

GROUP POLICIES

Code of Conduct

Always By Your Side.

www.polygongroup.com



Contents

Introduction	3
Polygon Code of Conduct Business Ethics	4
Anti-Corruption and Anti-Trust	
Employees	5
Professional behaviour	
Working environment	
Forced Labour	
Child Labour	
Equal opportunities	
Compensation	
Conflicts of interest	
Employee communication	
Confidential information	
Personal data protection	
Customers	7
Honesty and integrity	
Care and respect	
Gifts and favours	
Suppliers and Sub-contractors	8
Gifts and favours	
Bribery	
Payments	
Suppliers legal compliance	
Society and the Environment	9
Legal compliance and local customs	
Environmental impact	
Shareholders	10
Communication with shareholders	
Implementation	10
Breaches of the Code	11

Introduction

The Polygon Code of Conduct outlines the main principles of Polygon's corporate responsibility, as well as the personal, ethical and professional principles which all Polygon employees should adhere to, and which guide our relations with other employees, customers, suppliers, society and shareholders.

All Polygon Managers have the responsibility to inform employees about the Code of Conduct, and all employees have the responsibility to keep informed about the Code.

The Polygon Code of Conduct rests on the principle that all employees are individuals responsible for their own professional behaviour.

Axel Gränitz

President & CEO

December 2018



Polygon Code of Conduct

Business Ethics

Anti-Corruption and Anti-Trust

Based on our values of Integrity, Excellence and Empathy, Polygon is committed to the principles of fair competition. This includes our commitment to compete for business through the quality and price of our services, and not by offering improper advantages or benefits to others. Polygon has a clear policy of anti-corruption and behaviours associated with good business ethics.

The detailed policy is available on Polygon's intranet under the section ESG. The policy also includes strict adherence to the anti-trust laws and regulations that strive to prevent anti-competitive behaviour. For detailed information please refer to Polygon's Anti-Trust policy document.



Employees

Professional behaviour

Polygon employees are expected to undertake their duties in a professional, responsible, conscientious and ethical manner and to act in the best interests of Polygon. Polygon equipment and property should be treated with due care, and should only be used in the course of Polygon's business. Polygon's operations are, to a large extent, carried out in private homes or in hazardous environments, and with potentially dangerous equipment. Accordingly, it is absolutely forbidden for employees to be under the influence of alcohol or other drug substances on work sites.

Working environment

Polygon strives to be an attractive employer by creating a working environment based on collaboration, responsibility and openness. The company does not accept any form of bullying, e.g. isolation, verbal or physical abuse, or harassment.

The wellbeing of our employees is a high priority, and Polygon is committed to providing safe and healthy working conditions. We operate in compliance with all applicable laws and legislation, as well as setting high company standards within the area of health and safety. We take proactive action to report and follow up on occurred incidents to avoid and reduce future injuries.

Forced Labour

Polygon does not tolerate any form of forced or compulsory labour.

Child Labour

Polygon supports the elimination of exploitative child labour. We employ only workers who are at least 17 years of age, or the higher age limit that may be applicable in a country. We commit to complying with the Convention concerning the minimum age for admission to employment (Convention No 138 of the International Labour Organisation) as well as the Convention concerning the prohibition and immediate action for the elimination of the worst forms of child labour (Convention No 182 of the International Labour Organisation). If a national regulation concerning child labour provides for stricter measures, these shall have precedence.

Equal opportunities

Employees are recruited and promoted solely on the basis of their qualifications for the job, regardless of race, religion, age, national origin, gender, sexual orientation, political opinion, union membership, marital status or disability unrelated to the task in question. Polygon always works in compliance with applicable laws and legislation in the area of equal opportunities and strives to continuously improve our diversity in the workplace.





Compensation

Each employee shall be rewarded in a correct and fair manner in accordance with their individual performance and contribution to the success of the company.

Conflicts of interest

No employee may be involved in any activity that is in conflict with the company's business interests. Such conflicts of interest may include for example, holding external positions or ownership with competitor, customer, supplier, sub-contractor or agents, that is in conflict with Polygon's interests; receiving gifts and hospitality where there is an expectation or a perceived expectation of a return favour, or decisions regarding employment or promotion of relatives or friends.

Employee communication

Good employee communication is essential in order to run our business efficiently. Everyone in the company needs to know our goals, action plans and performance. A free flow of information is important; everyone at Polygon can speak to anyone across functions and organisational levels.

Confidential information

It is important to keep any confidential information relating to Polygon or Polygon's customers confidential. Communication to media is only conducted through Country Presidents. No financial information is communicated before it is officially disclosed by the company and any other critical issues should be communicated via the HR Manager or Integrity Line.

Personal data protection

When Polygon collects, uses or otherwise processes personal data about our employees we do this in a lawful, fair and transparent way. Polygon also requires that our employees handle any personal data related to our customers in the same professional manner. More information can be found in the Polygon IT Guidelines.

Customers

Honesty and integrity

Loyal, satisfied customers are the basis of our reputation. Honesty and integrity in all dealings with customers are prerequisites for profitable, long-term business relationships.

Polygon will provide customers with accurate information, and will only make commitments that we can live up to. Polygon will always price the work we do fairly and accurately, and will always seek to provide the appropriate services in accordance with our contracts. Additional work will always be agreed and confirmed with the customer in writing or by email before work commences.

Care and respect

A large part of Polygon's work is conducted at customer's premises which can be in the private homes of our customers or at work places. Our job is often following an emotionally stressful property damage. It is essential that we behave with the care and respect required in a private home or at our customer's work place.

We will also do our utmost to provide our customers with clear and consistent information on the scope, process, timelines and current status of the work.

Gifts and favours

Gifts, entertainment, compensation and personal favours may be offered to a third party only if they are modest in value and consistent with customary business practice. No gifts, entertainment or personal favours may be offered in contravention of any applicable law or code of practice.



Suppliers and Sub-contractors

Gifts and favours

No employee should seek or accept any gift, entertainment or personal favour that might reasonably be believed to have an influence on business transactions. Offers of gifts, entertainment or favours from suppliers shall always be reported by the employee to his/her manager and registered in accordance with Polygon's anti-corruption policy.

Bribery

Polygon has a zero tolerance policy in relation to bribery or behaviour that provides the impression that business advantage will be obtained through providing such gifts, entertainment or favours. All attempts of bribery shall be reported to the Compliance Officer.

Payments

Payments in cash shall never be made to suppliers and sub-contractors. Payment shall only be made to the contracted party and never to a third party. Polygon does not pay to numbered bank accounts. Payments are only made upon the presentation of an invoice that matches the agreed price and job performed; and in accordance with Polygon's payment routines.

Suppliers' legal compliance

Polygon requires that all our business partners observe the same high business ethics and we will not do business with suppliers that fail to comply with any applicable local, national or international laws and regulations. As we do ourselves, we expect our business partners to have a compliance model to identify and follow up on risks related to breaches of legal compliance. Polygon will inform business partners of the company's values and business principles.

Society and the Environment

Legal compliance and local customs

As a company, Polygon and our employees shall comply with all the applicable laws and regulations of a country in which the company operates.

In cases where a conflict exists between more restrictive laws and this Code's principles and values, the law shall prevail. We will respect the local traditions and customs of each country. In cases where there is a conflict between local customs and this Code's principles and values, the Code shall guide the employee's course of action.

Export and trade sanctions

Polygon is a global company but we act locally; this means that we perform services within the countries we operate and are currently not impacted by international trade rules, export control and trade sanctions. Trade sanctions prohibit or restrict the export of specific goods or conducting business in certain countries and/or with certain individuals, companies or organizations. In cases where an employee might be involved in trade or export, applicable rules and procedures must be followed. Trade rules are complex as the rules vary by location and may change following world events. For further guidance contact your local compliance officer.

Environmental impact

Polygon is committed to reducing any negative impact on the environment from our operations. Through the nature of our business of restoring, rather than completely rebuilding damaged properties, Polygon is reducing the use of resources and contributing to a sustainable society. Polygon is also seeking to use energy efficient equipment and processes in our operations.

We always encourage our partners and subcontractors to comply with sound environmental practices.





Shareholders

Communication with shareholders

Polygon will provide accurate and timely information on the company's activities, performance and financial situation to our owners. Polygon's accounting statements will present a true and correct view of the company's financial performance in line with International Financial Reporting Standards (IFRS).

Implementation

This Code of Conduct applies to all employees and all Polygon business activities, regardless of location. The Code sets out the main principles of corporate and individual employee responsibility, but cannot address all possible ethical dilemmas that may arise. It is intended to guide employees in how to act with integrity and good judgement at all times. Observance of the Code will be evaluated periodically at group level. The Code will be regularly reviewed and amended as necessary.

Breaches of the Code

If a breach of the Code has been identified, the response to the breach will result in an investigation which may result in disciplinary actions, termination of employment, damage claims raised by the company or even criminal charges. Employees who identify breaches of the Code should, as soon as possible, report the breach to the immediate manager or any other senior management position, or the Human Resources Manager.

In the event that an employee has reported a breach and does not get any response, or if the employee is not comfortable in reporting via normal channels, Polygon provides an Integrity Line which is located on the Polygon's Intranet. The Integrity Line provides an opportunity to report concerns anonymously to the Polygon Compliance Officer or external representative.





www.polygongroup.com

