

## CODE OF BUSINESS ETHICS AND CONDUCT

Asseco Business Solutions S.A.

seated in Lublin

Dear Colleagues,

we are handing over to you this Code of Business Ethics and Conduct of Asseco Business Solutions S.A. This document lays down the principles and defines the values that are at the core of our conduct and set the course of our actions that guide us in business and our day-to-day operations.

Asseco Business Solutions has attained remarkable success, and our impressive track record is the outcome of our joint effort and commitment. The Code of Business Ethics and Conduct brings together a set of rules that have generally guided our work hitherto. Besides, it names our expectations towards business partners with whom we cooperate and maintain relationships.

My genuine appeal to all of you is to continue to foster the values and embody the principles listed in this document because they have already led us to where we are now. I for one believe that transparency in business, respect for people, and clear rules of conduct will empower us to continue to build a modern company and enhance our effectiveness on the market.

Please, read the Code of Business Ethics and Conduct of Asseco Business Solutions S.A. and apply its principles in your daily work.

I wish you all the best,

Wojciech Barczentewicz

President of the Management Board

## PURPOSE

The Code of Business Ethics and Conduct of Asseco Business Solutions S.A. (“CBEC”) lays down the principles, standards of conduct, as well as defining values that govern interpersonal and business relationships and safeguard the Company’s assets and image. The CBEC also defines how the Company manages its internal relations, and what determines its cooperation with business partners, including suppliers, and how it responds to competitors.

The CBEC is rested upon common values that underpin the Company’s actions as well as the conduct of its employees and associates.

## DEFINITIONS

- Company – Asseco Business Solutions S.A., having its registered office in Lublin;
- employee – an individual employed at the Company under a contract of employment;
- associate – a natural person rendering services for the Company under a civil-law contract;
- CBEC or Code – the Code of Business Ethics and Conduct of Asseco Business Solutions S.A.

## GENERAL

- The standards of conduct embraced in the CBEC apply to all the Company’s employees and associates;
- The Company creates and forms a working environment that helps its employees and associates comply with the standards contained herein;
- The Company does its utmost to conduct its business in accordance with the letter and the spirit of the law as well as generally accepted standards of business ethics and conduct;
- The Company also encourages its business partners, including suppliers, to comply with the principles set out herein; whether they have equivalent policies in place is relevant to the Company when making decisions about business cooperation.

### VALUES of Asseco Business Solutions S.A.

At Asseco Business Solutions S.A., we demonstrate values that are shared by all our employees and associates, such as: commitment, respect, quality, professionalism, performance, and responsibility. This is how we understand them:

#### Commitment

We are fully committed to each project, and our clients' success is our greatest reward.

#### Respect

We require honesty and mutual respect from one another and from others.

#### Quality

We put the bar high as regards the quality of all our operations.

#### Professionalism

We keep developing our competence, and we are eager to share our experience.

#### Performance

We are ambitious and consistent in pursuing our goals.

#### Responsibility

We embrace responsibility for our work and business setting.

### CODE OF CONDUCT at Asseco Business Solutions S.A.

At Asseco Business Solutions S.A., in all our fields of activity, we adhere to the general principles of business conduct based on universally accepted values:

#### Legal Compliance

- In doing business, we observe the generally applicable law of the Republic of Poland;
- We respect human rights;
- Our employees enjoy the freedom to associate and engage in collective bargaining in accordance with applicable law;
- We do not use or derive any benefits from forced or compulsory labour;
- We do not employ children under the age of 15;
- We comply with labour law in all material aspects related to employment, including relevant regulations on working time, rest breaks, remuneration, benefits and allowances, etc.

### Equality

- We apply equal and fair rules of employment, remuneration, development, and promotion of our employees;
- We treat our employees equally, regardless of their race, gender, sexual preference, religion, and political outlook;
- We foster and build on mutual trust and respect for the other person as well as on proper conduct towards others, no matter the position or function at the Company.

### Relations

- We respect the dignity and good name of all people; we do not condone offensive behaviour towards anyone;
- We adhere to the principles of social coexistence and public morals; we do not accept any form of mobbing: verbal or physical harassment, insult, humiliation, derogation, slander, and intimidation;
- We do not accept any behaviour that is indicative of or meets the criteria of sexual harassment;
- We cultivate good relations and cooperation; we do not tolerate gossip and the spread of other content that could provoke conflict.

### Communication

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

### Work Safety

- We respect all work safety guidelines and the rules of ergonomics;
- We develop our employees' awareness of occupational health and safety through regular training dovetailed with employees and associates' tasks and duties;

### Protection of Company's Image

- We convey the positive image of the Company;
- We act in a way that does not tarnish the Company's reputation. This also applies to conduct outside the working hours and place of work;
- We take care of a proper dress code that matches our professional routines.

### Safeguarding Company's Assets

- The assets of the Company enable it to operate as a going concern and achieve business goals. We take care of the Company's assets; we use them in a proper and productive way;
- We take considerable effort to safeguard the Company's assets against loss, damage, misuse, theft, abuse, or destruction. This is true both about tangible and intangible items, such as trademarks, know-how, confidential or proprietary information, as well as information systems;

- We do not use the Company's assets that are at our disposal for private purposes, except when it has been permitted by the Company under a separate arrangement. The same rule also applies to property entrusted to us by clients or contractors.

#### Trade in Company's Shares

- It is forbidden to buy or sell the Company's shares (and other securities) based on insider, non-public information, i.e. information that has not been made public, and that the average investor might consider relevant when making a decision to buy, sell, or retain shares or other securities ("insider trading"). Trading in shares or securities based on such insider and non-public information, as well as sharing such information with others who may use it for the same purposes, is a serious breach that will entail disciplinary measures and may result in criminal liability. Each employee and associate is required to comply with the above rules on insider trading.

#### Additionally, WE GO BY THE FOLLOWING RULES IN BUSINESS RELATIONSHIPS:

##### Business Integrity

- We follow the standards for best business practice;
- We respect the rules of fair competition and antitrust laws; we do not seek to gain competitive advantage in an unfair or abusive manner;
- We foster good relationships with our clients;
- We do not solicit to hire personnel of our competitors to obtain legally protected information;
- We do not disseminate untrue information about competitors' products or services;
- We do not accept attempts to enter into price-fixing agreements or arrangements, nor do we share customer, supplier, or market bases with competitors and contractors;
- We do not accept the unauthorised transfer and acquisition of information about competitors;
- We do not accept the disclosure of confidential and sensitive information obtained in the performance of duties for the Company to unauthorised third parties, in particular competitors, or any unauthorised use of such information for other purposes;
- We seek to do business only with entities that operate in accordance with the law and match the Company's formal requirements for business partners;
- We keep our business partners informed about our compliance with the principles of business ethics and conduct by making the CBEC available on our website, and we encourage our partners to incorporate the same.

##### Information Security

- We exercise extreme care when safeguarding information, including personal data. We take care to ensure the security of information and data. We protect and ensure the

confidentiality of both the Company's data (business secrets) and the data and information provided or entrusted to us by business partners, in particular our clients. For this purpose:

- we employ adequate security measures to prevent information loss,
- we control access to our premises,
- we keep enhancing our defence systems against cyber attacks and information theft,
- we implement and upgrade information security management and business continuity management systems,
- we raise our employees and associates' awareness in the domain of information security, including personal data protection.

#### Counteracting Abuse and Corruption

- We incorporate the principle of "zero tolerance for corruption." We do not accept any forms of corrupt practices in doing business, nor in the activities of our employees and associates, in particular:
  - promising, suggesting, giving, demanding, or accepting any undue advantages of pecuniary or personal nature for yourself or for third parties,
  - referring to, seeking, or using your own or other persons' influence, including influence in public authorities, enterprises, and other entities for the purpose of obtaining pecuniary or personal advantage.

#### Conflict of Interest

- We avoid conflicts of interest, i.e. situations where our private or personal interests or the interests of our relatives or partners would be in conflict with the interests of the Company;
- Our goals is:
  - to maintain impartial business relationships and make decisions guided by the best interest of the Company and exclusively on the basis of facts and substantive grounds,
  - not to accept additional employment at our clients, suppliers, or other business partners of the Company, and above all, competitors,
  - not to take any action that may prospectively be regarded as biased and driven by a desire to obtain undue advantages;
- We report (to the immediate superior and to the Head of the Human Resources Department or the Head of the Legal Department) any family or personal relationship with the members of personnel of a business partner internally (including, in particular, of a client or supplier) if, in connection with the duties performed at the Company, we perform work projects together with such a partner business. Each such relationship needs to be assessed for a potential conflict of interest.

#### Anti-money Laundering

- We do not enter into transactions and cooperation with entities that dispose of funds that may come from illegal sources and have been accumulated as a result of, but not only, terrorist acts, drug and human trafficking.

#### Public Officials

- We do not transfer any undue pecuniary or non-pecuniary advantages to political parties and their representatives, as well as candidates for political offices, regardless of whether such advantages are given or offered directly or through third parties;
- We do not support any political party financially.

#### Gifts and Tokens of Gratitude

- We do not offer gifts or other advantages to contractors and their personnel or associates, nor do we accept gifts or other advantages from such persons if the value of such gifts or advantages exceeds the value of small, customary, and occasional tokens;
- We do not offer gifts or other advantages (regardless of their value) to public officials or candidates to public functions, or to persons who have ceased to perform public functions in the last 12 months or to individuals associated with them, and we do not accept gifts and other tokens of gratitude from such persons.

#### Donation and Sponsorship

- We make donations and offer sponsorship in accordance with applicable law and the relevant rules in place in the Company;
- Sponsorship and donations made by the Company to individuals, groups, or organisations are aimed to support the development or improvement of the quality of life, in accordance with applicable law, and are not connected with another business relationship with the donee or sponsored entity.

#### Protection of Intellectual Property

- Under no circumstances do we exploit any ideas, materials, software, or information of another person or entity if we are not authorised to do so;
- We use third party software that has been licensed to us;
- In protecting our intellectual property, we exclusively employ tools, software, systems, and devices approved by the Company.

#### Environmental Protection

We run our business in such a way as to minimise its negative impact on the natural environment, and we comply with the legal requirements and accepted standards in this regard.

### **ETHICAL CONDUCT**

- Ethical conduct involves both observance of applicable social and legal standards as well as the principles set out herein;
- All the Company's employees and associates are required to comply with the Code;
- We are all responsible for preventing any violations of the Code.

### Reporting Violations and Unwanted Conduct (Whistleblowing)

If you believe that someone in your corporate setting (another employee, client, contractor, supplier, or other person) is acting in violation of the law or this Code, you are required to report this fact to the Company (blow the whistle). You can do this by contacting your immediate superior or the Human Resources Department or to the Legal Department of the Company or:

- by sending an e-mail to: [etyka@asecobs.pl](mailto:etyka@asecobs.pl),
- by sending a letter to Asseco Business Solutions S.A. at ul. Spokojna 2, 20-074 Lublin, with the envelope labelled, "Ethics. Do Not Open. Hand Over Directly to the Addressee."

A whistleblower who reports a violation in good faith is subject to protection. Whistleblowing does not entail any negative consequences for the whistleblower. Each reported violation is treated seriously and fairly and will be addressed without undue delay. If, based on prior analysis, the situation so requires, appropriate corrective measures will be taken.