



CODE OF PROFESSIONAL CONDUCT

The Management Board and employees of Edge 1 Solutions have drawn up a Code of Professional Conduct which constitutes a written record of the key principles that govern the company's daily work, and serves as the main point of reference for all activities undertaken.

October 2024

Purpose of the document

The Code of Professional Conduct has been established in line with core principles regulating the company's conduct not only towards its employees, but also towards all entities with whom we cooperate, as well as towards the environment. One should bear in mind that the Code does not supersede generally applicable norms and laws nor does it relieve us of the obligation to exercise independent judgment.

We commit to comply with the principles and standards set forth in this document at every level of the organization. We ensure that this document is properly disseminated and we promptly take the necessary corrective measures in the event of any violations to this Code.

Since our executives serve a distinct role in shaping attitudes in their environment, we put great emphasis on ensuring that not only do they adhere to the norms set forth in this document, but also respond within their authority to any attempts to violate the norms, principles and values.

Our actions

Within our organization, we promote sustainable development, pursuing a balance between economics, ethics and ecology. In our business operations, we are committed to high ethical standards, building partnerships with customers, employees, suppliers and the community. We engage in a number of activities in the CSR area.

UN Global Compact Network Poland has awarded us the title of Ethics Standard Proponent. We rank among the companies that meet **the Standards of the Ethics Program**, a document designed under the United Nations guidelines.

The Code is a document open to suggestions from all of us. It can be updated depending on the needs and changes taking place within our organization.



Our values include:

#LEARN&TEACH

We invest in development. We continuously expand the skills and competencies of our employees so that they can best meet project requirements of our Clients.

#SIGNYOURNAMEONIT

Commitments to Clients and employees are a top priority for us. We respond with agility to the changing needs of our Clients. Our ultimate goal is to deliver a valuable solution on time and on budget.

#ACHIEVE&CELEBRATE

Technological competence, combined with business knowledge and experience, enables us to come up with actions that have a real and quantifiable impact on the business value being developed. Client's success is our success.

#BUILDTRUST

Our goal is to build long-term cooperation based on sound partnerships and mutual trust. Good communication is the foundation. We act transparently, with a sense of common purpose.

#BEATEAM.EDGE1TEAM

We are a team. We all make sure that our company is not just a workplace, but a community of collaborative, supportive and committed people.

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Rules of conduct

Respect for the law

- As a company that conducts itself ethically, we comply with all applicable regulations, both statutory and non-statutory requirements.
- We keep abreast of changes in local legislation, as well as European Union directives, and we align our procedures and processes accordingly.
- We do not derive material gains by virtue of our function and position.
- Our contacts with Clients and suppliers must not be used for any personal gain.
- Every employee is required to protect the property of Edge1S and the property of the Clients against theft, loss, damage, misuse and destruction.
- We comply with internal and external legal standards for financial reporting.
- We have anti-money laundering procedures in place.

Integrity and transparency in operations

- One of our values is **#BuildTrust**. Regardless of the organization's field of operation or type of task, we are committed to acting with integrity.
- When collaborating with our: Co-workers, Clients and Suppliers we never intentionally make false or inaccurate statements.
- All employees in the company are required to avoid relationships and circumstances that could possibly produce ethically questionable situations.
- We firmly observe an absolute ban on deriving any material benefit in monetary form from our suppliers and other Business Partners. We consider the violation of such a ban as a flagrant breach of professional obligations.

- All costs, fees and additional services related to the implementation of our activities must be clearly and thoroughly presented to the client before obtaining their consent as to whether or not to cooperate, or before taking any action for the implementation of the assigned task.
- When conducting marketing campaigns, we remain realistic and objective in presenting the advantages to be gained from choosing our services.

Managing conflicts of interest

Conflict of interest management applies to all employees, managers, directors, board members, as well as all third parties who act on behalf of the company.

The activities by E1S are aimed at maintaining transparency, integrity and fair practices throughout the company's operations.

All employees, managers and related parties act in the best interest of Edge1S and its stakeholders, and avoid situations which may lead to conflicts of interest; they are also obliged to promptly report to their immediate superiors any existing or potential conflicts of interest. Any transactions involving conflicts of interest must be thoroughly documented and approved by the company's relevant managing bodies. The HR team is responsible for the assessment and monitoring of the reported conflicts of interest.

Use of Social Media

Social media is an effective tool for sharing information and opinions with family, friends, and communities worldwide, and it has an increasing impact

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on business. However, using social media also involves certain risks, obligations, and consequences.

Everyone is responsible for what they post on the Internet. You should be aware that any conduct that adversely affects the quality of your work, the work of colleagues, or that adversely affects customers, suppliers, or those working on behalf of Edge1S may result in disciplinary action, up to and including immediate termination of employment/cooperation.

Behavior in Social Media that is inconsistent with our **Code of Conduct** includes, in particular: publishing discriminatory comments, harassing others and threats of violence, ridiculing and discrediting others, disseminating confidential information about Edge1S or the company's customers/suppliers and matters related to the work of their employees. Detailed rules for the use of Social Media can be found under this [link](#).

Confidentiality and privacy of information

- In our daily work, we apply the principle of diligence, professionalism and integrity with regard to maintaining the confidentiality and privacy of the information of the Partners with whom we cooperate.
- All data and information, acquired or generated in the course of performing business tasks, is the property of Edge1S and may only be used for the purposes of the company's operations.
- We comply with legal regulations and developed good practices in the acquisition, processing and protection of data.
- We process and store personal data in accordance with the applicable GDPR policy.
- We maintain appropriate systems and procedures to ensure data security and protection.

Respect for diversity

- **#BeATeam.Edge1Team** – We are a team. We all make sure that our company is not just a workplace, but a community of cooperative, supportive and committed people.
- In our company, we treat everyone equally – without prejudice or discrimination.
- We make sure that everyone feels free to express themselves and their opinions while being respectful of differing views.
- In particular, all discrimination based on gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnicity, belief system, sexual orientation is prohibited.
- We promote these principles in cooperation with our Clients as well. We reject actions based on discriminatory instructions from the Client.
- During recruitment processes and selecting Business Partners, we rely solely on the criterion of competence, professional qualifications, and objective market criteria.
- We maintain internal procedures to safeguard against unethical or unlawful discriminatory practices.

Cooperation with Business Partners

- **#SignYourNameOnly**, is another value inherent to the DNA of our organization. The quality of the services provided is of utmost importance to us.
- We want Clients to make informed decisions about working with us, and we never employ practices that would unfairly or illegally determine the choice of supplier.
- Our goal is to build long-term cooperation with our Clients based on sound partner relations and mutual trust.
- We always provide all available information needed to make business decisions related to the selection of an offer, signing of contracts, or selection of employees.
- We proactively seek change for the better. We improve processes by coming up with new solutions and eliminating mistakes.

- Driven by the **#Archive&Celebrate** value, we propose actions that have a real, quantifiable impact on the business value being developed. Client's success is our success.

Obligations towards employees and associates

- We are committed to ensuring that our employees are confident we comply with the rules and regulations related to the area of their employment.
- We always provide accurate information about the nature of the contract signed and the benefits offered.
- We make sure that remuneration is paid on time and in compliance with legal regulations and established business conditions.
- We commit not to take actions that could put payment of salaries owed to employees in jeopardy.
- We also value the benefits of work done in good atmosphere built on collaboration, as this provides the opportunity to better utilize employees' potential.
- In addition to good atmosphere and job security, equally important to us is employees' development.
- Pursuing the value of **#Learn&Teach** – we continuously expand employees' skills and competencies so that they can best meet project requirements of our clients and experience satisfaction with their own work.
- We care about the well-being of our employees and strive to make each of them feel part of the Edge1S team, so we target them with a range of activities to support both their well-being and personal development.
- Mindful of the environmental consequences of conducting business, we make every effort to ensure that our business activities place as little strain on the environment as possible.
- It is embedded in the culture of our organization, as well as in the mission and the vision of Edge1S.

Sustainable development

- We consistently implement a corporate social responsibility policy. It is embedded in the culture of our organization, as well as in the mission and the vision of Edge1S.
- With a motivated and well-integrated team, we are able to build strong long-term relationships with our Clients.
- We operate consistently with business ethics, legal regulations and commitments agreed upon with Clients.
- Compliance with all accepted standards allows us to maintain our status as a trustworthy business partner.
- In our projects, we also take public interest into account.
- We support the education sector by facilitating access to the latest technologies.
- We involve local communities by participating in selected charitable and grassroots initiatives.

Environmental protection

- We aim to use materials and raw materials in our daily work that are not harmful to the environment.
- We put the life and health of people and the safety of the environment first.
- When taking actions, we are mindful of their broader and long-term perspective, and the consequences they entail, both in terms of the business environment and the well-being of our employees and the natural environment.

EDGE ONE: SOLUTIONS

Any violations or reasonable suspicions of violations to this Code of Professional Conduct should be reported to immediate superiors, to the HR department or to the Management of the company by email: compliance@edge1s.com

Each time a violation or suspicion of violation is reported, the matter is investigated and the necessary action is taken. The reporting party receives feedback on recommendations based on the findings.

Reporting a suspected violation of the Code does not result in any negative consequences for the reporting employee/co-worker. Any person reporting an incident of violation is guaranteed personal data protection as well as confidentiality.