



Ethical Charter



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Our commitment: professional ethics underpinning responsible growth

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

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

Sii, a major operator among IT 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,
- ⇒ Changes in the provisions of Polish and EU 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.

1. 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.

2. 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

Status quo does not satisfy us – we constantly strive to be better, go further and above all we want to win against our competitors (it is main reason why we love this business so much!). We set ourselves ambitious goals and pursue them restlessly. We are rarely fully satisfied with our performance and we constantly challenge ourselves to improve and achieve even better results.

Can-do-attitude

Positive energy, optimism and enthusiasm is what defines us. Problems and blockers happen every day. We treat them as challenges always looking for new out-of-the-box solutions.

Courage

Leadership requires making tough decisions. We are not afraid of facing challenges, taking risks and facing the consequences of our choices. We always have the courage to express our opinion, even when it involves criticism against our subordinates and managers. To ensure long-term stability of the company, we are not afraid to make unpopular decisions.

Engagement and Passion

Our employees are the embodiment of passion, both at work as well as after hours. We are truly and deeply excited about work, people, technology and business. We love to learn and grow, and we do it with great enthusiasm reflecting our profound engagement, which we treat as an inseparable part of our daily responsibilities. We are fully dedicated to what we do and devoted to our company as well as the people, who constitute it. This motivates us to work effectively and deliver the best results every single day.

Fairness

We obey the fair play principles when dealing with our clients and employees and we treat them justly. We pay salaries, which reflect the objective average market value as well as the individual performance of employees. As to business partners, we treat them fairly by offering prices compliant with the quality we deliver.

Fighting Spirit

We never give up and fight till the end! Whether at work or competing with our competitors, we strive to achieve our ultimate goal - being the best IT, engineering and BPO services provider.

Flexibility

Flexibility is the core of what we do, both when it comes to our business partners and employees. At Sii the client is the main focus. Our objective is to meet the clients' expectations and requirements as well as adapt to their processes and tools in such a way so as to provide the best services possible. We offer the expertise of our consultants and engineers, whom we provide flexible employment conditions, the possibility of working from home, a vast range of executed 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, which is reflected by our integrity.

Modesty & Humility

We are ambitious and confident in our abilities, but, despite our success and great performance since establishing the company, we have not become arrogant. We remain modest and humble with the ability to accept mistakes and failures as we know we are not always right. We accept constructive criticism, which to us is as a means to development. We know we have a lot to learn from our colleagues and clients as well as competitors. Despite our dynamic growth, we keep in mind that our good financial situation may change.

Quality

Quality is our priority! We take the utmost care to ensure its highest level in cooperation between different Sii departments and units as well as in collaboration with our customers, partners, suppliers. On a regular basis we meticulously verify and evaluate our activities using satisfaction surveys as well as internal and external audits.

Respect

At Sii we are all equal. Regardless of position, age, sex, religion or any other factors, we respect each other. We listen to others and are tolerant of different opinions – what is more, we recognize them as our greatest assets. We listen to others and respect different opinions – what is more, we treat diversity as an advantage.

Team Spirit

A harmonious team is our greatest asset. We know it is hard to deliver great quality services alone and that we can achieve much more as a team. While working together we exchange opinions, which allows us to grow stronger together. Moreover we do not let our individual differences distract us from what we, as a team, aim for. Despite constructive conflicts between team members, we always look for

compromise and put the benefit of the majority in front of individual interests. We are not afraid to part ways with trouble makers, who have a negative influence on our joint performance. We believe it gives us advantage and is the engine for further growth.

Transparency

We spare no effort to constantly keep our clients and employees well informed. We avoid political correctness and despite the consequences, we openly communicate our opinion and criticism in any situation, even when it may offend someone.

Trust and Freedom

We strongly believe that mutual trust is an essential attribute of any relationship. We have confidence in our employees and delegate our decision power to lower hierarchical levels. Thanks to the autonomy we provide our experts with, the decisions are made quicker and more effectively. Our team is powered exclusively by people, whom we are willing to trust with such responsibility without a doubt.

3. Our commitment as an ‘Employer’

3.1 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.

3.2 Diversity

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

Diversity in terms of gender, origin, age and the integration of the disabled, 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.

3.3 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.

3.1 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.

3.1 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 behaviour 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.

4. Our commitments as a 'Partner'

4.1 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.

4.1 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,
- ⇒ select companies impartially based on pre-defined and transparent criteria.

4.2 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.

4.3 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 (to be 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 made available to Workers (to be implemented in December 2019). Its aim is to provide legal references and practical advice to help Workers deal with potentially risky situations.

4.1 Conflicts 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.

4.1 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 an 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.

5. Our commitments as ‘responsible citizen’

5.1 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.

5.2 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*.

6. Governance of ethical issues and reporting on non-ethical incidents

6.1 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.

The violation of ethical standards should be reported to the Ethical Committee by using an official e-mail: ethics@sii.pl.