**CODE OF BUSINESS CONDUCT**

**Preamble**

The Code of Business Conduct (hereinafter: the “Code”) contains standards of conduct applicable to all employees and associates of Buglo Play sp. z o.o. (hereinafter: the “Company” or “Buglo Play sp. z o.o.”).

The Code should serve as a guide for day-to-day business practices whenever and wherever Buglo Play sp. z o.o. conducts its operations. The Company's reputation depends on the moral, ethical and lawful conduct of all employees and associates.

The Company conducts its operations in accordance with generally applicable laws, the highest ethical standards and best business practices, adhering to the values and principles that guide all its activities.

Each of us is expected to act with the highest standards of integrity and professionalism and to abide by this Code.

The Code does not cover all the rules and laws that may apply in a particular situation, but its guidelines are meant to assist in making correct decisions on a daily basis.

Notwithstanding the above, every employee and associate of the Company is required to comply with the Anti-Corruption Policy, Buglo Play sp. z o.o.'s Internal Procedure for Prevention of Money Laundering and Financing of Terrorism, and anti-trust law, particularly cartel pricing.

In the above regard, the Company conducts the necessary training courses, in which the participation of the Company's employees and associates is mandatory.

In order to ensure compliance and protection of the aforementioned values and to counteract unacceptable practices, Buglo Play Sp. z o.o. has implemented a System for reporting and handling incidents that constitute violations of applicable laws, ethical principles and internal procedures under the name Whistleblower Procedure at Buglo Play Sp. z o.o..

All of the above-mentioned documents complement the Code.

If you have any questions about the Code, please contact the Company's Management Board or the HR Department.

**Buglo Play Sp. z o.o. Principles**

The Code of Business Conduct was designed to be consistent with the Company's principles including, in particular, respect, innovation, responsibility, entrepreneurship, social responsibility and environmental responsibility.

All employees and associates of Buglo Play Sp. z o.o. are expected to act in all business dealings in a manner that emphasizes the values of our Company.

**Operation of the Company**

All employees and associates of Buglo Play Sp. z o.o. are expected to conduct business in a professional manner. Employees and associates are strictly prohibited from any conduct or relationship with any vendor, supplier, customer, contractor, family member or other person or organization that could be perceived as a conflict of interest or a violation of the Company's guiding principles. As employees and associates of Buglo Play sp. z o.o., we must ensure that our personal interests do not conflict with our duties to the Company. We must avoid even the appearance of a conflict of interest.

**Gifts & Entertainment**

Buglo Play Sp. z o.o. is committed to conducting business in an ethical manner. The Company requires all of its directors, managerial staff members, employees and associates to act with integrity at all times and to comply with all applicable anti-corruption laws in all jurisdictions in which the Company operates and/or that may affect its business.

These rules also apply when compliance results in failure to attract new customers, failure to use certain services from third parties or partners, or delays in existing business.

 **Respect**

All employees and associates of Buglo Play Sp. z o.o. are expected to treat each other in a professional manner, with dignity and respect. Buglo Play Sp. z o.o. is committed to equal employment opportunities.

Buglo Play Sp. z o.o. does not discriminate against any employee or applicant for employment on the basis of race, color, religion, sex, disability, sexual orientation, gender identity, genetic information, marital status, national origin, age, ancestry, pregnancy, veteran or military status, or any other protected category with respect to any terms or conditions of employment.

The company does not tolerate any kind of harassment or mobbing.

**Health, safety and environmental protection**

The health and safety of all our employees and co-workers is of the utmost importance to Buglo Play Sp. z o.o. Each of us is responsible for the safe performance of our work and for complying with company and plant safety policies and procedures, as well as all applicable health and safety regulations.

Report any safety incidents or potential safety hazards immediately to the Health and Safety Manager and your supervisor.

The Company complies with all environmental rules with regard to legal norms and standards. The Company and its employees and associates have an obligation to minimize environmental pollution and strive for continuous improvement.

The company is an advocate of corporate social responsibility, as this contributes to sustainable development, including the well-being and health of society, and complies with applicable laws and is consistent with international standards of conduct in this regard.

**Competition**

The Company, as well as its employees and associates, is wary of any practice that may, even in the slightest, restrict competition.

The Company does not enter into agreements, regardless of form, the purpose or effect of which may be to eliminate, restrict or violate competition rules or regulations.

**Documentation, company data, confidential information**

All employees and associates are required to protect confidential information to which they may have access.

Employees and associates will use confidential information of Buglo Play Sp. z o.o. only for authorized purposes of the Company and only with the approval of the Company's management. Confidential information of the Company should be shared only with those employees and associates of Buglo Play Sp. z o.o. who have a need to know.

Confidential information regarding the Company's employees and associates should never be disclosed or shared with anyone outside the Company, except by authorized members of the HR Department, and only when necessary.

**Assets of the Company**

Proper protection and use of the Company's resources is the responsibility of every employee and associate.

While limited use of certain resources for personal purposes is permissible with the approval of the Company's management, employees and associates should never take this for granted, while remembering that their right to privacy may be limited when using these resources.

The Company's assets include physical property, information, data, documentation and intellectual property, computers, networks, Internet access, software, telephone and voice mail systems, and personal digital devices. Employees and associates must properly secure these resources and protect the Company's data stored on these systems.

**Additional responsibilities of Supervisors**

The Code imposes additional responsibilities on supervisors. They must ensure that those they supervise understand the Code and the issues that affect them. Superiors are required to enforce the Code and report any suspected violations. As members of management, supervisors should set the standards for their department.

**Violations, problem reporting and compliance**

Any suspected violation of the Code can be reported to your supervisor, the HR department or any member of the Company's Management Board.

In this regard, we are all bound by the Buglo Play sp. z o.o. Whistleblower Procedure, which is a system for reporting and handling of incidents that constitute violations of applicable laws, ethical principles and internal procedures.