

# Ethics

[GRI 102-16]

[GRI 412-2]

[GRI 103-1 dla Aspektu: Compliance - zgodność działalności z prawem i regulacjami ]

[GRI 103-2 dla Aspektu: Compliance - zgodność działalności z prawem i regulacjami ]

[GRI 103-3 dla Aspektu: Compliance - zgodność działalności z prawem i regulacjami ]

The basis of the Enea Group's and its Employees' operations is honesty, understood primarily as: acting in accordance with ethical rules, regulations and internal procedures, equal treatment of all [Stakeholders](#), mutual respect and acceptance of openness in expressing opinions and beliefs.

## The other values of the Enea Group are built upon honesty:

- Competence - willingness to share knowledge and constantly improve qualifications, but also to enable Employees to gain new experience;
- Responsibility - keeping the declarations on appropriate quality, punctuality and reliability of energy supply and services, but also for fulfilling employee duties and obligations resulting from social agreements;
- Safety - taking preventive and remedial actions in order to ensure a safe working environment and protection of the natural environment.

The employees and management of our companies are bound by the principles set out in [the Enea Capital Group Code of Ethics](#)".

The Code, along with other specific policies and procedures, including the 'Enea Capital Group Value Code' and 'Enea Group Gift Acceptance and Giving Policy', provides a basis for preventing any misconduct and indicates to us the principles that we should always follow as Enea Employees.

## Important regulations

### Enea Capital Group Code of Ethics

- Describes our attitude as Enea Group Employees and describes our commitments and professional conduct guidelines.

### Enea Group Compliance Policy

- Its objective is to achieve and maintain an organisational level that ensures the maximum possible degree of elimination of potential threats that may occur in the organisation as a result of non-compliance with the provisions of law and applicable standards.

### Internal policy in case of notification or detection of unacceptable behaviour at Enea SA

- The purpose of this document is to fulfil the employer's obligation to counteract mobbing and other unacceptable behaviours, such as discrimination and harassment.

- It sets out, inter alia, the procedure to be followed in the event of an application being received for the possibility of the occurrence of unacceptable behaviour.

## Anti-corruption measures

### Our priorities:

- Ensuring compliance of the activities with the law and internal regulations
- Eliminating any possible corrupt practices.
- Popularising among the Group's Employees the knowledge on the anti-corruption regulations and mechanisms adopted by the Enea Group.
- Ensuring competitiveness and transparency in relations with contractors
- Continuous improvement of the quality of contacts with customers and prevention of any undesirable behaviours in this area.
- Allowing Employees and Contractors to report irregularities (including in the area of corruption).

### Examples of our actions:

- Implementation of the provisions contained in the implemented Enea Group Compliance Policy.
- Provide training to employees in the Enea Group Compliance Policy and in the Enea Group Gift Acceptance and Giving Policy.
- Discussing the principles of counteracting corruption during meetings with Employees.
- Running regular meetings of Employees who have direct contact with Customers. During the meetings, the rules of conduct in contacts with Customers were discussed as well as the cases of complaints lodged by Customers, which concerned behaviours of Employees that were inconsistent with our rules.
- Monitoring the legal environment and market standards with regard to the development of the anti-corruption system
- Providing companies with a form through which information on any corrupt events can be reported to Enea SA.

### In 2017:

- More than 1 200 employees took part in e-learning training courses on the subject of counteracting corruption and conflicts of interest.
- Employees without access to computer and e-learning training were informed about anti-corruption rules directly by their superiors.
- The Enea Group has not experienced any confirmed corruption or human rights violations in the workplace through harassment or discrimination.