



**PASSION** for  
**TECHNOLOGY**



# Code of conduct

Warsaw 2023

## 1. Applicability and distribution

This Code of Conduct applies to all Workers of the Sii, regardless of their status or position within the organization.

The Code of Conduct supplements the Internal Regulations and the Ethical Charter of the Sii but does not under any circumstances replace these regulations.

Several channels are used to communicate and raise awareness of good conduct rules. This code is:

- Promoted among all new Workers,
- Available on both the SiiPortal and on the institutional website of the Sii,
- Conveyed through awareness raising campaigns and digital communications by the means of trainings and presentations about ethics.

## 2. Conduct of Workers

Our Workers should act with integrity, respect, objectivity, professionalism and a sense of responsibility for their behavior. They undertake to:

- respect the values of Sii,
- conscientiously fulfill the duties and take care of Sii's good name,
- respect confidentiality,
- respect Sii's property as well as the property of other entities and private persons,
- treat Sii assets with respect,
- respect the rules of usage and management guidelines relating to quality, security and the environment,
- follow the ethics guidelines, including the *Anti-Corruption and Bribery Policy* and the *Sii Ethics Charter* (see links in a section [Related documents](#)).

Workers may not act or conduct themselves in an unprofessional manner that harms the interests or reputation of the Sii, or that of a client or supplier.

Behaviors that will have negative consequences and non-professional actions include:

- aggressive actions or language,
- repeatedly offensive or rude remarks,
- inappropriate suggestions,
- inappropriate gestures,
- behavior violating the rights of persons on grounds of sex, faith, race or sexual orientation.

Workers are obliged to behave in a manner that does not violate the dignity of other employees.

Undesirable sexual or gender-related behavior, including mobbing or molestation, is prohibited.

All these types of behaviors are punished by the sanctions set out in the Polish Law.

This relates to inappropriate threatening, intimidating or forceful behavior, such as:

- mockery and verbal insults,
- sexist acts,
- sexual advances,
- racist acts,
- behavior violating the rights of persons on grounds of sex, faith, race or sexual orientation.

In addition, Workers shall not carry out any non-compliant actions or become involved in acts of corruption vis-à-vis their colleagues or any third parties of the Sii.

Sii Workers are respected by the Sii and are required to share common values. Consequently, each Worker shall benefit from inalienable rights such as:

- healthy and safe working conditions,
- integrity, dignity and respect regardless of the hierarchical level,
- respect for private life and, in particular, the protection of personal data,
- benefiting from an appropriate balance between professional life and private life,
- freedom of association and freedom to join a union.

#### **Protection of the assets of Sii:**

Assets refer to intellectual property rights, equipment and goods, financial resources as well as all media connected to the activities of the Sii.

- Assets are supplied to serve the interests of the company. They may not be used for personal business, for illegal or political purposes or for any other purpose that could affect the Sii.
- Workers are made aware that they should protect the goods entrusted to them and should do their utmost to guarantee they are kept safe, and this applies to both physical and virtual assets.
- Each Worker should make appropriate use and strive to preserve the hardware and software resources placed at their disposal.
- Therefore, all Workers should read and accept the *Terms and conditions of use of computer assigned to user for implementation of business processes in Sii* (see links in a section [Related documents](#)).

### **3. Conduct of Managers**

Managers must contribute to creating an ethical professional environment to encourage their colleagues. They must:

- set an example and respect the rules of conduct stipulated above,
- provide a positive environment for their colleagues to allow them to perform their activities,
- oversee their physical and psychological well-being at workplace,
- regularly monitor the activities entrusted,
- answer and make themselves available to respond to their requests,
- play a discretionary listening role and pass on to their Line Managers the information required,
- value the work carried out,
- deal with problems and explain the decisions taken.
- Conduct vis-à-vis Clients

Workers shall ensure they respect the principles of integrity and objectivity in their relations with clients.

They undertake to promote exchanges based on trust and honesty and guarantee data confidentiality.

Workers must not request or accept gifts or incentives whose purpose is to obtain an undue advantage or influence a decision different than symbolic or marketing (money, unjustified hospitality, unjustified entertainment, unjustified travel, unjustified services, etc.). Accordingly, Workers are obliged to respect *the Sii Anti-Corruption and Bribery Policy* (see links in a [section Related documents](#)).

When negotiating contracts with third parties, they should take appropriate measures to guarantee the accuracy of the information conveyed.

They should also ensure the relevance of the technical, commercial and legal aspects related to the contract before committing the Sii.

## 4. Conduct vis-à-vis Suppliers and Subcontractors

Workers shall ensure they respect the principles of integrity and objectivity in their relations with suppliers and subcontractors.

They should take into account the interests of all parties, in relation to the respect of fair contractual terms.

Workers undertake to use *Sii Supplier's Code of Ethics* and *The procedure for selection and periodic assessment of Suppliers* (see links in a [section Related documents](#)) in contact with Suppliers.

Workers must not request or accept gifts or incentives whose purpose is to obtain an undue advantage or influence a decision different than symbolic or on marketing matter (money, unjustified hospitality, unjustified entertainment, unjustified travel, unjustified services, etc.). Accordingly, Workers are obliged to respect *the Sii Anti-Corruption and Bribery Policy* (see links in a [section Related documents](#)).

The objective is to promote good practice. This relates to respecting Human Rights employment standards, protecting the environment and fighting against corruption. Therefore, Suppliers and Subcontractors are required to read and sign *the Sii Supplier Code of Conduct* (see links in a [section Related documents](#)).

## 5. Reporting non-ethical incidents

Workers who notice or suspect the violation of the anti-corruption and bribery law or of this Code of Conduct or another document on ethics issues in Sii (see: [Related documents](#)) report such event to the Ethical Committee openly and transparently (under the name) by using an official e-mail: [ethics@sii.pl](mailto:ethics@sii.pl) or use the platform to report abuse under your name or anonymously. The platform is an external tool for whistleblowers and a link to it is available from Sii's website: <https://sii.pl/en/profile-and-key-figures/>.

Sii is obliged to analyze every report of violation with a great care, according to Sii values and with the highest ethical standards. When the Worker is contacted by any of persons responsible for a particular investigation, he or she is obliged to cooperate during the whole process.

At the end of every investigation Sii is obliged to give an official feedback to declarant. It is necessary to build trust in a procedure and its effectiveness. Moreover, the Ethical Committee is obliged to

prepare periodical report about all improvements and seals which Sii implements thanks to this Code of Conduct.

## 5.1 Confidentiality and trust

**All reports of incidents are confidential**, especially personal data and subject of notification (including data of person suspected being guilty of violation).

At Sii we aim to encourage openness and will support anyone who raises genuine concern in good faith under this Policy.

At Sii, we are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion, that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected to raising a concern. If the Worker believes that he or she has suffered any such treatment, they inform the Ethical Committee by using e-mail [ethics@sii.pl](mailto:ethics@sii.pl).