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Ethical Charter

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Sii, in line with its respect for people and the environment bases its development and actions in Poland and internationally on values and principles to benefit:

- its clients,
- its Workers,
- its partners,
- the communities and countries where Sii operates.

Sii, a major operator among IT, BPO and engineering enterprises, aims to offer its clients the highest quality services. This aim, based on innovation and performance, is itself underpinned by ethics and responsible growth.

Gaining recognition as a responsible operator, ensuring the integrity and exemplary nature of its business conduct and contributing through its professional activities to the social development of civil society, requires that significant points of reference are established in order to sustain and increase the trust of its stakeholders.

- This Ethical Charter is based both on the values of Sii and the fundamental principles that the company undertakes to respect, namely:
- The Universal Declaration of Human Rights,
- The conventions of the International Labor Organization, including those relating to the prohibition of child labor and forced labor,
- The United Nations Global Compact principles,
- The principles of the Organization of Economic Cooperation and Development, particularly those relating the fight against corruption,
- Polish and EU law regulations, as well as case law.

The Ethical Charter does not replace the laws and regulations in force in the countries in which Sii operates, nor any existing contracts and obligations. Its goal is to promote its provisions and guarantee their fair and effective application.

Who does this document apply to?

The Ethical Charter applies to the entire Sii workforce, in terms of all dealings and transactions in Poland and all countries where Sii operates. The entire Sii workforce which consists of Workers, coworkers, consultants, civil contractors, freelancers, agents, managers, directors and other entities acting on behalf of Sii (hereinafter: Workers), are required to read, understand, and follow the rules set out by this Policy.

In addition, Sii managers are required to enforce the Policy and ensure that Workers for which they are responsible are made aware, understand and adhere to this Policy.

1. Sii values

The Sii is characterized by a corporate culture driven by strong values fully in line with the recommendations of “Global Compact”, the initiative of the United Nations Secretary General.

Ambition & Fighting Spirit

Status quo doesn't satisfy us – we constantly strive to become better, reach further and, above all, we want to win against our competitors (it is the main reason why we love this business so much!). To remain the best technology consulting, digital transformation, BPO and engineering services vendor in Poland, we set ourselves ambitious goals and pursue them persistently thanks to our perseverance and discipline. We are never fully satisfied with our performance and we constantly challenge ourselves to improve and deliver even better results. We never give up and fight till the end to achieve it!

Positive Can-do Attitude

Energy, optimism and enthusiasm is what defines us. Problems and blockers happen every day, but we treat them as challenges and always look for new out-of-the-box solutions.

Courage & Transparency

Leadership requires making tough and unpopular decisions. We are not afraid of tackling challenges, taking risks and facing the consequences of our choices. We always have the courage to express our opinion despite the consequences, even when it involves criticism against our subordinates or managers. We avoid political correctness. Even when we don't bring good news, we speak our minds honestly.

Engagement and Passion

Power People are the embodiment of passion, both at work as well as after hours. We are truly and deeply excited about people, technology and business. We love to learn and grow, and we do it with great engagement and enthusiasm.

Fairness

We never compromise our integrity. We obey the fair play principles and treat justly both our clients and workers. We pay salaries, which reflect the objective average market value, as well as their individual performance. As to business partners, we serve them fairly by offering prices compliant with the quality we deliver.

Simplicity & Authenticity

We never compromise our authenticity and stay true to our characters. We don't play ourselves up, but communicate directly and straight to the point, without beating around the bush or sugarcoating.

Flexibility

Flexibility towards both our business partners and employees is key to us. Our objective is to meet our client's expectations and requirements as well as adapt to their organization and processes to provide the best services possible. We provide to our workers with flexible employment conditions, the possibility of working from home, a vast range of projects and the opportunity to change their career path.

Loyalty & Solidarity

Regardless of the circumstances, we stay loyal to our company and stand behind our people. We can count on each other in good and in worse times. We don't quit when we face a problem, but instead

we support each other in the quest of finding the best solutions. We always stand united and act together to reach our core objectives.

Modesty & Self-Criticism

Despite our achievements, we remain humble, which allows us to identify areas for improvement and avoid excessive pride, arrogance, or overconfidence. By objectively assessing our own actions and decisions, we can address our faults and shortcomings. We take constructive criticism not as a setback but as an opportunity to enhance our skills and better serve our team, company, and clients.

Quality & Efficiency

Keeping high standards of work in cooperation between Sii departments and units, as well as in collaboration with our clients, partners, and suppliers, is extremely important to us. We regularly verify and evaluate our activities through satisfaction surveys and internal and external audits. What's more, we are productive and drive maximum results out of the work we do. Eliminating unnecessary work, meetings, and bureaucratic rules results in improving our efficiency and effectiveness. Thanks to that we can direct our efforts toward the outputs that bring the highest effect and ROI (return on investment).

Curiosity

We always ask many questions, because we have the desire to learn new things and meet new people. We are eager to discover new businesses, technologies and organizations as well as to explore new places, cultures and methods. We are always curious about the new and never afraid of change.

Team Spirit & Respect

At Sii we are all equal. Regardless of position, hierarchy level, age, gender, religion or any other factors, we respect each other. We believe that all opinions matter equally, and everyone can contribute to our growth. We are guided by empathy, which allows us to appreciate other people's perspectives. We recognize diversity as one of our assets, thanks to which we can develop and collaborate effectively. Moreover, we do not let our individual differences distract us from what we, as a team, aim for because we are a community sharing common goals and a sense of fellowship. We know that we can achieve much more together. Despite constructive conflicts between team members, we always look for compromise and put the benefit of the majority in front of individual interests. However, we are not afraid to part ways with troublemakers, who have a negative influence on our joint performance. We believe it gives us an advantage and is the engine for further growth.

Ownership & Accountability

We don't blame others for our mistakes. We are accountable for our performance and take full ownership of our failures and learn from them

Trust and Freedom

We strongly believe that mutual trust is essential to any relationship. We have confidence in our employees and delegate our decision-making power to lower hierarchical levels. Thanks to the autonomy we provide our experts with, the decisions are made quicker and more effectively.

2. Our commitment as an 'Employer'

2.1 Our Workers

Sii is confident in the loyalty, integrity, motivation, sense of initiative and responsibilities of its Workers. Managerial staff undertake to:

- Ensure consistent and fair treatment in terms of remuneration, training, promotion, in keeping with the skills and performances of each person,
- Develop a team spirit, professional conduct and the sense of service among Workers,
- Set motivating objectives,
- Provide training, encourage Workers to take responsibility and offer support,
- Support the diversity in the teams,
- Encourage flexibility in the organization of work in order to promote an equitable balance between professional activities and private life,
- Respect individuals and their right to the protection of their private lives.

2.2 Diversity

Sii conducts a proactive non-discriminatory hiring and professional equality policy in its management of careers, and ensures it takes diversity into account. The commitments of the company in favor of non-discrimination and diversity are communicated both internally and externally.

Sii condemns all forms of discrimination in the workplace and promotes diversity. The company strives to be an accessible and inclusive workplace that enables development for everyone and gives the Worker the opportunity to fully use their potential.

Diversity and equal treatment in terms of gender, sexual orientation, gender identity, age, religion, political opinion, national extraction and racial, ethnic, social origin, or other, and the integration of people with disabilities, young people and older persons is a one of challenges in our workplace in relation to which Sii is working on several levels:

- Regulatory: preventing and prohibiting all unequal treatment,
- Societal: encouraging access to employment and promotion for all Workers,
- Economic: recruiting and taking advantage of the best skills.

2.3 Social dialogue

Sii encourages and promotes social dialogue aimed at maintaining internal social cohesion and the engagement of Workers to the values of the company. All Workers and, more especially, those in managerial positions undertake to:

- Communicate complete and reliable information to their Workers,
- Encourage the transparency and adapt conditions to realize this idea,
- Promote improvement meeting as a platform for social dialogue,
- Support Workers in the deployment of the corporate values,
- Communicate and share the ideas and concerns of Workers to CEO.

2.4 Health & Safety

Sii offers a healthy and safe working environment. It ensures that its premises and professional practices comply with the law and regulations pertaining to health and safety for its Workers, as well as for its suppliers, subcontractors and partners who are required to work in its premises.

Sii evaluates the occupational risks of Workers at their place of work, both in its own premises as well as in those of its clients and shall communicate these risks to the parties involved. The analysis of occupational risks and associated preventative measures are formalized and communicated to all Workers, suppliers, subcontractors and partners who work in the premises of Sii.

Sii organizes training to obtain the authorizations required in relation to the risks to which its Workers may be exposed.

At all sites belonging to Sii, it is prohibited entering into or remaining in the premises in a state of inebriation. Smoking or vaping in closed and covered premises that constitute a place of work is prohibited. It is also prohibited to be under the influence of illegal substances or to be in possession of any such substances, whether in the premises of Sii or those of a client, supplier, subcontractor or partner.

2.5 Harassment

Workers of Sii may not carry out any moral or sexual harassment, any type of violence, or any other degrading behavior vis-à-vis their colleagues. This relates to:

- inappropriate behavior such as verbal or physical conduct that threatens, intimidates or is forceful,
- verbal insults and mockery,
- sexist acts,
- sexual advances.

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

2.6 Modern Slavery and Forced Labour

Sii guarantees labour free from all forms of modern slavery and forced labour, including practices such as:

- debt bondage,
- forced labor,
- other exploitative conditions.

The Ethics Charter was created based on the principles of the Convention for the protection of human rights and fundamental freedoms, ensuring that all Workers are employed voluntarily and can leave their jobs at any time.

3. Our commitments as a 'Partner'

3.1 Our Clients

Sii endeavors to offer its clients business and technological solutions to guarantee the results they expect, along with the appropriate know-how tailored to their needs.

All Workers of Sii undertake to:

- only accept missions for which the company is qualified, in order to fulfil their remit in the best interests of the client,
- adopt clear and explicit contractual forms that are in line with the reality of the services,
- respect the confidentiality of information, data security and intellectual property rights and reject all forms of corruption,
- refuse to participate in any prior or agreed arrangements that are contrary to the rules of free competition,
- respect any contractually determined requirements, particularly in terms of security, reliability, quality and performance,
- respect all approvals, certifications and regulations applicable.

These requirements cover not only the services offered by Sii but also extend to the activities carried out by the suppliers, partners and subcontractors of the company.

3.2 Our Suppliers

Sii promotes a reciprocal climate of trust with its suppliers, subcontractors and partners. Buyers must comply with the good practices set out in the inter-enterprise charter (CDAF, French association for purchasing professionals).

All Workers of Sii undertake to:

- guarantee data confidentiality,
- treat their points of contact with honesty and respect, also based on diversity and inclusivity,
- select companies impartially based on pre-defined and transparent criteria.

At the same time, Sii, acting in accordance with the principles of sustainable development, cares for a responsible supply chain and expects a similar approach from partners and suppliers. It requires the companies it works with, from which it buys products and services, to act in accordance with the highest standards in areas such as the environment, ethics, labor rights and the supply chain. Therefore, the principles of ESG (Environment Social Governance) are among the criteria mentioned above, according to which, among others, Sii suppliers are selected.

3.3 Our Competitors

Sii strives to stand out from its peers and competitors through honest and legal means and through the quality of its services. It adheres to the fundamental principle of healthy and fair competition, as a factor of growth and innovation.

All Workers of Sii and, more especially, those in commercial positions undertake to:

- not harm any competitors through procedures, maneuvers or declarations that are contrary to the principle of fair competition,

- not recruit staff from a competitive company for the sole purpose of diverting for the company's benefit an ongoing contract with a client,
- not get involved in agreements with competitors for the purpose of, or which results in, the fixing of prices, the prevention of a bidding process, the sharing of a market, the limitation of production or the boycotting of a client or supplier,
- not exchange sensitive information with competitors, in breach of competition law,
- never abuse a dominant position.

3.4 Corruption

Sii undertakes to respect statutory and contractual provisions on combating corruption and shall not tolerate any form of corruption, influence peddling or the involvement in any form of money laundering and terrorism financing.

Sii therefore firmly rejects the offering, soliciting, or accepting, directly or indirectly, of incentives or rewards whose purpose is to obtain an undue personal advantage or influence a decision in an unethical way, which has no business and marketing reasons and are forms of bribery (unjustifiable cash, gifts, hospitality, entertainment, trips, services, etc.). Accordingly, Workers are obliged to respect the Sii gift policy applicable in the country (implemented in November 2019).

This applies to relationships with an actual or potential client or supplier, both in the public and private sectors.

In particular, during negotiations or difficult competitive situations, all Sii Workers shall always conduct themselves fairly and honestly.

Sii does not finance political parties or associations with a political purpose.

An anti-corruption practices guide is available to Workers (implemented in December 2019). Its aim is to provide legal references and practical advice to help Workers deal with potentially risky situations.

3.5 Conflict of interest

All Workers should avoid being confronted with situations in which their personal interests, or those of individuals or legal entities to which they are linked, conflict with the interests of the entities of the company.

If he/she is unable to avoid such a situation, the Worker in question shall act honestly and fairly towards Sii.

In cases where conflicts of interest may arise, it is essential to follow the Conflict of Interest Policy.

3.6 Confidentiality

Each Sii Worker is made aware of the importance of respecting confidentiality. Workers shall not disclose outside of the company any confidential information in their possession. Equally, such information may not be revealed to Workers who are not authorized to possess such knowledge.

If a Worker has access, through their professional activities or by chance, to confidential information, he/she shall take all due care to preserve its confidential nature.

This obligation survives the end of the contractual relationship with Sii.

Each party shall ensure it protects and respects intellectual property and all projects and know-how of Sii.

Workers and subcontractors sign a confidentiality undertaking.

4 Other Sii commitments as 'responsible citizen'

4.1 Local ecosystem

Sii is present and plays an active role in terms of local challenges, in partnership with elected representatives and associations. In 2016 the company appointed Sii Power Volunteers Program, which aim is financial and organizational support of Workers in leading their charity projects. Sii supports:

- the social engagement of its Workers,
- local initiatives for public or community events,
- NGOs appointed by Workers.

In addition, in all public communications, the company undertakes to communicate information honestly, responsibly, accurately, appropriately and in a comprehensible manner. This commitment also applies to publications appearing on social networks.

4.2 The environment

The actions of Sii respect the natural environments of the countries where it operates. All Sii Workers and, more especially, those in charge of environmental issues undertake to apply and promote commitments contained in the *Sii Environmental Policy* (see: [Related documents](#)).

In order to minimize the negative impact of Sii's business activity on the natural environment, the company implemented the ISO 14001 environmental management system in 2022 and acts in accordance with the highest standards set by this international standard.

5 Governance of ethical issues and reporting on unethical behavior and law violation

5.1 Ethical Committee

An Ethics Committee is responsible for dealing with ethical issues, especially business ethics, within Sii.

The Ethics Committee regularly reviews the application of this Charter and ethical practices within Sii.

It monitors any regulatory and legal changes. At its own initiative or on request, it informs all entities of Sii of the values and the implementation of the principles set out in this Charter. Under conditions ensuring confidentiality, it examines reported non-ethical issues submitted to it by internal (Sii Workers and their Line Managers) and external (partners, subcontractors, suppliers and clients) stakeholders.

5.2 Reporting unethical behavior and law violation

Sii has many tools for reporting unethical behavior.

According to the Regulation on the appointment of an Ethical Committee, all Workers should report any unethical behavior to their Line Manager first. One of the primary roles of each Line Manager is to support the Worker in any situation, so they should be the person of most significant trust.

Unethical behaviors can be also reported to Ethical Committee by using an official e-mail: ethics@sii.pl.

All stakeholders can report law violations regulated in the procedure for *Reporting violations of the law and subsequent actions* by using the Alert Platform ([EQS Integrity Line](#)), which provides the opportunity to write both under name and anonymously. The platform can be accessed via a link at www.sii.pl.