

# Ethics and integrity

At the LOTOS Group, we are aware of the need to follow a code of ethics and clear-cut standards of behaviour both in social and workplace environments. Adherence to ethical standards improves the comfort and quality of our work, regardless of what responsibilities we hold or what place we occupy within the organization, which also plays an important role in shaping long-term and trust-based business relations, including commercial ones.

## Adherence to ethical standards + economic efficiency = value for the LOTOS Group shareholders

The LOTOS Group's Code of Ethics has been in place since 2013. This document is of key importance to us for the following reasons:

- It is a set of principles and standards of conduct rooted in the organization's ethical values.
- It is intended to govern behaviour within the organization, as well as external relations with key stakeholder groups, capital market participants, customers and trading partners, local communities and competitors.

We make every effort to communicate the LOTOS Group's ethical standards within and outside of our organization. All our existing and newly hired supervisory and management staff as well as employees and trading partners of the LOTOS Group are required to confirm with their signatures that they have read and are familiar with the Code of Ethics. The LOTOS Group's Code of Ethics has been translated into English and Lithuanian. Additionally, we organize training for all new hires, and the Ethics Officer holds regular meetings with the employees.

Number of downloads of the Code of Ethics in the Polish language version	2013	2014	2015
www.lotos.pl	1,107	889	2,804
Intranet	370	125	159

The full version of the LOTOS Group's Code of Ethics is available on our [website](#).

## Ethical Conduct Programme – objectives and implementation

The LOTOS Group's Code of Ethics is the cornerstone of our comprehensive Ethical Conduct Programme, designed to make business ethics the highest point of reference in the management of our organization.

As part of the Ethical Conduct Programme, in addition to ethics education, communication initiatives and channels for reporting violations of the Code of Ethics, an important role is played by the Ethics Officer, whose duty is to ensure that the accepted standards of ethical conduct are always upheld. The Ethics Officer was first appointed in 2014. Persons in this role perform their duties without remuneration.

## The voice of employees is heard:

Each employee of the LOTOS Group has access to the Ethics Officer. The management staff members have a special role to play in improving the organization's ethical culture: they support the employees by setting a good example to follow, and by discussing with them any doubts concerning ethical issues.

### The Ethics Office can be contacted by:

- A meeting, upon earlier phone contact (phone no. 505 050 218) at the time convenient for the interested party;
- A telephone conversation or recording the message (phone no. +48 58 308 80 70);
- An e-mail sent to [liniaetyki@grupalotos.pl](mailto:liniaetyki@grupalotos.pl);
- Filling in a Request form at [www.lotos.pl](http://www.lotos.pl) and in LOTOSTRADA, ETHICS PROGRAMME subservice;
- Sending communication by traditional mail.

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## We listen to what others have to say:

The LOTOS Group's stakeholders may report any suspected or actual breaches of the Code of Ethics to the persons responsible for their prevention using dedicated channels of communication with the LOTOS Group's Ethics Officer. Relevant form is available on our website:

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### [More information](#)

## Excellent ethical conduct and how to achieve it – as exemplified by LOTOS Paliwa

In 2015, LOTOS Paliwa set up the Ethical Conduct Programme Team responsible for the Programme's operation throughout the LOTOS service station network, which marked the end of a two-year phase of implementation of ethical standards at the LOTOS stations. The Team promotes the knowledge of the values, standards and rules of conduct defined in the Code of Ethics. One of the communication tools used to that end is the Dynamiczni quarterly, addressed to individuals working for the service stations. In addition to news on recent developments at the service stations, the quarterly also discusses the rules to be followed in their business. It also features articles presenting interpretation of the provisions of the Code of Ethics so that they are fully observed in day-to-day operations.

## What else did we do?

We organized the 'Monday with Ethics' competition for the LOTOS Group employees, which aimed to demonstrate that the provisions of the Code of Ethics should be a reference for decisions made in the course of our professional duties.

