



Introduction

ABC Data as well as the employees and associates of the company are obligated to work with integrity and mutual respect, in agreement with all laws and the highest ethical standards.

The Validity of the Ethical Code of Conduct

All employees and associates of the company, including every supervisor, director, member of management, and all employees of subsidiary firms, must abide by ABC Data's Ethical Code of Conduct. They are obligated to act responsibly and ethically, follow the provisions of this Ethical Code of Conduct, and act fairly in all business situations and with all business contacts.

Members of management are obligated to act in such a way as to guarantee the compatibility of business actions and processes with the Ethical Code of Conduct.

Goals of the Ethical Code of Conduct

This Code outlines the basic norms and rules governing the actions that employees and associates of ABC Data and its subsidiary firms should take when fulfilling their responsibilities. In addition to dictating ethical standards, The Code of Conduct also aims to build transparency, thus creating trust in the business environment.

I General Ethical Rules

Basic rules which form the basis of relations between ABC Data and the outside environment.

1. The rule of law means that an employee/associate fulfills his/her responsibilities in accordance with the law, keeping in mind the interests of the firm.
2. The rule of reliability means that:
 - 2.1. an employee/associate fulfills his/her duties faithfully, to the best of his/her knowledge and abilities;
 - 2.2. an employee keeps commitments to outside agents and associates.
3. The rule of professionalism means that an employee/associate:
 - 3.1. is polite and remains available in his/her relations with stakeholders;
 - 3.2. tries to be helpful and provides exhausting and precise answers to questions when answering letters, phone calls, and emails;
 - 3.3. dresses in 'business casual' clothes when representing the firm.
4. The rule of impartiality means that an employee/associate treats everyone equally, without prejudice due to race, sex, marital status, ethnicity, language, religion, sexual orientation, attitude, education, reputation, or social standing.

II Detailed Ethical Rules

1. Friendly workplace

The company provides a friendly workplace, in which all employees are ensured the necessary conditions to utilize their potential and abilities. Any and all manifestations of discrimination are unacceptable.

2. Disclosing information and communication with the media

Employees and associates of ABC Data are forbidden from disclosing confidential information about the company. The ban on disclosing confidential information includes traditional forms of communication as well as posts on internet forums, chats, websites, and blogs.

Communication on behalf of ABC Data is led by management and designated employees or associates of the PR department. They are responsible for the actions of Public Relations and Investor Relations, including contact with the media and representatives of financial markets. All questions from journalists and representatives of other media should be submitted to the PR department.

3. Competition and antimonopoly action

Employees/associates of ABC Data are required to abide by all applicable laws, especially competition law, which forbids agreements limiting competition and forbids abusing a dominant market position. Additionally, employees/associates of ABC Data are required to know and comply with the internal regulations of ABC Data.

4. Fair competition

- 4.1. The details of a competitor's rival offer should never be discussed with the competitor.
- 4.2. Limiting free competition by setting prices, separating market segments etc. with a competitor is forbidden.
- 4.3. Persuading a client to buy products or services which don't serve their needs is forbidden.
- 4.3. Partaking in corporate espionage or attempted bribery is forbidden.
- 4.5. Employees/associates of ABC Data are required to give clients detailed and true information and fairly present the quality, functions, and availability of offered products and services.

5. Conflicts of Interest

A potential conflict of interest occurs when a nonbusiness relationship with a person or business entity could affect an employee's assessment of a situation encountered while fulfilling work duties.

5.1 Illegal Gratuities

5.1.1. Gifts, invitations

- a. Employees/associates of ABC Data are forbidden from offering their current or potential business partners any valuable gifts, apart from marketing products of low value, that could affect their decisions, unless these are elements of official marketing campaigns or competitions.
- b. No employee/associate of ABC Data, and no member of his/her immediate family, is allowed to directly or indirectly accept any money, loan, gift, invitation, or other benefit which could affect his/her decision, from clients, external suppliers, competitors, or business partners of ABC Data, without informing ABC Data.
- c. Forcing or provoking clients, external suppliers, other business partners, or suppliers of ABC Data to offer employees/associates gifts or favours is forbidden, even if their value is minimal.
- d. If an employee/associate of ABC Data or a member of his/her immediate family receives a gift or other illegal gratuity, he/she should inform his/her supervisor and register any gratuity valued at more than 200 PLN in the Register of Benefits.

5.1.2. Discounts

An employee/associate can accept a discount for private shopping offered by a supplier only if the

supplier offers similar discounts to similar clients, and the discount does not affect the supply price for ABC Data.

5.1.3. Business Meetings

An employee/associate can accept an invitation or service from a supplier or client only if these are business-related and typically offered to all people working with the supplier or client. These should be services that do not deviate in standard from services the employee is entitled to, and are eligible to be settled in the firm's representative fund.

5.2. External employment of an employee

An employee of ABC cannot be hired:


- a. in any firm competing with or providing services for ABC Data;
- b. in any other workplace if this employment threatens the objectivity of decisions made during the fulfillment of work duties for ABC Data, if this employment is an obstacle to fulfilling work duties, or if it coincides with work hours.
- c. It is forbidden for an employee to use time, materials, information, or other firm resources in order to carry out tasks for another business entity, institution, organization, or for personal gain.

5.3. Contact with suppliers and clients

- a. An employee/associate is forbidden from directly or indirectly gaining any personal benefit from agreements and transactions between ABC Data and suppliers or clients.
- b. An employee/associate is forbidden from carrying out business transactions with close friends or relatives on behalf of ABC Data.
- c. If an employee/associate is related to, or has a mutual business interest with a potential contractor or client, he/she should immediately inform the HR Director and his/her supervisor of this fact.
- d. Relatives and life partners cannot take part in committees that make decisions influencing the company's finances.

5.4. Hiring family members

Relatives and life partners can be employed by ABC Data only if the employed relative or life partner will not influence the career, promotion, or work and pay conditions of the other party.



III Find out more

The Ethical Code of Conduct includes the basic rules of ethical behaviour pertaining to business contacts and actions. The Code does not describe in detail all of the applications of its provisions to business actions; all of its included provisions are intended as guidelines. Any doubts or questions about the application and interpretation of this Code should be directed at supervisors or ABC Data's HR Director.

IV Reporting Violations

ABC Data supports a culture of open communication and transparent rules of functioning. Any doubts regarding the compatibility of actions taken with the provisions of the Code, as well as any breaches of the provisions of the Code, should be immediately reported to immediate supervisors and ABC Data's HR Director. In these cases employees and associates are obligated to observe confidentiality.

V Final Provisions

1. Employees/associates of ABC Data are obligated to inform ABC Data's HR Director and their supervisors of any breaches of the provisions of ABC Data's Ethical Code of Conduct.
2. All employees of ABC Data must submit yearly reports testifying to not being involved with any entity in a way that could constitute a conflict of interest. ABC Data also reserves the right to expect associates to submit such a report at its discretion, and to make starting or continuing cooperation conditional on the submission of such a report.
3. These reports should be submitted directly to each employee's supervisor, who signs and forwards them to the HR Department. In the case of associates, reports should be submitted directly to the HR Director.
4. The provisions of ABC Data's Ethical Code of Conduct apply 14 days from its announcement.

We encourage open and honest communication. However, if an employee or associate of the company wishes to remain anonymous, he/she can send a report to the following designated email address: kodeks.etyki@abcdata.eu