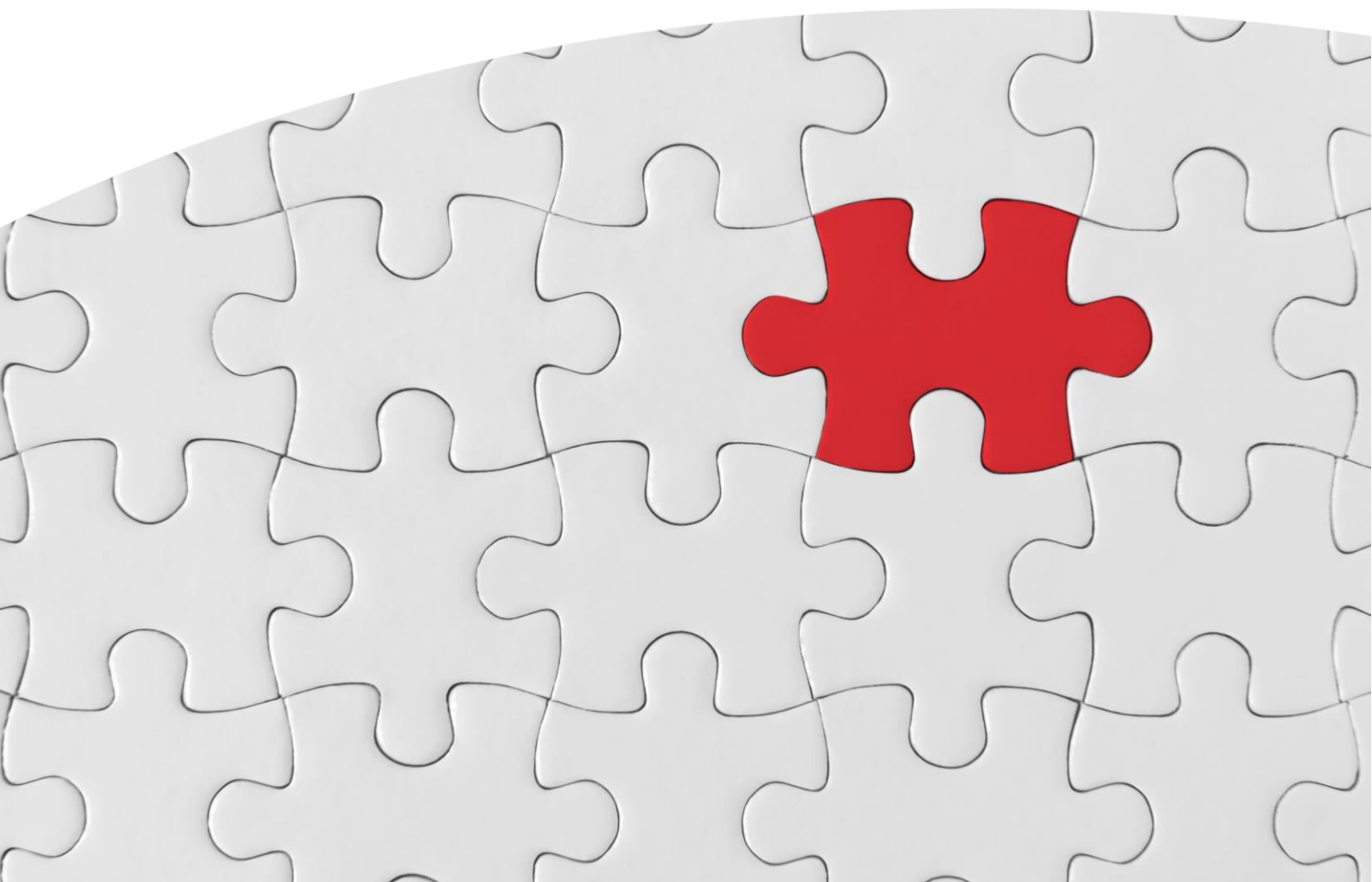
- **TRANSPARENCY AND ANTI-CORRUPTION**

We strongly reject and refuse to tolerate any manifestations of corruption, bribery, extortion and other forms of taking advantage of or offering any additional and illegal benefits on account of the functions and duties performed, and our actions are open and transparent. None of our activities are funded from unclear, illegal sources or territories that apply harmful tax competition.

- **MODERNITY**

We boldly implement new technologies and IT systems on our projects, and we care about the proper development and training of employees, and focus on the future while respecting the past. We are ready and open to act in order to find the best solution.

3 WHISTLEBLOWING



Why should we report situations of concern?

In fulfilling our obligations under this Code, each of us must have a sense of security in being able to identify and report violations that are contrary to our ethical values. Any situation of concern should be reported, because any unreported incident can harm the entire business environment in which we operate on a daily basis.

What is the risk of non-reporting violations?

Lack of appropriate response to an unethical incident or behaviour of even a single person may result in the widespread and adverse effects for all persons involved in the Company's activities. Therefore, when reporting a situation of concern, we should take into account the good of all of us, rather than that of an individual person.

Where can I report violations?

You can report a relevant situation of concern in several ways, including in a completely anonymous manner. **You can read about all the details concerning e-mail, telephone or written notification of violations in the special whistleblowing procedures in place at the Company.** For some violations, the most appropriate person will be a direct supervisor, HR department or person responsible for compliance. E-mail violations can be reported via the following address: etyka@domd.pl

What happens when the person affected learns that I have reported such incident?

It is of equal importance to provide adequate protection to the person who reports a violation. The Company will not tolerate any incidents that would have negative consequences for the person reporting the violation, provided that the person reports the situation of concern to the best of his or her knowledge, without withholding any information and without being guided by any negative emotions or experiences toward the person or persons concerned.

What are the consequences for a person who, despite the ban, undertakes discrediting or retaliatory actions?

Any person who takes any action intended to discredit or retaliate against another person reporting in good faith a situation of concern will be subject to disciplinary action.

The following diagram will help you make any decision or take any action that has given rise to an ethical concern.



All reports will be promptly investigated and appropriate steps will be taken, depending on the assessment of the incident.

4 WE, AND OUR IMMEDIATE ENVIRONMENT



**JESTEŚMY
FAIR**

4.1 WE ARE FAIR

As part of the “We are Fair” programme, we communicate the values followed by the Capital Group in our daily operations. The programme is based on three pillars: responsibility for the products, relations and the local community.

Responsibility for the products is understood as high quality and taking into account the friendly environment of the project, access to infrastructure, material quality, functionality and comfort of the apartments and energy efficiency. The Capital Group’s projects have carefully planned common spaces which facilitate good neighbourly relations.

Responsibility for relations is another of the Capital Group's core values and is expressed through transparent activities and communication, the pursuit of long-term relations with business partners, creating a friendly workplace environment and providing all necessary resources and development opportunities to the Capital Group's employees.

The specifics of property developer activities is inextricably linked to the impact on the shape of the city and the quality of life of its residents. Given the scale of impact of the Capital Group's operations on local communities, we strive to have a positive impact in the locations where we operate. We support local social benefit organisations, work with local suppliers and subcontractors and create generally accessible infrastructure for city residents.

4.2 WORKPLACE, WORKING CONDITIONS, AND HEALTH AT WORK

Each of us co-creates our common workplace, which is Dom Development. It is therefore very important to ensure decent, friendly and safe working conditions for all employees and associates.

By decent and friendly working conditions, we mean the creation of a working environment in which every person, regardless of beliefs, opinions, religion, race, gender, physical or psychophysical conditions and other personality determinants, world views and appearance, feels treated on an equal footing with other persons, has equal opportunities for employment and professional development. We ensure that each person has a modern workplace and performs their duties with a sense of well-being and satisfaction from their work. We promote a responsible approach to the assets owned by the Company and the Capital Group, and support conscious efforts to foster a good atmosphere at work, including the opportunity to constructively express criticism and share knowledge and experience with other team members.

No less important than decent and friendly working conditions is working in a safe and healthy atmosphere that ensures the protection of our health and life while we are doing work, in particular by adhering to relevant safety and health rules. Safety also means adapting your clothing and behaviour to the place where you are currently performing your duties, for example when we work temporarily or permanently outside the Company’s headquarters, in field sales offices or on construction sites of individual projects, and properly using the equipment assigned to us when performing dangerous work. This is why we make sure that our employees are adequately trained and equipped with the means to allow them to perform their work safely.

All of us together and each of us individually must take care of our common work environment by preventing any actions or attitudes that are discriminatory, bullying, violating the principles of health and safety at work or of equal treatment.

We do not tolerate any form of human trafficking, forced or compulsory labour and do not allow any personal freedom restricting practices such as taking away identity documents, passports, work permits as a condition of employment.

We operate in accordance with Article 32 of the Charter of Fundamental Rights of the European Union and do not employ children.

We agree to pay our employees fairly, both in the context of internal and external comparisons with other employees, and to comply with legally guaranteed remuneration and minimum wage standards, if any. We provide equal pay for men and women employees for work of equal value.

We undertake to comply with national working time regulations, including the right to break, time off, leave and to maintain a work-life balance.

We acknowledge that we treat workers equally in human resources processes, taking into account such diversity factors as gender, education, age, and professional experience.

We provide protection against unjustified dismissal, mobbing, discrimination, violence at the workplace, and ensure equal, fair remuneration for men and women for work of equal value.

In accordance with the principles fostered by us, professional and qualification development depends solely on personal performance, individual skills and personal capabilities of individuals.

We are committed to the promotion of diversity and to working with employees and partners representing different cultures, ways of thinking or nationalities in an atmosphere of mutual respect and respect for the individual.

4.3 OUR MUTUAL RELATIONS

In our daily activities, we are guided above all by respect for mutual differences and diversity. We are a responsible and diverse team focused on acting together to achieve goals set by Dom Development based on the principles expressed in this Code.

The foundations for our mutual relations:

- honest and open dialogue,
- mutual respect for individual predispositions and positions taken in a debate,
- we value the work we do and recognise the needs of others,
- we trust each other and keep our promises,
- we are open to each other and share know-how,
- we clearly communicate our expectations,
- we seek consensus,
- each of us contributes to our common good.

4.4 PROFESSIONAL AND PERSONAL DEVELOPMENT

We consider the professional and personal development of each employee to be a very important part of their lives. We are convinced that our employees and associates are the of greatest value to us - after all, all of us are building the Company together.

The professional development of every single employee is fundamental to the success of Dom Development. Systematic learning and regularly acquired and extended knowledge allows us to effectively use the potential and competence of each employee, which is reflected in the work of all of us. We always strive to be leaders, and the leader means primarily professionalism and innovation, which we gain through professional development. We offer and accept various forms of training and workshops for all employees.

The personal development of each employee is also very important for us, as it directly affects professional development and building employee competences. We support all forms of developing the potential of our employees. We offer them a chance to be exposed to art, create opportunities for family and holiday gatherings, integration events to get to know each other better and make friends. We promote get-togethers at venues of cultural significance, running events, and actively participate in the life of the Company in all of its aspects.

4.5 BUSINESS SECRECY, PERSONAL DATA PROTECTION AND USE OF DOM DEVELOPMENT ASSETS

We provide all Company's employees and associates with appropriate work tools and workspaces. It is up to each of us to take care that these tools are used properly for their intended business purposes.

We do not use any physical or intellectual property of Dom Development for purposes that are inconsistent with their intended use or that violate any ethical, moral or legal principles.

Each of us must protect business secrets of Dom Development S.A. Moreover, we exercise due care to protect confidential information, trade secrets and intellectual property in the same way as we protect the Company-owned tools necessary to do our jobs.

We ensure that all personal data of employees and associates is properly safeguarded and protected. We create special procedures, which each of us can always consult to obtain detailed knowledge regarding the protection and processing of personal data and the protection of business secrets. In doing so, we comply with latest legal regulations in force as regards business secrecy, intellectual property protection, confidentiality and employee personal data processed at Dom Development.

We have in place and adhere to a "clean desk and clean screen" policy - we use only documents and data necessary at a given moment for the tasks entrusted to us, and we never leave a switched on and logged in work computer or work phone unsecured.

4.6 CONFLICT OF INTEREST

It is important for us to avoid situations in which the personal goals of a Company's employee or associate are in conflict with the Company's objectives. In the event of such a conflict, we endeavour to find a solution that is good and satisfactory for both sides.

In addition, we try to prevent situations when a Company's employee or associate is under direct functional subordination of their family member. We also take measures to eliminate the pursuit of activities by an employee outside the Company that would conflict with the interests of the Capital Group.

5 WE, AND OUR EXTERNAL ENVIRONMENT



5.1 OUR RELATIONS WITH CUSTOMERS AND OTHER STAKEHOLDERS

In addition to providing the best possible conditions for our employees, our commitment extends to the satisfaction of our customers and other stakeholders, including business partners and shareholders.

Striving to build long-term, friendly and professional relationships with customers and other stakeholders, we adhere to the following principles in our daily activities:

- professional, reliable, meticulous, competent and customer-centred attitude;
- we do not engage in practices misleading to consumers;
- we keep our word and honour all our commitments;
- we treat all stakeholders equally;
- we provide customers with the highest standards of service;
- we pay attention to the needs and challenges of the real estate market;
- we continue to modernise our operations;
- we ensure the safety and comfort of our stakeholders;
- we do not abuse the trust of our stakeholders nor take advantage of their possible lack of information experience;
- we use an honest and fair marketing policy for our products and services;
- we provide stakeholders with true and complete information and data;
- we avoid activities that may harm Dom Development, its stakeholders, including but not limited to business partners, customers, employees or associates;
- in contacts with stakeholders, we do not pursue personal gain and avoid situations where personal interests may conflict with the interests and needs of Dom Development;
- in a conflict situation, we seek constructive resolution of a dispute, striving to reach an agreement, while also respecting confidentiality during this process.
- we systematically collect feedback from customers and other stakeholders, with a view to continuously improve our service and communication practices;
- we take into account the needs and expectations of customers and other stakeholders in the decision-making process;
- our activities are carried out with respect for all matters concerning stakeholders, including Dom Development customers;
- we undertake to provide clear information about the progress in initiatives implemented with Dom Development and any significant issues that may have material impact on our customers and stakeholders.

5.2 OUR RELATIONS WITH BUSINESS PARTNERS

We build our lasting and good relations with business partners based on respect for mutual interests, trust, integrity, professionalism and unity in pursuit of a common goal which is to make our customers' home dreams come true. We always expect our business partners to provide services of top quality and use the latest technologies.

We have zero tolerance for corruption, bribery, fraud or other dishonest behaviour. We do not offer or accept any benefits from business partners that could affect any decision we might take. When selecting a business partner, we take into account only objective criteria, thus avoiding any conflict of interest in this respect.

We flatly condemn and decline to cooperate with any business partners on a sanction list, i.e. the list of natural persons, legal persons or unincorporated organisational units subject to restrictions, published by Polish and international bodies authorised to impose sanctions, which have a bad reputation, or whose activities are financed from unclear and illegal sources ("money laundering"), and whenever we become aware of the origin of illegal finance used by our business partner, we inform relevant authorities of that fact immediately. We perform appropriate checks of the prospective business partner before initiating cooperation. We refuse to cooperate with entities that in any way, directly or indirectly, finance terrorism or other illegal activities. We also do not cooperate with entities that are known to us to use unfair market practices, practices that violate collective consumer interests or engage in greenwashing.

5.3 PROTECTION OF DATA OF CUSTOMERS, OTHER STAKEHOLDERS AND BUSINESS PARTNERS

As with employees, we protect and care about the security of all data of our customers, other stakeholders and business partners. Our internal procedures are entirely in line with the applicable legal requirements in this respect, and a customer, other stakeholder or business partner has the right to receive full and true information about the level of protection of their data and how it is safeguarded.



5.4 OUR RELATIONS AND COMMITMENT TO AND WITH THE MARKET AND COMPETITION

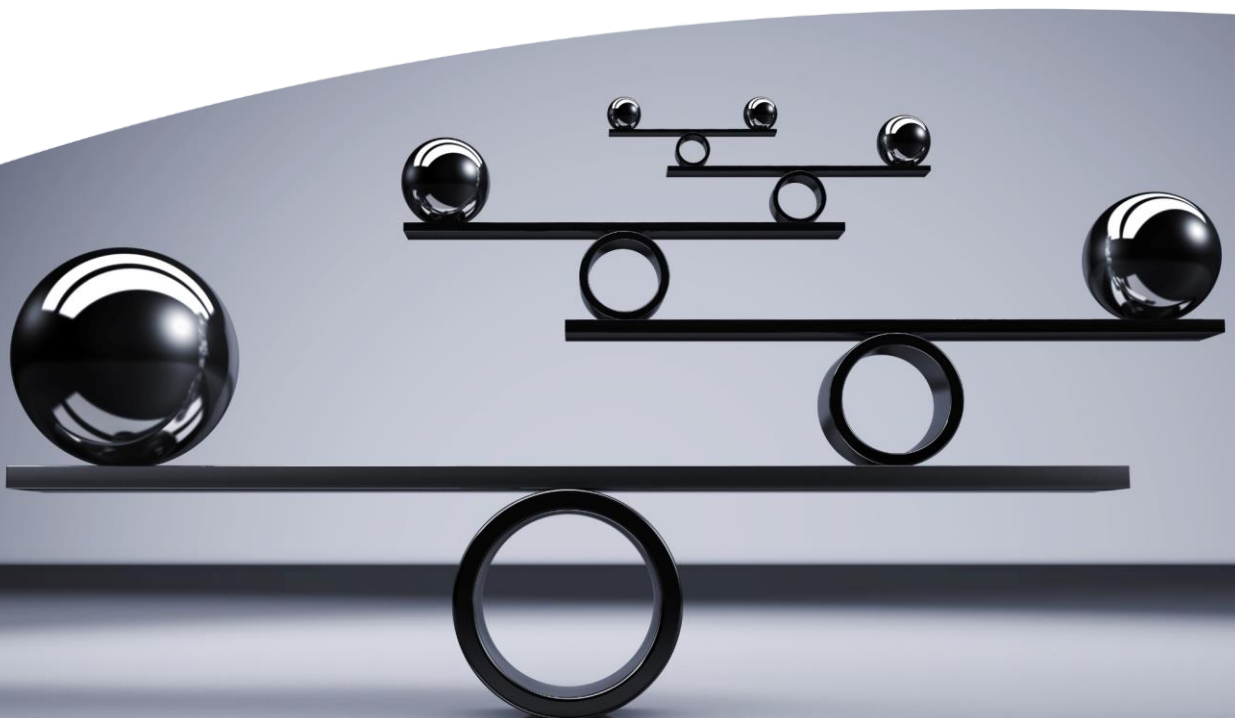
We conduct our business and accomplish objectives of Dom Development S.A. in a transparent and honest manner. We seek to gain advantage over the competition through the quality of our projects, which we care about at every stage of their provision, a professional and friendly approach to the customer, while maintaining the principles of honest and ethical behaviour. We do not tolerate any form of fraud in our actions. We promote the principles of fair and free competition by complying with national competition laws.

We maintain reliable and clear financial documentation, and adhere to the best market practices, including the Best Practice for WSE Listed Companies. We are a transparent public company, complying with all legal requirements in terms of disclosure obligations and handling of inside information.

We are involved in social and local activities, including supporting social, sports and cultural initiatives. We do not engage in political activities and do not finance such activities.

We take due care of the natural environment, supporting the development and dissemination of environmentally friendly technologies. When deciding on the development of a project, we take into account its impact on the immediate environment and ecosystem. Our business partners are bound to do business in a manner that has the least possible adverse impact on the environment, and in the case of waste generation, that which prioritises recovery or the recycling of waste. We undertake initiatives to promote greater environmental responsibility and actions to reduce adverse impact of our operations on the environment. We also support a preventive approach to environmental problems. We aim to minimise the generation of waste, reduce the consumption of raw materials, natural resources (including water) and limit greenhouse gas emissions associated with its business activities,

6 APPLICATION OF THE CODE



Compliance with laws in force and internal regulations applicable at Dom Development S.A., including this Code, is in the interest of all employees, associates, business partners and other stakeholders. Each of us plays a part in building the Company - our collective success stems from the efforts of each and every one of us. The Company will respond adequately to each instance of conduct contrary to the law and the provisions of this Code.

The Code is subject to periodic verification, just as other Compliance Culture-related procedures and documents at the Company. You can always find out more about the Code, the Compliance Culture and ethics at the Company at the following e-mail address: etyka@domd.pl or by talking directly with persons responsible for the area of compliance at the Company.

This Code of Ethics has been developed as an internal guide outlining principles for our conduct and does not replace current laws. Appendices or other supplementing guidelines may be added to this Code.