

Code of Business Ethics and Conduct.

ASSECO



Dear Colleagues,

We are providing you with the Asseco Poland Code of Ethics and Business Conduct. The document contains the principles and defines the values that guide our business and our daily work. We make dozens of decisions and interact with different people every day, and our behavior determines how we will be perceived by the marketplace. Our success, strong position in Poland and worldwide as well as continuous development are possible thanks to hard work and commitment, but also because we share the same standards and values, which are reflected in this document. The following Code contains the internal principles that have guided us for a long time and has now been supplemented with our requirements for partners with whom we do business. 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 on the market. I warmly invite you to read the following document and ask you to apply these principles in your daily work.

I send you best regards and wish you great success

Adam Góral

President of the Management Board

The goal of the document.

The Code of Ethics and Business Conduct of Asseco Poland is based on common values that form the foundation of conduct of its employees and co-workers. It defines principles and standards of conduct concerning interpersonal relations, business relations and the protection of the company's assets and image. It also specifies how Asseco Poland operates, how it cooperates with its partners and suppliers, and how it acts towards its competitors.

General rules.

The standards of behavior contained in the Code shall be binding for all employees and co-workers of Asseco Poland.

We take the necessary steps to enable employees and associates to comply with the Code.

We make every effort to conduct our business activities in accordance with the rule and spirit of the law and accepted standards of business conduct.

We also expect our business partners to abide by the principles set out in this document, which means that their policies matter to us when we decide to work together.

Our values and internal rules of conduct.

At Asseco Poland we share common values with all our employees and co-workers, such as: commitment, professionalism, efficiency, responsibility, respect and quality, which we understand as follows:



Commitment

We are fully committed to every project, and the success of our customers gives us the greatest satisfaction.



Respect

We expect mutual respect from each other.



Professionalism

We constantly improve our qualifications and are happy to share our experience.



Responsibility

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



Efficiency

We ambitiously and consistently strive to reach our goal.



Quality

We set the bar high for the quality of all our activities.

General best practices.

Equality

- We respect human rights and labor law standards.
- We apply equal and fair rules for the hiring, compensation, development and advancement of our employees and associates.
- We treat employees and associates equally regardless of race, gender, sexual orientation, religion or political beliefs.
- We base our relationships on mutual trust and respect for one another, regardless of position or function.

Relationships

- We respect the dignity and good name of all individuals, we do not accept offensive behavior towards the others.
- We are guided by the principles of social conduct and good morals and do not accept any form of bullying (insulting, humiliating, denigrating and intimidating others) or any behavior that bears any hallmarks of sexual harassment or constitutes it.
- We are committed to good relations and cooperation, and we do not accept the spreading of rumors and other content that leads to conflict.

Communication

- We communicate precisely and unambiguously.
- We provide information that is complete, objective, timely and understandable.

Work safety

- We work with all safety and ergonomic principles in mind.
- We develop health and safety awareness through regular training courses, tailored to the responsibilities of employees and associates.

Image protection

- We take care of Asseco Poland S.A's positive image.
- We conduct ourselves in a manner that does not compromise the good image of Asseco Poland. This includes our behavior outside of our time and place of work.
- We take care to look neat and professional, appropriate to the tasks we perform.

Asset protection

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

Additionally, in business relationships, the following values are important to us:

Business Integrity

- We comply with fair competition and antitrust laws and do not seek to gain any advantage through unfair or abusive means.
- We price our products and services based on a fair estimate of the work and its quality.
- We do not hire our competitors' employees to obtain legally protected information.
- We do not disseminate false information about competitors' products or services.
- We do not accept attempts to enter into contracts or agreements to fix prices, share customer bases, suppliers or markets with competitors or counterparties.
- We do not accept the unauthorized transfer or acquisition of competitive information or the sharing of confidential or sensitive information with competitors or others.
- We invite to cooperation suppliers, whose offer presents the most advantageous balance of price and other important criteria for the subject matter of the contract.
- We inform our business partners of our adherence to our principles of ethical business conduct by making the principles publicly available on our website and require our partners to adhere to these principles.

Anti-Corruption and Anti-Fraud

- We profess a zero tolerance for corruption. We do not accept any form of corrupt behavior in business activities, as well as in the actions of our employees and associates, in particular:
 - promising, suggesting, giving, demanding or accepting any financial or personal benefit for oneself or for any third party,
 - using influence, seeking or using one's own or others' influence, including that of public authorities, enterprises and other entities, to obtain financial or personal benefit.

Conflict of interest

- We report to the Compliance Officer any family or personal relationship with staff of a business partner if we are involved in carrying out work with that business partner in connection with our duties. Each such relationship is evaluated to determine whether it constitutes a conflict of interest.
- We also commit to:
 - maintain impartial business relationships and make decisions based solely on merit,
 - not to take on additional employment with the Company's customers, suppliers or other business partners, especially competitors,
 - to refrain from taking any action that might in the future be perceived as biased and oriented to gain undue advantage.

Benefits / Gifts of appreciation

- We do not provide gifts or other benefits to, or accept gifts or other benefits from, contractors and their employees or their affiliates that exceed the value of customary occasional small gifts.
- We do not give gifts or other benefits (regardless of value) to, or accept gifts or other expressions of gratitude from, persons who have ceased to hold public office or who are candidates for public office, or persons who have ceased to hold public office in the past 12 months or persons associated with them.

Donations and sponsorships

- We conduct our donation and sponsorship activities in compliance with applicable laws and the transparent rules set out in our internal regulations.
- Sponsorships or donations made by the company to individuals, groups or organizations are intended to promote development or improve the quality of life, in accordance with applicable law, and are not made in conjunction with another business relationship with the sponsored or recipient entity.

Way of conduct towards persons performing public functions

- We do not give political parties and their representatives, or candidates for political office, any undue material or non-material benefits, whether such benefits are given or offered directly or through third parties. This is also what we expect from our business partners.
- We do not financially support any political party.

Prevention of illicit money circulation

- We are transparent in our dealings - we do not engage in transactions or co-operate with questionable parties whose activities are unlawful and whose funds may be derived from illegal activities such as acts of terrorism, drug trafficking, human trafficking or tax evasion.

Protection of intellectual property

- We use the ideas, materials, software, information of another person or entity only if we have permission to do so.
- We use third-party institution software for which we are authorized.
- In protecting our intellectual property, we only use 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 in both our business and personal activities. We implement this principle as follows:
 - we base our products and services on the principles of privacy and security, and use adequate safeguards to protect against loss of information,
 - we protect information provided to us by our contractors,
 - we constantly develop systems to defend against cyber-attacks and information theft,
 - we continuously improve our Information Security Management System and Business Continuity Management System,
 - we implement programs to build awareness among our employees and associates in the area of information security, including personal data protection,
 - we supervise access to our premises.

Respect for the environment

- We are committed to protecting the environment.
- We conduct our business so as to have minimal negative impact on the environment and to comply with legal requirements and accepted standards.
- We shape the environmental awareness of our employees and associates by providing access to up-to-date knowledge in this area and to environmental initiatives.

Reporting violations and undesirable behaviors

If you believe that someone in your line of business [another employee, customer, contractor, supplier or other person] is violating the law or this Code, you must report this to the Compliance Officer.

You can do this:

- by sending an email to etyka@assecop.pl,
- by sending mail to the following address: Asseco Poland S.A., 13 Adama Branickiego St, 02-972 Warsaw, marked "Compliance Officer".

Any person who in good faith reports a violation is protected. Reporting a suspected violation of the Code will not result in any negative consequences for the employee/co-worker. Each submission is taken seriously and fairly and is processed promptly. If, based on analysis, the situation warrants it, appropriate corrective action is taken.

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