Professionalism and ethics

133
PEOPLE

trained in anti-bribery policy

14
Members

of the Business Ethics Committees

4

detailed subject-matter policies

As a company, we have shaped our business, social and cultural relations in respect for legal frameworks wherever we are present.

Michał Malina – Business Ethics Ombudsman at the Grupa Kęty S.A. Capital Group: Our organisation strongly emphasises the development of ethical processes. There are many reasons for that. The first and foremost one is that we, as an international organisation with over 5 thousand employees and more than 6 thousand contractors, care for professionalism and ethics in business relations. On the other hand, we follow market trends and the planned legal solutions which will oblige all medium-sized and large enterprises in Poland to implement such actions.

"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



Ethical principles



The supreme document of the company regulating the ethical aspects and comprising a presentation of moral standards followed by our organisation and our employees is the Code of Ethics accompanied by detailed subject-matter policies, including: Anti-bribery Policy, Conflict of Interest Prevention Policy, Dignity at Work Policy, and Diversity Policy. Significant emphasis within our values is also put on the environmental issues. All the documents make up a platform of guidelines and standards of operation as well as superior values at the whole Capital Group of Grupa Kęty S.A.

In accordance with the assumed plan, about which we have informed the stakeholders in the report for 2018, the year 2019 was busy with training in anti-bribery policy. The training courses were carried out at the major business segments and were attended jointly by over 130 members of the management staff. The organisation has also strengthened its information disclosure to the employees, who do not avail of the IT resources of the Group in their daily work, where the aforesaid documents are published. This happened through installing noticeboards with the most important clauses of the Code of Ethics and the information about the possibilities and channels for reporting the Code breaches at the production halls.

Ethical processes



The provisions of the Code of Ethics reflect a method for reporting official breaches and a possibility to share any doubts regarding ethical 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.

The ethical processes monitoring structure remained virtually unchanged as compared to 2018. In 2019, Business Ethics Committees operated within the main business segments (appointed by Grupa Kęty S.A., Aluprof S.A., Alupol Packaging S.A.) as well as the Business Ethics Ombudsman at the Capital Group Level, making it the total of 15 people. Caring for the development of ethical processes and competencies of the engaged persons, the organisation prepared a special training for the Business Ethics

Committees.

In 2019 two reports on the Code of Ethics violations were received. Both of them referred to a breach of the Dignity at Work Policy at the Aluminium Systems Segment. One of the reports was withdrawn by the reporting person before the formal commencement of work by the Segment's Ethics Committee. The other one was verified by the Committee and no breach of the Code of Ethics was confirmed in effect.

No reports on violation of human rights or anti-bribery policy were filed.

The Code of Ethics also 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 2019, the Company did not make any donations to political parties.