

# CODE OF BUSINESS ETHICS

of Ailleron Spółka Akcyjna of Kraków and Ailleron Outsourcing  
Services Spółka z ograniczoną odpowiedzialnością of Kraków

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ailleron 

# TABLE OF CONTENTS

<b>I Glossary</b> .....	<b>2</b>
<b>II From the Management Board</b> .....	<b>2</b>
<b>III Purpose and Scope of the Code</b> .....	<b>4</b>
<b>IV Our values</b> .....	<b>6</b>
<b>V Employees/Our Team</b> .....	<b>8</b>
1. Professionalism .....	8
2. Trust and work culture .....	8
3. Equal treatment .....	9
4. Diversity .....	9
5. Training and development .....	9
6. Health and safety .....	10
<b>VI Business Operations</b> .....	<b>11</b>
1. Cooperation with business partners.....	11
2. Fair competition.....	11
3. Preventing corruption .....	12
4. Preventing money laundering and the financing of terrorism .....	13
5. Avoiding conflicts of interests.....	13
6. Accounting and financial transparency .....	14
<b>VII Assets of the Company and of Third Parties</b> .....	<b>15</b>
1. Protection of property .....	15
2. Intellectual property .....	15
3. Personal data protection.....	15
4. Information security.....	16
<b>VIII Corporate Social Responsibility</b> .....	<b>17</b>
1. Environmental protection .....	17
2. Support for local communities.....	17
<b>IX Reporting of illegal or unethical activities</b> .....	<b>18</b>
<b>X Summary</b> .....	<b>19</b>

## I. GLOSSARY

In this Code, the following terms shall have the following meaning:

**“Ailleron”**, the **“Company”** – **Ailleron Spółka Akcyjna** of Kraków, al. Jana Pawła II 43b, 31-864 Kraków, entered into the Register of Businesses maintained by the District Court for Kraków-Śródmieście in Kraków, Division XI (National Court Register Cases), under number 0000385276, NIP (tax identification number): 9452091626, share capital: PLN 3,706,651.20 (fully paid in), and

**Ailleron Outsourcing Services Spółka z ograniczoną odpowiedzialnością** of Kraków, al. Jana Pawła II 43b, 31-864 Kraków, entered into the Register of Businesses maintained by the District Court for Kraków-Śródmieście in Kraków, Division XI (National Court Register Cases), under number 0000349565, NIP (tax identification number): 9452139020, share capital: PLN 5,000.00 (fully paid in), also referred to jointly as the **“Companies”** and the **“Ailleron Companies,”**

**“Employee”** – a person involved in working with Ailleron and in projects carried out for Ailleron’s external clients, irrespective of the form of collaboration.

## II. FROM THE MANAGEMENT BOARD

Ailleron is a company guided in its operations and business relations by the principles of integrity and ethics. Maintaining this reputation and trust in relations with all entities and companies—our business partners—is a top priority for the Ailleron Companies and every Employee.

This Code is a set of values and principles in force at the Ailleron Companies. The Code describes the fundamental ethical values of the Company and the standards we expect the Employees, including executive personnel, to follow. The provisions of this Code reflect the legal norms contained in the most important acts of international law:

- the International Bill of Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights;

- the fundamental International Labor Organization Conventions, including but not limited to Convention No. 29 concerning Forced or Compulsory Labor, Convention No. 138 concerning Minimum Age for Admission to Employment, Convention No. 100 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value, and Convention No. 111 concerning Discrimination in Respect of Employment and Occupation.

Our Code is also based on universally recognized sets of principles concerning corporate social responsibility in the global context:

- the ten principles of the UN Global Compact;
- the OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights.

In our operations, we follow these norms and comply with the recommendations and guidelines that result from them. At the same time, we take bold actions in terms of ecology, corporate social responsibility, and corporate governance (ESG), as these areas are regulated in particular in EU legislation. By introducing the Code, we want to point attention not only to the principles we should follow in carrying out everyday tasks, but, above all, to our commitment to act in accordance with these principles and our expectation that our clients and business partners will do the same. We make our business decisions based on economic factors, at the same time remembering about social matters, including those related to environmental protection.

### III. PURPOSE AND SCOPE OF THE CODE

The provisions of the Code of Ethics apply to the managers, members of the management board, and all Employees of the Ailleron Companies. The Code is intended to help everyone it applies to understand what their legal and ethical obligations are when it comes to carrying out tasks related to the Companies' operations.

The Code specifies the standards in terms of business ethics, professionalism, and confidentiality that are in force in the Ailleron Companies. The provisions of the Code are intended to promote ethical behaviors in relations with counterparties, the Employees, the Companies' shareholders, and third parties. We believe that promoting the appropriate standards of behavior will produce positive effects not only for the development of the Companies, but also in the relations between the Employees, contributing to maintaining a good reputation of the Companies on the market.

Furthermore, the Code helps to:

- prevent behaviors that are in conflict with legal regulations or cause ethical doubts;
- meet health and safety requirements, including by means of mitigating occupational risks and reducing the number of accidents through the monitoring of potentially hazardous events and the implementation of preventive actions on that basis;
- raise the awareness of the Employees in terms of health and safety when it comes to quick identification and removal of potential non-compliances;
- build the loyalty of the Employees and business partners, including in the context of conflicts of interests that may occur when establishing cooperation with competing companies, both during employment or collaboration and after their termination;
- carry out operations in accordance with the principles of sustainable development;
- save the costs related to potential corrective actions, penalties, and compensations;
- protect the reputation of Ailleron and its clients and business partners.

One of our key goals is to operate our business in a lawful way. In order to achieve this goal, all Employees are required to act diligently, in accordance with legal regulations and the Company's internal regulations.

In the event of any doubts as to the interpretation of the applicable legal regulations or internal regulations, every Employee is required to immediately consult his or her supervisor.

Furthermore, the Employees are required to:

- read, understand, and follow the legal regulations in force in the countries in which they work, as well as the industry standards that apply to them;
- be engaged in ensuring compliance with the Code, in line with the Ailleron mission and based on the principles and values followed;
- follow all internal regulations that concern their work;
- look for support if unsure how to act;
- act ethically and actively respond to all potential and actual unethical behaviors;
- report unethical behaviors and suspected cases of violation of internal and external regulations, including the Code.

Additionally, the managers of Ailleron are required to:

- familiarize their Employees with the Code and the resulting obligations;
- ensure that the Employees follow the Code and supervise compliance in this respect;
- assist the Employees in getting answers and solving problems related to the principles of conduct;
- build a work environment that allows achieving the best possible results;
- identify and report potential and actual violations of the Code.

## IV. OUR VALUES

As a responsible employer, we ensure that the workplace is a safe and professional environment. We promote teamwork and diversity, building a work culture based on trust. We make our best efforts to guarantee equal rights in employment. We present attitudes that are in line with good customs and the principles of polite and respectful interpersonal relations. In what we do, we follow these values:

- **Partnership**

The provisions of the Code of Ethics apply to the managers, members of the management board, and all Employees of the Ailleron Companies. The Code is intended to help everyone it applies to understand what their legal and ethical obligations are when it comes to carrying out tasks related to the Companies' operations.

- **Passion**

We are motivated and full of passion and we genuinely like what we do. We constantly discover new areas and act with full engagement. We perceive challenges as an opportunity to develop, both for the Companies and for each of us. We are proud that we have people on board who are passionate and we love supporting them in pursuing their interests.

- **Excellence**

Our goal is to achieve true excellence. We invest in new technologies and skills, but most of all, in the people behind them. As a result, we are able to provide our clients with top quality products and services, and our Employees—with a stimulating environment in which they can develop.

- **Integrity**

Our integrity, honesty, and open and clear communication are something we are proud of. They mean that you can count on us no matter what happens and also allow us to efficiently overcome obstacles. We always take responsibility for our decisions and actions. We keep our word and expect the same of others.

- **Empathy**

We are genuinely interested in the perspectives of others. We approach every situation

with care and sympathy, listening to and appreciating others. Our sensitivity allows us to notice the problems around us.

At Ailleron, we practice and promote a culture of mutual appreciation. We take care of the well-being of our Employees every day. We also focus on bringing our Employees together and building relations between them; this is why we organize trips, picnics, and team events. As a result, the teams are better-integrated and the atmosphere is friendly.



## V. EMPLOYEES/OUR TEAM

### 1. Professionalism

At Ailleron, we:

- respect human rights and labor law regulations;
- follow equal and fair rules of work, remuneration, development, and promotion of our Employees;
- treat all our Employees in the same way, irrespective of race, gender, sexual orientation, religion, and political beliefs;
- base our relations on mutual trust and respect of the other person, irrespective of the position held and the function performed;
- take care of the positive image of Ailleron;
- behave in a way that does not put the good reputation of Ailleron at risk. This includes our behaviors outside of the workplace and outside of the working hours;
- make sure to look tidy and professional, appropriately to the tasks carried out;
- take care of Ailleron's property since it helps us achieve business goals;
- do not use the property entrusted to us for private purposes, unless this is separately regulated. This principle also applies to the property entrusted by clients or counterparties.

### 2. Trust and work culture

We are determined to make our workplace free of any forms of harassment, abuse, and violence. We do not tolerate sexual harassment, mobbing, and other socially reprehensible or legally prohibited behaviors.

Ailleron's internal communication is based on fair and full exchange of information. Everyone is encouraged to share their opinions and proposals of solutions facilitating the functioning and the development of the organization. We communicate the scope of duties and expectations in a transparent and understandable way and we provide full work evaluation feedback.

We solve interpersonal conflicts in a constructive manner, with respect for the views and opinions of others, even if they are different from our own.

We prevent the dissemination of unsubstantiated information about colleagues. As an employer, we fully respect the rights, dignity, and freedoms of our Employees.

### **3. Equal treatment**

At Ailleron, we promote diversity and equal treatment.

At Ailleron, decisions in terms of selection and promotion are always based on merit and objective and transparent evaluation.

At Ailleron, we follow equal and fair rules of employment, work, remuneration, development, and promotion of our Employees. We treat all our Employees in the same way, irrespective of race, gender, sexual orientation, religion, and political beliefs. Our relations are based on mutual trust and respect for the other person, irrespective of the position held and the function performed.

At Ailleron, we do not tolerate direct or indirect discrimination on grounds of gender, race, age, nationality, religion, sexual orientation, disability, descent, language, political beliefs, political or union membership, or any other trait that is not objectively related to working conditions, irrespective of whether these matters are covered or not by the legal regulations applicable in the given jurisdiction.

### **4. Diversity**

Tworzymy pełne akceptacji miejsce pracy, w którym doceniamy niepowtarzalne cechy i umiejętności każdego Pracownika. Szeroki zakres doświadczeń i punktów widzenia pozwala nam bardziej kreatywnie rozwiązywać problemy, jak również lepiej rozumieć potrzeby naszych klientów.

Oznacza to, że:

- uwzględniamy znaczenie różnorodności podczas rekrutacji i budowania zespołów,
- przy podejmowaniu decyzji, aktywnie poszukujemy alternatywnych punktów widzenia,
- wysłuchujemy opinii każdego członka zespołu, niezależnie od stażu pracy.

### **5. Training and development**

At Ailleron, we focus on training and development. We invest in the development of our people through a number of development initiatives, such as training seminars whose topics are adjusted to the current business needs and market trends. The goal of our actions in this area is the development of key competences, both hard and soft, that allow for

building good cooperation in teams and delivering top quality services and technologies. We promote activities intended to exchange practical know-how and share experience. We want to develop the diverse skills of our Employees in the best and most efficient way possible, so that they can utilize their experience, get inspired, and be motivated to broaden their minds.

We encourage and support our Employees who are involved in activities that benefit local communities and in volunteering.

## **6. Health and safety**

Preventing occupational risk is something that makes Ailleron stand out and a prerequisite for ensuring the health and safety of the Employees. Ailleron has implemented a specific strategy and plans in terms of preventing occupational risk, in accordance with PNN 18002:2011.

All Employees are required to follow and monitor compliance with norms in terms of safety and the use of protective measures in this respect.

In particular:

- we do not take risks that could result in a threat to anyone's integrity or health;
- we rigorously follow health and safety regulations in order to protect ourselves, other Employees, and third parties;
- we use the entrusted equipment responsibly, especially when carrying out risky activities, promoting risk-preventing practices;
- we do not tolerate working under the influence of alcohol or narcotics. In the case of medication that could affect work safety, we consult medical personnel.

## VI. BUSINESS OPERATIONS

### 1. Cooperation with business partners

We make our best efforts in order to build and maintain relations with counterparties that are based on mutual trust and respect.

In particular, we consider the following unacceptable:

- Employees accepting or giving tangible or personal benefits from or to counterparties; however, customary gifts (Christmas/Easter or special occasion gifts), small gadgets, etc. are not considered to constitute such benefits;
- unequal treatment of shareholders in terms of access to information about the Company's operations;
- actions that could lead to a threat to the security of the personal data processed by the Company;
- discrimination, sexual harassment, mobbing, or other socially reprehensible or legally prohibited behaviors;
- collaborating, without the Company's knowledge and consent, with businesses that compete with the Company;
- failure to inform the Company about personal or financial links between an Employee and the Company's counterparties.

The Employees are required to work together in order to achieve the Company's goals. They should make decisions that are of importance for the Company in a loyal and objective manner, considering the Company's best interests, regardless of personal or external factors.

### 2. Fair competition

At Ailleron, we follow the principle of fair competition and comply with antitrust regulations. We do not strive to achieve a competitive edge in an unfair or abusive way. In particular:

- we shape the prices of our products and services on the basis of a sound valuation of the required labor and the quality offered;
- we do not hire the employees of our competitors in order to acquire legally protected information;
- we do not disseminate false information about the products or services of our competitors;

- we do not accept attempts to enter into agreements and understandings in order to fix prices or share databases of clients, suppliers, or markets with competitors and counterparties;
- we do not accept unauthorized sharing and acquiring of information about competitors and sharing confidential and sensitive information with competitors and other entities;
- we cooperate with those suppliers who offer the best balance between the price and the other significant criteria concerning the object of the order;
- we inform our business partners that we follow the principles of ethics in business, sharing these principles on our website and requiring our partners to comply with them.

### **3. Preventing corruption**

Ailleron operates in accordance with the applicable anti-corruption regulations.

At Ailleron, we do not accept corruption, bribery, or any forms of extortion.

We do not practice or tolerate offering, directly or indirectly, any gains to public officials, including the employees of state enterprises, in order to affect their actions or decisions. Furthermore, we make sure that the agents authorized to do business on behalf of the Company enjoy a good reputation and comply with the above guidelines.

We do not tolerate affecting the will of third parties in order to achieve gains, preferential treatment, or guarantees of gains for the Company, for oneself, or for others through any type of payment or compensation in cash or in kind, directly or via third parties.

The relations with the clients, suppliers, partners, persons, or entities that do, did, or could do business with Ailleron should be managed by the persons authorized to do so and should be kept within the boundaries laid down in this Code.

We do not allow for any gifts, payments, commissions, or other personal gains to be accepted from existing or potential clients, suppliers, or persons remaining in or seeking to be in a relation with Ailleron or from persons acting on their behalf, except for customary gifts (Christmas/Easter or special occasion gifts), small gadgets, etc. Similarly, we do not practice seeking such gifts, payments, commissions, or other personal gains. This also includes the provision of personal services, job offers, travel opportunities, privileged treatment, special discounts, and any and all other things of value.

## 4. Preventing money laundering and the financing of terrorism

At Ailleron, we are vigilant, so as to prevent illegal activities, and exercise special diligence in order to comply with legal regulations concerning money laundering and/or the financing of terrorism.

In accordance with the general rule, Ailleron does not allow for making and collecting payments in cash. Every exception from that rule should be properly documented and approved.

In the case of jurisdictions and activities where Ailleron is subject to supervision and has reporting obligations, due diligence measures should be in line with the legal regulations in this respect.

At Ailleron, we monitor in particular:

- the actual identity of the third parties we are about to work with: clients, partners, suppliers, NGOs, etc.;
- the origin of the funds we receive as payment;
- the collecting of split or structured payments the intention of which could be to circumvent any registers or notifications required under the legal regulations intended to counteract money laundering and the financing of terrorism;
- payments that could be used, directly or indirectly and partially or in full, to fund terrorist activities;
- payments that could be of non-economic nature or could have no reasonable explanation;
- incoming payments from and outgoing payments to persons and entities based in tax havens.

## 5. Avoiding conflicts of interests

When carrying out official duties, we must act loyally and defend the interest of Ailleron, avoiding situations that could lead to a conflict between our personal interests and the interests of Ailleron.

The members of the management board and the executive personnel know and follow legal regulations concerning conflicts of interests and the loyalty obligation in connection with related operations.

The following situations should be consulted with the management board:

- engaging, directly or indirectly via a related person, in any business operation or

transaction with the subsidiaries of Ailleron;

- having the ability to decide, negotiate, or execute agreements on behalf of Ailleron with related persons or with legal persons in which an Employee would have, directly or via a related person, an economic or personal interest;
- holding, directly or via a related person, the position of a shareholder, manager, member of the management board, member of executive personnel, etc. of a client, a supplier, or a direct or indirect competitor of Ailleron;
- carrying out the duty of supervising the work or activities of related persons;
- during an audit or inspection: a situation where the head or a member of the audit or inspection team is a related person.

Related persons are:

- an Employee's spouse or partner;
- ascendants, descendants, and siblings of the Employee or his or her spouse (or a person with which he or she remains in an analogical romantic relationship);
- the spouses (or their counterparts) of the ascendants, descendants, and siblings of the Employees.

## 6. Accounting and financial transparency

The transparency of our books, registers, and financial statements, as well as legal public disclosure of these documents, are of crucial importance for maintaining the trust that we have built with our clients and shareholders. Consequently, we actively manage all business documents and take the actions necessary to make sure that they are true and transparent. In particular:

- we strictly follow all principles of financial control and accurate keeping and management of documentation;
- we provide auditors and regulatory authorities, on time, with accurate documentation;
- we publish periodic reports and financial results in accordance with the applicable legal regulations;
- we store documentation for as long as required under legal regulations.

## VII. ASSETS OF THE COMPANY AND OF THIRD PARTIES

### 1. Protection of property

We take care of Ailleron's property because we understand that it is intended to achieve business goals. We are committed to protecting the Company's property against theft, misappropriation, destruction, and loss.

We do not tolerate using the Company's property for purposes other than carrying out the obligations resulting from the legal relationship between the Employee and the Company. Using company equipment for private purposes requires the Company's prior written consent.

All cases of destruction, loss, or improper use of Company property should be immediately reported by the Employees to their supervisors.

### 2. Intellectual property

We ensure the integrity of all intellectual property rights of Ailleron or its clients and business partners, including copyrights and the related rights, patents, trademarks, industrial designs, and rights to databases.

All intellectual property created by the Employees as part of their official duties, including but not limited to software development services and products, are the property of the Company or its clients. When developing products and services, we make sure that they do not violate the intellectual property rights of third parties.

### 3. Personal data protection

Respecting the privacy of our clients, Employees, and business partners and compliance with personal data protection regulations are among the foundations of our business.

We observe the following rules of processing personal data:

- we process personal data for legitimate purposes, in accordance with the relevant agreements and legal regulations;
- we store and share personal data in a secure and responsible manner;
- we use the appropriate personal data protection measures;



- we comply with the applicable personal data retention periods and use secure tools to erase this data;
- we make sure that personal data is shared with third parties on the basis of the relevant agreements.

#### **4. Information security**

Protecting data and information in order to prevent unauthorized access is our shared obligation.

As Ailleron employees, we often deal with confidential information of economic, financial, technical, personal, commercial, and administrative nature (in the paper and digital form), which is of immense value for Ailleron and is covered by the laws on intellectual property and on personal data processing in the jurisdictions in which we operate.

All persons employed at Ailleron are committed to comply with the Company's standards in terms of information security and personal data protection and to use the measures implemented at Ailleron in order to prevent third parties and Employees from accessing data and/or information they are not authorized to access.

The confidentiality and guardedness obligation continues after the end of collaboration with Ailleron. We pay particular attention to:

- using information owned by the Company exclusively for purposes related to the work we carry out;
- sharing information only with authorized persons;
- acting in accordance with the NDAs executed by the Company;
- using technologies and IT systems in a secure manner that is in compliance with internal cybersecurity procedures, which entails securing documents, logins, and passwords, in accordance with our security principles, and, after concluding collaboration with Ailleron, returning all confidential information and complying with the confidentiality obligation.

In order to avoid any misunderstandings, all documents, memos, files, and other materials produced by an Employee that contain, reflect, or are based on confidential information, but contain more than just confidential information, are classified as derivative information that is subject to the same protection as confidential information.

## VIII. CORPORATE SOCIAL RESPONSIBILITY

### 1. Environmental protection

Ailleron respects the natural environment in all of its activities, not only by complying with the applicable legal regulations, but also by operating in a manner that intends to minimize the negative impact on the environment and introducing sustainable environmental management.

To this end, we manage sustainable development in the area of environmental protection. We analyze the impact of our corporate group's operations on the natural environment and the potential challenges related to environmental issues.

We consider environmental issues in our business strategy and implement due diligence procedures with respect to areas that could have a negative impact on sustainable development. We take into account risks related to climate change and look for ways to limit the emissions of greenhouse gases and energy consumption and reduce the quantity of waste generated by our operations, including by means of proper management of IT equipment.

### 2. Support for local communities

We are a socially responsible employer, working with local communities. We carry out a number of campaigns intended to support those in need, such as providing assistance to an orphanage and preparing packages for nursery home residents. We operate a database of volunteering and charitable projects, which we share with our Employees.

We were named a Friendly Workplace in 2023. This is a prestigious distinction awarded by the editorial team of MarkaPracodawcy.pl to companies that have a modern approach to employees, focusing on development, lasting and authentic relations, and work-life balance.

## IX. REPORTING OF ILLEGAL OR UNETHICAL ACTIVITIES

Every action that deviates from the principles described in this Code should be immediately reported in one of the ways specified at the Ailleron Companies.

Everyone who notices unethical conduct may report this in the following way:

1. by personally contacting a member of the management board of the Company the report concerns;
2. by e-mail, to the dedicated e-mail address;
3. via the alternative channel, i.e., by sending a postal item to the registered office of the Company the report concerns.

An improper behavior of a member of the management board of the given Company who is authorized to receive reports should be reported to a member of the supervisory board of the Company the report concerns.

Every Employee who sees obstacles to reporting unethical conduct directly to a member of the management board can and should use the alternative channel. The alternative channel consists in sending a postal item to the registered office of Ailleron, with a note reading “Do not open – to be delivered to a Member of the Management Board” or “Do not open – to be delivered to a Member of the Supervisory Board” on it.

An employee wishing to report a violation of the Code should make sure that the postal item contains a detailed description of the violation.

The Company follows the principle of not allowing any form of retaliation against a person who reports an improper behavior of others, provided that the report is made in good faith. The Employees are expected to assist in investigations of improper behaviors.

To the extent to which a violation of the Code is also a violation within the meaning of Ailleron's Regulations for internal whistleblowing, reporting violations of legal regulations, and taking follow-up actions, the provisions of the Regulations concerning the procedure to be followed when reporting irregularities apply directly.

## X. SUMMARY

This Code of Business Ethics specifies the ethical framework according to which we want to carry out our operations. It lays down the values shared by all Employees and collaborators that have to be followed in everyday work. The Code also describes the fundamental rules and principles related to our actions and our relations with clients, suppliers, and other external entities.

The Code does not cover all possible situations, but provides clear guidelines on how to act. Your obligation is to comply with the Code at each stage of making a decision, and if you have doubts in a specific case, please make sure to contact your direct supervisor.

Ailleron will not tolerate any violations of the Code of Ethics. No Employee, irrespective of grade or position, is authorized to demand from other Employees that they violate the Code.

In addition to other liability, a violation of the Code may entail disciplinary measures, in accordance with labor law regulations.