

PARTNER CODE OF CONDUCT



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POLYGON VALUES

Our values Integrity, Excellence and Empathy are what set us apart from other companies - it's the foundation of our business philosophy and model. The values and our responsibility are closely connected with our brand promise Always by your side.

INTEGRITY

We are transparent and act in an honest way. We take responsibility for our actions. Reliability is a key part of the services we offer.

EXCELLENCE

We are experts and knowledge leaders, striving for continuous improvement and applying best practice from our global operations.

EMPATHY

We have a genuine understanding of our customers' challenges. Our people make a difference by showing respect and compassion.

OUR PARTNER CODE OF CONDUCT

Our Partner Code of Conduct (or the “Code”) outlines the main principles of Polygon’s corporate responsibility, as well as the personal, ethical and professional principles which all Partners to Polygon must follow when conducting business and in relationship with Polygon and its own colleagues, employees, suppliers and other partners. Polygon also expects that all Partners shall adhere to UN Global Compacts 10 Principles.

THE CODE APPLIES TO ALL PARTNERS

The Partner Code of Conduct clarifies the ethics and compliance expectations for everyone who works for Polygon. The Code and its high ethical standards apply to all our Partners and its employees, regardless of location and nature of business. We expect all Partners to communicate the obligations set out herein and ensure compliance with the Code throughout their organisations and value chain.

Polygon’s Partner Code of Conduct rests on the principle that all of our Partners, their employees and suppliers are responsible for their own actions and professional behaviour.

As Polygon operates in many countries and several continents, there may be times when local laws, regulations, or customs conflict with this Code. Whenever there is a conflict between an applicable legal requirement and the Code, you must apply the strictest standard. Ensure you don’t follow customs that violate our Code.

The Code sets out the main principles of corporate and individual responsibility but cannot address all possible ethical dilemmas that may arise. It is intended to guide our business partners in how to always act with integrity and good judgement. If in doubt at any time employees should refer the matter to a member of the Partners senior management team or compliance function.

WHAT HAPPENS IF A PARTNER VIOLATES THIS CODE?

Failure to comply with this Partner Code of Conduct may result in legal actions, including, but not limited to, the withholding of payments to the Partner and termination of the Partner’s contract with immediate effect.

SERVICES AND SOLUTIONS SHOULD BE THE SUSTAINABLE CHOICE

Partners shall conduct its operations in an environmentally sustainable manner, and comply with, or exceed, those standards stipulated by laws, regulations and international conventions. It shall be the responsibility for the Partner’s whole organization to adopt the approach of minimising the environmental impact and constantly improving the environmental performance.

Polygon expects its business Partners to:

- have environmental commitment as a fundamental part of its business model, overall strategy and goals. The environmental strategy shall incorporate reduction-targets, progress monitoring and actions to ensure we reach our environmental goals.
- work systematically to identify risks, mitigate, and follow up on any negative impact its business operations, products and services may have on the environment, and work proactively to reduce it.

- engage in open dialogue regarding environmental matters and collaborate to improve Polygons performance as well as theirs.
- maintain transparency and provide any necessary environmental data when requested.
- use prevention and restoration over replacement as their first choice, limiting the use of new materials and waste. Any remaining waste should be carefully disposed of and recycled where possible. Non virgin material should be used to extent possible.
- if essential to the business, track and optimise the consumption of natural resources, including energy and water, and implement sound measures to prevent or minimise pollution, reduce waste and protect biodiversity and ecosystems.

Polygon measures greenhouse gas emissions (GHG) and have science-based emission reduction targets aligned with the latest climate science and encourage their business Partners to do the same. Furthermore, Polygon encourage its business partners to source renewable energy to the best of their abilities.

Polygons primary approach to property damage is to prevent and control as well as restore and repair rather than replace. Polygon promotes Partners with circular business models (partners that prevent, restore and repair, re-use and recycle).

BEING A REPRESENTATIVE OF POLYGON

Many of our Partner's people meet Polygon's end-customers every day, often operating autonomously without direct supervision. This requires everyone to undertake their duties in a professional, responsible, conscientious and ethical manner, while acting in the best interests of Polygon.

CARE AND RESPECT

A large part of Polygon's work is conducted at customers' premises, which can be in the private homes of our customers or at workplaces. The job often follows 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 workplace. Partners are expected to do the utmost to provide the customers with clear and consistent information on the scope, process, timelines and current status of the work.

HUMAN RIGHTS

Partners are expected to adhere to the UN Guiding Principles on Business and Human Rights and UN's Universal Declaration of Human Rights. Partners shall align with applicable standards and legislation such as national supply chain laws and relevant EU directives as well as OECD Guidelines for Multinational Enterprises and ILO Core conventions.

Partners shall comply with national regulations for legal labour in all countries where they operate. Individuals who do not have the legal right to work in a country shall not be hired.

Any form of modern slavery, including forced, bonded or compulsory labour, or human trafficking, must not be tolerated. Each one's presence is strictly voluntary. Further, deposits or confiscations of identification papers from employees shall not be required. Employees are free to leave their employment.

Children's right to personal development, including the right to education, the right to rest and play and the right to have the child's basic needs met, in accordance with the UN Convention on the Rights of the Child, Article 31.1, must be respected. Unlawful employment or exploitation of children, including child labour anywhere in our value chain, in accordance with the UN Convention on the Rights of the Child, Article 32.1 is prohibited.

WORKERS' CONTRACTS, WORKING HOURS & COMPENSATION

Partners shall comply with local laws and regulations regarding workers' contracts and working hours, including overtime and overtime compensation. Salaries shall be paid regularly and the applicable local legislation, industry standards and the local market situation shall be complied with.

COMMUNICATION

A transparent culture where everyone feels free to speak shall be encouraged.

Employees shall be provided with a way to anonymously report any misconduct they may experience at work, and retaliation against employees who raise concerns in good faith must not be tolerated.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Freedom of association means that employees of our Partners shall have the freedom to join, not join, or establish any association. This right applies both to organizing and taking part in collective and individual bargaining that is undertaken in accordance with local laws and regulations. No employee shall be subject to dismissal, discrimination, harassment, intimidation, or retaliation for exercising these rights.

HEALTHY AND SAFE WORK ENVIRONMENT

The well-being of the employees shall be of high priority, and the Partner shall be committed to providing safe and healthy working conditions.

Partners shall operate in compliance with all applicable laws and legislation, as well as setting high company standards within the area of health and safety. Proactive actions to report and follow up on sick leave and incidents to avoid and reduce future injuries and limit absences, shall be taken.

HEALTH

In their jobs, some employees may be exposed to dusty, smoky or otherwise unhealthy environments. The aim should be for the Partner to reduce the exposure to health-damaging substances and materials to an absolute minimum and provide high-quality protective equipment whenever it is needed.

Stress is a common cause of poor health, both physically and psychologically. Partners shall acknowledge the fact that many jobs are stressful at times but strive to avoid long-term or continuous stress by proactive planning.

Polygon's psychological working environment is based on integrity, excellence and trust. Therefore, we do expect our Partners not to tolerate any form of bullying, e.g. isolation, verbal or physical abuse or harassment.

SAFETY

Our operations are sometimes carried out in hazardous environments using potentially dangerous equipment. Before work begins at a new site, a safety assessment must be made by an appropriately qualified person. Protective equipment must be worn and instructions, manuals, policies etc. must be followed.

Driving motor vehicles is a common feature in everyday work for many. Whether it is a Polygon-branded van, a company car or a private vehicle, when driving for work purposes, local laws, rules and regulations must be followed.

It is absolutely forbidden to be under the influence of alcohol or other drugs during work. This applies regardless of when the substance in question was consumed or when work takes place.

DIVERSE AND INCLUSIVE WORKPLACE

Diversity opens a rich potential for new ways of thinking, helping us to build successful and winning teams. Polygon embraces diversity in its workforce and strives for a workforce reflecting the countries we operate in.

Polygon recruits, promotes and compensates solely on the basis of qualifications for the job and performance. We provide a work environment where everyone is treated with respect and dignity and given fair and equal opportunities for career advancement and development. Partners are expected to share that view and to act accordingly.

Our Partners must not accept discrimination based on any grounds including but not limited to race, religion, age, nationality, gender, sexual orientation, political views, union membership, marital status, disability or any other factors.

BUSINESS ETHICS AND COMPLIANCE

Our Partners shall be committed to competing for business through the quality and price of services, and not by offering improper advantages or benefits to others. All Partners shall have a clear policy of anticorruption and behaviours associated with good business ethics. Partners shall also have a policy that includes strict adherence to anti-trust laws and regulations that strive to prevent anti-competitive behaviour.

CONFLICTS OF INTEREST

The Partners shall have policies to prevent employees from being involved in any activity that conflicts with the Partners' business interests. Such conflicts of interest may include, for example - decisions regarding employment or promotion of relatives or friends, holding external positions or ownership with competitors, customers, Partners, sub-contractors or agents, that is in conflict with the Partner's interests, or receiving gifts and hospitality where there is an expectation or a perceived expectation of a return favour.

CONFIDENTIAL INFORMATION

It is important to keep any information relating to Polygon, its employees or customers confidential. Partners must ensure that appropriate restrictions are in place to prevent their employees from disclosing undue information, and that these restrictions are adhered to.

PERSONAL DATA PROTECTION

Suppliers shall ensure that personal data is processed (created, collected, used, shared, stored, deleted etc.) in accordance with applicable data protection legislation (e.g. the EU GDPR) and Polygon's instructions. Appropriate technical and organisational measures shall be implemented to ensure the security of the personal data.

EXPORT AND TRADE SANCTIONS

Polygon is a global company, but with local business. Trade sanctions prohibit or restrict the export of specific goods or conducting business in certain countries and/or with certain individuals, companies or organisations. Partners must ensure that no entity or person subject to United Nations, European Union or other applicable sanctions laws and regulations is involved in or unlawfully benefits from the Partner's operations, including its own supply chain, and to prevent involvement in any transaction prohibited by applicable sanctions laws and regulations.

MONEY LAUNDERING

All Partners must firmly oppose all forms of money laundering and only conduct business with sub-suppliers and partners involved in legitimate activities with funds from legitimate sources. Partners shall take reasonable steps to prevent any illegal payments and ensure that their financial transactions are not used by others to launder money.

LEGAL COMPLIANCE AND LOCAL CUSTOMS

Partner's and its employees shall comply with all of 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. Further, local traditions and customs of each country shall be respected. In cases where there is a conflict between local customs and this Code's principles and values, the Code shall guide the employees' course of action.

GIFTS AND HOSPITALITY

No Partner shall, directly or indirectly, offer gifts to Polygon or to other customers, vendors, partners or others, or to representatives, or anyone closely related to these, unless the gift is of modest value.

Hospitality, such as social events, meals or entertainments may be offered and received if there is a business purpose involved, and the cost is kept within reasonable limits.

Gifts and hospitality shall not be offered or received in situations of contract negotiation, bidding or award. When dealing with public officials, gifts and hospitality shall be avoided.

CORRUPTION AND BRIBERY

Polygon has zero tolerance and is firmly opposed to all forms of corruption. No Partner, or its employees shall ever offer, give, ask for, accept or receive any form of bribe. A bribe occurs when someone attempts to influence a third party's decision by offering an improper advantage. In some countries government officials commonly request "facilitating payments", which are payments made to government officials to expedite performance of a routine, non-discretionary government action. Polygon strictly prohibits and its Partners shall ensure to prohibit all facilitating payments.

Partners shall not use agreements with middlemen to channel payments to anyone to facilitate corruption, and each Partner shall exercise due care with respect to the selection and use of business partners so that Partner does not become involved in corrupt activities.

Any observation of suspected corruption shall be reported as stated under “How to Report”, below.

PAYMENTS

Payments in cash must never be made by Partners to their contractors. Payment must only be made to the contracted party and never to a third party. Payments are only made upon the presentation of an invoice that matches the agreed price and job performed, and in accordance with appropriate and lawful payment routines.

QUESTIONS AND CONTACT INFORMATION

HOW TO REPORT

Each Partner shall immediately report any act that is likely to constitute a breach of this Partners Code of Conduct. Reporting can be done through Polygon's Integrity Line at: <https://report.whistleb.com/en/polygonexternalreport>

WHAT HAPPENS AFTER I RAISE A CONCERN?

Once a report has been made it will be investigated appropriate actions taken.

AUDITS

Polygon may from time-to-time conduct surveys and audits (either directly or through independent third parties engaged by Polygon in its sole discretion) to verify compliance with this Partner Code of Conduct and any applicable laws. Such surveys and audits will be reasonable as to scope, place, date and time. The Partner shall cooperate fully and in good faith with any such audit.