

# CODE OF ETHICS

We do what is right

**WP** media

wakacje.pl



**SZALLAS** GROUP  
CEE YOU THERE!

 audioteka

Nocowanie.pl

**superauto.pl**

totalmoney.pl

 homebook

**SELSEY**

**extradom**



# CONTENTS

1.	About us
2.	Our values <ul style="list-style-type: none"><li>✓ Honesty and openness</li><li>✓ Courage</li><li>✓ Energy and engagement</li><li>✓ Effectiveness of actions</li><li>✓ Team work</li><li>✓ Creativity</li></ul>
3.	Our priorities <ul style="list-style-type: none"><li>✓ Freedom of speech</li><li>✓ Truth</li><li>✓ Objectivity</li><li>✓ Freedom of choice</li><li>✓ Environmental protection</li></ul>
4.	Our principles <ul style="list-style-type: none"><li>✓ Business ethics</li><li>✓ Care about employees</li><li>✓ Environmental protection</li><li>✓ Cooperation with the local community</li><li>✓ Diversity</li></ul>
5.	Rights and responsibilities of employees <ul style="list-style-type: none"><li>1. Standards of professionalism</li><li>2. Safety of employees</li></ul>

3.	Employment and remuneration policy
4.	Principles of external and internal communication
5.	Use of social media
6.	Looking after our resources
6.	External principles <ul style="list-style-type: none"><li>1. Relations with clients, audience and other stakeholders</li><li>2. Relations with investors, the public market and state authorities</li><li>3. Relations with competitors</li><li>4. Conflicts of interest</li><li>5. Anti-corruption</li></ul>
7.	Rules for reporting breaches of the Wirtualna Polska Code of Ethics
8.	Resources
9.	Glossary of terms





# 1. About us

The photo shows Wirtualna Polska employees

Wirtualna Polska Holding is a first-choice partner for millions of members of audience, partners and clients. We deliver engaging information, entertainment and services, and inspire in daily decisions. We operate both in Poland and abroad.

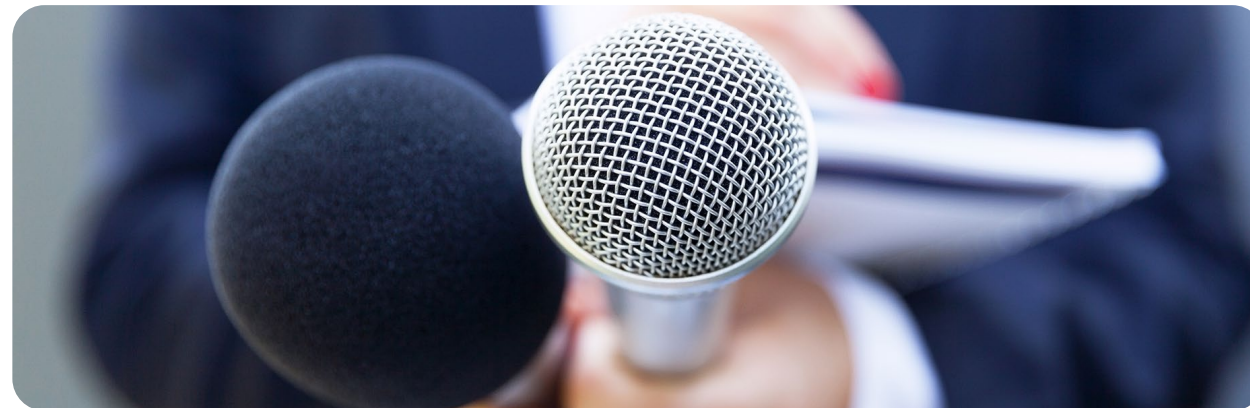
What is of utmost importance to us is people. We form a team of talented professionals, full of passion and engagement.

Our activity involves journalism and advertising activity based on journalistic content. We are the owner of the WP Portal, specialized topical websites and we develop subscription services.

In the e-commerce area, we operate mainly in the tourist and financial industries.



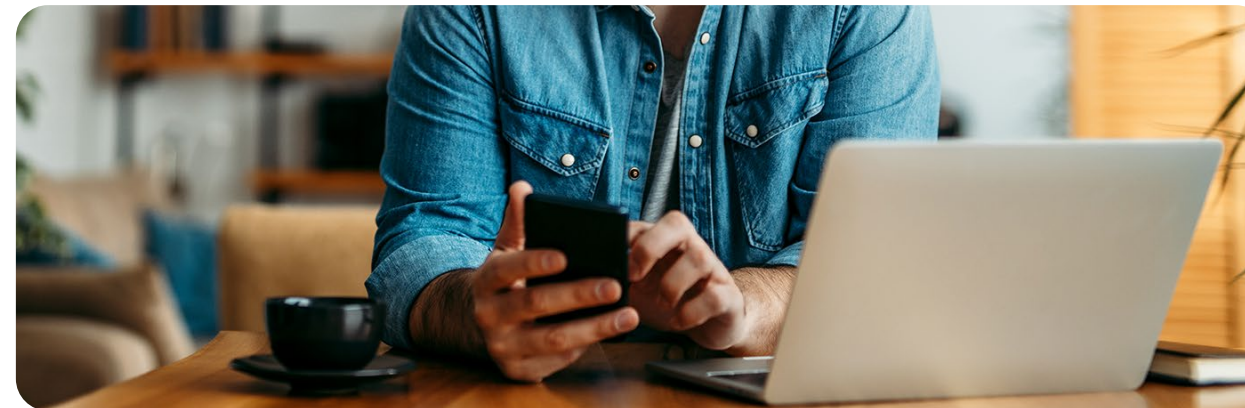
## Journalism



Our journalists are independent, reliable and observe the highest professional standards described in the Code of Journalistic Ethics of Wirtualna Polska Media. Every day, they prepare hundreds of materials, interviews, video reports, opinions, documentaries and news items.

We inform, inspire, teach and entertain millions of our users, working every day to earn their trust and give them satisfaction.

## Advertising



We operate on the online advertising market, offering a wide range of innovative, technologically advanced and effective tools, due to which clients successfully pursue their sales, marketing and image objectives. Keeping abreast of market trends on an ongoing basis, we respond to challenges of brands. We set the rhythm on the Polish web, developing innovative advertising products, and we adjust our offer to objectives set by clients.

## Subscriptions



We develop subscription services intensively, believing in prospects of that market. Paid television, music, email, audiobooks and podcasts are all part of the broad portfolio of our media services.

Journalism

Advertising

Subscriptions

Travel

Consumer finance

E-commerce

## Travel



We are in the business of organized international tourism, both local and individual. We offer the widest database of domestic and foreign tours and thus we are able to give our clients a choice of the most attractive offers.

## Consumer finance



We provide a full range of offer comparisons associated with financial products, i.e. cash loans and leases. We also offer a broad offer of cars available online.

## E-commerce



We support our users in their everyday decisions to make online purchases, also in interior design and house design industry.



# The code of ethics is for us... the most important guidepost.

It is a guide to the organization's principles. It is intended to indicate the way forward and help us conduct our business with integrity and transparency. We follow it to make sure we have the right perspective when we encounter difficult situations.

# Ethical conduct is for us... the basis for all external and internal relations.

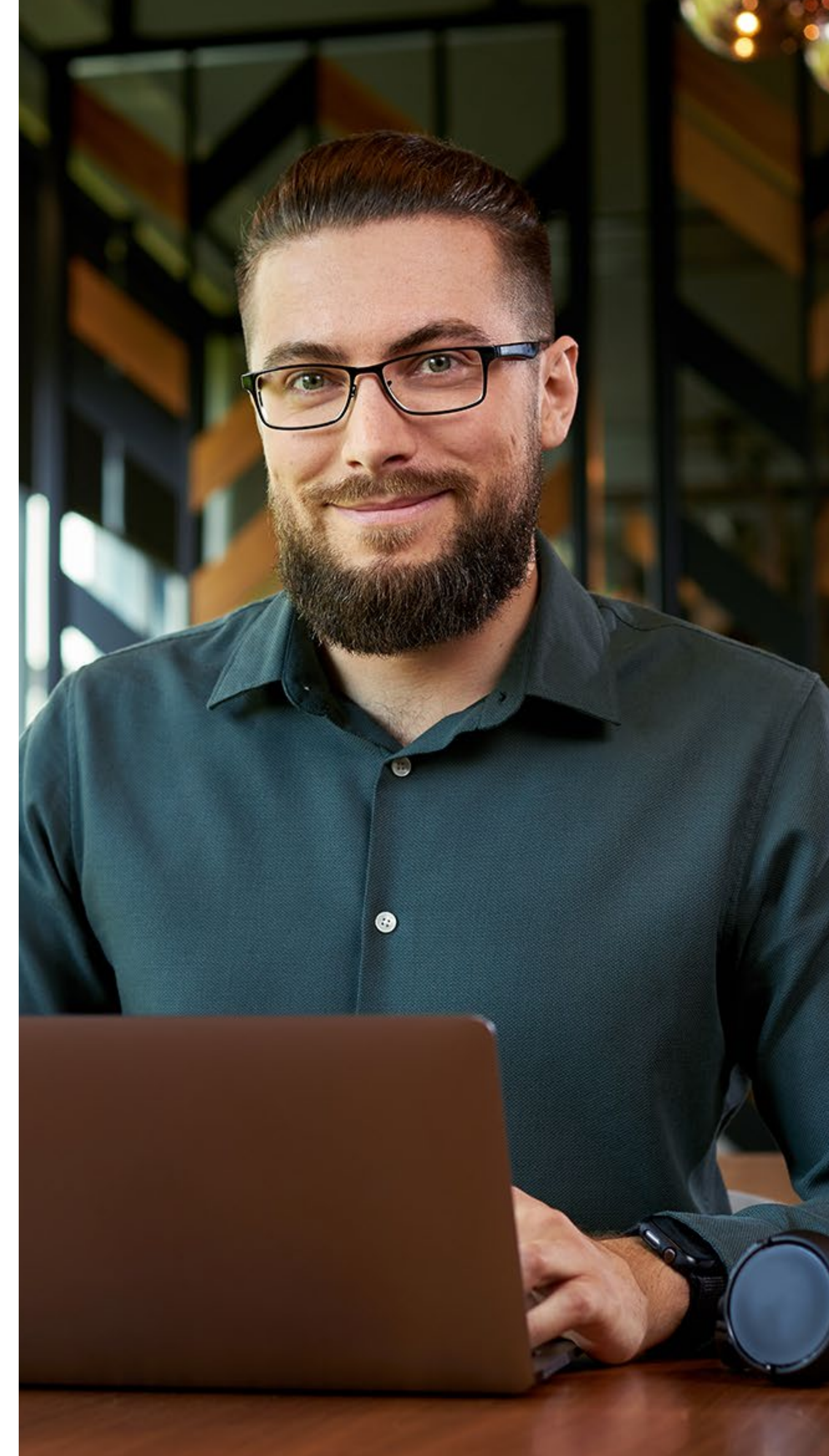
In everything we do we promote our values and make sure that we act in compliance with the law. We do what is good for us as human beings, the company or society. As a company operating in the media and Internet industry, we consider it our duty to contribute to the development of ethical business practices and do our part in creating, promoting and supporting stringent ethical standards.





# We respect and protect... human rights.

We conduct business activity respecting human rights and the dignity of every person, in compliance with all the prevailing laws which promote and protect human rights and prohibit slavery, human trafficking or exploitation of minors. In our Group, we follow a policy of diversity, which defines rules of conduct for managing the risk of discrimination.





# We are responsible

## We respect all the Conventions of the International Labor Organization (ILO).

Every human being has the right to freedom defined in such documents as: the UN Charter (1945), the Universal Declaration of Human Rights (1948), the International Bill on Human Rights, encompassing the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights (1966) as well as other documents adopted by the Council of Europe or the European Union.

## This Code applies to...

all the Group's employees, or employees of the Group's companies, management board members and managerial staff, regardless of where they carry out their activities. We also follow the Code in contacts with our vendors and business partners.

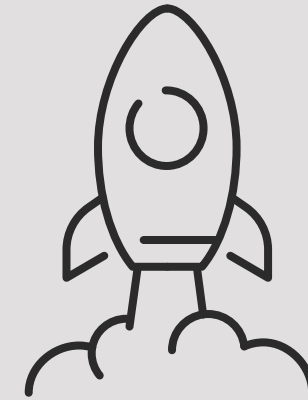


## 2. Our values



### **HONESTY AND OPENNESS**

If we have a different opinion or idea, then we talk about it honestly and openly, bearing in mind the overriding principle, which is mutual respect for each other. We are not afraid of criticism and different opinions.



### **COURAGE**

We take risks and assume responsibility for our tasks. We are not afraid to ask for help since we know that we will get it and we gladly give help to those who ask for it.



### **ENERGY AND ENGAGEMENT**

We are committed (and open to new experience). We look for a way to do something rather than a reason to explain why it cannot be done.





## EFFECTIVENESS OF ACTIONS

We do not surrender easily, we show determination and take things through to the end. After implementing a solution, we verify how it works in the organization and whether some things should be improved, streamlined or changed.



## TEAM WORK

The highest value for us is people, and the source of our success is effective cooperation. We share knowledge and experience with others but we also take advantage of their experience.



## CREATIVITY AND OPENNESS

We like an innovative and creative approach to everyday tasks. We turn problems into challenges which we meet with courage and engagement, exploiting the advantage of team work.

### 3. Our priorities

#### Areas of particular concern to us



In these areas we want to be active and particularly attentive, trusting that through this we will contribute to a better future for our users, clients, partners and all the employees of Wirtualna Polska.

## 4. Our principles

### Rule of law and acting in compliance with prevailing laws

We act in compliance with the spirit of the law. We undertake to comply as far as possible with all laws and regulations applicable to our activity in every country where we conduct activity. This is the fundamental standard of ethical conduct.

### Business ethics

In Grupa WP, we act ethically. The Code supports guidelines for the right conduct and refers to these. It is impossible to predict every situation that may occur while conducting business activity therefore our employees are obligated to comply with the principles of the Code.







This Code does not replace other more detailed principles in force in Grupa WP companies but it overrides them.

## Care about employees

We count on good atmosphere and friendly relationships. Every day, we rely on mutual trust, which is a key element of our cooperation.

We are courageous, committed and we support one another. We work in a dynamic environment and innovativeness and following trends improving the work environment is one of our priorities.

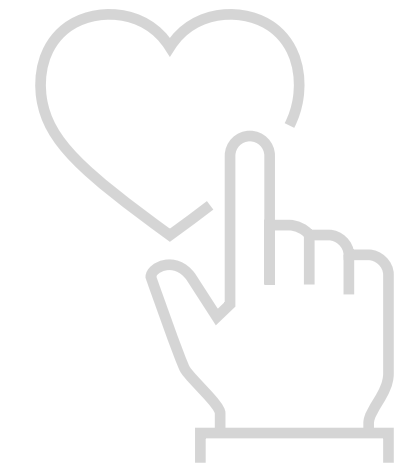
**What is important to us are relations, flexibility, development, health.**

## Appropriate relations



- ✓ we value diversity
- ✓ we work based on trust
- ✓ we listen to and respect each other
- ✓ we celebrate our successes
- ✓ we are involved in social campaigns
- ✓ we listen to critical voices and opinions
- ✓ the voice of every employee  
is important to us
- ✓ we survey the employee commitment level

## Flexibility



- ✓ we rely on a casual dress code
- ✓ we choose our benefits using  
the cafeteria platform
- ✓ we have flexible working hours

# Development



- ✓ we develop solutions based on new technologies
- ✓ we grow with the changing environment we improve and seek solutions
- ✓ we value creativity and a fresh look
- ✓ we promote our talents as industry experts
- ✓ we use a platform for learning languages

# Health



- ✓ private medical care for employees
- ✓ we care for wellbeing, relying on support from specialists and psychologists, we promote a healthy lifestyle
- ✓ we promote educational and sports events and pro-health activities on our websites and support these initiatives
- ✓ we cooperate with associations and join social campaigns



# Environmental protection

We are aware of the enormous environmental challenges and our environmental footprint. Every day, we pay a lot of attention to activities supporting the planet. We pursue sustainable growth and report results of our environmental and climate activities.

**We set ambitious, strategic environmental objectives for ourselves regarding the share of green energy, protection of biodiversity, ecological education.**

More information about our commitments can be found here:

**<https://holding.wp.pl/en/sustainable-development>**





# Cooperation with the local community

We have the sense of belonging to the community in which we function. Therefore, feeling responsible, we assume the commitment to support local communities. Being aware of how the Internet influences social attitudes and behaviors, we take part in charities, sponsor charity promotion events and cooperate with institutions aiding people in difficult life situations.

We stimulate and activate citizenship and charitableness in our employees by encouraging them to engage in employee volunteerism.





# Diversity is our strength

We see diversity of our employees as a great value, on the basis of which we create our organizational culture. Equal treatment, tolerance and mutual respect are its pillars.

We cooperate and accept each other without regard to gender, race, national and ethnic origin, religion, belief, degree or type of disability, medical condition or age, or anything else in which we may be different.





# 5. Employee rights and responsibilities

## We promote professional attitudes



In our organization, we have established standards of professionalism which all employees and collaborators of the Wirtualna Polska Group are obligated to meet.

## We observe laws

Our employees observe prevailing laws and internal regulations which are in force in the Group as well as agreements entered into with business partners.

## We do not engage in competitive activity

It is prohibited to engage in competitive activity without prior approval from an authorized person. Agreements include specific provisions on competitive activity.



## We respect one another

Respect and kindness are the basis of our contacts – this is how we treat everyone we work with. We assume a supporting, open attitude, sharing our experience. We make efforts to be professional in contacts with users, clients, partners and suppliers.

## We are loyal

We do not take any action which could result in the occurrence of a conflict of interest. We follow the principles about conflicts of interest whenever there is an impression that a decision-making process was affected by the employee's personal interest or a third party's interest, which at the same time may be in conflict with the Group's interest. We do not take advantage of business opportunities obtained from employment in Grupa WP for private purposes.

We do not have any influence on decisions, nor do we make decisions for the Group to establish relationships with customers, partners or suppliers with whom we have capital or personal ties.





# We care about the safety of our employees

## We observe safety principles

The fundamental right of each and every one of us is health and safety.

We provide regular occupational safety and health training, preventive medical care by occupational medicine specialists, onboarding and periodic health checkups, specialist examinations for drivers and we take all efforts to prevent the occurrence of workplace accidents.



If you are a witness to an accident, incident and a dangerous situation – you should report it immediately to the persons responsible.



It is forbidden to use any intoxicating substances, alcohol and to be under the influence of such substances on company premises. Smoking tobacco products is permitted only in designated areas.

# We take care to ensure a transparent employment and remuneration policy

- ✓ We apply in practice the principles of equal treatment, including as part of our hiring and compensation policy.
- ✓ We shape the rules of employment and cooperation with our self-employed contractors on our own, in consideration of the type and quality of work or services, our needs and possibilities, and the market environment.
- ✓ The amount of base compensation as well as the award of raises, bonuses and commissions depends on the competences and performance of the pertinent staff member, regardless of gender, religious affiliation, political views, origin, social status, sexual orientation, age, marital status, disability.
- ✓ An employee's immediate family and life partners may be employed and undertake cooperation with the Group on the condition that they remain in no official relationship with this employee and have no influence on his or her competence, promotion and working and pay conditions.
- ✓ We build our internal labor arrangements by pursuing the development and promotion policy within our Group, enabling all employees to participate in our recruitment processes



# We appreciate the importance of external and internal communication

We make efforts to convey information consistently, which affects the way the organization is perceived, its image and reputation among stakeholders.

Grupa WP has a department in charge of corporate communications, which helps all companies and departments belonging to it create content and which authorizes materials provided to employees.

The Communication Department communicates information to employees through email notifications, the intranet, social media, periodic meetings, posters, video materials and podcasts.

**Every employee may send a request to the Communication Department for aid in preparing and providing internal and external information.**



We respect employees' need to have access to information. Employees are first to get to know information about important organizational changes.



The person authorized to contact the media is the company's or the Group's Press Spokesperson.

# We would like to persuade you to use social media responsibly

While there are tremendous benefits to having a presence on social media channels, they also involve certain risks and responsibilities, which is why we have implemented the **Best Practices for Using Social Media** to make sure online interactions are genuine and safe for our brands.

We recommend that our employees should observe the following 3 key principles:

## **BECOME INVOLVED: Be a role model**

Use the opportunities offered by social media in the best possible way.  
Build a personal brand, demonstrate professionalism, promote projects you participate in and celebrate professional successes.

## **GET TO KNOW THE BASICS: Protect your account and our data**

Comply with laws, behave ethically and give priority to security. Never forget that when you are online, you represent both yourself and the company; your posts in social media will not disappear from the Internet.

## **PROTECT THE COMPANY: Think before you publish anything**

Do not provide access to internal company information. Protect confidential information and other proprietary information about clients, suppliers and collaborators.

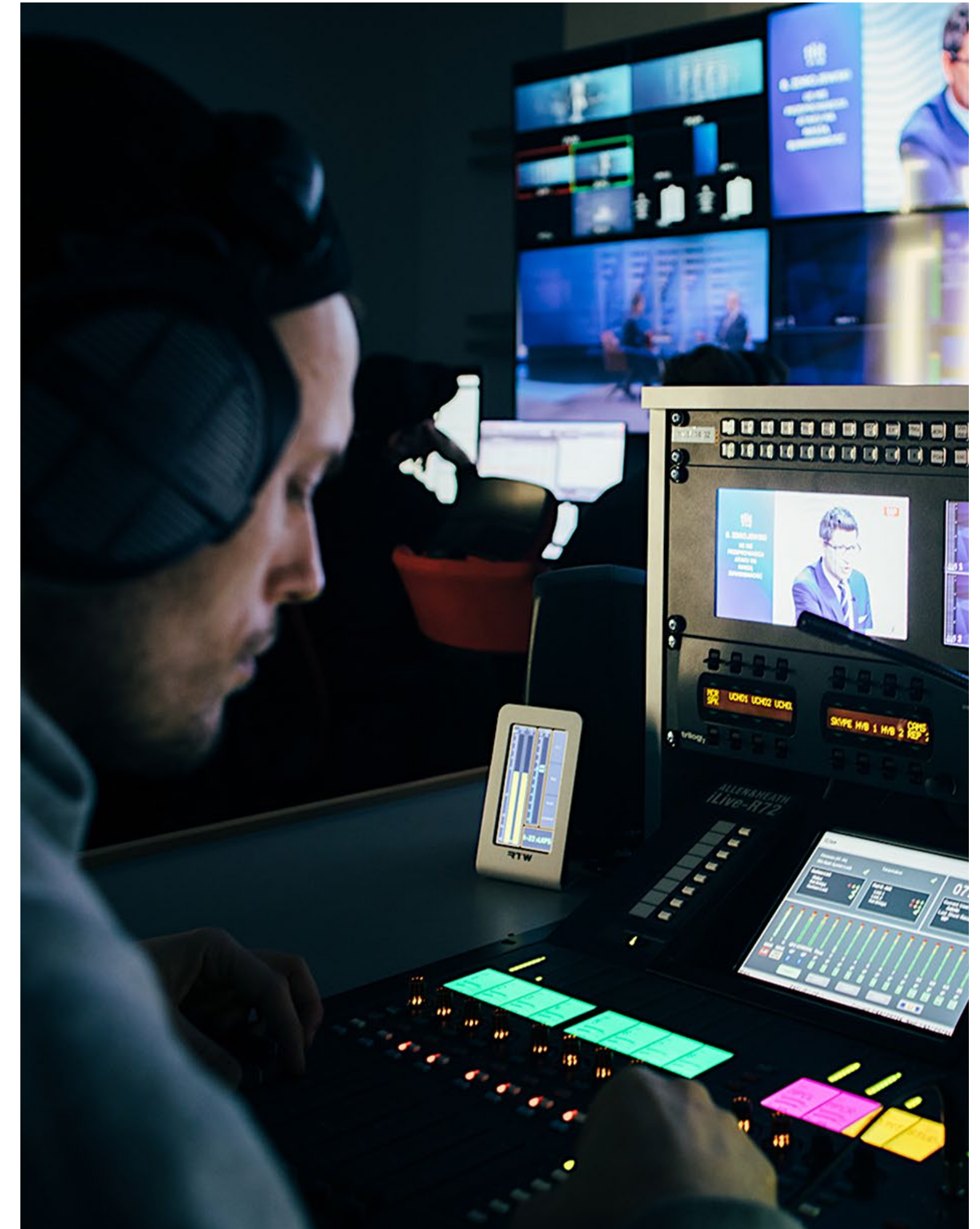


# Political and social activity

Employees have the right to participate in and support political and social activities as they wish. Their personal views and beliefs, however, must not affect the work they do.

It should also be made clear that an employee's personal views and activities are not to be identified with views and activities of Grupa WP.

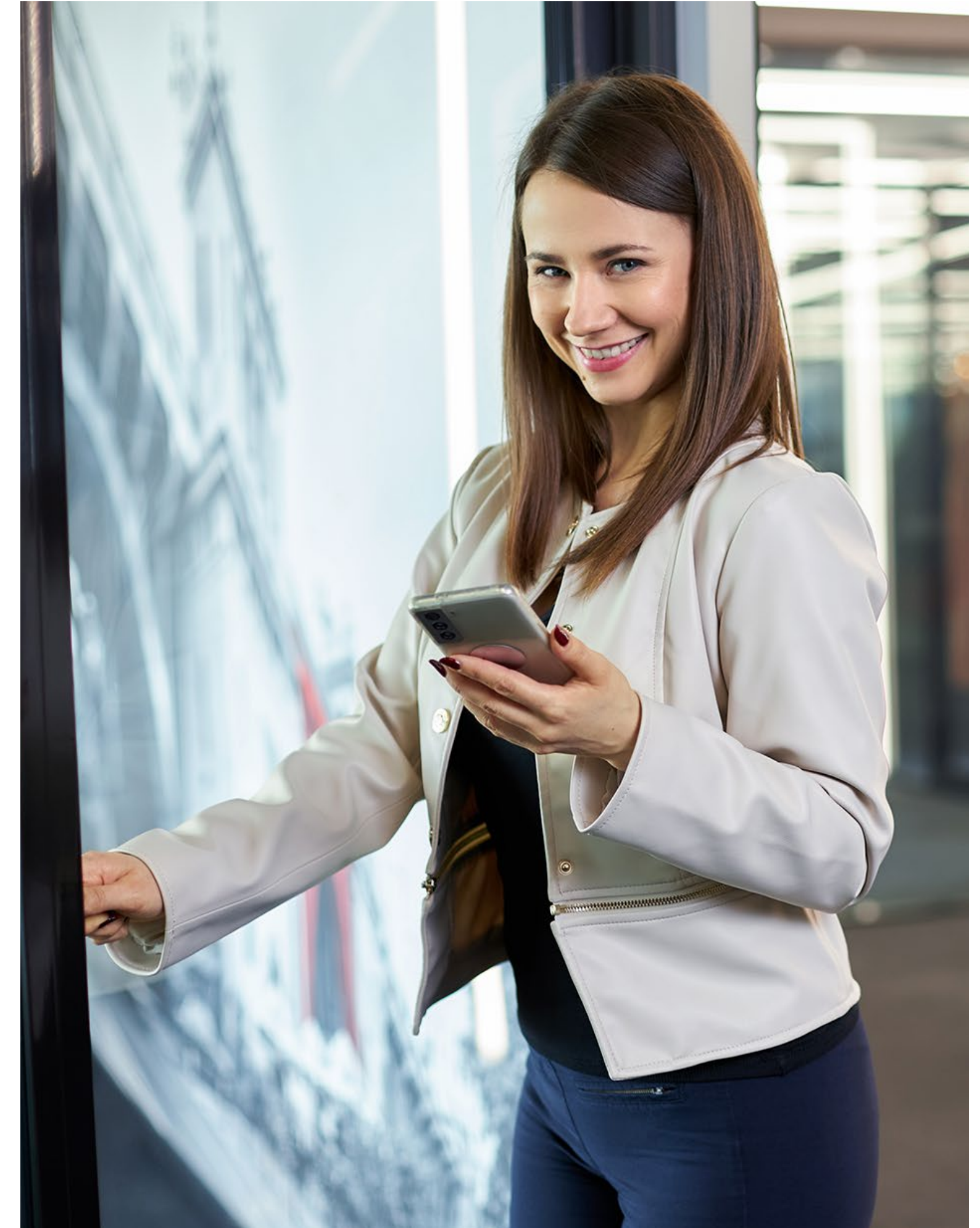
Company funds or resources must not be used for any political or social purposes without appropriate authorization.





# Caring for the good name of Grupa WP

- ✓ Employees shall care for the Group's good name and represent it with dignity in everyday relations with other employees, collaborators, clients, partners and suppliers.
- ✓ Our employees do not refer to work or cooperation with the Group outside of the performance of their duties in a manner that may imply acting for or on behalf of any of the Group companies unless the contract includes additional provisions defining principles of referring to work or cooperation with the Group.
- ✓ Cases when an employee intends to refer to employment or cooperation with the Group – and this does not follow from performed official duties and may affect the Group's rights, obligations and reputation – should be first agreed on with the employee's direct supervisor.
- ✓ We do not use the fact of being employed by or cooperating with the Group within political activity.







## Respect for resources

### We care about entrusted property

- ✓ We use the Group's property and resources responsibly.
- ✓ We respect the entrusted tools, equipment and facilities.



# Intellectual property

Creation of intellectual property and protection of our intellectual property rights and reserved information are the basis of our activity. All the work done as part of regular employment contract is the company's intellectual property.

Examples of confidential information and/or intellectual property include:

- our brands and logos and trademarks and/or copyrights to these;
- business and marketing plans, presentations and analysis;
- the company's initiatives (existing, planned, proposed or developed);
- trade secrets, reserved information and discoveries;
- methods, know-how and techniques;
- systems, software and technologies;
- other copyrights, trademarks and patents;
- ideas for articles, cycles, programs.

The obligation to protect confidential information and intellectual property continues even after the termination of the employment with the company.



On becoming aware of a violation of WP intellectual property rights, you should contact the legal department.



# Data protection

The organization has clear rules of access to company email, telephone and computer. Access to internal systems and additional resources is provided depending on the employee's job and needs. In justified situations, the Management Board may decide to access the data stored on devices or in internal systems, without prior agreement with the employee. It may happen when it is necessary to access the data when the employee is absent, when there is a justified suspicion of abuse or authorized entities demand such access pursuant to prevailing laws.

! Confidential information is technical, technological, organizational or other information of economic value which has not been made public.





# Rules for protecting confidential information and personal data:

- ✓ Take care to store and transmit information in a safe manner.
- ✓ Protect computer hardware, software, access to internal and external networks, and documents on all media from unauthorized access by others.
- ✓ Provide information to the media, offices, administrative bodies or any other institutions or persons only to the extent to which an employee have been authorized by internal procedures and provisions of law.
- ✓ In cases where requesting or providing information may cause harm to the Group or when in doubt, you should contact your supervisor, legal counsel or the person responsible for communication in the Group.





## 6. External principles

### Relations with clients, audience and other stakeholders

- ✓ We observe the rules of fair competition and the proper performance of contracts.
- ✓ We refrain from cooperating with dishonest or unethical clients, partners or suppliers.
- ✓ We react to any manifestations of unfair or unethical behaviors by our clients, partners or suppliers in the fulfillment of orders.
- ✓ We do not tolerate any corrupt practices, regardless of their form or purpose.
- ✓ We do not enter into restrictive agreements or abuse our dominant position





# Relations with investors, the public market and state authorities

Wirtualna Polska Holding is a company listed on the main market of Warsaw Stock Exchange, which means obligations to Investors and the relevant authorities.

We maintain active relations with participants and institutions of the capital market based on the relevant legal regulations in force and the best market practices: the principle of openness and equal treatment of all Investors through equal access to information.

We adhere to the principles contained in the Good Practices of Listed Companies and report publicly on how we follow these principles.





We are responsible for timely publication and delivery of accurate, reliable and up-to-date financial statements and reports that will properly reflect the Company's economic position and financial standing. We are also responsible for compliance with all accounting and financial reporting standards and regulations.

We ensure timely and appropriate response to summonses received from public administration bodies.





# Our relations with competitors

We are advocates of free market and healthy and fair competition. We exclude inappropriate practices to restrict competition. We compete observing fair principles and where we can see similar values, we cooperate for the benefit of clients and to achieve market growth.

**Relations with competitors require appropriate care and special attention. Our employees should avoid:**

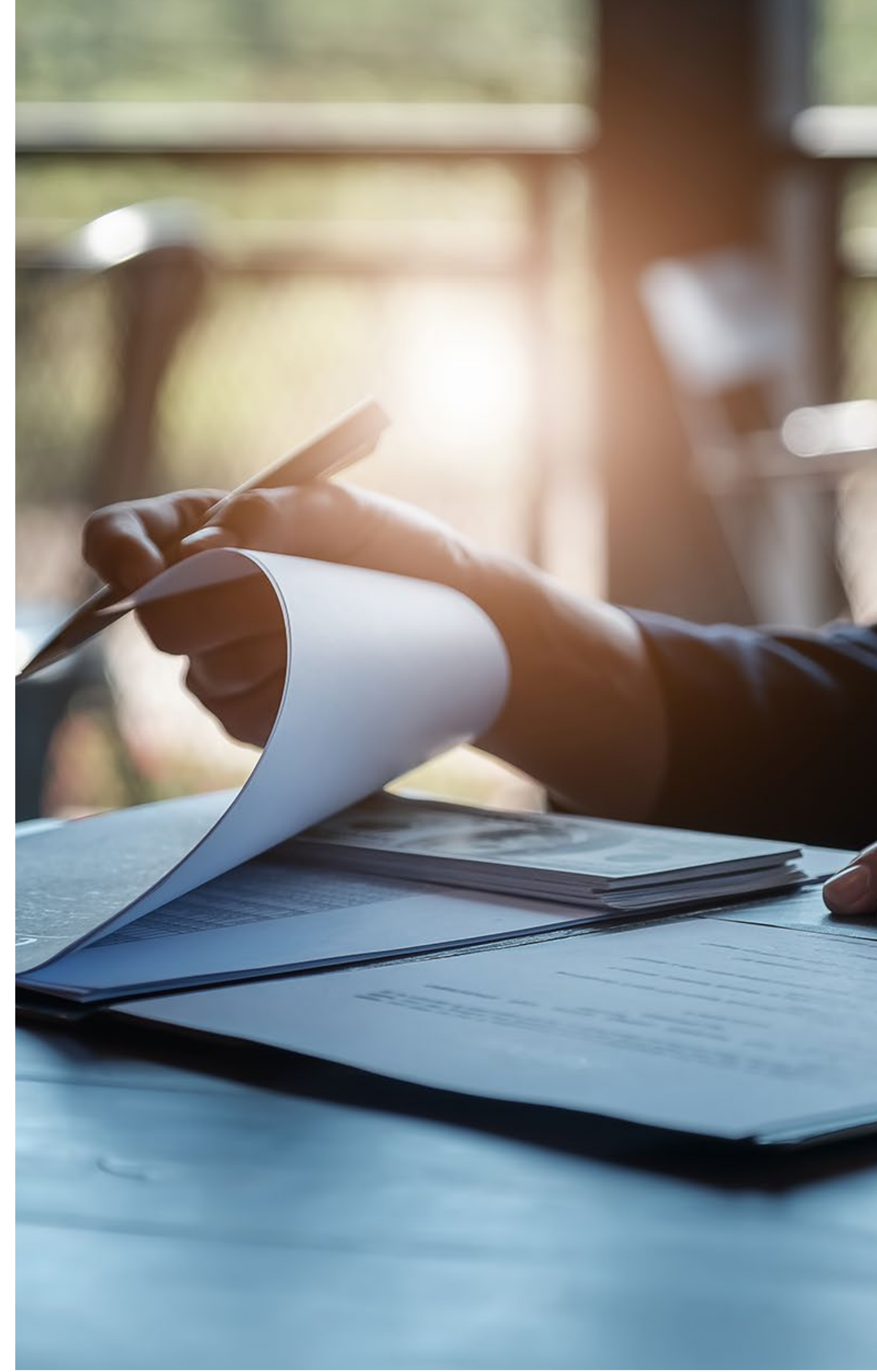
- ✓ disclosing details of negotiations with business partners, industry organizations
- ✓ obtaining confidential information about competition from new employees or candidates for jobs
- ✓ providing competitors with sensitive information about our business partners and other stakeholders
- ✓ providing competitors with sensitive information about Group companies
- ✓ disclosing price and product policies of performed projects



# Conflicts of interest

It is important to avoid any conflicts of interest, as well as any impression of a conflict of interest. This applies equally to each individual and company representing WP.

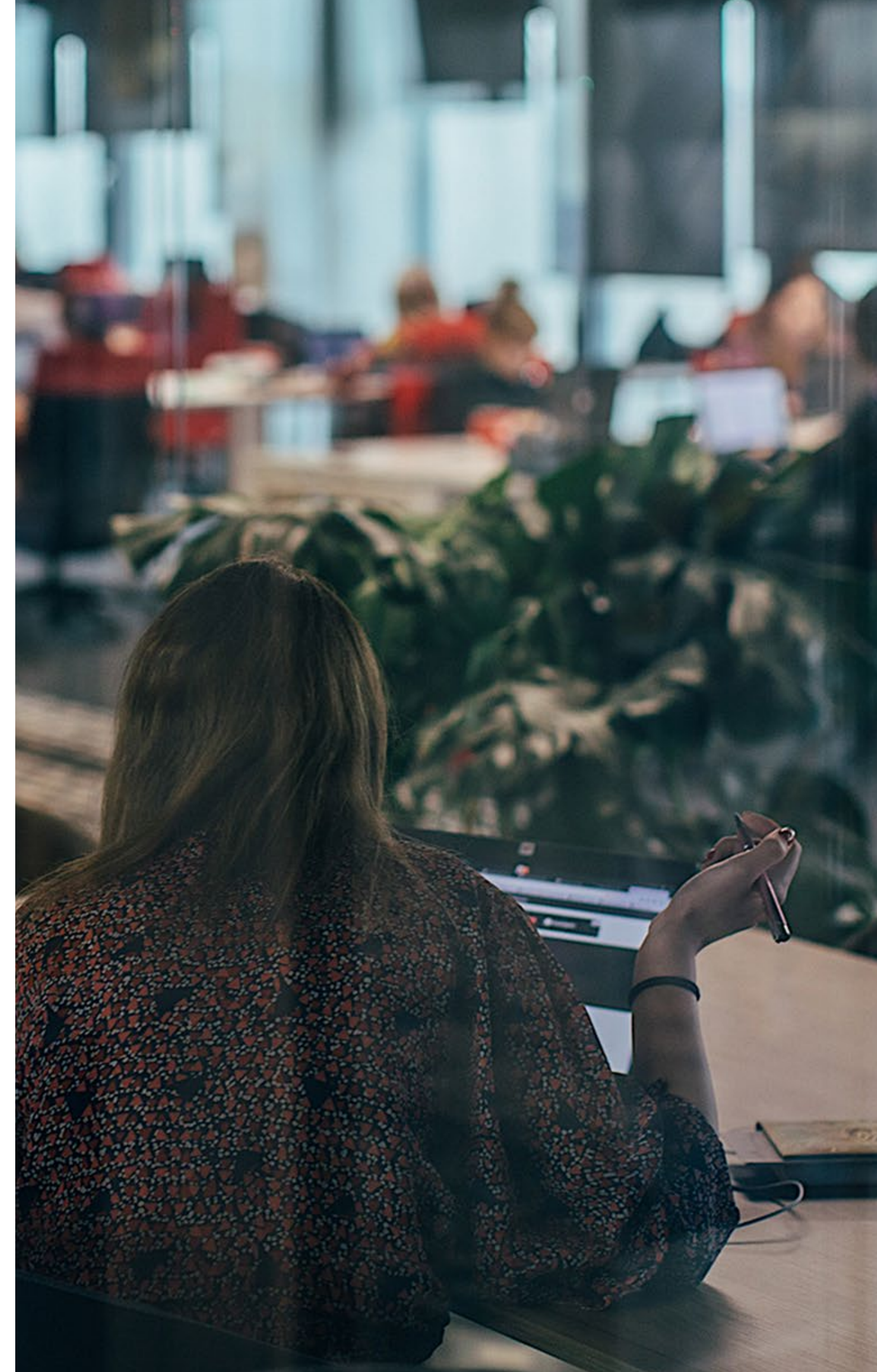
Conflicts of interest usually occur when actions are taken or interests are pursued that make it difficult to do work objectively and effectively. If an employee believes that there is a conflict of interest, they should inform their direct supervisor about it.





## Conflicts of interest may include:

- ✓ having a second job;
- ✓ sitting on a board of another company, with or without remuneration;
- ✓ holding a financial interest in a competitive company or an entity doing business with WP;
- ✓ accepting generous gifts or invitations from a potential supplier or vendor whose contract is being negotiated;
- ✓ selecting a vendor because of personal relations with the vendor's employee;
- ✓ dating a close co-worker;
- ✓ employing or supporting employment of a family member;
- ✓ using information obtained during work at WP to gain benefits for yourself or somebody else.





# We prevent corruption

We undertake to comply with all applicable anti-corruption laws.

We do not offer or accept bribes; we do not want our gifts and proposals of entertainment to give the impression of bribing. This applies equally to each individual and company representing WP.



Bribes may assume the form of cash, gifts, loans, small gratuities or facilitation payments, donations for charities, services and favors.



If you are in doubt or observe such situations, contact the Ethics Officer.



# 7. Rules for reporting breaches and irregularities with regard to the Code of Ethics

We counteract abuses committed to the detriment of the Group and its members as well as to the detriment of our employees and collaborators, stakeholders and investors.

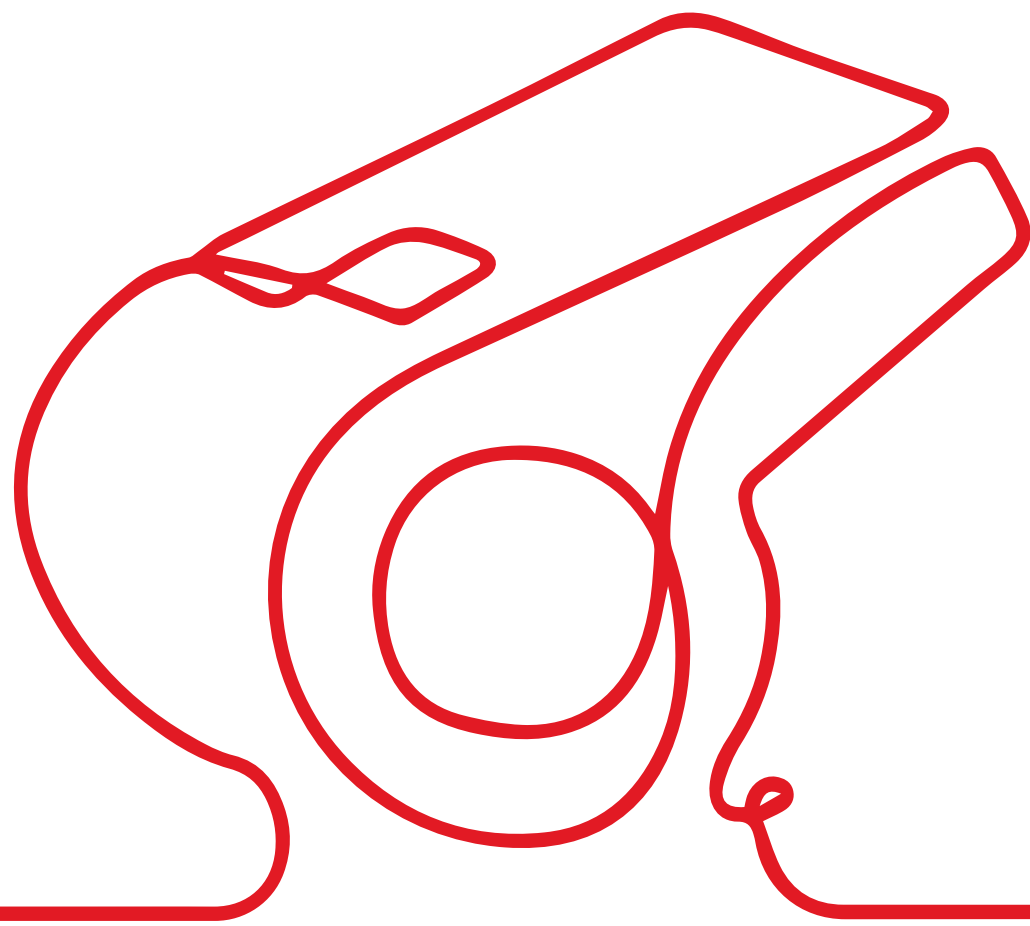
All employees and collaborators are required to abide by the Principles to Counteract and Prevent Undesirable Behaviors in the Group.

Each employee has the right to report to WP any undesirable behavior toward him/her or other persons.

A report may be also made anonymously.

## Contact the Legal

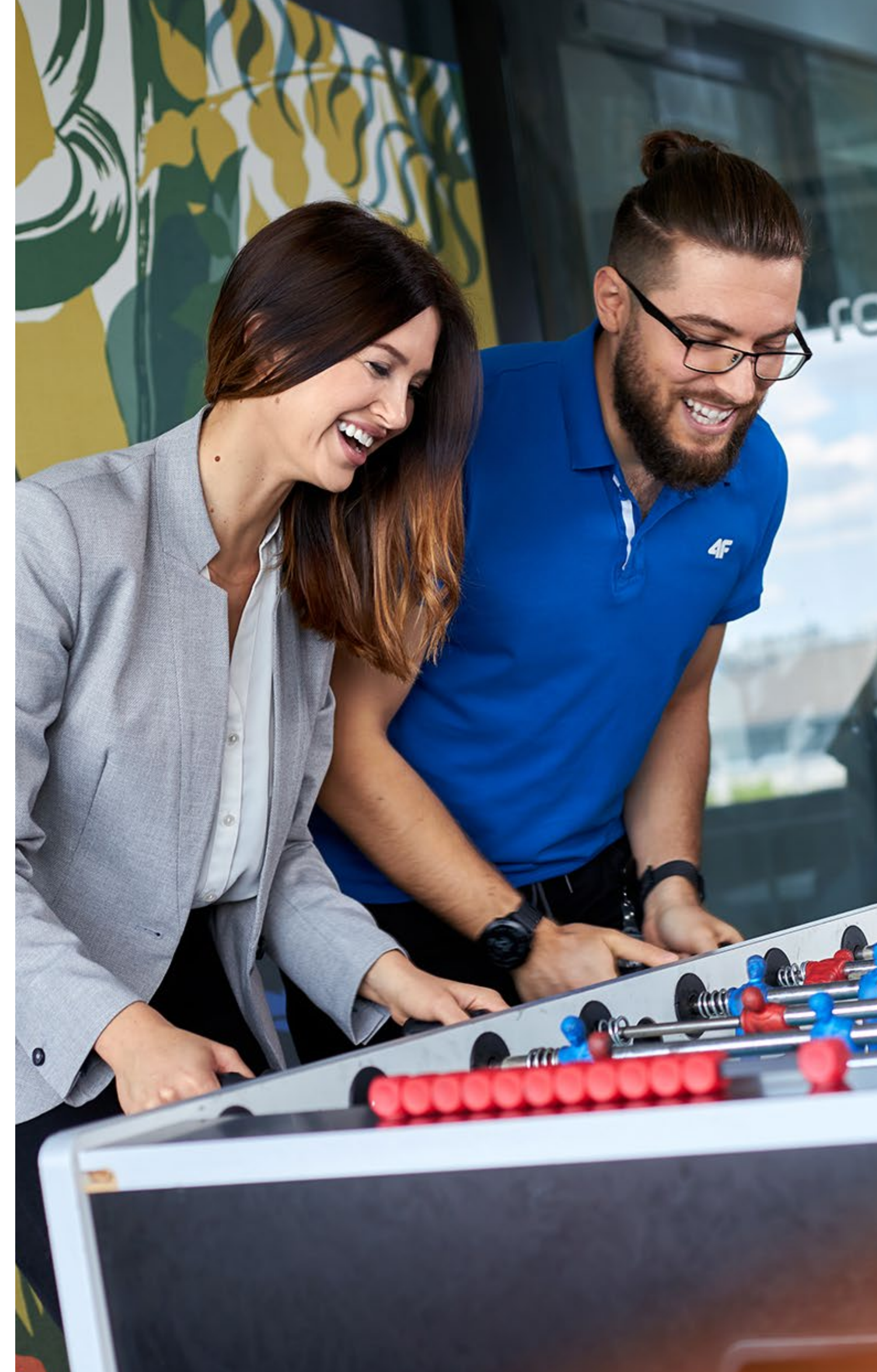
- **HR:** [hr@grupawp.pl](mailto:hr@grupawp.pl)
- **Department:** [legal@grupawp.pl](mailto:legal@grupawp.pl)
- **Contact for external stakeholders:**  
[ethics@grupawp.pl](mailto:ethics@grupawp.pl)





# We do not take any retaliatory actions

We do not tolerate retaliation against employees who, in good faith, seek help and support, raise concerns about actions that may be inconsistent with our Code, our policies or the law, or assist in the investigation of suspected misconduct.





# React!

When you see any practices or actions inconsistent with this Code, the Group's internal regulations or applicable laws, you should react immediately.

**Reports of violations of the Code of Ethics:**

**codeofethics@grupawp.pl**

Comments may be also sent directly to the Ethics Ombudsman:

**Tomasz Siemieniec**

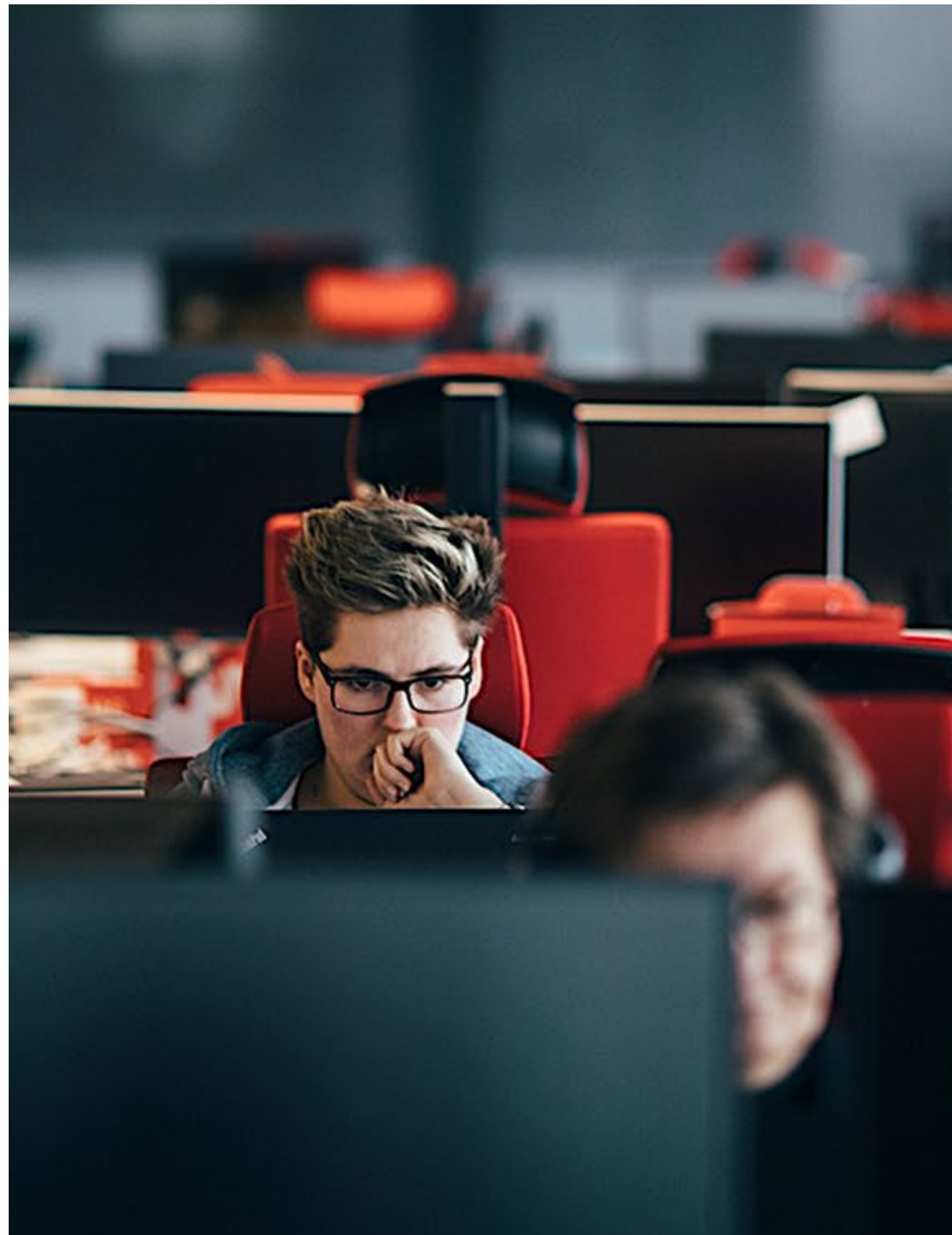
**tel.: +48 600 013 332**

**e-mail: tomasz.siemieniec@grupawp.pl**

or to the superior or to the persons designated for this purpose by the Management Boards of the companies from the Group.







Any reports will be reviewed within explanatory proceedings. The selection of the form of proceedings and the persons involved in them is decided by the Presidents of the Management Boards of the Group Companies together with persons appointed by them for this purpose (or the Supervisory Boards of the Group Companies, if the report concerns Management Board Members).

If the report on irregularities is made in good faith, the Group undertakes to ensure the safety and anonymity of the person reporting the problem, so that he or she will not suffer any adverse consequences resulting from the report. The Group also undertakes to take care of the good name of a person against whom any allegations are made until the case is clearly explained.

**The Wirtualna Polska Group examines the level of compliance with ethical principles in the Group by conducting a survey every year.**



# 9. Glossary of terms

## ✓ Diversity

in the context of Corporate Social Responsibility (CSR), the term refers to diversity of employees. The way they may differ includes such things as gender, race, national and ethnic origin, religion, belief, lack of religious beliefs, world view, degree or type of disability, medical condition, age, psychosexual orientation or gender identity as well as family status, lifestyle or any other reasons for potential discrimination.

## ✓ Discrimination

means treatment of persons as a result of which they are in a less advantageous position than other ones in a comparable situation because of gender, race, ethnic origin, nationality, religion, belief, world view, disability, age or sexual orientation.

## ✓ Bullying

repeated, habitual persecution involving various annoying actions to torment, upset, tease or intimidate a victim or his or her loved one. It is therefore in principle a repetitive offense.

## ✓ Ethics

all the norms recognized at a given time by a social community as a reference point to assess and regulate behavior in order to integrate the group around certain values; it is a synonym of morality.

## ✓ Human rights

basic rights which every one is entitled to following from the very fact of being human. They are non-transferrable (they cannot be waived) and inalienable. They are based on respect for the most important values for a human being such as life, dignity, liberty, uninhibited growth and many others.

## ✓ Mobbing

actions or behaviors concerning an employee or directed against an employee, consisting of persistent and long-term harassment or intimidation of an employee, lowering his/her self-esteem as to his/her professional usefulness, causing or intended to cause humiliation or ridiculing of an employee, isolating him/her or eliminating him/her from the co-worker team.

## ✓ Bribe

benefit, most often financial one, handed over to a person or group to achieve a definite goal, disregarding standard procedures. Under Polish criminal laws, bribery is a crime.