

GROUP POLICIES

Polygon Responsible Business Partner Policy

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Summary of the Policy

This policy outlines the main principles of corporate and individual responsibility in relation to the Responsible Business Partner Policy.

Message

All Polygon Business Partners have a responsibility to adhere to this policy which has been outlined here.

Who

All Polygon Business Partners and business activities, regardless of location.

What

This Policy covers business ethics, suppliers and sub-contractors, society and the environment.

How

This Policy is intended to define the basic minimum requirement to Business Partners in how to conduct themselves with integrity and good judgment at all times.

Process

Polygon will review the policy (periodically) and amend where necessary.

Introduction

Polygon is committed to responsible business practices and conducting business with high ethical standards. Polygon wants to maintain stable and honest business relationships with all its “Business Partners”, including but not limited to, suppliers, advisers, agents and clients.

This Responsible Business Partner Policy (“the Policy”) defines the basic minimum requirements that apply to all Business Partners to Polygon as it strives to meet the increasing need for transparency with regards to how businesses manage their broad range of operational, social and environmental responsibilities.

Polygon expects their Business Partners to adopt the principles set out below to ensure alignment with Polygon’s own commitments to social responsibility.

Policy Statement

Legal compliance and local customs

Polygon and our Business Partners 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 Policy’s principles and values, the law shall prevail. We require that all Business Partners will respect the local traditions and customs of each country. In cases where there is a conflict between local customs and this Policy’s principles and values, the Policy shall guide the Business Partners’ course of action.

Environmental impact

Business Partners must comply with all applicable legal environmental requirements and seeking to use energy efficient equipment and processes in their operations. At a minimum, this means that the Supplier shall optimise its consumption of natural resources, including energy and water, and implement sound measures to prevent or minimise pollution, solid waste, wastewater and air emissions.

Anti-corruption and anti-trust

Based on Polygons 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. Business Partners will comply with all applicable anti-trust and competition laws, which prohibit agreements, business practices or conduct that are anti-competitive or unreasonably restrain trade.

Business Partners will comply with all applicable anti-bribery laws and all applicable local laws where Polygon and its subsidiaries operate. Business Partners will not offer, promise, give (including facilitation payments), demand or accept bribes or other improper advantage, including excessive gifts and entertainment, in order to obtain, retain or give business.

Business entertaining and hospitality involving individuals representing Polygon must be kept reasonable and proportionate and be done entirely for the purpose of maintaining good business relations and not to influence unfairly any future business decisions. No gifts, entertainment or personal favours may be offered in contravention of any applicable law or code of practice.

Conflicts of interest

Business Partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of Polygon. Business Partners must declare all and any conflict of interest in any business dealing to Polygon, to allow Polygon to take appropriate action.

AML

All business dealings must be carried out in a transparent manner and recorded accurately. Business Partners shall not accept, support or facilitate money laundering and are strictly forbidden to knowingly engage in transactions that facilitates money laundering or otherwise result in unlawful diversion of assets.

Confidential and data protection

Polygon requires that all Business Partners handle any personal data related to Polygon or Polygon's customers in a lawful, fair and transparent way.

It is important to keep any confidential information relating to Polygon or Polygon's customers confidential.

Sub-Contractors

Professional behaviour

Polygon's sub-contractors 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 contractors to be under the influence of alcohol or other drug substances on work sites.

Customers

Honesty and integrity in all dealings with customers are prerequisites for profitable, long-term business relationships. Contractors will provide customers with accurate information, and will only make commitments that we can live up to.

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 all contractors behave with the care and respect required in a private home or at our customer's work place. All contractors will also do their utmost to provide our customers with clear and consistent information on the scope, process, timelines and current status of the work.

Health, safety and security

Business Partners will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Polygon does not accept any form of bullying, e.g. isolation, verbal or physical abuse, or harassment.

Forced labour

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

Child labour

Business Partners should support the elimination of exploitative child labour and only employ workers who are at least 17 years of age, or the higher age limit that may be applicable in a country. Business Partners shall 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 and diversity

Business Partners should recruit and promote solely on the basis of their employees 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.

Compensation

Business Partners employees must be provided with wages and benefits that, at a minimum, comply with national laws or industry standards whichever is higher.

Communication and Implementation

Business Partners will make these principles known to employees dealing with Polygon, and promote and monitor compliance.

This Policy applies to all Business Partners and all Polygon business activities, regardless of location. The Policy 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 Business Partners in how to act with integrity and good judgment at all times. Observance of the Policy will be evaluated periodically. The Policy will be regularly reviewed and amended as necessary.

Monitoring

Polygon reserves the right to conduct enquiries and investigations of Business Partners' conduct to satisfy ourselves that the principles within this Policy are being met. Note that failure to demonstrate compliance with these principles will require the implementation of corrective action by the Business Partner, and may result in contract termination.



