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ESKOM IT Sp. z o.o.
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CODE OF ETHICS

A set of business ethics rules at ESKOM IT Sp. z o.o.

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1. Introduction

At ESKOM IT Sp. z o.o. (ESKOM) we believe that in order to build a good reputation in business, apart from using the latest technology, the highest standards and the best knowledge, it is necessary to operate in accordance with ethical principles. The vision, mission and values we have developed pay off in the form of trust from our customers and influence the quality of products delivered to them. Our **MISSION** is to properly understand the needs of our customers, select solutions best suited to their needs and deliver them in a manner that allows a quick return of investment. Our **VISION** is that IT solutions will help you run your business more efficiently, more cost-effectively and more securely. **VALUES** that allow us to achieve our goals are:

- Competence – we're constantly improving the qualifications of our employees and recruit among the best specialists;
- Efficiency - we believe that results will speak for themselves. We adhere to schedules, appreciate optimization, understand expectations;
- Innovation - we constantly analyze and implement new ideas in order to not only react, but also to anticipate changes in the environment.

2. Standards and general customs

The ESKOM Code of Ethics is not a closed set of all desired behaviors. The Code is subject to updates as new or unknown situations arise. We strictly obey the law and ethical principles applicable to our Customers, Partners, Contractors and Consortium members. We require from every employee honesty, reliability, conscientiousness and worthy representation of the company based on the guidelines of business ethics. We attach great importance not only to the results themselves, but also to the manner in which they are achieved.

We expect management to:

- 1) set an example of model ethical behavior and take responsibility for creating appropriate attitudes,
- 2) enforce compliance with accepted standards and ethical values from employees at all levels, Contractors and Customers,
- 3) educate subordinate employees on ethical standards and values,
- 4) make personnel decisions regarding, among other things, recruitment, employment, assignment of responsibilities, evaluation, rewards, training and promotion, in accordance with the principles of professionalism, objectivity, integrity, and transparency,
- 5) providing employees with an appropriate level of trust and responsibility, creating space for raising ethical concerns and issues,
- 6) monitor the atmosphere in the team, pay attention to signs of discrimination or personal conflicts,
- 7) immediately respond to observed or reported violations of the Code of Ethics.

We expect our employees and contractors to:

- 1) know and apply the rules of the ESKOM Code of Ethics,
- 2) not to agree to deviate from the accepted standards and ethical values,

- 3) immediately report any comments or concerns regarding compliance with the Code of Ethics, including any observed irregularities,
- 4) cooperate with superiors and other employees in applying the Code of Ethics and in building an organizational culture based on ethical standards and values,
- 5) strive to achieve the mission and vision through diligent performance of professional duties,
- 6) care for the good name of the company and represent it with dignity.

ESKOM is committed to:

- 1) compliance with antitrust and competition laws,
- 2) periodic verification of compliance of employees' conduct with the Code of Ethics,
- 3) periodic training of employees on anti-corruption laws and on compliance with the principles contained in the Code of Conduct,
- 4) maintain confidentiality trade secrets, proprietary information and respect the intellectual property rights of its Business Partners,
- 5) observe the principles of equal opportunity in employment and business activities regardless of (including but not limited to) race, religion, nationality, skin color, sex, gender identity, age, disability, etc.
- 6) work against harassment and bullying in any form. Employees are expected to practice and promote a harassment-free work environment,
- 7) respect the human rights of employees and treat them with dignity and respect,
- 8) be ready for audits, inspections to verify compliance with the Code and the law.

We expect from the external entities we work with to:

- 1) be familiar with the Code of Ethics implemented in ESKOM and respect the ethical standards and values contained in these documents,
- 2) comply with the standards and ethical values in all activities resulting from cooperation with us,
- 3) immediately inform us of any observed irregularities related to the violation of ethical standards and values in connection with the Company's operations,
- 4) adhere unconditionally to the "zero tolerance for corruption" rule.

3. Rules of conduct

We avoid any activity that creates a conflict of interest. It is strictly forbidden to offer or give financial or illegal benefits to government officials, politicians, local government officials or other contractors. We don't take advantage of, or assist in taking advantage of, any information or position within the company.

Zero tolerance for corruption

- 1) employees of ESKOM, in connection with their work, do not accept any benefits of pecuniary or non-pecuniary nature, benefits of a personal or material nature, gifts of inadequate value (in any form), including offers of entertainment or travel given in order to
- 2) induce to take actions inconsistent with the law,

- 3) ESKOM employees do not offer benefits to external persons or entities in violation of the law or ethical standards and values.
- 4) by "profit" we understand, in particular, a gift, money, honorarium, reward, position, employment or favor that may raise suspicion of lack of impartiality in the performance of tasks,
- 5) we strictly prohibit any form of money laundering that involves the concealment or transfer of illegally acquired money or the conversion of such money into lawful funds.

Conflict of Interest

We recognize that an employee has a conflict of interest when, in acting for his or her own benefit or the benefit of another person or entity to whom he or she owes a duty, he or she simultaneously acts contrary to the interests of ESKOM. A conflict of interest arises when an employee's private, social, financial, political or other activities or relationships have the potential to interfere with the employee's loyalty or objectivity to ESKOM

If a conflict of interest arises or is likely to arise as a result of an employee's relationships, benefits received, investments made or other activities, it is the responsibility of each employee to report the circumstances immediately.

Fair Competition

We observe the principles of fair competition, which result from the applicable regulations on competition and consumer protection. We assume that decisions to choose our services and goods are based solely on quality, timeliness of execution, customer needs and price.

- We do not influence or control the pricing of products and services.
- We do not jointly join boycotts of suppliers or customers.
- We do not share markets or customers.
- We do not coordinate competing offers or attempt to do so.
- We do not lobby.
- We do not engage in political campaigning.

4. Contacts with Public Customers

We ensure that we are aware of and comply with all laws, rules, regulations (including public procurement laws) and contractual clauses that govern the purchase of goods and services by government entities to which we directly or indirectly sell or recommend products and services. Interactions with public sector clients must be in full compliance with the laws and regulations and applicable rules of the institution. For the avoidance of doubt as to compliance with this Code, it is prohibited to provide benefits to public officials or to conduct discussions concerning statutory activities outside the premises of the relevant public institution or ESKOM. You must not attempt to obtain information through channels other than official channels that affect the integrity of the procurement:

- a public sector entity's confidential information, e.g., about the pre-award stage of a formal procurement, the persons conducting the procurement, the entities responding to requests for proposals,
- proprietary information, including, for example, information about purchasing procedures, if there is a reason not to disclose such information.

5. Gifts and favours

We prohibit the giving of any financial benefit directly or indirectly to any individual, business or other entity for the purpose of unethically soliciting a customer.

Gifts or favours **must not**:

- be excessive or extravagant,
- be considered inappropriate and affect the recipient's business judgment,
- result in biased favorable treatment or competitive advantage in an unethical manner,
- be given or provided to influence a business decision.

We permit the occasional receipt of meals, drinks and snacks, invitations to business-related training or entertainment appropriate to the circumstances, in connection with ordinary business discussions, provided that they are not intended to influence a business decision made by the employee.

Each employee has a direct duty to ensure that the acceptance of any favours provided in a business context, gifts or entertainment is appropriate and does not appear to be an attempt to obtain favorable treatment. If the acceptance of favours in the form of payment of lodging expenses by the organizer of a business meeting, conference, training, workshop and similar events exceeds the net value of PLN 3500, it must be recorded in the Register of Accepted Benefits.

6. Reporting incidents of ethics violations

If you:

- have any concern related to the contents of this Code,
- are aware of discrimination, harassment or bullying,
- have a suspicion that the Code of Ethics is being violated,
- need advice on whether your compliance with the Code creates a conflict of interest,
- you have been offered benefits or have knowledge of such an offer made by or to any employee of ESKOM,

immediately contact your supervisor or write to:

ESKOM IT Sp. z o.o.
Urząd Pocztowy Warszawa 93
Skrytka pocztowa 9
ul. Puławska 424
02-800 Warszawa

Email: aml@eskom.eu

We guarantee that the whistleblower will be treated with due respect, anonymity and will be subject to available safeguards against potential revenge.