

Myślenice, January the 4th, 2018

TFKable Group INFORMATION POLICY

This document defines the rules for dissemination of information and communication with business, financial and social partners to TFKable Group.

TFKable Group leads a transparent information policy, both using traditional methods and modern technology, which ensure the transparency of information exchange while maintaining high safety standards, substantive quality with matched way of presentation of content transferred, in accordance with expectations and information needs of the partners.

Within the meaning of these Instructions, TFKable Group is defined by all production plants located in Europe and agencies together with the distribution network covering the areas of international sales regions. The Management Board of the TFKable Group is understood as the Management Board of the TELE-FONIKA Kable SA company, which is a dominating company within this Capital Group.

These Instructions shall apply to all TFKable Group organizational units

§ 1

OBJECTIVE OF THE INFORMATION POLICY

1. TFKable Group shall endeavour to increase the level of information efficiency by ensuring high standards of communication which are an expression of respect for such principles as: transparency, integrity, credibility, actuality and consistency
2. Information is provided under principles binding for TFKable Group by national and international laws and regulations, provisions in force under contracts, adopted standards and decisions of the Board that lead to strengthening and building positive relationships based on trust with external partners.
3. Following information policy assumptions, TFKable Group stresses and expresses the obligation to maintain secrecy of TFKable Group in terms of ensuring protection of confidential information along with the determination of mechanisms for supervision over storage and processing of data in accordance with applicable national legislation and the resulting separate internal regulations with regard to the processing of sensitive data

§ 2

ORGANISATION OF INFORMATION POLICY

1. Information Policy principles are determined by TFKable Group Management Board by way of resolution, based on a review of compliance with the rules

2. TFKable Group carries out periodic verification of compliance of Information Policy with applicable law, recommendations of the supervisory authority and other regulations
3. The shape of directions of actions in the area of external communications, including contacts with the media shall be determined by TFKable Group' Management Board.
4. Advisor for TFKable Group relations and Director of Marketing in TFKable Group shall be responsible for providing responses to the media

§ 3

INFORMATION POLICY RECIPIENTS

1. This Information Policy is addressed in particular to the following business, financial and social partners to TFKable Group:
 - i. customers - current and potential ones
 - ii. advisers - current and potential ones
 - iii. business partners
 - iv. banks and other financial institutions
 - v. authorities and institutions where TFKable Group is required to report certain information
 - vi. other stakeholders in TFKable Group
2. Due to the structure of the shareholding, the obligations to inform the Shareholder are carried out: directly, in accordance with the provisions of the Commercial Companies Code, under principles laid down in the Articles of Association, the rules of procedure of the Management Board and the rules of procedure of the Supervisory Board.

§ 4

FORMS OF DISSEMINATION OF INFORMATION

1. TFKable Group shall use the following forms for communication via identified information channels:
 - vii. corporate portal in selected languages- www.tfkable.com
 - viii. electronic mail
 - ix. letter correspondence
 - x. text messages
 - xi. direct contacts and meetings of TFKable Group employees
 - xii. social media
 - xiii. information and product materials, and in particular the product catalogs, brochures, leaflets
 - xiv. product and information presentations, in particular direct presentations during industry meetings
 - xv. presentations to stakeholders, in particular, for financial institutions, suppliers and global credit agencies
2. TFKable Group shall communicate with partners and stakeholders using the most optimal form of contact, having regard to the time of receiving information, its scope and the detailed nature of the data transmitted

§ 5

THE SCOPE OF DISSEMINATION OF INFORMATION

1. Correctly implemented Information Policy applies to the obligation to inform the Shareholder and TFKable Group clients about events that have direct or indirect impact on the current activity of TFKable Group
2. The information referred to in this Policy may not be published if their disclosure would adversely affect the position of TFKable Group within the meaning of competition and consumer protection law or it would violate a secret protected by law
3. While taking action in the field of Information Policy, TFKable Group also follows ethical principles, universally applicable laws and internal procedures in force that set standards of conduct in relations with the partners and other stakeholders of TFKable Group
4. Communication with partners is based on the principle of accessibility to information and transmitting it in a clear, honest and adequate to the needs way, including via product offers, as well as facilitating access to after-sales service for partners
5. TFKable Group shall provide equal access to information for all partners, including the principles concerning reception and processing of complaints
6. TFKable Group applies the Procedure of Dealing with Complaints setting out the rules for accepting and dealing with complaints. All applications are subject to thorough analysis, and the conclusions drawn from these are used to improve existing processes and improve the quality of after-sales service

§ 6

HOW TO DISSEMINATE INFORMATION

1. The information indicated in this Information Policy is disseminated in www.tfkable.com
2. The data that TFKable Group is required to reveal shall be published within the time periods specified by the generally applicable rules of law
3. Information about significant events that affect the position of TFKable Group is communicated to the public and to the partners in Polish or English, in accordance with generally applicable laws
4. Only the Board of TFKable Group shall make decisions regarding disseminating confidential information to the other party under separate non-disclosure agreements, together with an indication of how the shared data shall be archived and following the highest safety standards.

§ 7

COMMUNICATIONS SECURITY POLICY

1. Security of information stored and transferred within TFKable Group is meant to ensure the following:
 - xvi. confidentiality of information - denying access to data to third parties
 - xvii. integrity of information - avoiding unauthorized changes in the data
 - xviii. availability of information - providing access to the data, in accordance with the applicable national and international laws and regulations and internal procedures

- xix. archiving of information - providing storage of full history, in accordance with the applicable national and international laws and regulations and internal procedures
2. TFKable Group Management Board shall apply measures adequate to the situation to ensure the security of information within TFKable Group
3. The following data shall be subject to special protection (confidential information) in TFKable Group:
 - xx. information about implemented contracts - both planned, current and historical
 - xxi. financial information of TFKable Group
 - xxii. organizational information of TFKable Group
 - xxiii. access data to IT systems of TFKable Group
 - xxiv. personal data
 - xxv. information about TFKable Group' competitive advantage
 - xxvi. other information marked as "confidential" or "sensitive data"
4. TFKable Group Management Board obliges each employee of TFKable Group to maintain the secrecy of sensitive data which they have been authorized to access

§ 8

THE VALIDITY OF INFORMATION POLICY

This Information Policy shall enter into force on January 4, 2018.