



**INTER  
CARS**

**DRIVING HIGHER  
STANDARDS**



**CODE OF CONDUCT  
AND GOOD MARKET PRACTICE  
OF INTER CARS S.A. CAPITAL GROUP**

**INTERCARS.EU**

### Ladies and gentlemen,

To meet the market challenges and build a brand providing the highest quality of services, we place in your hands the Code of Conduct and Good Market Practice of the Capital Group Inter Cars S.A.

This measure is inspired by the belief that the innovative development and continuous improvement of the services offered is the overall objective of our Group. This applies both to the automotive products delivery and workshop equipment, as well as to building a responsible and an ethical business. By developing the Code of Conduct, we have strived to ensure the continuous growth in the shareholder value, to fully satisfy our clients and build a good and lasting stakeholder relationship.

An important part of our mission is to carry out projects in a fair, socially and environmentally responsible manner. We also support the social and economic development and ensure the health and safety of our employees and customers.

The principle of compliance is seen by us as an important means for the realization of our strategy and business objectives.

By implementing this mechanism, we want to prevent abuses and promote good market practice among our employees and business partners. The ethical work environment reflects the strength of the brand and strengthens the organization itself, which, thanks to the transparent rules and procedures, is more resistant to crises of any kind.

Honesty, responsibility and trust are the values that we treasure most in our daily work. The Code is designed to help each of us - the employees, co-workers and partners of the Capital Group Inter Cars S.A. - to build a responsible and ethical socio-economic environment, in which we live, work and run a business. We are addressing this Code of Conduct and Good Market Practice of the Capital Group Inter Cars S.A. to you - our employees, co-workers and business partners. We believe that the Code will be reflected in the action of every employee and applied to our day-to-day conduct.

We are here to dispel all your doubts as to the application of the Code. This is why we have created a dedicated e-mail address [compliance@intercars.eu](mailto:compliance@intercars.eu), so that you can ask questions and report any irregularities.

Sincerely,  
**Maciej Oleksowicz**  
 President of the Management Board  
 of Inter Cars S.A.



1

The Code is a set of rules and values important for Inter Cars S.A. Capital Group which we try to implement daily in our business practice and internal relations.

2

The Code applies to all entities operating within the structure of Inter Cars S.A. Capital Group. We strive to ensure that our business partners, in particular distributors (franchisees), also comply with the rules set out in the Code.

3

The rules set out in the Code apply to all employees and co-operators, irrespective of the legal form of their co-operation with Inter Cars S.A. Capital Group.

4

The members of Inter Cars Capital Group management team, regardless the level and the area of responsibility, should always set an example on proper conduct for all employees, co-operators and business partners and provide them with support and advice on any questions regarding the Code.





Passion  
and Commitment  
Partnership  
Entrepreneurship

**EXAMPLES OF DESIRED BEHAVIOUR:**

A partnership, passion, entrepreneurship, integrity, openness and trust are the grounds of our working environment.

We help each other when help is needed and it is possible to help without neglecting our own duties.

We assure a stable and secure work conditions that comply with the labour regulations.

**EMPLOYEES AND CO-OPERATORS**

The success of Inter Cars is a result of passion and involvement of our employees. Many of us have worked in Inter Cars since the beginning of the company, for many Inter Cars is the first and only workplace. Together we build a positive working environment, based on partnership, passion, entrepreneurship, integrity, openness and trust.

We strive to ensure dignified and friendly working conditions. Invariably, for many years we have guaranteed stability and security of employment, we pay salaries and wages regularly and on time, and we offer an attractive social package to our employees.

We enable work life balance. We support initiatives and hobbies/passions of our employees.

We strive to ensure that the working environment of our employees is free from discrimination, harassment, humiliation, intrusion in privacy, and abuse of power.

We respect the rights of employees arising from labour law. At the same time we try to implement and apply international standards and good practices in human capital management.

## SAFETY



Personal safety, health and life of people are of key importance to us. We strive to minimise risk related to carrying out duties by our employees. We treat very seriously any actual and potential risks and try to react to them immediately and properly.



We promote responsible and sensible behaviour in the workplace. We believe that each of us is responsible for our own safety and the safety of others.



We believe that the awareness of risks is the basic requirement of prevention. We strive to ensure that our employees have the current knowledge about the risks related to their work and about the procedures to follow in dangerous situations.



We strictly comply with safety rules and regulations, as well as good practice in this respect.

## EXAMPLES OF DESIRABLE BEHAVIOUR:

We do not let employees perform the work if it can be dangerous for them or for their colleagues, in particular persons under the influence of alcohol or drugs.

We inform each other about incidents which may be life- or health-threatening.

We make sure we undergo periodic medical examinations on time.





### EXAMPLES OF DESIRED BEHAVIOUR:

We carry out recruitment ensuring objectivity of assessment and comparability of candidates.

We make sure that opinions expressed by us are balanced and do not offend anyone.

### EQUAL OPPORTUNITIES AND EQUAL TREATMENT

We comply with the principles of equal opportunities and equal treatment. These principles apply to recruitment process, assessment, promotion, and the access to opportunities offered by Inter Cars.

We assess candidates to work and our employees fairly and on the basis of merit. We use clear and fair criteria of work assessment and criteria of professional promotion.

We inform clearly and openly about opportunities we offer our employees.

We promote attitude of tolerance and openness, we treat everyone fairly, irrespective of their sex, age, race, beliefs, health, trade union membership, work experience and position, appearance, and sexual orientation.

We oppose the voicing of opinions which are extreme and contrary to generally accepted civilisation standards, in particular when directed against personal dignity, religious feelings or beliefs.

## CLIENTS



Satisfaction and trust of our clients are our priorities. We make every effort to ensure that products and services offered by us meet clients' expectations, as well as quality and safety standards. We also try to ensure positive client experience in co-operation with us.



We fulfill our obligations towards clients on time. We do not abuse their trust or our information advantage for our benefit.



We apply equal treatment principle to clients. We do not use discriminative criteria or access conditions to products and services offered by us.



We respect clients' rights, in particular consumer rights, arising from general law and agreed rules of co-operation. We inform clearly and openly about our trade conditions, prices and clients' rights.



We respect privacy and personal data of our clients. Our marketing communication is carried out in the scope and on terms and conditions set out in the law, only with a valid basis. We do not send marketing communication to persons who did not express their will to receive it.



### EXAMPLES OF DESIRED BEHAVIOUR:

During talks we keep calm and treat clients with respect.

We provide our clients with reliable information and explanations. We always try to be helpful and polite.

Before sending commercial information we make sure that the addressees have agreed to receive it.



## BUSINESS PARTNERS

- Good relations with our business partners are an important value to us. We try to co-create fair and mutually beneficial principles of co-operation.
- We expect our business partners to comply with the law and good market practices. We prefer partners who have ambitious targets also in terms of implementation of principles of co-responsibility for the environment in which we all function.
- We assess business partners only on the basis of merit, business and ethical premises. According to the principles of equal treatment, we do not use discriminating criteria or terms of co-operation.
- We do not accept the possibility of co-operation with partners whose operations are unethical, infringing the rights of other persons, good standards or market practices.
- We make our partners familiar with our principles of operation and encourage them to apply the principles described in this document.

### EXAMPLES OF DESIRED BEHAVIOUR:

We inform our business partners about our ethical standards and expect them to comply with the standards in their business activity.

We constantly verify whether our partners operate in an ethical and professional way.

## MEDIA



We are open to co-operation with the media, and demand at the same time fairness, integrity, objectivism and professionalism.



We willingly speak out on matters which concern us or in which we are competent. Only persons indicated by Inter Cars are authorised to speak on behalf of Inter Cars.

### EXAMPLES OF DESIRED BEHAVIOUR:

We direct persons interested in obtaining information about Inter Cars to the right persons.

Without an appropriate authorisation we do not speak out in a way which might suggest that our statement is the position of Inter Cars.

## COMPETITION



While operating on a competitive market we respect the principles of fair competition and business ethics. We strongly fight any forms of unfair market practices and condemn unethical conduct.



As a market leader, we initiate and engage in actions aiming at co-operation, within the boundaries allowed by competition protection law, in order to seek solutions to common problems.



We do not use practices directed in any way against competition. We reject any forms of agreements, collusions and arrangements which could be anti-competitive in nature.

### EXAMPLES OF DESIRED BEHAVIOUR:

We protect our business secrets and do not acquire other companies', including our competitors', business secrets.

We offer only genuine and recognized products.

We promote our business in compliance with good practices.





**EXAMPLES OF DESIRED BEHAVIOUR:**

- We make sure that the information which could be price-setting is made available only at times and in scope provided by the law.
- We entrust our financial statements only to partners who guarantee highest professionalism and reliability.
- As a listed Company we comply with the corporate governance requirements.

**PARTICIPANTS OF THE CAPITAL MARKET**

- We try to operate business in a way ensuring constant growth in value for shareholders.
- We maintain accounting according to the law and adopted international standards. The financial information made available by us reflects actual business operations and is prepared thoroughly and with utmost care.
- As participants of the capital market we comply with legal regulations, guidelines and good practices in force or adopted in this market.
- We have implemented and applied internal control procedures through which we ensure the reliability of our financial statements. In supervising the legal compliance of the business and financial documentation we co-operate with the leading audit companies.
- We carry out an open information policy. Within the scope of the regulations binding us, we make available thoroughly prepared and precise information about the activities of Inter Cars.





### EXAMPLES OF DESIRED BEHAVIOUR:

We pay taxes, duties and other public liabilities on time.




We comply with the laws and internal procedures during the public authorities' inspections.

We do not finance political parties or support them in any way.

## STATE TREASURY AND BODIES OF PUBLIC AUTHORITY

-  We make every effort to comply with tax and customs regulations in business. We pay taxes and other public duties on time.
-  We are an apolitical organisation, we do not engage in political disputes. We co-operate with bodies of public authorities within the scope permitted by the law, in particular we provide information and subject ourselves to inspections of appropriate bodies.
-  We engage in actions which may support bodies of public authority in the area of legislative initiatives in which we have appropriate knowledge and experience.
-  We engage in actions aiming to prevent terrorism and money laundering. We comply with legal regulations in this respect. We implement processes which aim to ensure the compliance of our operations with relevant laws.

## ACCEPTING OR OFFERING FINANCIAL BENEFITS

-  We highlight the importance of integrity which is the foundation of business. In order to avoid any doubt, which could arise from accepting or offering financial benefits we apply clear rules of conduct in this respect.
-  We do not approve accepting any financial benefits which could affect the decisions we make.
-  We allow only exceptional accepting and offering of small gifts of symbolic value in the scope in which this is accepted in a given type of relations, helps to build good business relations and does not infringe the law.
-  We do not approve of corruption or bribery as methods of operating in business and we undertake actions to prevent them.

### EXAMPLES OF DESIRED BEHAVIOUR:

We report incidents to the superiors which may constitute attempted bribery.

We do not accept gifts except in situations when accepting a gift is allowed according to a relevant procedure.

Any questions or violations in respect of gifts and invitations may be reported to the direct superior or at [compliance@intercars.eu](mailto:compliance@intercars.eu)

**EXAMPLES OF DESIRED BEHAVIOUR:**

- We put waste only into appropriate, designated containers.
- We try to limit the consumption of paper, water, electricity and other resources by economical management.
- We promote pro-ecological trends amongst our clients and business partners.



**ENVIRONMENTAL PROTECTION**



We assume that the natural environment is the key element of our surroundings, therefore it should be taken into consideration when making business decisions. We make sure that we share this awareness with others. As part of intergroup initiatives and initiatives directed to our partners we try to promote pro-environmental attitudes and the conscious, sustainable and legal use of natural resources.

In everyday work we try to limit our influence on the environment and use its resources reasonably. We comply with the law and good practices in the area of environmental protection regulations.

Operating in the automotive industry we feel especially responsible for education and creating environmental attitudes among drivers, our clients and business partners.

## PROTECTION OF THE INFORMATION CONFIDENTIALITY AND PERSONAL DATA



We protect confidential information, including our know-how and business secrets entrusted to us by our partners. We make every effort to ensure that this information is properly secured and used only in the scope in which it has been agreed with its owners.



We respect every person's right to privacy. Like every entrepreneur we process personal data of various persons, including our employees, co-operators and clients. We do it only on the basis of the valid law and only as long as it is necessary for the purpose of data processing.



We process personal data in accordance with the law. We use technical and organisational security mechanisms, adequate to risks which are linked to processing of individual categories of personal data.

### EXAMPLES OF DESIRED BEHAVIOUR:

We make sure that members of the public do not have access to information shown on our monitors or visible on printed documents.

We do not hand over to members of the public information about employees, clients or other persons without the knowledge and consent of these persons.

We follow the data security requirements when managing the IT projects.

Intellectual Right  
 Management Business  
 Trademark Patent License  
 Author Certification Reserved  
 Registered Insurance Legal  
 Company Successful Piracy  
 Information Copyright Protection  
 Recognizable Commercial  
 Property Limitation

PROTECTION OF INTELLECTUAL PROPERTY

We recognise the value and significance of intellectual property in the modern world. We respect intellectual property of third parties, and at the same time protect the intellectual property of Inter Cars.

We use procedures aiming to limit the risk of accidental breach of intellectual property rights of third persons or confidentiality of information.

EXAMPLES OF DESIRED BEHAVIOUR:

- We only use software which we are certain that comes from a legal source.
- In presentations we do not use photographs, films or music without an appropriate licence.

## WHISTLEBLOWING



We promote co-responsibility for the environment we work in. We appreciate involvement in building positive work atmosphere and eliminating phenomena which threaten values which are important to us.



In order to ensure that our values are properly understood, followed and protected in practice we have implemented a dedicated email address **compliance@intercars.eu** which can be used for questions and reporting. We assure a full protection of the person reporting in good faith any kind of irregularity, abuse or misconducts. We believe that this approach is the foundation of locating and eliminating any actions that may be deemed as the violation of the values set forth in the Code.

### EXAMPLES OF DESIRED BEHAVIOURS:

In a well-understood common interest we report instances of abuses in accordance with an appropriate procedure.

We protect the persons acting in a good faith.





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**Inter Cars S.A. - Compliance**

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