



adopted on 21st November 2022

Code of Ethics

This Policy is applicable to Capital Group of Asseco South Eastern Europe (ASEE) and to all ASEE Employees

Asseco South Eastern Europe S.A. with the registered seat in Rzeszów, ul. Olchowa 14, 35-322 Rzeszów, phone: +48 17 888 5555, fax: +48 17 888 5550, www.asseco.com/see, e-mail: office@asseco-see.com, NIP: 813-351-36-07, REGON: 180248803
District Court in Rzeszów, XII Commercial Division of the National Court Register KRS: 0000284571
Share capital: PLN 518 942 510.00, the amount of paid-up capital: PLN 518 942 510.0

Table of contents

I. OBJECTIVE OF THIS DOCUMENT	3
II. DEFINITIONS	3
III. GENERAL RULES	3
IV. ASEE CORE VALUES	3
V. MUTUAL RELATIONS STANDARDS	4
VI. PROTECTING THE COMPANY'S IMAGE	5
VII. SAFEGUARDING THE COMPANY'S PROPERTY	5
VIII. CONFLICT OF INTEREST	6
IX. BUSINESS CONDUCT	6
X. ANTI-CORRUPTION AND ANTI-FRAUD	7
XI. ETHICAL CONDUCT	7
XII. FAIR COMPETITION DATA	7
XIII. INFORMATION SECURITY AND DATA PROTECTION	8
XIV. CONFIDENTIALITY	8
XV. INTELLECTUAL PROPERTY	9
XVI. FINANCIAL DATA	9
XVIII. REPORTING VIOLATIONS AND UNDESIRABLE BEHAVIOURS	10
XIX. EFFECTIVENESS	10

I. OBJECTIVE OF THIS DOCUMENT

- The Code of Ethics of ASEE defines the principles, rules of conduct and values to be followed in interpersonal and business relationships, as well as in protecting the property and positive image of Asseco South Eastern Europe S.A. and all companies of the Capital Group of Asseco South Eastern Europe including Payten.
- The Code of Ethics of ASEE is based on the Core Values of ASEE which lay the foundation for actions undertaken by the Company's Employees and the Company itself.

II. DEFINITIONS

- Company – Asseco South Eastern Europe and its subsidiaries, including Payten
- ASEE - Capital Group of Asseco South Eastern Europe including Payten
- Employee – a person employed by the Company
- Code – the Code of Ethics of ASEE
- ASEE Core Values – the key features of the Employees' behavior and actions, setting the work standards laid down in this Code.

III. GENERAL RULES

- The standards of behavior contained in this Code apply to all Employees.
- The Company shall continue to create a working environment that enables its Employees to comply with the standards contained in the Code.
- The Company shall make every effort to ensure that its business operations are carried out in accordance with the letter and the spirit of law as well as other accepted standards of business conduct, which are reflected in generally applicable laws and the Company's internal bylaws.
- We also expect our business partners to abide by the principles set out in this Code.

IV. ASEE CORE VALUES

ASEE shares common values with all Employees and co-workers of the Companies belonging to ASEE Group, such as: integrity, respect, responsibility, efficiency,



professionalism, commitment. These values are approved by the Management Board and Human Resources Department of ASEE and communicated to all off the Employees and co-workers, who are obliged to follow them in all aspects of their work. These values we understand as follows:

Integrity

Acting with honesty and honor without compromising the truth.

Respect

Treat others the way you wish to be treaded.

Responsibility

Taking responsibility for our work and the environment in which we operate.

Efficiency

Ambitious and consistent striving to reach our goal.

Professionalism

Constant improvement of our qualifications and sharing our experience.

Commitment

Full commitment to every realized project

V. MUTUAL RELATIONS STANDARDS

Equality

- We respect human rights and labor law standards.
- We provide fair working conditions and we are committed to compliance with all applicable environmental, health and safety laws;
- We follow the principles of equal and fair employment, remuneration, professional development and promotion of our Employees.
- Our Employees are treated equally, regardless of their race, gender, religion or political beliefs.



- We rely on mutual trust and respect and proper dealings with others, regardless of their position and function within the Company.

Relations

- We respect dignity of all people, we do not accept any abusive behavior, violating the dignity and good name of others.
- We follow the rules of principles of social conduct and good morals and we do not accept any form of mobbing: insulting, humiliation, discrediting, slander or intimidation of others.
- We are committed to good relations and cooperation and we do not accept spreading of any rumors or other messages that would result in conflicts or disturb good relations and cooperation.

Communication

- We strive to communicate precisely and unambiguously.
- We provide complete, objective, timely and understandable information.

VI. PROTECTING THE COMPANY'S IMAGE

We do care about the positive image of our Company.

We behave in a way that does not compromise the good image of the Company. This also applies to our behavior outside of the regular time and place of work.

We take care of neat and dignified appearance, appropriate to our tasks.

VII. SAFEGUARDING THE COMPANY'S PROPERTY

All Employees are responsible for protecting Company's assets and ensure proper usage.

The Company's assets shall serve to achieve its business goals.

We do not use the Company's assets for our private purposes except when this has been dealt with separately by the Company. This rule also applies to assets entrusted by clients or business partners.

We protect our computers and systems with strong passwords and taking security measures to avoid theft or damage.

VIII. CONFLICT OF INTEREST

We shall not allow the occurrence of any situation in which our private interests, or the interests of our relatives or related persons, would be in conflict with the Company's interest.

Employees must not participate in activities from which they expect to acquire, contrary to the interests of Company, direct or indirect material or other benefit.

The term "to acquire material or other benefit" shall also imply acquiring material or other benefit for the Employee's:

- Spouse;
- Children;
- Other legal entities or individuals, through which the Employee shall indirectly acquire material or other benefit.

Each Employee shall report to the direct superior (and/or line manager) all relations or issues that are liable to result in conflict of interests while fulfilling his/her assigned service duties.

Each member of the Company's management board, shall report any said conflict of interests to the sole (or majority) shareholder and she/he shall follow provisions of relevant articles of association requiring shareholders' approval on conclusion of agreement with related parties.

In dealing with these potential conflicts the Company requires integrity, use of good judgement and discretion.

The ASEE Employees shall:

- maintain impartial business relationships and make decisions based solely on merit,
- not to take on additional employment with the Company's customers, suppliers or other business partners, especially competitors,
- refrain from taking any action that might in the future be perceived as biased and oriented to gain undue advantage.

IX. BUSINESS CONDUCT

We comply with the best practices of business conduct.

We maintain good relations with our customers.

We do not tolerate illicit financial benefits, any forms of extortion or corruption, facilitating payments, money laundering, as well as financing of terrorism, etc.

We strive to do business only with those entities which operate in accordance with legal regulations and comply with all formal requirements imposed by the Company on its contractors.

We do not engage in transactions or co-operate with questionable parties whose activities are unlawful and whose funds may be derived from illegal activities such as acts of terrorism, drug trafficking, human trafficking or tax evasion.

X. ANTI-CORRUPTION AND ANTI-FRAUD

We profess a zero tolerance for corruption. We do not accept any form of corrupt behavior in business activities, as well as in the actions of our Employees and associates, in particular:

- promising, suggesting, giving, demanding or accepting any financial or personal benefit for oneself or for any third party,
- using influence, seeking or using one's own or others' influence, including that of public authorities, enterprises and other entities, to obtain financial or personal benefit.

We do not provide gifts or other benefits to, or accept gifts or other benefits from, contractors and their employees or their affiliates that exceed the value of customary occasional small gifts.

We do not support any political party.

We do not give gifts or other benefits (regardless of value) to, or accept gifts or other expressions of gratitude from political parties and their representatives, persons who have ceased to hold public office or who are candidates for public office or persons associated with them.

We conduct our donation and sponsorship activities in compliance with applicable laws and the transparent rules set out in our internal regulations.

Sponsorships or donations made by the company to individuals, groups or organizations are not made in conjunction with another business relationship with the sponsored or recipient entity.

XI. ETHICAL CONDUCT

- Ethical conduct encompasses both compliance with applicable social and legal standards as well as with the principles described in this Code.
- All Employees are obliged to comply with this Code.
- We are all responsible for preventing the occurrence of any violations of this Code and, in the event of such violation, all Employees should follow the rules of ASEE Group Whistleblower Procedure.

XII. FAIR COMPETITION DATA

We adhere to the principles of fair competition and anti-trust laws and do not seek to gain any advantage through unfair or abusive means.

We win customers based on our products or services and do not disparage our competitors or solicit or use non-public information from our competitors.



We comply with all relevant fair competition laws in all jurisdictions in which we do business.

We never agree with competitors to set prices, limit production, divide markets or bids or make any other agreements to limit competition. As a rule of thumb, do not discuss prices, clients, product plans or other confidential information with any competitors.

We treat with respect our competitors i.e. (i) we do not attempt to obtain legally protected information possessed by our competitors and (ii) we do not disseminate false information about competitors' products or services and (iii) we do not accept the unauthorized transfer or acquisition of competitive information or the sharing of confidential or sensitive information with competitors or others.

XIII. INFORMATION SECURITY AND DATA PROTECTION

We treat the protection of information, including the protection of personal data, with the utmost care in both our business and personal activities. We implement this principle as follows:

- we base our products and services on the principles of privacy and security, and use adequate safeguards to protect against loss of information,
- we protect information provided to us by our contractors,
- we constantly develop systems to defend against cyber-attacks and information theft,
- we continuously improve our Information Security Management System and Business Continuity Management System,
- we implement programs to build awareness among our Employees and associates in the area of information security, including personal data protection,
- we supervise access to our premises,
- we collect, hold and use personal data only for express business purposes and only hold it for as long as required,
- only Employees who are expressly permitted to do so may access or obtain personal data.

Employees must consult with the Country Leader or General Manager before disclosing any personal data to third parties to ensure compliance with laws, regulations and contractual provisions.

XIV. CONFIDENTIALITY

We protect confidential information. We protect information provided to us by our contractors.

Employees must keep all confidential information learned from the Company strictly confidential.

Employees must take specific precautions referring to confidentiality of information delivered to the Company by the third parties, if required by the contractual obligations (Non-disclosure provisions, "need-to-know basis" access restrictions).

Asseco South Eastern Europe S.A. with the registered seat in Rzeszów, ul. Olchowa 14, 35-322 Rzeszów, phone: +48 17 888 5555, fax: +48 17 888 5550, www.asseco.com/see, e-mail: office@asseco-see.com, NIP: 813-351-36-07, REGON: 180248803
District Court in Rzeszów, XII Commercial Division of the National Court Register KRS: 0000284571
Share capital: PLN 518 942 510.00, the amount of paid-up capital: PLN 518 942 510.0



Employees may not provide confidential information to third parties without prior consent and approval of the Country Leader or General Manager, unless the Company has concluded with a third party an agreement under which such information can be revealed to that third party.

Employees must exercise caution and good judgment in using social media and may not share confidential information on such platforms without prior consent and approval of the Country Leader or General Manager.

XV. INTELLECTUAL PROPERTY

We protect and maintain strictly confidential our inventions, patents, trademarks, copyrights and trade secrets.

Employees involved in software development must protect intellectual property, particularly paying special attention to intellectual property rules and regulations.

In protecting our intellectual property, we only use company-approved tools, software, systems and devices.

We use the ideas, materials, software, information of another person or entity only if we have permission to do so. We use third-party institution software for which we are authorized.

XVI. FINANCIAL DATA

We prepare our business and financial results in accordance with the IFRS as endorsed by European Union, as well as local regulations prescribed by the countries in which the Company operates.

Company maintains disclosure controls and procedures to ensure full, fair, accurate, timely and understandable disclosure of required information.

Employees must create complete, accurate and truthful records.

We are dedicated to, and expect our Employees to adhere to, reliable financial reporting controls.

Our financial statements and books and records must properly disclose the nature and purpose of transactions and Employees are expected to comply with all laws, regarding proper disclosure and recordkeeping.

All Employees, suppliers and business partners are expected to fully cooperate with all internal and external auditors.

XVII. RESPECT FOR THE ENVIRONMENT

We believe that environmental responsibility and implementation of an appropriate environmental policy represents our contribution to the society.

Taking into consideration the environmental impact on its business activities, the Company ensures that its operations are environmentally friendly by implementing appropriate



technologies and actively promoting recycling, low energy consumption, and minimum environmental impact.

XVIII. REPORTING VIOLATIONS AND UNDESIRABLE BEHAVIOURS

In the event any Employee identifies actual or potential violation of rules set out in this Policy, he/she should report this fact based on rules specified in ASEE Group Whistleblower Procedure.

Any person who in good faith reports a violation is protected and stays anonymous. Reporting a suspected violation of the Code will not result in any negative consequences for the reporting Employee.

Each submission is taken seriously and fairly and is processed promptly. If, based on analysis, the situation warrants it, appropriate corrective action is taken.

XIX. EFFECTIVENESS

This Code is effective from the date of its adoption by the Management Board of Asseco South Eastern Europe SA. As of the effective date of this Code, the previously binding Code of Ethics loses its effect.

If effectiveness of this Policy requires additional actions of the Subsidiaries' management, the management is obliged to take these actions as soon as possible and no later than within 1 (one) month from coming of this Code into force.