

**C O D E O F  
E T H I C S**



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# FORTE'S VALUES

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This Code of Ethics outlines the values of our organisation. We consider them as our declaration to all persons and companies associated with FORTE, by indicating what is essential, important for the Group, and what we keep in mind when building relationships with our employees and the external environment. The main purpose of the Code of Ethics is to recommend values, attitudes and rules of behaviour while performing our daily work. The Code should serve as a benchmark for our actions in relations with our colleagues, customers, suppliers, competitors, as well as social and natural environment. The purpose of the Code is to facilitate the right choices by indicating key ethical standards and norms pertaining to our organisation and professional activity.





## RESPONSIBILITY

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The world surrounding us requires our attention, our consideration on how to improve it so that what is distant and abstract becomes close and loved.

Responsibility is not merely a number of assumed commitments, but it's a drive to improve the quality of life.

And so we listen to our employees, customers, business partners and local communities when they talk about their needs and we set out directions for the Company's development based on those needs.

**RESPONSIBILITY MEANS MUTUAL INVOLVEMENT OF EMPLOYEES AND THE ORGANISATION IN DECISION-MAKING, ACTION AND DAILY WORK.PRACY.**



## SENSITIVITY

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There is so much happening around us... Sensitivity lets us focus, open up to the needs of others and appreciate the seemingly invisible.

We draw our strength from sensitivity to engage in what's important and thus, it helps us execute exceptional projects.

**SENSITIVITY MEANS OPENING TO THE NEEDS OF OTHERS, UNDERSTANDING THEIR PROBLEMS AND RESPONDING TO THEM.**



## COOPERATION

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Each of us is different... In the multitude of tasks and fast-paced life we tend to forget that what makes us different also connects us. Diversity is indispensable. It allows us to see the need for change, it drives us and makes us talk and cooperate.

Only in the exchange of experience, clash of opinions, ideas and attitudes good solutions are born, which provides us with a chance to change our home, our life and our world.

**COOPERATION MEANS THE EXCHANGE OF EXPERIENCE, OPENNESS TO VIEWS AND IDEAS OF OTHERS IN ACHIEVING COMMON GOALS.**



## DEVELOPMENT

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We can express it as a number of products sold, volume of income earned or the size of our investment. But these are not the only factors which show development.

A friendly workplace and opportunities for personal and professional development of employees are equally important as new technologies and products.

It is people who make the Company. Owing to their talents, knowledge and qualifications, a continuous development of the Company is possible.

**DEVELOPMENT MEANS THE OPPORTUNITY TO INDIVIDUALLY IMPROVE YOUR PROFESSIONAL QUALIFICATIONS IN MANY AREAS, PARTICIPATION IN CONFERENCES, TRAININGS, POST-GRADUATE STUDIES AND OTHER DEVELOPMENT PROGRAMMES, PARTICIPATION IN INTERESTING PROJECTS AND SELF-FULFILMENT.**

# INTRODUCTION

## WHY WAS THE CODE OF ETHICS ESTABLISHED?

This Code of Ethics is an expression of our belief that our everyday work should be done in reference to a coherent and universal system of values and rules, which are applicable to all, regardless of the place or position occupied within the FORTE structure. The Code of Ethics refers not only to attitudes and behaviour of our employees, but also to all entities with whom we cooperate.

We feel responsible for what we create, for the environment in which we work and live. Commitment to local communities is one of the important values underlying the activities of the FORTE Group. Our ambition is to be a credible entity which openly communicates the values and rules of conduct it has adopted. The rules are like road signs. The Code of Ethics provides guidance on how to act in accordance with the laws, as well as ethical rules and standards adopted by FORTE. The purpose of the Code is to facilitate the right choices, also by indicating the most important ethical standards and norms in professional activity and social relations. The implementation of the document does not exempt employees from making an independent assessment of a given situation. In case of doubt or when the principles described herein do not provide enough information on how to proceed, you can consult your immediate superior or ethics spokesperson.

## **WHO IS THE CODE OF ETHICS ADDRESSED TO?**

The Code of Ethics defines standards, norms and rules of conduct addressed to all employees, regardless of their position, working time arrangements, working hours, location or type of work performed, as well as to associates and business partners of the FORTE Group.

A failure to comply with the rules described in the Code of Ethics may constitute a breach of employee duties. The employees certify that they are familiar with these rules and undertake to comply with them by signing an appropriate statement.

## **OBSERVANCE OF LAW, AMICABLE RESOLUTION OF DISPUTES**

In every area of its operations, the FORTE Group adheres to the applicable national law, European Union law, international law and human rights set out in the Universal Declaration of Human Rights.

We endeavour to amicably resolve all disputes involving entities of the FORTE Group.

## **MANAGEMENT RESPONSIBILITIES**

Management staff members, that is persons who perform executive functions and supervise the work of other employees, have a particular responsibility for complying with the Code of Ethics. For our culture of ethical conduct and behaviour consistent with the adopted policies, the exemplary conduct of our management staff is very important.

These persons should ensure that their subordinates adhere to the Code of Ethics and that external entities with whom we cooperate know and follow our policies and procedures.

# EMPLOYEES





# OUR VALUES

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## RESPONSIBILITY

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means mutual involvement of the Group's employees and FORTE in decision-making, action and daily work.



## COOPERATION

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means the exchange of experience, openness to views and ideas of others in achieving common goals.



## SENSITIVITY

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means opening to the needs of others, understanding their problems and responding to them.



## DEVELOPMENT

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means the opportunity to individually improve your professional qualifications and competencies in many areas, in particular participation in conferences, trainings, post-graduate studies and other development programmes.



# 1. RESPONSIBLE COMMUNICATION

1. Responsible and effective communication is essential for the proper functioning of a company.
2. Information flow channels within the company must be comprehensible and precisely defined. We are committed to make the principles of information flow within FORTE and outside the Company clear, comprehensible to everyone, regardless of their position, and precisely defined.
3. Two-way communication between the management and employees is key to the company's operations, develops good relationships and a friendly atmosphere. In employee relations, we focus on cooperation and understanding, manifested by openness and professionalism, and joint development of appropriate solutions.
4. Each employee has access to current information about the Company to the extent necessary to properly carry out the assigned tasks. It is essential to adjust the scope and content of information to its recipient as precisely as possible. Do not send messages to people who should not receive them.
5. Information about the Company is provided to the public by officially authorised persons. It is communicated in a reliable and responsible manner, bearing in mind the reputation of FORTE.
6. FORTE is committed to ensure proper communication with external entities cooperating with the Company. We communicate with our environment in a professional manner, focused on substantive cooperation and developing good partnership relations.

7. When we make public statements about the Company, we are aware that we represent the Company and its values.
8. Information disclosed, for instance, in social media by persons cooperating with the Company cannot have a negative impact on the image, reputation or activity of FORTE.
9. You must not disclose or use confidential or relevant information before it is officially made public.
10. We care about the culture of expression. We avoid profanity or expressions that are generally considered to be indecent. We express our respect for each other.
11. Even anonymous use of the Internet or social media in no way releases us from responsibility for our statements and affects our image (that is how other people see us). Remember that negative comments affect the image of FORTE. It is better to try to solve the problem using the official route than to comment on it in social media.

**EXAMPLE A**

Can I post comments regarding my work on Facebook or in other social media?

**Yes. Provided that it is not a Company's secret, confidential information or any information being a secret, and the posted information is true and is not to the detriment of the Company, then we can post our comments on events. Please keep in mind that if the critique relates to FORTE or the Company's employees, it should be constructive. If you suspect any violations of the Code of Ethics or any abuse, report the issue using the official route. Do not disseminate publicly your comments regarding your suspicions before the issue is clarified.**

## EXAMPLE B



Something important happened in the Company. Journalists approach people before the main entrance of the Company and ask for comments regarding the event. Can I comment?

**No, you should not provide any information. You can inform the journalists that you are not authorised to provide such information and refer them to the Board's Department or the Brand Management Department where they obtain the official statement of the Company regarding the situation. Only persons designated or authorised to do so shall comment on key events at FORTE.**

## EXAMPLE C



My colleague sends a lot of information in a single message to many people at the Company. Some information should not at all reach some of these people. Doing so, he somewhat shares the responsibility for the project with other persons and then he does not feel responsible for the project himself. What can I do in this situation?

**Your colleague should not send emails to so many people. Sometimes it is better to organise a short meeting and discuss everything in a small group than to write emails. Please talk to your friend. If that does not help, report this issue to your superior, maybe a conversation with him will be enough for him to change his conduct.**

**EXAMPLE D**

My colleague sends mass emails to a few dozens of people whom these messages do not relate to and she does not hide the identity of recipients. Can she do it?

**No, she should not do it. Such procedures are not compliant with the GDPR. Additionally, by sending such emails your colleague causes people to spend time on matters which do not relate to them at all. Please talk to your colleague, perhaps she's not aware that such conduct is not appropriate.**



**I RELY ON FACTS,**  
**NOT OPINIONS**



**I DO NOT USE WORDS THAT ARE**  
**GENERALLY CONSIDERED TO BE**  
**INDECENT AND OFFENSIVE**



**I KNOW THAT MY BEHAVIOUR AND MY**  
**PUBLIC STATEMENTS AFFECT THE**  
**COMPANY'S IMAGE**









## 2. | USE OF COMPANY PROPERTY

1. Company property is used by employees to properly perform tasks entrusted to them and by the Company to achieve specific business goals.
  - E we use all work tools to carry out the assigned tasks,
  - F we use equipment in accordance with instructions, its intended use and we make sure that the resources at our disposal are not wasted,
  - G we do not tolerate negligence or waste of our resources,
  - H we protect all company property and intellectual values against theft, loss, damage or destruction.
2. When using FORTE's property, we are guided by the following principles:
  - A we take care of all material and financial assets in the possession of the Company,
  - B we respect intellectual property rights vested in other entities or persons,
  - C we use at work only such information constituting a Company's secret or confidential information that is necessary for the proper performance of our duties,
  - D we use the Company's logo and its trademark only in an authorised manner,
3. We use our time at work in a proper and effective way, which means, among others, that we are punctual, we do not prolong meetings and do not take too many breaks during the working day.

4. We represent FORTE's interests in relations with external entities with pride and dignity. When travelling on business and incurring representation expenses, in particular related to participation in meetings with business partners of the Company, we act responsibly and make sure that all costs to be incurred or approved are necessary and reasonable. We ensure that all expenses incurred on business trips are accurately and fully recorded and correspond to the facts. We never use company funds to pay for private travel or supplement our own income.
5. We comply with the rules regarding the use of business credit cards, preferred travel service providers, necessary management approvals, receipts, statements of expenses and other matters related to travel.
6. When travelling on business or acting on behalf of the Company, we do not accept or make invitations to meetings or events which could negatively affect the reputation or image of the Company.
7. We do not use company equipment or other resources of FORTE, in particular to:
  - A engage in illegal activities,
  - B watch pornography,
  - C access websites inciting hatred, racism, discrimination,
  - D conduct political activities,
  - E carry out tasks related to employment with another employer or business activities not related to the Company.
8. We use company equipment only in accordance with the rules and regulations adopted by the Company.
9. We make it our goal to shape awareness and correct attitudes of employees in relation to the protection of the Company's resources, including, in particular, company property, intellectual property rights, software, company secrets and confidential information.



## EXAMPLE A

I would like to use one of our machines to cut some skirting boards as I'm renovating my home. Can I do it?

**Please ask your superior for permission to use the machine. If they consent and you will receive the price estimate for the service which you will agree to pay, you can use the machine.**



## EXAMPLE B

The supplier brought us handle samples which have not been selected for the furniture collection. Can I take them?

**Taking anything from the Company is a theft. If the handles have not been used and you would like to take them, ask your superior for permission. If they agree, you can take them. But please remember that you need to have a pass. Please ask your superior for the pass.**



## EXAMPLE C

A colleague from the shift preceding mine is a very messy person. After his shift our workplace is a mess and I can't locate applicable tools soon enough. What can I do?

**First of all, you have to talk to your colleague. All FORTE employees are required to keep their workplaces clean and tidy. It also applies to waste removal. If the conversation does not help, report this issue to your superior.**

**EXAMPLE D**

While securing a package my friend always uses more plastic foil than necessary. Should I say something about it to him?

**Yes, you should talk to him. If the conversation does not help and he will continue to use more plastic foil than necessary, please report this issue to your superior.**

**EXAMPLE E**

I would like to buy handles which the Company uses in the production of furniture as mine have been damaged. Can I buy such handles at FORTE?

**Ask your superior. If it does not affect the Company's demand, you might be given permission to buy such handles at a favourable price.**

**EXAMPLE F**

One of my colleagues is always late to scheduled meetings? This way people scheduled to meet with her waste their time which could be used in a productive manner. What can I do in such situation?

**Please talk to your colleague. Explain to her that punctuality is important and lack of it affects work and effectiveness of all participants of the meeting. If the conversation does not bring expected results, please report the issue to your superior.**



**I KEEP MY WORKPLACE CLEAN**



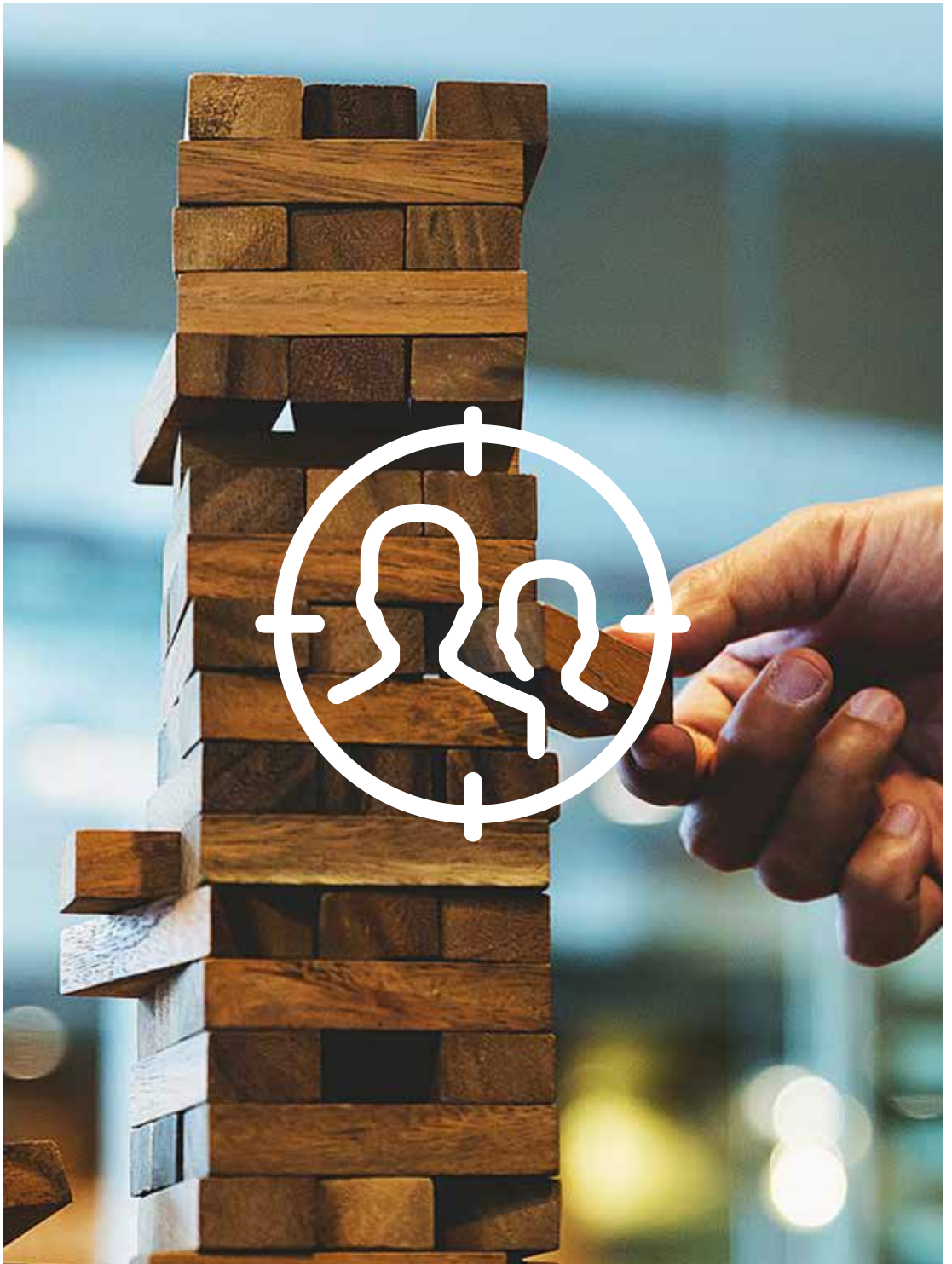
**I USE COMPANY EQUIPMENT IN A  
MANNER CONSISTENT WITH THE RULES**



**I ADHERE TO THE RULES OF USING  
BUSINESS CREDIT CARDS**



**I VALUE MY TIME AND TIME  
OF MY COLLEAGUES**



# 3. | CONFLICT OF INTEREST

1. A conflict of interest occurs when an employee, while acting for their own benefit or for the benefit of another person or entity they have commitments to, acts against the interests of FORTE, and thus cannot perform their duties for the Company in an objective and efficient manner.
2. We are loyal to the Company and we always act in its best interest. We inform our immediate superior about other forms of our professional activity. We avoid conflicts of interest and other activities which could harm the Company or negatively affect its reputation. Even an apparent conflict of interest may undermine the integrity of the Company and of the employee in the opinion of colleagues, customers, suppliers and other entities with whom we conduct business. We do not undertake additional work if it interferes with the performance of our main duties or impairs our objectivity when making business decisions.
3. We make business decisions impartially and exclusively in the interests of FORTE.
4. Any form of bribe or illegal commission paid in exchange for assistance in making a transaction, contract or other obligation is prohibited. This prohibition results not only from the fact that such action leads to a conflict of interest, but also from the fact that such behaviour is illegal.
5. Any potential or existing conflict of interest situation should be disclosed in writing to your superior or ethics spokesperson. If you have information about an existing or potential conflict of interest, please report it immediately to your superior or ethics spokesperson.

**WORTH TO KNOW****If you do not know  
what to do, write to  
ethics spokesperson****[rzecznik.etyki@forte.com.pl](mailto:rzecznik.etyki@forte.com.pl)****[rzecznik.ostrow@forte.com.pl](mailto:rzecznik.ostrow@forte.com.pl)****[rzecznik.hajnowka@forte.com.pl](mailto:rzecznik.hajnowka@forte.com.pl)****[rzecznik.suwalki@forte.com.pl](mailto:rzecznik.suwalki@forte.com.pl)****[rzecznik.tanne@forte.com.pl](mailto:rzecznik.tanne@forte.com.pl)****[rzecznik.bialystok@forte.com.pl](mailto:rzecznik.bialystok@forte.com.pl)****[rzecznik.ukr@forte.com.pl](mailto:rzecznik.ukr@forte.com.pl)**

- 6.** A conflict of interest does not constitute a violation of the provisions of the Code of Ethics if it has been disclosed to your superior or ethics spokesperson.
- 7.** A failure to properly report a conflict of interest or a failure to follow the instructions of your superior or ethics spokesperson will constitute a breach of the Code of Ethics.
- 8.** If there is any doubt as to whether a given situation or circumstance constitutes a conflict of interest or leads to it, your superior or ethics spokesperson should be consulted.
- 9.** Any outside employment, business venture or investment shall not constitute an activity competitive to the employer and shall not have a negative impact on employee's duties. All employees should be loyal to FORTE and their activities should be carried out for the benefit of FORTE.
- 10.** If a family member of an employee or someone close to them works at FORTE, it is necessary to ensure that all activities carried out by the employee are targeted to deliver the maximum possible benefits for the Company. Personal or family relationships cannot be an obstacle to correct decision-making. The employee should not be involved in making decisions regarding employment, remuneration, evaluation or promotion with respect to a member of their family or a person close to them. If a situation arises where the superior is to assess an employee who is a member of their family or a person close to them, it is necessary that a representative of the Personnel Department (director, deputy director or manager) take part in such an appraisal meeting.



11. We disapprove of any activities that compromise our impartiality in performing a function or duty. We consider all forms of corrupt behaviour to be unlawful.
12. We do not offer or provide our business partners with material benefits, exclusive of small corporate gifts of insignificant value. We do not accept any material benefits from our business partners. Detailed regulations regarding gifts are included in the Anti-Fraud Procedure.
13. We should inform our immediate superior or ethics spokesperson about any attempts to offer benefits or benefits actually gained.

**EXAMPLE A**

Can I recommend a company of my family member as a subcontractor for FORTE?

**Yes, you can recommend your family member as a subcontractor, that is you can indicate to whom the offer should be sent, but you can't influence the result of the tender procedure.**

**EXAMPLE B**

The equipment supplier brought me expensive alcohol as a gift after he won the tender. Can I accept the gift?

**No. We shall not accept any gifts from our business partners. Please tell them that FORTE's Code of Ethics explicitly forbids the employees to accept any gifts.**

**EXAMPLE C**

Can I recommend a family member for work at FORTE?

**Yes, provided that you can't influence the recruitment process for this position and the ultimate employment decision.**



**I AM LOYAL TO FORTE**



**I DO NOT ACCEPT OR OFFER  
MATERIAL BENEFITS**



**I INFORM THE RIGHT PEOPLE ABOUT  
A POTENTIAL CONFLICT OF INTEREST**



# 4. | DIVERSITY MANAGEMENT

1. A diverse team of employees, bringing different skills, abilities, experience and culture, is extremely important for shaping corporate governance of the Company and its success on the market. We take all possible measures to prevent discrimination and fully respect basic human rights, regardless of gender, age, marital status, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, sexual orientation or form of employment.
2. We operate among various cultures and nationalities with full respect for law, culture, customs, religion, tradition and other aspects of social life.
3. Our goal is to provide employees and job applicants with equal opportunities for employment, promotion, professional development and improvement. We treat everyone fairly, regardless of their position, seniority, disability, trade union membership, age, gender, sexual orientation, appearance, nationality, religion or political beliefs.
4. Recruitment procedures applied by the Company, employee appraisals, promotion and remuneration of employees are based on clearly defined principles and criteria, which serve to guarantee equal treatment of all employees and job applicants at FORTE.

5. The Company counteracts any form of behaviour showing signs of discrimination, mobbing, insult, harassment or disrespect for other people. We do not condone any discriminatory behaviour towards persons who point to a problem of compliance with the Code of Ethics.
6. At FORTE, we do not employ minors and do not accept forced labour.
7. We cooperate and maintain a regular dialogue with trade unions operating in the Company. We carefully listen to the opinions and observations provided to the employer by trade union representatives. We want to build relationships between trade unions and the Company in a spirit of mutual understanding and dialogue in order to work out effective and socially acceptable solutions.

### EXAMPLE A



One of my colleagues is being continuously made fun of by other members of the team. Can I somehow help him?

**Yes, you can help him. We respect all employees regardless of their origin, religious or political beliefs. Such situations should not happen. You should report this matter to your superior.**

## EXAMPLE B



Some of my colleagues treat foreign employees inappropriately, for instance, by commissioning worse jobs or disrespecting them. What to do?

**We do not condone any form of discrimination because of origin, gender or religious beliefs. Everyone should be treated with respect. If you have witnessed such situation, please report it to your superior or ethics spokesperson.**

## EXAMPLE C



I have noticed that our new colleague is being marginalised by most of our team. The new colleague is a dynamic person, but is not assigned many tasks, no information is provided to him. Recently he mentioned his resignation even though he is a great specialist. How to help him?

**You should report this situation to your superior. Our Company does not condone this type of behaviour. The Code of Ethics is binding on all FORTE employees.**



**I CARE ABOUT GOOD RELATIONS WITH  
MY COLLEAGUES, REGARDLESS OF THEIR  
ORIGIN AND DIFFERENCES OF OPINION**



**I TREAT EVERYONE WITH RESPECT,  
I DON'T DISCRIMINATE AGAINST ANYONE**







# 5. | PROFESSIONAL DEVELOPMENT

1. We share our knowledge and professional experience with employees and colleagues, we assess their work in a fair and professional manner.
2. We inform employees in a clear manner about the scope of their duties and expectations on the position held.
3. We openly and clearly inform employees about our expectations of them, we maintain a constructive dialogue regarding their performance.
4. We provide all employees with equal opportunities in recruitment, training and promotion.
5. We create a work environment that allows both vertical and horizontal promotion. We fill our vacancies through internal recruitment first.
6. We are committed to professional development by constantly improving the competencies and skills of our employees and we enable their personal development.
7. We provide clear and fair rules for access to development-oriented training within the given position or area of competence.
8. We oblige superiors to actively support the professional development of subordinate employees.

9. We oblige all employees of the Group to improve their skills and professional qualifications.
10. We make all decisions regarding employee promotion after thorough analysis.
11. We apply transparent remuneration principles that are understandable to everyone and comply with applicable laws.

#### EXAMPLE A



Recently all administration employees from our Branch have received information on mandatory internal training. I wanted to attend it as scheduled, but my superior did not allow me to go and did not go himself. Could he do it?

**No, your superior should not hinder your participation in a mandatory training. This conduct is not permissible and should be reported to the Personnel Department.**



**I TAKE PART IN INTERNAL TRAININGS  
OFFERED BY THE COMPANY**



**I KNOW MY DUTIES AND PERFORM  
THEM CONSCIENTIOUSLY**



**AFTER TRAININGS, I SHARE MY  
KNOWLEDGE WITH COLLEAGUES**



# 6. | FRIENDLY WORKPLACE

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1. Our goal is to provide all employees with safe working conditions and a good work atmosphere.
2. We put emphasis on cooperation, mutual trust and respect. We want the atmosphere at work to contribute to efficient and creative functioning of the entire Company and to building positive relationships with colleagues, subordinates and superiors.
3. We promote friendly attitudes in the workplace. We treat others with respect even if their views and opinions differ from ours.
4. We respect the rights, dignity and personal freedom of our employees, associates and business partners.
5. We make every effort to provide the opportunity to freely express opinions in professional matters, respecting dignity and diversity of viewpoints.
6. We are well-mannered towards our colleagues, superiors and other persons with whom we maintain professional contacts. We create a good atmosphere at work – we try to be friendly and helpful to each other.



7. We focus on creating an atmosphere of mutual trust between employees and management.
8. We do not accept and try to prevent behaviour showing signs of aggression, mobbing, insult, harassment or discrimination on any grounds.
9. We do not condone any behaviour or statements that violate personal rights of others or lead to conflicts or disrupt a good atmosphere at work.
10. We do not disseminate private, false information about employees or information violating their dignity or reputation.
11. We do not agree to the use of an employee's professional position to achieve unauthorised personal benefits, whether of a material or non-material nature, or in a way that violates personal rights of other employees.
12. Every employee should report to their superiors or ethics spokesperson any doubts or fears regarding, in particular, the place, conditions or atmosphere at work, as well as any manifestations of mobbing, harassment, discrimination or insult. Superiors should encourage their subordinates to express their opinions about the workplace, as well as to report any doubts, reservations or irregularities related to work.
13. We require that our workplace is free from drugs, alcohol and abusive substances.
14. We are committed to maintaining a balance between private and professional life by organising work in such a way as to perform our duties efficiently and effectively.
15. We consider it necessary that every employee, regardless of their position, should set a good example of applying the Company's values in practice.
16. FORTE respects the privacy of its employees. The Company does not disclose information or data related to its employees.



## EXAMPLE A



Should anyone and if yes, then who should be informed about a conflict between colleagues?

**Conflicts which in particular affect the work atmosphere and work results should be reported to the superior. Conflict situations should be resolved directly with the concerned employee in the smallest possible group.**

## EXAMPLE B



Should I inform anyone and if yes, who should I inform that my colleague is under the influence of alcohol?

**Yes, it should be reported. You should immediately inform your superior or persons responsible for the Health and Safety Policy at FORTE, that is employees of the Board and Administration Department, directors of Production Plants, Occupational Health and Safety specialists or through reception desks and secretaries at branch offices.**

**EXAMPLE C**

Is staying at work outside of regular work hours without superior's knowledge permitted?

**No, your superior should be informed about your work outside of normal work hours and their permission is necessary.**



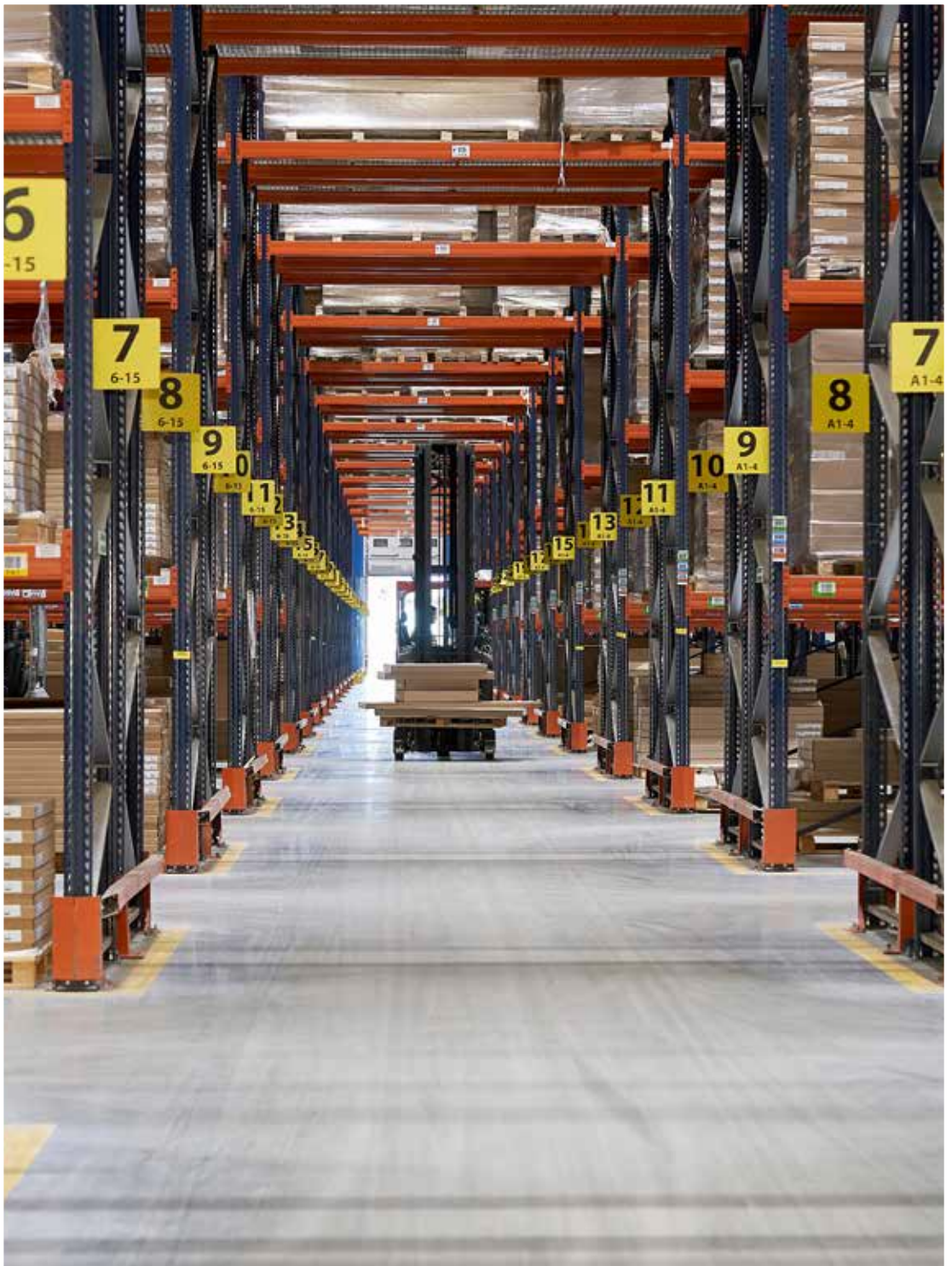
**I AM NOT UNDER THE INFLUENCE OF ALCOHOL OR DRUGS AT WORK**



**I DO NOT GOSSIP**



**I AM KIND TO MY COLLEAGUES**





# 7. | OCCUPATIONAL HEALTH AND SAFETY

1. The Company feels responsible and is committed to providing a safe and hygienic working environment for all of its employees and associates.
2. FORTE takes actions to protect its employees' life and health against threats occurring in all aspects of the business.
3. In its activities, the Company aims to eliminate accidents at work, occupational diseases and potential accidents.
4. The Company provides appropriate financial, technological, technical and organisational resources to achieve the objectives of the Occupational Health and Safety Policy and the tasks set..
5. Every employee, regardless of their position or function, shall:
  - A know and comply with occupational health and safety and fire safety rules,
  - B comply with applicable laws and internal procedures regarding occupational health and safety,
  - C use personal protective equipment required for the position held,

- D** save lives and health in emergency situations, first ensuring their own safety,
  - E** continuously improve the safety and organisation of their workplace, identify and eliminate threats occurring therein,
  - F** report to appropriate persons or entities all cases of breach of occupational health and safety rules and regulations, accidents, injuries or uncontrolled release of hazardous substances into the environment,
  - G** improve their knowledge in the field of occupational health and safety, as well as engage in activities to improve working conditions,
  - H** keep their workplace clean and tidy,
  - I** warn other people whose life or health may be threatened, and counteract such situations,
  - J** promote a culture of health and safety at work and health protection principles.
- 6.** In order to achieve the occupational health and safety objectives, FORTE:
- A** introduces procedures involving management and all employees to constantly improve safety during organisation of workplaces and production processes as well as to identify and eliminate hazards occurring in work processes,
  - B** identifies threats affecting the safety and health of employees and takes necessary preventive measures
  - C** takes care of raising the level of competence and awareness of all employees in the field of occupational safety and health protection,
  - D** promotes a culture of health and safety at work among employees and associates as an important factor in shaping safe and hygienic working conditions, mutual responsibility for employees' own safety and safety of their colleagues,

- E** takes appropriate actions to prevent accidents and injuries as a result of work or in connection therewith, by limiting the causes of hazards in the working environment as far as possible,
  - F** provides employees with regular, documented OHS trainings,
  - G** strives to improve methods for identifying hazards, preventing accidents at work and occupational diseases.
- 7.** We remember that each of us is responsible for the safety of ourselves and our colleagues.
- 8.** Any violation of occupational health and safety, health protection and fire safety rules should be immediately reported to superiors, OHS specialists or ethics spokesperson.

**EXAMPLE A**

Refitting my machine is time consuming. My superior ordered me to turn off the security switch to save time. Currently I can be directly next to the processed element and a moving head working over it. Is it a proper course of action?

**No, no safety hazard to yourself, members of your team or other persons should be allowed. You should report this matter to another foreman or another superior.**



**EXAMPLE B**

Employees from other units who come to the production hall do not always wear e.g. appropriate shoes. Aren't they required to wear protective clothing just like the production hall employees?

**All employees of the Company are required to follow the occupational health and safety rules. If you spot a person who does not wear any protective clothing, e.g. protective shoes, please tell them to do so. Maybe they have forgotten to change their shoes and can return to their unit to change them. If this situation is repeated, report this matter to your superior or ethics spokesperson.**



**I KNOW THE OCCUPATIONAL HEALTH AND SAFETY RULES AND I FOLLOW THEM**



**I KNOW THAT MY ACTIONS AFFECT THE SAFETY OF OTHERS**



**I PARTICIPATE IN ALL FIRE-FIGHTING EXERCISES AND EVACUATION DRILLS**



**I REPORT SAFETY BREACHES TO APPROPRIATE PEOPLE**





# NATURAL ENVIRONMENT



# OUR VALUES

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## RESPONSIBILITY

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for us means conducting business in harmony and with respect for every element of the natural environment, and striving to achieve product quality that will meet ecological standards throughout the product life cycle.



## SENSITIVITY

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means that we perceive the environment as our common good, which we want to protect by making every effort to promote pro-ecological attitudes and actively engage in environmental protection.



## COOPERATION

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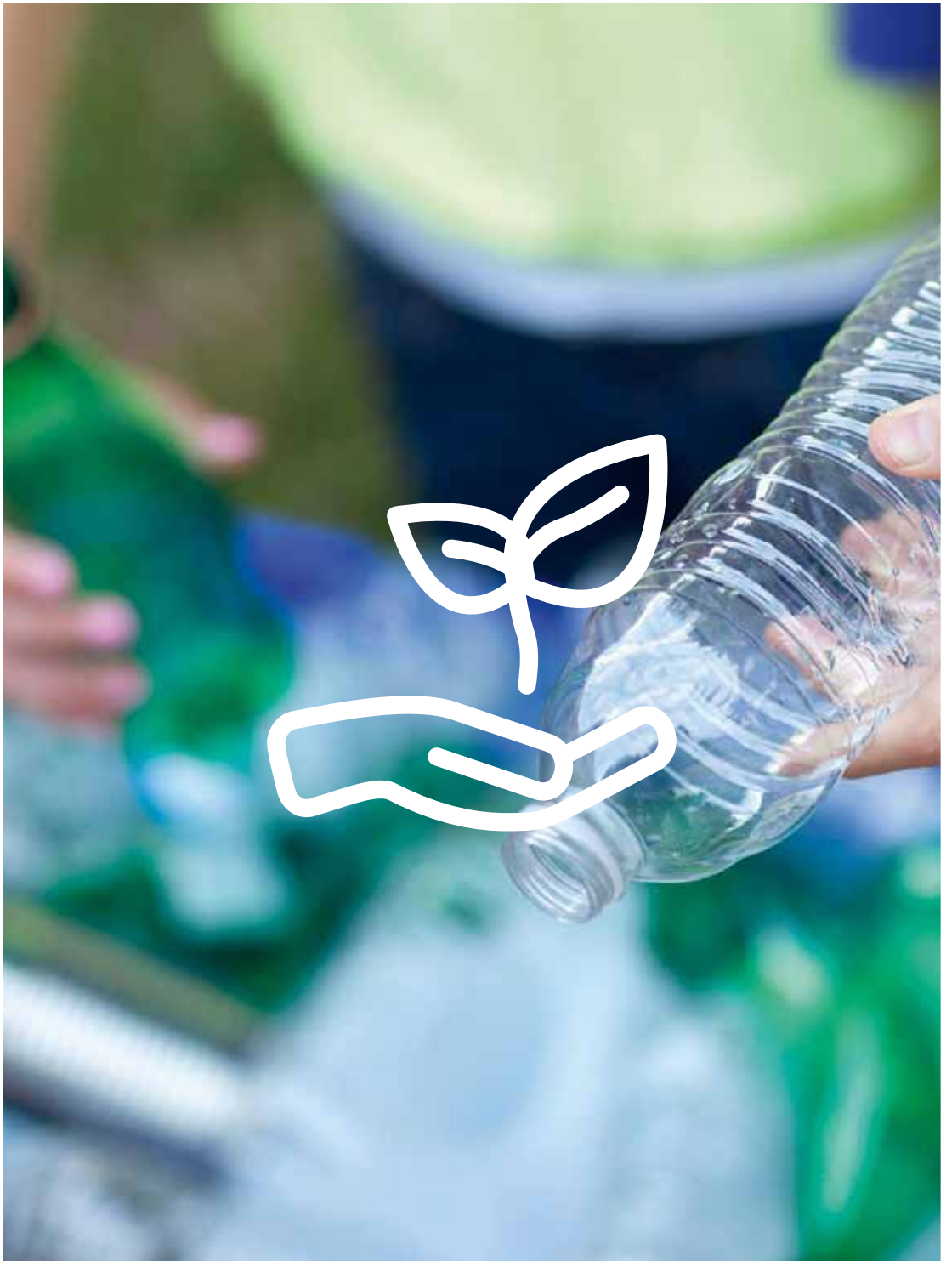
for us means cooperation with environmentally responsible business partners and openness to pro-environmental activities in partnership with local communities, administration and NGOs.



## DEVELOPMENT

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means improving technologies and limiting their impact on the environment and its resources, as well as supporting pro-ecological activities in every area of the Company's operations.



# 1. | PRO-ENVIRONMENTAL ACTIVITIES

1. Our priority are pro-ecological technological solutions in the area of production and investment activities.
2. We strive to prevent waste and excessive use of materials and raw materials as well as waste generation in individual production and packaging processes.
3. We control the legality of timber, timber products and certified materials.
4. We segregate waste and transfer it to responsible recipients who first take it to recovery and recycling processes.
5. We save water, fuels and energy to reduce the use of raw materials.
6. We avoid using substances that are particularly harmful to human health and the environment, and if we need to use them, we take measures to reduce their impact on the environment.
7. We conduct a dialogue with customers, suppliers, administrative bodies, employees and neighbours as an expression of our concern that our production plants are least burdensome to the environment.

**EXAMPLE A**

My colleague does not follow the waste sorting rules.  
What can I do?

**First, talk to your colleague and find out what the reason is. Maybe they are not aware of their duties or are not familiar with the sorting rules and they will change their ways after the conversation. If it does not help, please report this matter to your superior who should inspect the technical equipment for sorting waste and should take steps to eliminate any irregularities.**



**I DON'T USE MORE MATERIALS  
THAN NECESSARY**



**I SORT WASTE**



**I TURN OFF THE LIGHT**



**I SAVE WATER**











## 2. ENVIRONMENTAL RESPONSIBILITY

1. We try to monitor our impact on the environment to prevent its deterioration and to take preventive measures.
  - A know and comply with the principles of the Environmental Policy,
  - B know and comply with the principles of the Ecological Code,
  - C comply with applicable laws and internal procedures regarding environmental protection,
  - D report to appropriate persons or entities all cases of violation of regulations or principles pertaining to environmental protection,
  - E leave their workplace clean and tidy and sort waste generated at work,
  - F promote ecological behaviour..
2. All employees of the FORTE Group, regardless of their position, shall:
  - A know and comply with the principles of the Environmental Policy,
  - B know and comply with the principles of the Ecological Code,
  - C comply with applicable laws and internal procedures regarding environmental protection,
  - D report to appropriate persons or entities all cases of violation of regulations or principles pertaining to environmental protection,
3. We cooperate with environmentally responsible business partners, and we also act as an ecological advisor to our customers.
4. We prevent pollution by improving processes in individual areas of activity to minimise negative impact on the environment.

**EXAMPLE A**

I have witnessed a person pouring the remnants of the engine oil or any other hazardous liquid onto the ground. Is it allowed?

**You have to react immediately and stop this action. Using personal protective equipment secure the area against further spreading of the substance and promptly report this event to your superior. There are procedures in place which provide detailed instructions on how to handle situations which could affect the natural environment.**



**I FUNCTION IN HARMONY WITH THE  
NATURAL ENVIRONMENT**



**I MANAGE NATURAL RESOURCES  
RESPONSIBLY**





# 3. | ENVIRONMENTAL EDUCATION

1. We make our employees, associates and business partners aware that even a small action of each of us can have a huge impact on the environment, because great acts are made up of small deeds. We promote the principle:  
*- Think globally, act locally.*
2. We shape pro-ecological attitudes among our employees, associates and business partners.
3. We conduct educational activities related to ecology and environmental protection for our employees and their families.
4. We educate our suppliers and contractors on environmental requirements.
5. We are open to actions and activities related to ecological education of local communities.
6. We expect our employees and associates to care for the environment and to demonstrate pro-environmental behaviour (in particular, such as waste sorting, efficient material, energy or water consumption), aimed at respecting every element of the natural environment in which we live and work.

**EXAMPLE A**

When my colleague leaves the bathroom, she does not turn off the light and leaves the faucet running. When I try to talk to her about it, she thinks I'm being mean to her. Her superior also does not think this is wrong. Should I just let it be?

**No. It's very good that you pay attention to it. We are responsible for the natural environment and we would like to care for it and protect it even through the smallest of actions. If the superior does not react to it, report this matter to ethics spokesperson.**

**EXAMPLE B**

My colleague prints out a lot of emails and documents which he receives even though it's unnecessary. Should he do it?

**No, we should not print out documents if it is not necessary. Talk to your colleague as he might not be aware of the fact that it's a waste of paper which badly affects the natural environment.**



**I KNOW AND ADHERE TO THE  
ENVIRONMENTAL POLICY  
OF THE FORTE GROUP**





# MARKET AND BUSINESS ENVIRONMENT





# OUR VALUES

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## RESPONSIBILITY

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We understand responsibility as our Company operating in accordance with the principles of responsible and sustainable development. We are open to cooperation with suppliers who want to develop together with us, constantly improve their products and take up new challenges out of concern for the safety of our customers.



## SENSITIVITY

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We open ourselves to the needs of others, we appreciate comments and feedback from our partners. We recognise the needs of local communities and try to respond to them by engaging in charitable, educational and cultural activities of the communities in which we conduct our business activity.



## COOPERATION

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We want to build long-term, transparent cooperation with our business partners, based on mutual understanding and respect for the rights of each party, in particular taking into account the needs of our customers.



## DEVELOPMENT

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We want to improve our processes and provide products of appropriate quality, which are well adapted to the changing needs of our customers.



# 1. CUSTOMERS

1. We pursue our business goals while respecting the rights of all our customers. We try to respond to their needs as quickly as possible. We provide professional, responsible and reliable customer service, which is characterised by sensitivity and respect.
2. We provide full and reliable information about the product, its properties and purpose, exclusive of information which is a trade secret or subject to protection under the applicable laws.
3. We strive for continuous improvement of quality and reliability, paying special attention to issues related to health and safety of using our products. Our products are designed in such a way that, when used as intended, they meet the relevant standards related to product safety, environmental protection and other special requirements. We make sure that they undergo appropriate tests that meet the above standards.
4. What counts for us is reliability, which we understand as placing high demands on work standards, behaviour, customer service and cooperation with contractors. Our reliability is a task for us and an example for others.
5. We strive to build long-term relationships with our customers, offering products of appropriate quality at good prices and demonstrating honesty and reliability in relations with them.
6. We actively learn about the needs of our customers and try to meet them by adapting our offer accordingly. We try to support them in solving problems they encounter as part of their activities.

7. We want to improve our processes and provide products which are well adapted to the changing needs of our customers. We develop our skills in the field of design, service and production in response to consumer requirements. We constantly improve our sales and service processes. We are open to new solutions and proposals. We identify and implement international standards and best practices in the industry. We are flexible and we can adapt to the tastes and needs of customers throughout the world. Based on many years of experience, we confidently enter new markets, create new trade routes and shape new trends.
8. We keep our promises, we are committed to observing internal procedures and principles pertaining to cooperation with customers, in particular with respect to compliance with the adopted customer service standards and timely fulfilment of our obligations towards them.
9. We do not leave customer questions unanswered. We provide only reliable and factual information about our products. We listen to our customers, their criticisms and complaints are each time analysed and explained in good faith, taking into account the legitimate interest of our customer.
- We initiate and implement solutions aimed to eliminate complaints, errors and ambiguities in the future.
10. We educate and actively enhance the knowledge and awareness of our customers regarding the safe use of FORTE products.
11. We want to constantly develop and we make efforts to set trends and development directions in the furniture industry. In order to meet our obligations, we regularly carry out internal audits and undergo audits conducted by external companies. If necessary, we take corrective actions and initiate changes.
12. In our advertising and information materials, we honestly, responsibly and competently inform our customers and consumers about the terms and conditions of cooperation, and about features and properties of the products offered. We take responsibility for our actions.
13. We strive to make our commercial offers, marketing messages and promotional activities reliable and understandable. We do not provide incomplete information or misleading descriptions of the products offered.



**I PROVIDE CUSTOMERS WITH RELIABLE INFORMATION**



**I MEET DEADLINES**



**I DON'T LEAVE CUSTOMER QUESTIONS UNANSWERED**



## 2. | SUPPLIERS

1. In relations with our suppliers, we want to build and maintain the image of a responsible and reliable partner. It is important for us to have a long-term, professional cooperation based on transparent relationships that bring value to both the Company and our suppliers.

of a potential supplier. We identify, among others, situations that could lead to a conflict of interest. We adhere to the principles of fair competition. We do not participate in activities that could be interpreted as corrupt, dishonest or unlawful.
2. We select our suppliers in accordance with transparent internal procedures for the selection and verification of contractors. We assess suppliers in a reliable manner based on clear and objective criteria. When choosing suppliers, we put particular emphasis on avoiding conflicts of interest.
3. At the stage of searching for suppliers, we inform contractors about our requirements and the adopted standards of operation. When choosing a supplier, we check the reliability and reputation
4. We strongly oppose all forms of corrupt behaviour. We do not accept or offer our business partners money or other material benefits in order to obtain benefits for the Company or to influence their decisions.
5. We favour cooperation with partners caring for the natural environment, complying with applicable laws and standards regarding environmental protection and constantly limiting their impact on the environment.

6. We expect our suppliers to be involved in co-creating and improving our offer.
7. We exercise due diligence when signing contracts and performing obligations. We meet the payment deadlines and comply with the agreed commercial terms.
8. We thoroughly assess our suppliers as well as the quality and effects of cooperation at every stage.
9. We provide in good faith all comments regarding the cooperation, which means, among others, that we immediately clarify possible doubts and misunderstandings.



## **I MEET DEADLINES**



## **I VERIFY THE CREDIBILITY AND RELIABILITY OF SUPPLIERS**



## **I CARE ABOUT THE IMAGE OF FORTE AS A RESPONSIBLE AND RELIABLE PARTNER**







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# INDEX

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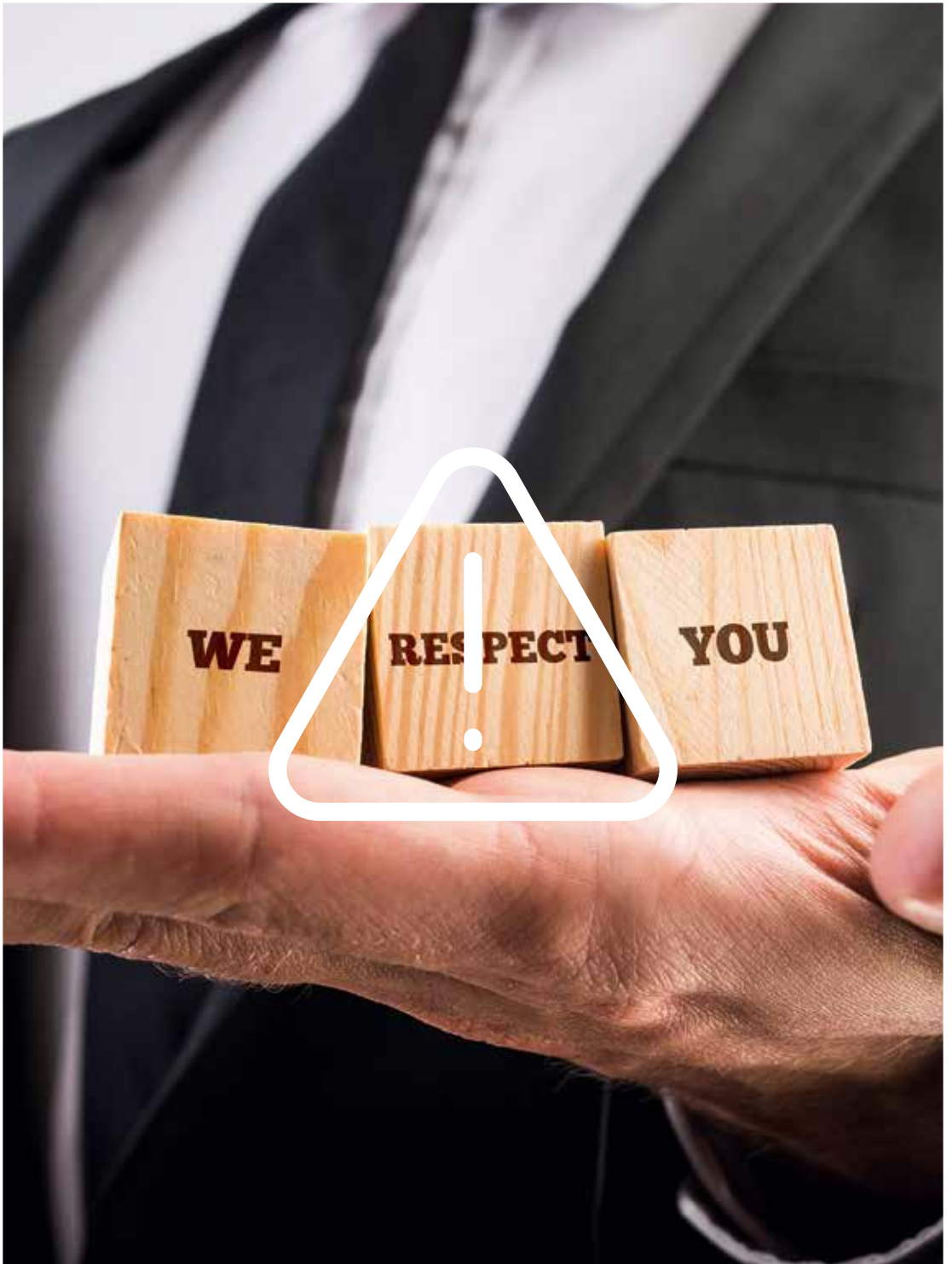
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# 3. | INVESTORS AND SHAREHOLDERS

1. We are a reliable name on the capital market. We treat all shareholders and investors seriously and with due respect. We care for the proper functioning of corporate governance and we provide equal and reliable access to information.
2. No entity is privileged to access information about the Company.
3. We do not use or disclose non-public information prior to the official date of dissemination. We immediately publish information that should be communicated on the market.
4. We operate in accordance with the law and internal regulations:
  - A We comply with applicable laws relating to public companies.
  - B We comply with internal regulations regarding disclosure obligations, including the Disclosure Policy and Confidentiality Regulations.
5. We provide financial and non-financial reports in a reliable and timely manner:
  - A Our reports are prepared in accordance with applicable laws, are complete and reliably reflect the facts.
  - B We inform the market about financial results.
6. We apply high standards of communication with the capital market, shareholders and investors:
  - A We organise regular conferences for investors.
  - B We provide answers to shareholders' questions.
  - C We correct false information.
- C We protect confidential information.



**WE**

**RESPECT**

**YOU**

# 4. | COMPETITORS

1. We compete on the market in an active and effective way, in accordance with the law and respecting other competitors.
2. We do not tolerate any agreements between competitors to set or control prices, to boycott specific suppliers or customers, or to limit the production or sale of product lines.
3. We always obtain information about our competitors in a legal and lawful manner.
4. When dealing with competitors, our employees avoid situations that may cause a conflict between the personal interest of an employee and the interest of FORTE.
5. We do not damage the reputation of our competitors, either directly or by insinuation.

## EXAMPLE A



My friend has been recently employed by our competitors. Can I talk to her about my work?

**You can talk to her about your work, but you should not disclose to her any information which is considered to be a trade secret or material information which the employer considers to be a business secret.**



**I DO NOT DISCLOSE INFORMATION WHICH  
CONSTITUTES A TRADE SECRET  
OR BUSINESS SECRET**





# 5. | SOCIAL COMMUNITY

1. Our goal is to maintain positive, long-term, mutually beneficial social relationships with the Company's environment.
2. We conduct a dialogue focused on solving local problems, we take an active part in the life of local communities, we support the development of cities in which the Company operates.
3. We recognise the role of education, culture and art in our lives and actively support various types of events organised in places of our business activity.
4. We organise internships and placements within the Company, we cooperate with universities and schools in places where our production activity is conducted.
5. We operate in accordance with the Charity Policy adopted by the Company's Management Board.
6. We take support measures both within the Company and for the benefit of local communities.
7. We support charity actions to level out social differences.
8. We actively support employee volunteering by regularly organising and financing projects for the benefit of local communities, which are implemented by employees of the Company.

**EXAMPLE A**

A teacher whom I know privately, asked me for help in renovating a classroom in one of local schools. Can I be part of the decision making process regarding this request?

**No, you should not be part of the decision making process regarding this request. You can send the request document to a relevant person, but this should be the extent of your action.**



**I SUPPORT THE LOCAL COMMUNITY BY**  
**ENGAGING IN VOLUNTEER ACTIVITIES**





# COMMUNICATION CHANNELS



# 1. | ETHICS SPOKESPERSONS

1. In the FABRYKI MEBLI „FORTE” S.A. Group, there are ethics spokespersons who are elected for a two-year term.
2. An Investigation Commission is established to assist ethics spokespersons in their activities.
3. The main tasks and duties of ethics spokespersons include:
  - A monitoring compliance with ethical norms and standards as well as suggesting solutions and recommending actions that are aimed at strengthening awareness of ethical behaviour in the Company,
  - B clarifying doubts and ambiguities regarding the interpretation of the principles contained in the Code, in particular by answering questions asked by employees and explaining the reported problems,
  - C disseminating the provisions of the Code among employees and promoting its principles and values,
  - D accepting proposals for changes to the Code and considering suggestions submitted by employees,
  - E supervising the process of accepting reports regarding violations of the Code of Ethics and maintaining a register of such reports.
4. Ethics spokespersons perform an advisory function and are obliged to maintain confidentiality and professionalism.
5. Ethics spokespersons cooperate with each other to comply with the provisions of the Code of Ethics.
6. Ethics spokespersons are required to submit three-month reports on their activities.

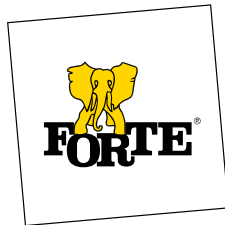
## 2. | CLARIFYING DOUBTS AND PROPOSING CHANGES TO THE CODE OF ETHICS

1. Every FORTE employee has the right to receive explanations regarding the provisions of the Code that are unclear to them. To this end, an employee may contact their immediate superior or ethics spokesperson.
  - A take independent action to remove violations,
  - B report the violation to their immediate superior or ethics spokesperson.
2. All employees of the FORTE Group have the opportunity to report any violation or suspected violation of the provisions of the Code.
  - A meet ethics spokesperson directly,
  - B report a violation of the provisions of the Code at one of the following email addresses  
in Polish:  
rzecznik.etyki@forte.com.pl;  
rzecznik.ostrow@forte.com.pl;  
rzecznik.hajnowka@forte.com.pl;  
rzecznik.suwalki@forte.com.pl;  
rzecznik.tanne@forte.com.pl;  
rzecznik.bialystok@forte.com.pl,  
in Ukrainian:  
rzecznik.ukr@forte.com.pl,
  - C report a violation of the provisions of the Code by post to the address of the registered office of FORTE in Ostrów Mazowiecka with a note „Ethics spokesperson”,
  - D complete an anonymous form on the Company’s website at [www.forte.com.pl/pl/contact](http://www.forte.com.pl/pl/contact) under „Report a violation”. By sending an anonymous report you agree not to receive information about the resolution of the reported problem.
3. In the event of a breach of the Code, the employee has the right to:
  - A take independent action to remove violations,
  - B report the violation to their immediate superior or ethics spokesperson.
4. In order to report a violation of the Code to ethics spokesperson, you can:
  - A meet ethics spokesperson directly,
  - B report a violation of the provisions of the Code at one of the following email addresses  
in Polish:  
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rzecznik.ostrow@forte.com.pl;  
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rzecznik.tanne@forte.com.pl;  
rzecznik.bialystok@forte.com.pl,  
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FABRYKI MEBLI „FORTE” S.A.

ul. Biała 1

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