

OUR APPROACH

Here at CD PROJEKT, our actions are based on a number of key principles. We aim to collaborate with suppliers who also value these principles in order to foster accountable business attitudes, promote ethical working conditions and support sustainable growth.

This Code lays out the principles we follow and expect you to follow in the course of our cooperation.

Learn more about our accountability rules by reading Rules of the Game: Business and Ethics Standards at the CD PROJEKT Group.

ETHICS AND COMPLIANCE

We strive to act in an ethical and responsible manner and expect the same of you in the course of our collaboration. If possible, we encourage you to outline your code of conduct as a set of internal procedures/regulations.

DATA PROTECTION AND CONFIDENTIALITY

Make sure any and all information obtained during the course of our cooperation is stored safely and protected from unauthorized access. As you are obliged to comply with the NDA, please inform the staff you employ of the stipulations included therein. Secure your work equipment to prevent data loss and comply with security standards related to data and infrastructure protection, incident management and maintaining the continuity of operations. If your work involves personal data processing, always proceed in compliance with applicable regulations.

Before we establish our cooperation and share our data with you, please make sure you meet the requirements laid out in our <u>Security Requirements for External Entities</u>.

CORRUPTION PREVENTION

Make sure you spot, prevent and report any attempts at corruption or money laundering. Do not offer or accept any gifts or other types of benefits that may influence your business decisions, e.g., choice of supplier or choice to continue cooperation. Make sure all of your transactions are transparent and that relevant documentation is thorough and maintained diligently.

Please refer to <u>CD PROJEKT Group's Anti-Corruption</u> <u>Policy</u> to learn more about our best practices.

CONFLICT OF INTEREST

During the course of our cooperation, avoid any situations that may influence your objectivity or autonomy. If you notice or find yourself in a situation that may potentially represent a conflict of interest, please let us know HERE.

FAIR COMPETITION

Ensure your actions are compliant with principles of fair competition. Do not establish any relationships that may infringe upon existing laws, such as price fixing or market sharing. While choosing contractors, we encourage you to base your decision on objective criteria, such as price and quality of service.

INTELLECTUAL PROPERTY RIGHTS

Do not violate intellectual property laws, such as trademarks, patents and copyrights. Before utilizing intellectual property that does not explicitly belong to you, make sure you are within your rights to do so, i.e., you have the appropriate permissions and are making use of the property in the agreed scope and capacity.

SANCTIONS AND INTERNATIONAL TRADE

Comply with any and all international sanctions and customs regulations, including but not limited to import and export laws. Do not collaborate with persons and/or entities sanctioned by the United Nations, the European Union or the government of your country.

REPORTING IRREGULARITIES

Make sure all staff you employ within your organization have access to secure methods of reporting irregularities and are protected against potential retaliation. Encourage your contractors to report irregularities that occur within their supply chains.

If you would like to report any irregularities that occur or have occurred in the course of our cooperation, you can do it <u>HERE</u>. You can also inform persons within your organization about the possibility of doing so.



Here at CD PROJEKT, mutual respect is one our fundamental values. We care about human rights, promote inclusivity and ensure a safe work environment. Our actions are compliant with international standards, especially those defined in the UN Guiding Principles on Business and Human Rights and recommendations of the International Labour Organization (ILO). Please make sure to comply with these

EQUAL TREATMENT AND NON-DISCRIMINATION

standards as well.

Do not discriminate against others, especially based on their gender, ethnicity, nationality, age, worldview, sexual orientation, religion and/or disability. Do not limit anyone's right to organize and collectively bargain if it's within their rights to do so.

EMPLOYMENT CONDITIONS, WORKPLACE HEALTH AND SAFETY

Make sure all persons employed within your organization are able to work in decent conditions. Employee renumeration should be commensurate with the scope of work. Working hours should be set in accordance with applicable legislation, and allowance should be made for appropriate breaks and holidays. Ensure that the workplace is set up in accordance with health and safety regulations, and that employees have access to safe working tools and are provided with health and safety training. You should also ensure that your contractors adhere to these rules.

FORCED LABOR (MODERN-DAY SLAVERY)

You must adhere to fundamental principles of human liberty and dignity. Never agree to forced and/or slave labor, both within your organization and among your contractors. Do not tolerate any forms of abuse, be it physical or mental, or any exclusionary or exploitative labor.

ILLEGAL CHILD LABOR

You can only employ children of suitable age and in compliance with legal stipulations and **ILO recommendations**. Always check the age of individuals you aim to employ. You must provide underage workers with suitable working conditions that do not endanger their health and safety.



ENVIRONMENTAL PROTECTION

Here at CD PROJEKT, we try to act in an environmentally responsible manner while taking action against climate change. We also expect your compliance with applicable requirements related to protection of the environment.

THE NATURAL ENVIRONMENT

You should act in compliance with applicable environmental protection rules and take steps to limit your impact on the environment. We also encourage you to inform your employees and contractors within your supply chain of your efforts to limit environmental impact and active engagement in protection of the environment.

For more information, please refer to the CD PROJEKT Environmental Policy.

CARBON FOOTPRINT AND EMISSIONS REDUCTION

We encourage you to take action aimed at reducing greenhouse gas emissions and at setting emission reduction goals based on current scientific knowledge (SBTi). If you calculate and monitor the carbon footprint of your products and/or services, we encourage you to share that information with us.

Read about CD PROJEKT's carbon footprint HERE.

RESOURCE MANAGEMENT

We encourage you to utilize sustainably sourced materials and choose resources that limit negative impact on the environment. Whenever possible, limit your use of assorted resources, energy, water, heat and fuel.

WASTE MANAGEMENT

Make an effort to manage your waste in an environmentally friendly manner. We encourage you to recycle and hand over recyclable materials to authorized recipients. Make sure the packaging you employ for your products is as recyclable as possible.

