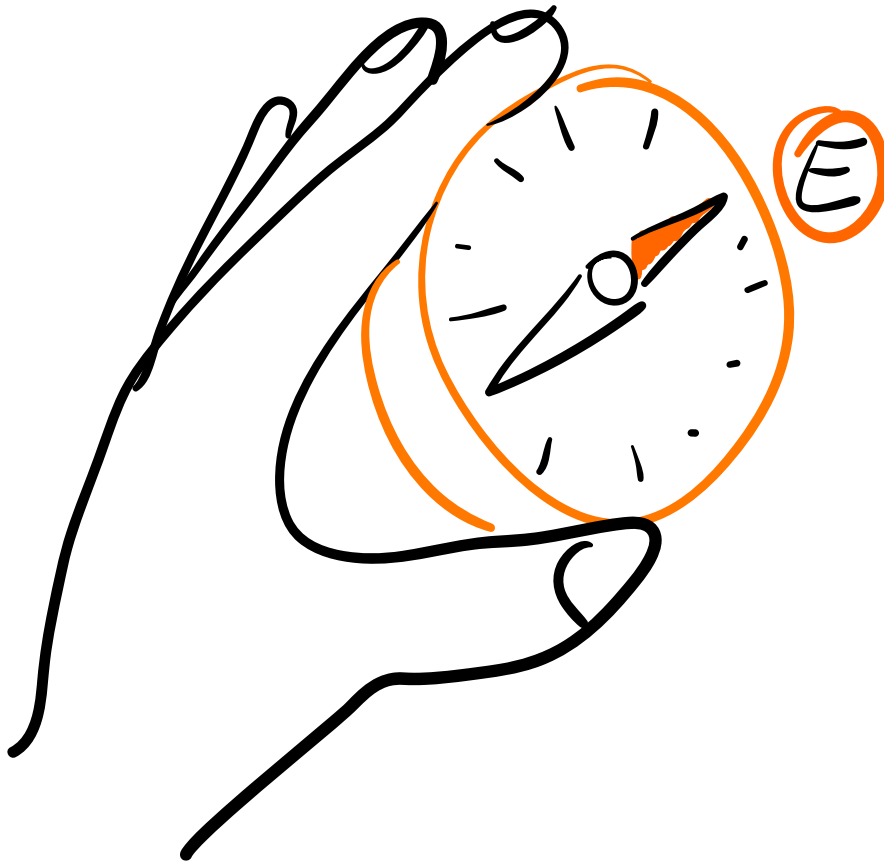


Orange Polska

Code of Ethics



Our company

Our mission

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Our commitments

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Individual conduct

Reporting violations of the Code of Ethics



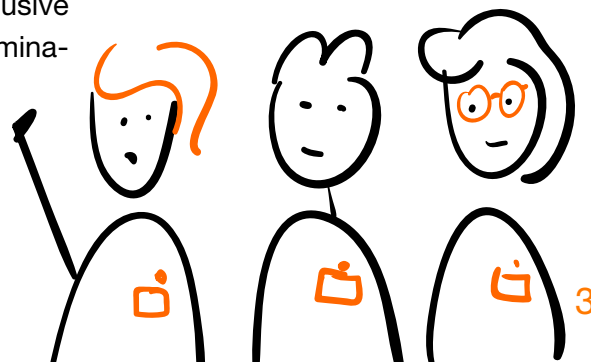
Our company

We provide telecommunications services of the highest quality to our individual and corporate customers. The foundation of Orange Polska's success is our competitive range of products and services, our active and effective sales structures and the high quality of our customer service, which is ensured by the engagement of all employees.

We are the leader on the Polish market in all key segments of the telecommunications market. We are the only operator to offer comprehensive telecommunications services throughout the entire country.

We grow together, and we develop sustainable.

We can achieve our strategic goals only with an open corporate culture. We strive to create an environment that supports our workers, promotes talent, broadens opportunities and creates a more inclusive working environment, free from unethical behaviours and discrimination, with respect for dignity and diversity.



Our mission

As a trusted partner, Orange Polska gives everyone access to the digital world.



Our values

Close

- I'm close to the customer
- I'm close to the team
- I build relations based on trust & respect

Simple

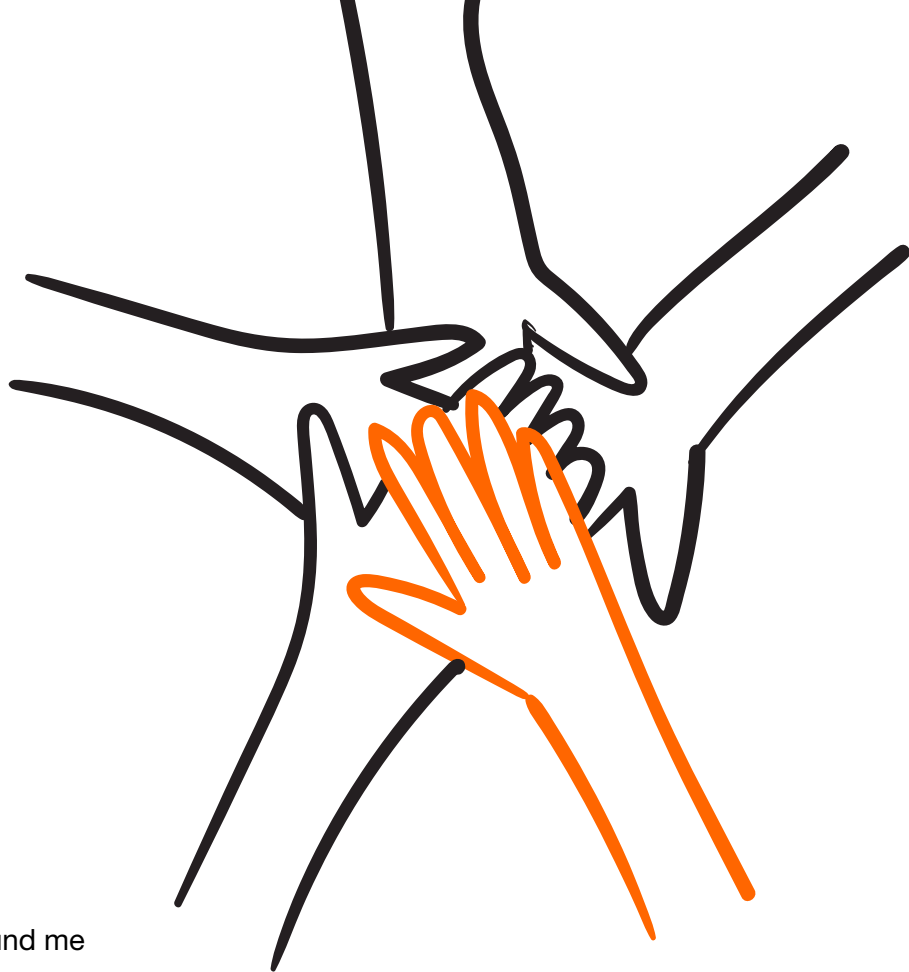
- I constantly simplify
- I work in agile way and effectively
- I communicate in open & effective way

Positive

- I collaborate
- I appreciate work of others
- I share passion and I care about world around me

Bold

- I challenge the status quo & propose improvements
- I experiment and take risk
- I look for innovation



Our commitments

The foundation of Orange Polska's strategy is offering products and services of the highest quality, while protecting the interests of our shareholders and partners. In committing to transparency and honesty in our business contacts, we expect to be treated the same way.

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We strive to introduce positive change in our customers' daily lives, providing them with increasingly advanced technologies of the highest quality.

.....

In our actions we are guided by our values: close, simple, positive, bold. They are at the heart of all of our decisions. These values are fundamental for our work, and also for the company's reputation and the relationships we build with customers, employees, shareholders and local communities and the environment.

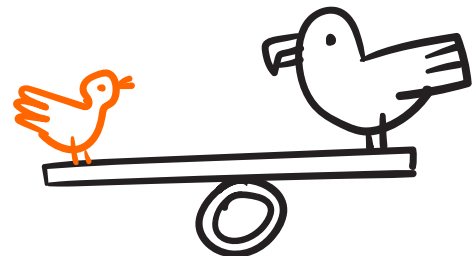


We respect each individual's right to privacy. We understand and accept diversity and individual differences between people. They are never the basis for value judgments. Regardless of origin, race, gender, sexual orientation, culture, age, family or material situation, religious convictions, political views or political or trade union activity, for Orange Polska every human being is equal and deserves respect.

Our actions are in line with the fundamental principles set down in the Universal Declaration of Human Rights and the regulations of the International Labour Organisation, as well as the Organisation for Economic Cooperation and Development (OECD), in particular in the area of the fight against corruption. Our actions are guided by principles including our Compliance rules and the standards of corporate social responsibility.

We respect the environment and take all possible actions to protect it so that its resources will also be available for future generations.

We strive to ensure equal opportunities for promotion, professional development and compensation for our employees, motivating them to act and to develop their talents and skills.



Our external relationships

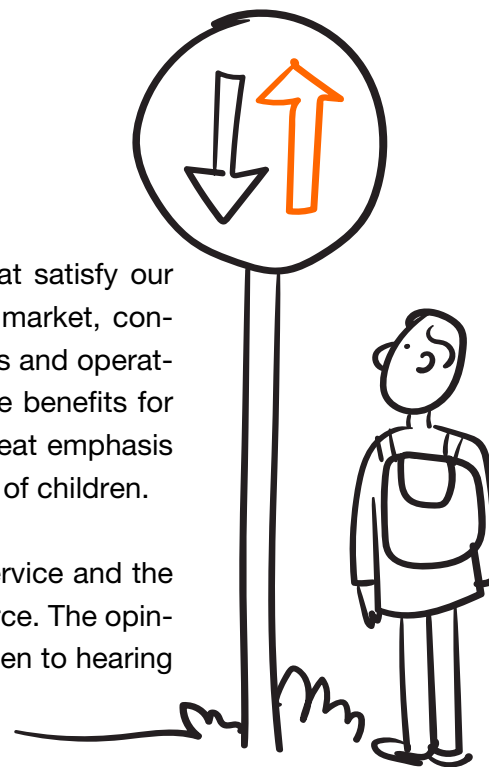
■ with our clients

We have built our success on high-quality products and services that satisfy our customers. We continually adapt to the needs and demands of the market, constantly updating our products and services, as well as our technologies and operating methods. In designing and launching products we strive to ensure benefits for our clients through high quality and innovative solutions. We place great emphasis on public expectations in the area of security, in particular the security of children.

Engagement in continuous improvement of the quality of customer service and the products and services we introduce on the market is our motivating force. The opinions of our clients are exceptionally important to us. We are always open to hearing them.

■ with our employees

The strength of Orange Polska lies in its people – our employees. We believe in their integrity, loyalty, engagement, motivation and responsibility. We create conditions that support the development of every employee, regardless of their position, gender,



worldview or seniority. We promote knowledge sharing, partnership and taking collective ownership: every employee can share their ideas and experience.

We don't tolerate discrimination in any form, at any step of the career path. We pay particular attention to this in the hiring and promotion process. We do not consent to any form of harassment or intolerance. We encourage employees to report all irregularities to the independent Orange Polska Ethics Committee.

We also expect our subsidiaries to follow procedures allowing employees to report cases of behaviour that does not comply with the Code of Ethics, as well as social norms of behaviour. We require all such reports of noncompliance to be investigated in detail, and if confirmed, for corrective measures to be taken.

■ with our shareholders

We are a public company. Orange Group of France holds a controlling stake. Smaller stakes are held by Polish and international financial institutions and individual investors.

Our shares are traded on the Warsaw Stock Exchange. Our efforts are directed toward building trust among our shareholders and increasing the company's value. We continuously provide shareholders with credible, significant and comprehensive information. We respect the Stock Exchange Regulations and rules, as well as the principles of corporate governance.

■ with our suppliers and partners

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We build relationships with our suppliers and partners based on integrity, trust and mutual respect. We seek long-term, effective partnership, gaining the trust of the organisations and institutions we work with.

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We do not tolerate corruption. We respect cultural differences and the specifics of working with business partners. We expect them to abide by the ethical standards that are binding within Orange Polska.

■ with our competitors

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Healthy, honest competition is the foundation of economic development. It drives improvement in the quality of products and services. Clients are among those who benefit, by receiving better value for a reasonable price.

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Orange Polska is open to healthy, honest competition, because we believe it's a key factor in growth and innovation. We respect the competition regulations.



■ with local communities

By behaving responsibly, we want to help improve the lives of people and local communities. We promote the use of information and telecommunications technologies in the pursuit of sustainable development. This approach delivers benefits for the company and those around us and leads to long-term development of society, and is also a motivating factor for our team.

Whenever we are working on problems that are important for the public interest, we commit to engage all of the resources required to faithfully fulfil our mission.

We respect the laws and regulations that are in force in Poland. We do not finance political parties or organisations whose purpose is primarily political. We do not tolerate corruption.

■ with the environment and the climate

The natural environment is a key resource, not only in our business operations but also in everyday life. In investing in telecommunications infrastructure, we bear in mind the ecological perspective and the latest technological solutions that support it.

We respect and nurture the environment so that future generations will be able to use the same resources we have today. We strive for the lowest possible use of energy and other natural resources, for the use of renewable energy sources and for sustainable management and use of waste.



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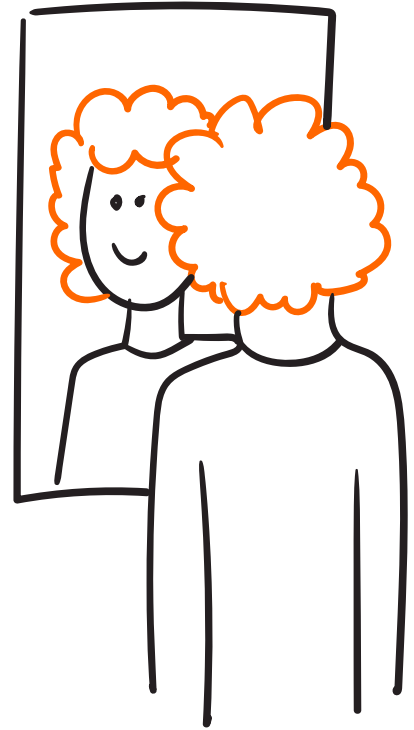
We are aware of our impact on the environment. We continually monitor and report on it. Our goal is to reduce CO2 emissions, achieving climate neutrality by 2040.



Individual conduct

Regardless of their position, all Orange Polska employees should act in accordance with the law, the general rules of behaviour in society and the Code of Ethics. Each employee, regardless of their field or area of responsibility, should strive for perfection and constantly work to increase their professional qualifications and effectiveness, and to develop their innovative thinking skills. Each employee also has a role in creating and maintaining a positive working environment, including through effective communication, supporting colleagues' initiatives and teamwork.

Respect for others, honesty, loyalty, tolerance, impartiality, professionalism and accountability are the basic principles of individual behaviour.



How do I, as an Orange Polska employee, put these principles into practice in my work?

■ in my relationships with customers and suppliers

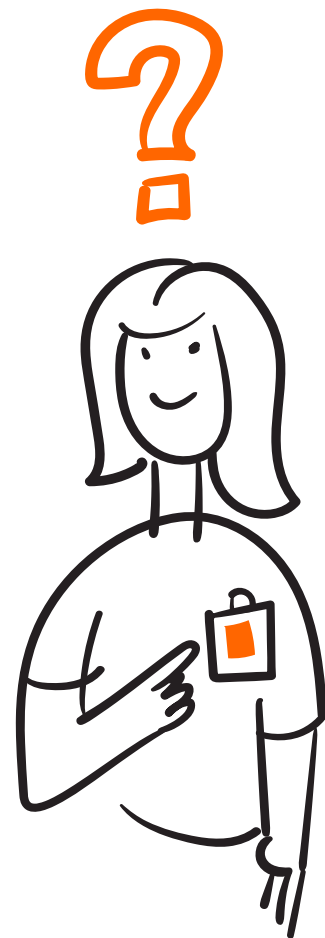
I ensure respect for the principles of loyalty, impartiality and integrity. In relationships with customers and suppliers I am guided by the principles of the Anticorruption Policy and the Orange Polska guidelines in this area. I do not accept gifts or perks, refusing anything that has more than token value.

I do not engage in any illegal activity, in particular acts of corruption. In negotiating agreements with other companies I take all steps to ensure the provision of honest information. Additionally, before taking on any obligations on behalf of Orange Polska, I make every effort for the interests of Orange Polska to be appropriately protected.

■ in protecting corporate assets

I ensure the appropriate protection of Orange Polska's physical and intellectual property, as well as property rights, designs and know-how. I am responsible for ensuring that Orange Polska's resources are used appropriately and the company's assets are secured. I act to avoid any losses or abuse. In using resources and work tools I act for the good of Orange Polska and in accordance with the rules.

If I am privy to confidential information in the course of my work or by accident, I make every effort to ensure that this information remains confidential. I continue to act this way even after my employment with Orange Polska ends.



■ to the values and principles of Orange Polska

If I learn of any case of fraud, abuse or any other action that harms Orange Polska, I am obliged to inform my direct manager, and if this is not possible, a manager at a higher level. I can also request assistance from the Orange Polska Ethics Committee or the Chairman of the Audit Committee of the Supervisory Board.

■ in the case of conflicts of interest

I avoid situations in which my individual interests (or the interests of individuals or legal entities I am related or close to) conflict with those of Orange Polska. If this is unavoidable, I act in accordance with my conscience and with my feeling of loyalty to Orange Polska, and I inform my immediate manager of the conflict.

The presence of a conflict of interest without the appropriate reaction may lead to serious violations, and even violations of the law, so preventing the risk associated with conflicts at all levels of the organisation is part of Orange Polska's corporate culture.

The instructions and guidelines for how to proceed in the case of a conflict of interest are described in the Orange Polska Policy on conflicts of interest and the Practical handbook for identifying, preventing and managing conflicts of interest in Orange Polska.

If the situation requires it, employees and their managers may turn to the Conflict of Interests Committee, which is authorised to issue opinions, recommendations and decisions concerning conflicts of interest.

■ stock trading conduct

If I am in possession of material information that, if it were made public, could impact the future value of a publicly traded security of Orange Polska, I shall refrain from disclosing this information, from directly or indirectly trading on the basis of this information in a financial marketplace, and from allowing third parties to do so before such information is made public. Failure to comply may be grounds for personal liability and may entail sanctions, up to and including criminal sanctions. A set of guidelines pertaining specifically to stock trading supplements this Code, in accordance with regulations in force.



If I learn of any case of fraud, abuse or any other action that harms Orange Polska, I commit to inform my direct manager, and if this is not possible, a manager at a higher level. I can also inform the Orange Polska Ethics Committee or the Chairman of the Audit Committee of the Supervisory Board.



■ Why is the Code of Ethics important?

The Code of Ethics is a document that lays out the system of values, norms and principles that guide us. It places an obligation on Orange Polska and its employees to act according to the highest standards in relationships with our contractors, partners, customers and those around us. It applies to all Orange Polska employees, regardless of their position or area of responsibility.

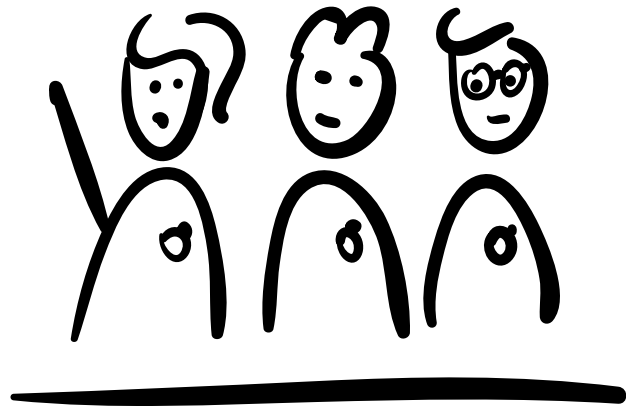
It is important to create a friendly, safe working environment, and in difficult situations to protect and strengthen the agency of each employee and the reputation of Orange Polska. Failure to meet this obligation may be treated as a violation of an employee's basic duties.

■ Who guarantees compliance with the Code of Ethics?

The Orange Polska Ethics Committee is responsible for handling issues related to compliance with the ethical standards of Orange Polska and companies from the Orange Polska Group. Its Chairman and members are appointed by the President of Orange Polska.

The Committee continually monitors the ethical standards in Orange Polska and analyses potential breaches of the Code of Ethics. The Committee advises Orange Polska entities on the implementation of the guidelines contained in the Code. Acting in the strictest confidentiality, the Committee considers individual cases submitted to it for review by Orange Polska employees.

The Committee submits recommendations to the President and Management Board of Orange Polska aimed at increasing compliance with and understanding of the Code. The Committee is responsible for preparing and updating the rules for reporting irregularities in Orange Polska, the rules of procedure for reported irregularities, the rules for protecting whistleblowers as well as the Code of Ethics. Every year, the Committee reports on its activities to the President of Orange Polska and to the Audit Committee of the Supervisory Board.



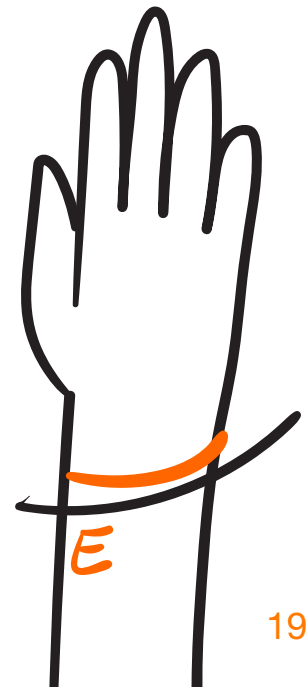
Every employee should familiarise themselves with Orange Polska's Code of Ethics, statute and strategy, the Compliance rules, the organisational regulations, labour regulations and other internal rules, procedures and guidelines that are in force within the organisation.

■ **Respect for the principles included the Code**

All Orange Polska employees are obliged to follow the Code of Ethics. Every inappropriate action and violation of the Code demands a reaction from both the employee and their manager.

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We ensure that all reported cases of failure to comply with the Code of Ethics are diligently analysed and investigated.

.....
We strive to create a safe space and a friendly atmosphere for all employees and everyone we work with. So if we are witnesses of violations of the rules described in the Code of Ethics, we should report them.



Reporting violations of the Code of Ethics or the legal or compliance rules



Orange Polska has introduced Rules for reporting irregularities and Rules of procedure for reported irregularities and Whistleblower protection.

The system for reporting irregularities supports Orange Polska's activities, in particular in the area of Ethics, Compliance and Corporate Social Responsibility, reducing the risk of loss of reputation and financial losses.

If an employee finds themselves in a situation where a violation of the law or the ethics or Compliance rules has occurred or could occur (in particular those related to corruption, external and internal regulations and procedures), they should speak with their manager. If this is not possible, they may turn to the Ethics Committee, the Compliance Officer, the Legal Department or the Human Capital team. In justified cases, they may report their uncertainty directly to the Chairman of the Audit Committee of the Orange Polska Supervisory Board, who has oversight of areas including business ethics.

If the seriousness of a matter requires it and it is justified, the employee may report an irregularity as a Whistleblower, using the Whistleblowing System. A report can be filed:

- by an e-mail to: **Zapytaj.etyka@orange.com**
- in writing: to the Chairman of the Ethics Committee at
Aleje Jerozolimskie 160, 02-326 Warszawa
- orally: to the Chairman of the Ethics Committee

It is also possible to use the Orange Group system for reporting irregularities:

<https://orange.integrityline.org/>

Orange Polska commits to protect Whistleblowers if at the moment of filing the report they are acting in good faith and if the information concerns a violation of the law, or of internal Orange Polska rules and procedures described in the Orange Polska S.A. Rules for reporting irregularities.

No person acting in good faith and providing information, whether openly or anonymously, on any irregularities or cases of violation of the rules presented in this Code shall face any consequences for such a report. Orange Polska guarantees the confidentiality of any information submitted.

