

ETHICS AND EQUIVALENCE

We create our organizational culture based on common values that take the rights and expectations of all groups of Stakeholders into account. We act in accordance with the applicable law and internal procedures. We respect the views of our Employees and provide them with equal opportunities and equal treatment.

Values of the Enea Group

The values with which we identify are built on the foundation of respect and mutual trust. We strive to create clear and transparent rules of cooperation and a favourable atmosphere for all associates. We do not differentiate them on the basis of sex, race, nationality, disability, age, sexual identity, trade union membership, ethnic or social origin, religion or political beliefs.

In everyday work, we follow ethical principles based on 4 values that have the following meaning:

Honesty:

- Conducting in accordance with ethical principles;
- Responding to situations that are incompatible with legal regulations and internal regulations;
- Mutual respect and acceptance of openness in expressing opinions and views.

Responsibility:

- Keeping declarations regarding the quality of service, timeliness and reliability of production and supply of energy, as well as products and services offered by the Enea Group, while taking account of the risk resulting from the activity being carried out;
- Implementation of duties of the employer and a member of the community;
- Taking account of the needs and requirements of broad social interests in the activities.

Security:

- Running a business in a manner that ensures energy security for our Clients;
- Protection of personal data and protected information of Stakeholders;
- Ensuring a safe working environment;
- Protection and respect for the natural environment.

Competence:

- Implementation of tasks, provision of services and offering products of the highest quality;
- Sharing knowledge and experience with associates;
- Raising qualifications in order to implement the Group's business plans and self-fulfilment of Employees.

Documents defining ethical values and rules of conduct:

- Policy of Counteracting Mobbing and Discrimination and Other Unacceptable Behaviour - indicates unacceptable behaviour and ways of submitting information in case of reporting an incident. Specifies preventive actions and obligations of the employer and Employees in this area;
- The Enea Group's Code of Ethics - presents principles of conduct, based on equal treatment and respect for personal dignity. It introduces standards of behaviour towards Clients, business partners, shareholders, local communities and co-workers.

The Code of Ethics

In relations with Employees and external entities, we follow ethical principles and follow specific rules. In everyday work, we are supported by the principles set out in the Enea Group's Code of Ethics.

In our Group, the Code of Ethics defines the values that should guide all Employees of the Group in their daily work and business contacts. In addition, there is an Ethics Committee in the Group's structures that review reports regarding events that are against the conduct standards in the Enea Group's Code of Ethics. With regards ethical concerns raised by Employees and noticed violations of the Code of Ethics, the Commission conducts activities aimed at the impartial resolution of identified violations. The adopted form allows Employees to benefit from help and clarify doubts about unethical behaviour.

Examples of activities building ethical culture

In order to provide ethical principles throughout the Group, information and education initiatives were undertaken. Their goal was to provide knowledge to Group's members relating to the application of the adopted rules. Internal educational campaigns as well as trainings and meetings were organized. During their course, key aspects of preventing mobbing and ethical behaviour were discussed.

- In **Enea** information and education activities, as well as online trainings addressed to managers have been carried out. The initiative involved the conscious building of a friendly working environment, proper communication and interpretation of the introduced regulations;
- **Enea Serwis** conducted training on the topic "Building a Friendly Working Environment and Countering Mobbing" addressed to the members of the Board and directors;
- In **Enea Oświecenie** a team was established, the purpose of which is to investigate possible violations in the workplace and an information campaign was carried out regarding the implementation of the new rules;
- **Enea Operator** has established the Anti-mobbing Commission. Team members received the appropriate preparation through training and legal consultations. The regular education of the management staff in the area of counteracting mobbing and other undesirable behaviour was also ensured;
- In the **Enea Logistyka**, the Anti-mobbing Team was created and the dedicated e-mail address was established to which Employees can report behaviour that contradict the accepted standards.

Compliance

We are aware that the appearance of adverse events in our Group may have a negative impact on our reputation and perception by the social and business environment. That is why credibility, transparency and honesty are the priorities in our Group. We value our image and long-term relationships with business partners, Clients, social partners and Employees.

Our goals:

- Conducting business activity in accordance with the applicable law and without any manifestations of corruption and bribery;
- Prevention of the occurrence of corruption and its elimination;
- Counteracting the occurrence of the conflict of interest phenomenon;
- Implementation of regulations ensuring transparency with relation to Contractors, affecting the minimization of the risk of financial and reputational losses in the Group's companies.

Effects:

- We did not report any corruption in the companies of our Group;
- All Employees of our companies were informed about the applicable anti-corruption rules;
- All members of the management bodies of our Group were informed about the organization's anti-corruption policies and procedures;
- Almost 100% of Employees have completed mandatory training in the field of counteracting corruption.

Implemented activities:

- Knowledge dissemination in the field of counteracting corruption during adaptation training for newly hired Employees;
- Systematic training during direct meetings or using the e-learning platform common to Group companies.

Documents in the Compliance area:

- Rules for receiving and handing out gifts in the Enea Group;
- Enea Group Compliance Policy;
- Code of Ethics in the Enea Group;
- Purchasing Policy of the Enea Capital Group;
- Principles of conducting sponsoring activities in the Enea Group.

Employee Rights

Our goal is to provide Employees with decent working conditions and create an organization in which Employee rights are respected. We are open to dialogue, which allows us to shape the conditions of cooperation that satisfy both sides.

The Employees have access to reports on the activities and events taking place in our Group. The efficient flow of information enables the following:

- **Corporate Intranet** - news about our Group is posted therein;
- **Employee Area** - a separate space in the Intranet with current information and documents regarding Employee matters;
- **Newsletter ("Enea News")** - informs about the most important events taking place in the Group and contains messages about upcoming actions and initiatives;
- **Mailing** - important messages are sent in the e-mails concerning selected groups or all Employees;
- **Idea** - e-mail box, for which the Employees of our Group send their initiatives and ideas to improve work;
- **HRnapiszdonas** - an e-mailbox to which Employees of the Group send questions regarding Employee issues published in the Employee's Intranet.

Individual companies use various forms of information exchange among Employees:

- Cyclical operational meetings in organizational units;
- Strategic sessions;
- Video-conferences in which the Management Boards of the companies and managers of organizational units participate, as well as Employees interested in the given topic;

- Meetings of managers of organizational units with lower level managers regarding current operational issues;
- Daily communication of superiors with workers, taking place through their presence in the areas for which they are responsible;
- Annual or quarterly evaluation talks, allowing for a summary of the past period and discussion of mutual expectations;
- Meetings of Management Boards of companies with trade union representatives.

We comply and respect the right of Employees to associate and form trade unions. Employees can take advantage of the opportunities that are given to them by membership and active participation in such organizations. Employee representatives are not discriminated against in any way due to activities related to the representative function of trade unions.

Trade unions operating in leading companies and employing the largest number of Employees in the Enea Group:

Enea

- Inter-Organization NSZZ "Solidarność" Enea;
- Inter-enterprise Trade Union of Power Engineers in Enea Wytwarzanie Sp. z o.o.;
- Inter-enterprise Trade Union of Employees of the Enea Capital Group;
- Inter-enterprise Trade Union "Synergia" Employees of the Enea Capital Group;
- Inter-enterprise Union Organization of the Trade Union of Engineers and Technicians at Enea SA.

Enea Operator

- Inter-enterprise organization of NSZZ "Solidarność" Enea;
- Inter-enterprise Trade Union of Employees of the Enea Capital Group;
- Inter-enterprise Trade Union of Continuous Movement Workers of the Energy Group of Enea SA;
- Inter-enterprise Trade Union of Energetyk Zakładowa Organizacja Związkowa at Enea Operator Sp. z o.o.;
- Inter-enterprise Union Organization of the Trade Union of Engineers and Technicians at Enea SA;
- Intercompany Trade Union "Synergia" Employees of the Enea Capital Group.

Enea Elektrownia Połaniec

- Inter-enterprise Trade Union at Elektrownia Połaniec;
- Inter-enterprise Trade Union Organization of NSZZ "Solidarność" Employees of Elektrownia Połaniec and Companies;
- Inter-enterprise Trade Union of Continuous Workers;
- Inter-enterprise Union Organization "Energetyk";
- Inter-enterprise Trade Union of Supervision Workers at the Elektrownia Połaniec.

Enea Wytwarzanie

- Inter-enterprise Trade Union of Shift Workers in Enea Wytwarzanie Sp. z o.o.;
- NSZZ Solidarność Organization in Enea Wytwarzanie Sp. z o.o.;
- Inter-enterprise Trade Union of Power Engineers in Enea Wytwarzanie Sp. z o.o.

Enea Centrum

- Inter-enterprise Trade Union of Employees of the Enea Capital Group;
- Inter-enterprise Union Organization of the Trade Union of Engineers and Technicians at Enea SA;
- Inter-enterprise organization of NSZZ "Solidarność" Enea;
- Inter-enterprise Trade Union "Synergia" Employees of the Enea Capital Group;
- Inter-enterprise Trade Union of Continuous Movement Workers of the Energy Group of Enea SA;
- Inter-enterprise Trade Union of Power Engineers in Enea Wytwarzanie Sp. z o.o.;
- Inter-enterprise Trade Union at Elektrownia Połaniec SA in Zawada;
- Inter-enterprise Trade Union of Supervision Workers in Elektrownia Połaniec;
- Inter-enterprise Union Organization at Enea Ciepło Sp. z o.o. with headquarters in Białystok of the National Trade Union of Heat Engineers.