

Code of Ethics  
and **Business**  
Conduct.

asreco



## Dear Colleagues,

We are pleased to present to you the “Asseco Poland’s Code of Ethics and Business Conduct”. This document outlines the principles and values that guide us in our business and daily work. Every day, we make dozens of decisions and interact with various people, and our behavior determines how we are perceived by the market. Our success, strong position in Poland and globally, and continuous growth are possible thanks to hard work and commitment, but also because we adhere to the same standards and values reflected in this document. I believe that transparency in business, respect for people, and clear rules of conduct will allow us to build a modern company and increase our effectiveness in the market. I kindly ask you to apply these principles in your daily work.

With best regards and wishes for success

Adam Góral

President of the Management Board

## Purpose of the document.


“Asseco Poland’s Code of Ethics and Business Conduct” is based on shared values that form the foundation of the company’s conduct. It sets forth principles and standards of conduct regarding interpersonal and business relationships, as well as the protection of the company’s assets and reputation. It also specifies how Asseco Poland operates, what guides its cooperation with partners and suppliers, and how it conducts itself in relation to competitors. The operating principles we have adopted are consistent with applicable regulations, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

## General Principles.


- The standards of conduct set forth in the Code apply to all employees and contractors of Asseco Poland.
- We take the necessary steps to enable employees to comply with the principles set forth in the Code.
- We make every effort to conduct our business activities in accordance with the letter and spirit of the law and accepted standards of business conduct.
- We expect our business partners to comply with the principles set forth in this document, which means that their policies in this regard are important to us when deciding whether to collaborate.
- If you have any questions regarding compliance with the principles set forth in the Code of Ethics, please contact the Compliance Officer.

## Our values and internal rules of conduct.


At Asseco Poland, we uphold values such as: commitment, professionalism, effectiveness, responsibility, respect, and quality, which we understand as follows:




**Commitment**  
We are fully committed to every project, and our greatest satisfaction comes from our clients’ success.




**Respect**  
We expect mutual respect from one another.




**Professionalism**  
We are constantly improving our skills and are happy to share our experience.



**Responsibility**  
We take responsibility for our work and the environment in which we operate.



**Effectiveness**  
We ambitiously and consistently strive to achieve our goal.



**Quality**  
We set high standards for the quality of all our activities.

## General principles of conduct.

### Equality

- We respect human rights and labor laws.
- We apply fair and equitable principles of hiring, compensation, development, and promotion.
- We treat all employees equally regardless of race, gender, age, sexual orientation, religion and political beliefs.
- We base our relationships on mutual trust and respect for one another, regardless of position or role.

### Relationships

- We respect the dignity and good name of all individuals; we do not tolerate behavior that is offensive to others.
- We adhere to the principles of social coexistence and good manners; we do not tolerate any form of bullying (insulting, humiliating, abusing, slandering, or intimidating others) or any behavior that constitutes or resembles sexual harassment.
- We value good relationships and cooperation and do not tolerate the spreading of rumors or other content that leads to conflict.
- We provide a confidential and transparent process for reporting violations, with a guarantee of protection for whistleblowers.

### Communication

- We communicate precisely and unambiguously.
- We provide information that is complete, objective, up-to-date, and understandable.

### Workplace safety

- We work in compliance with all safety and ergonomic principles.
- We promote awareness of occupational safety and health through regular training tailored to employees' job responsibilities.

### Brand protection

- We strive to maintain a positive image of Asseco Poland S.A.
- We conduct ourselves in a manner that does not jeopardize Asseco Poland's good reputation. This also applies to our behavior outside of work hours and the workplace.
- We maintain a neat and professional appearance appropriate to the tasks we perform.

### Protection of assets

- We take care of Asseco Poland's assets, as they serve to achieve business objectives.
- We do not use the assets entrusted to us for private purposes, except where this has been separately regulated. This principle also applies to assets entrusted by clients or business partners.

## Additionally, in our business relationships, the following principles are important to us:

### Business integrity

- We adhere to the principles of fair competition and antitrust laws; we do not seek to gain an advantage through unfair or abusive means.
- We set the prices of our products and services based on a fair assessment of the work involved and their quality.
- We do not hire employees of our competitors to obtain legally protected information.
- We do not disseminate false information about competitors' products or services.
- We do not accept attempts to enter into agreements or arrangements to fix prices or share customer, supplier, or market databases with competitors and business partners.
- We do not accept the unauthorized transfer or acquisition of information about competitors, nor do we disclose confidential or sensitive information to competitors or other entities.
- We invite suppliers whose offers provide the most favorable balance of price and other relevant criteria regarding the subject of the contract to collaborate with us.
- We inform our business partners that we adhere to ethical business conduct in business by publishing our principles on our website, and we require our partners to adhere to these principles.

### Anti-Corruption and Anti-Fraud

- We adhere to a "zero-tolerance policy for corruption." We do not accept any form of corrupt behavior, in particular:
  - promising, suggesting, offering, demanding, or accepting any financial or personal benefits for oneself or for third parties;
  - invoking influence, seeking or using one's own influence or that of others, including influence within public authorities, companies, and other entities, for the purpose of obtaining financial or personal gain.

### Conflict of interest

- We report any family or personal relationship with a business partner's staff to the Compliance Officer if, in connection with our duties, we are involved in work with that business partner. Each such relationship is assessed to determine whether it constitutes a conflict of interest.
- We also commit to:
  - maintaining impartial business relationships and making decisions based solely on substantive grounds;
  - not taking on additional employment with the company's clients, suppliers, or other business partners, and above all, competitors;
  - refraining from any actions that could in the future be perceived as biased and aimed at obtaining undue benefits.

### Gifts / Tokens of Appreciation

- We do not give gifts or other benefits to business partners and their employees or persons associated with them, nor do we accept from such persons gifts or other benefits whose value exceeds that of customary occasional small tokens of appreciation.
- We do not give gifts or other benefits (regardless of their value) to public officials or candidates for such positions, as well as to individuals who have ceased to hold such positions within the last 12 months or their associates, and we do not accept gifts or other expressions of gratitude from such individuals.

### Donations and sponsorship

- We conduct activities related to donations and sponsorship in accordance with applicable laws and the transparent principles set forth in our internal regulations.
- Sponsorship or donations provided by the company to individuals, groups, or organizations are intended to support development or improve quality of life, in accordance with applicable law, and are not provided in connection with any other business relationship with the sponsored or recipient entity.

### Conduct toward Persons Holding Public Office

- We do not provide political parties and their representatives, as well as candidates for political office, with any undue material or non-material benefits, regardless of whether such benefits are given or offered directly or through third parties. We also expect this from our business partners.
- We do not provide financial support to any political party.

### Combating money laundering

- Our operations are transparent—we do not engage in transactions or cooperate with entities whose activities raise concerns, and whose funds may originate from illegal sources resulting from activities such as terrorist acts, drug trafficking, human trafficking, or tax evasion.

### Intellectual property protection

- We use the ideas, materials, software, or information of another person or entity only if we have the necessary rights to do so.
- We use software from third-party providers for which we have the necessary licenses.
- To protect our intellectual property, we use only company-approved tools, software, systems, and devices.

## Information security

- We treat the protection of information, including the protection of personal data, with the utmost care, both in our business operations and in our private lives. We implement this principle as follows:
  - our products and services are based on privacy and security principles, and we implement appropriate safeguards to protect against information loss;
  - we protect the information provided to us by our business partners;
  - we continuously develop systems to defend against cyberattacks and information theft;
  - we continuously improve our Information Security Management System and Business Continuity Management System;
  - we implement programs to raise our employees' awareness of information security, including the protection of personal data;
  - we monitor access to our premises.

## Sustainable development

- We conduct our business in accordance with the principles of sustainable development.
- We treat environmental protection as an integral part of our corporate responsibility and organizational culture, conducting our business in a way that minimizes negative impacts on the natural environment and complies with legal requirements and accepted standards.

