

## I. Principles and their application

Sygnity Business Solutions S.A. ("SBS") applies corporate social responsibility in all spheres of its activity, in particular by observing the following principles:

- ethical action when making business decisions,
- the avoidance of conflicts of interest and
- to apply zero tolerance to any act or omission having or likely to have the appearance of corruption.

At the same time, SBS undertakes to observe the above mentioned rules of all its contractors, and entering into cooperation with SBS is tantamount to acceptance of the contractor's commitment to observe them.

The contractor undertakes to implement the principles of conduct described above for its employees and co-workers, as well as to communicate them clearly within the contractor's organization. These principles should include awareness-raising among decision-makers on all aspects of corporate social responsibility.

The Contractor also undertakes to ensure that, in the event that any obligations towards SBS are entrusted to further contractors, such further contractors shall comply with all the aforementioned principles of corporate social responsibility.

## II. Avoiding conflicts of interest and maintaining fair competition

SBS takes care - and obliges its contractors to do so - to ensure fair and transparent conditions of cooperation, based on clear and understandable rules and obligations for both parties and to maintain fair competition and security of information provided to each other. The contractor declares that it is committed to doing so and that it actively seeks to build ethical attitudes among all its employees and associates and verifies their awareness of ethical attitudes and corruption risks.

By entering into cooperation with SBS, the contractor declares that there are no circumstances that may reasonably be expected to arise in the future that would create a conflict of interest that would or might affect the contractor's credibility or integrity and the performance or proper performance of its obligations. Proper performance of obligations shall be understood as both the agreed scope and quality of the contractor's obligations, but also his independence in relation to SBS. Contractor agrees to perform its obligations in any event so as to avoid any conflict of interest and to notify SBS in writing in case of any circumstances giving rise to a conflict of interest. In the event of any circumstances that may give rise to a conflict of interest, the contractor undertakes to immediately take measures to avoid the conflict of interest and inform SBS of such circumstances. With the notification, the contractor undertakes to make a proposal to remove any existing or potential conflict of interest and to indicate how to prevent it in the future.

### III. Anti-corruption rules

SBS does not tolerate any corrupt behaviour, including those involving the abuse of positions or functions, in order to gain undue financial or personal advantage or make promises in this respect. SBS continuously monitors compliance with anti-corruption rules and laws on corruption and its prevention. You agree to consciously and proactively manage the risks of fraud and corruption, and to immediately report and explain any incident that constitutes, or even may constitute, any violation of the law or of your obligations regarding corruption or its prevention. You agree to take immediate and appropriate action, as appropriate, to remove the risks, remedy the violations and discipline those who do so, and to eliminate similar events in the future.

The contractor undertakes to actively take care of the awareness of its employees and co-workers in the area of criminal and civil liability for corrupt activities, as well as the awareness of their negative impact on the cooperation, development, safety and costs of the business activity, and consequently on the image and good name of both the contractor and the entities that cooperate with him.

The contractor undertakes to initiate control or audit activities that will make it possible to identify areas of activity, in particular those exposed to the risk of occurrence of corruption-generating events, as well as to assess the circumstances of such events and identify persons responsible for both corrupt acts and persons who have favoured such circumstances or neglected obligations related to the application and observance of anti-corruption rules.

The contractor must make its employees and other persons acting in its name and on its behalf aware of the prohibition of acts such as:

- **bribery** - that is, offering, promising, soliciting or giving any financial or personal advantage to any person in a public function in connection with that function,
- **venality** - that is, offering, promising, soliciting or giving any financial or personal advantage to any person in a public function in connection with that function,
- **paid protection and trade in influence** - that is, invoking influence in a state or local government institution, international or domestic organization or in a foreign organizational unit with public funds, or inducing another person to believe in the existence of such influence by proposing (active paid protection) or seeking (passive paid protection) intermediation in settling a matter in exchange for a financial or personal benefit or a promise thereof,
- **tender conspiracies and manipulation of tenders** - that is, concluding agreements the object or effect of which is to eliminate, restrict or otherwise distort competition on a given market, consisting, among other things, in agreeing with the entity organizing the procedure for the award of a public contract or by those entities with the entity organizing the procedure the conditions for submission of tenders, in particular the price or scope of works, submission of bogus bids or manipulation of the content of tenders by submitting documents or explanations in such a way as to lead to the selection of an agreed tender or the dissemination or concealment of information relevant to the procedure.

A financial benefit is defined as any value or good that can be expressed in money and that can satisfy a specific need. These can be gifts, invitations to events or meals that exceed the normal customs. This may be not only a direct increase in the recipient's assets, but also other activities or agreements that are beneficial to the recipient, such as ordering certain activities or works.

A personal benefit should be understood as a benefit of a non-pecuniary nature which improves the situation of the person who receives it, such as the promise of promotion, arranging a job, limiting professional duties, taking up an apprenticeship, sending a scholarship or any other kind of opportunity to improve professional competence, creating a favourable image in the media, etc.

The contractor undertakes that employees and other entities acting in its name or on its behalf shall not claim or accept any financial or personal benefit or its promise in exchange for the abuse of the powers granted to them, failure to fulfil or omission of the obligation incumbent on them, an act constituting an act of unfair competition or leading to unjustified or unlawful preference for the contractor or which may cause harm to the Signatories, including exposing them to the infringement of their good name and image. Contractor further agrees that any of its sponsorship activities will be conducted transparently, fairly and not aimed at obtaining any unlawful or unauthorized financial or personal advantage from any party to such activity.

The contractor also undertakes to maintain its records in a manner that ensures transparency and reliability. The contractor also undertakes to build awareness among its employees and associates:

- when making a payment, they should always know the purpose of the payment as well as its proportionality (equivalence),
- it is also the responsibility of the contractor's employee or associate to obtain a receipt or other financial document (e.g. a bill or invoice) that describes the validity of the payment.

#### IV. Compliance with the law

The contractor also undertakes to:

- respect applicable human and civil rights and to avoid any violation thereof, respect for freedom of assembly, the right to collective bargaining and the unrestricted right to express one's opinion on working conditions,
- respect for human dignity, privacy and liberty, the prevention and avoidance of slave labour, child labour and the prevention of all such incidents, as well as taking immediate action should they occur,
- combat any discrimination based on any ground, in particular race, colour, sex, sexual orientation, political or religious beliefs, opinions, national origin or language,
- comply with labour law provisions, including in particular those concerning remuneration, working time, the right to rest and health and safety at work,
- act in an environmentally friendly manner.



Sygnity  
Business Solutions

Any violation or suspected violation of the anti-corruption policy or other laws should be reported anonymously or with your personal information by sending a report to the address:  
[compliance@sygnitysbs.pl](mailto:compliance@sygnitysbs.pl)

SBS ensures that reports are confidential and that their examination will be carried out each time with due diligence and insight, as well as respecting all legal regulations concerning personal data protection and other relevant provisions of law.

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1991 - 2021 30 YEARS OF EXPERIENCE

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