_codelab

CODE OF **CONDUCT**

WE KNOW,
WE CARE,
WE DO

_codelab

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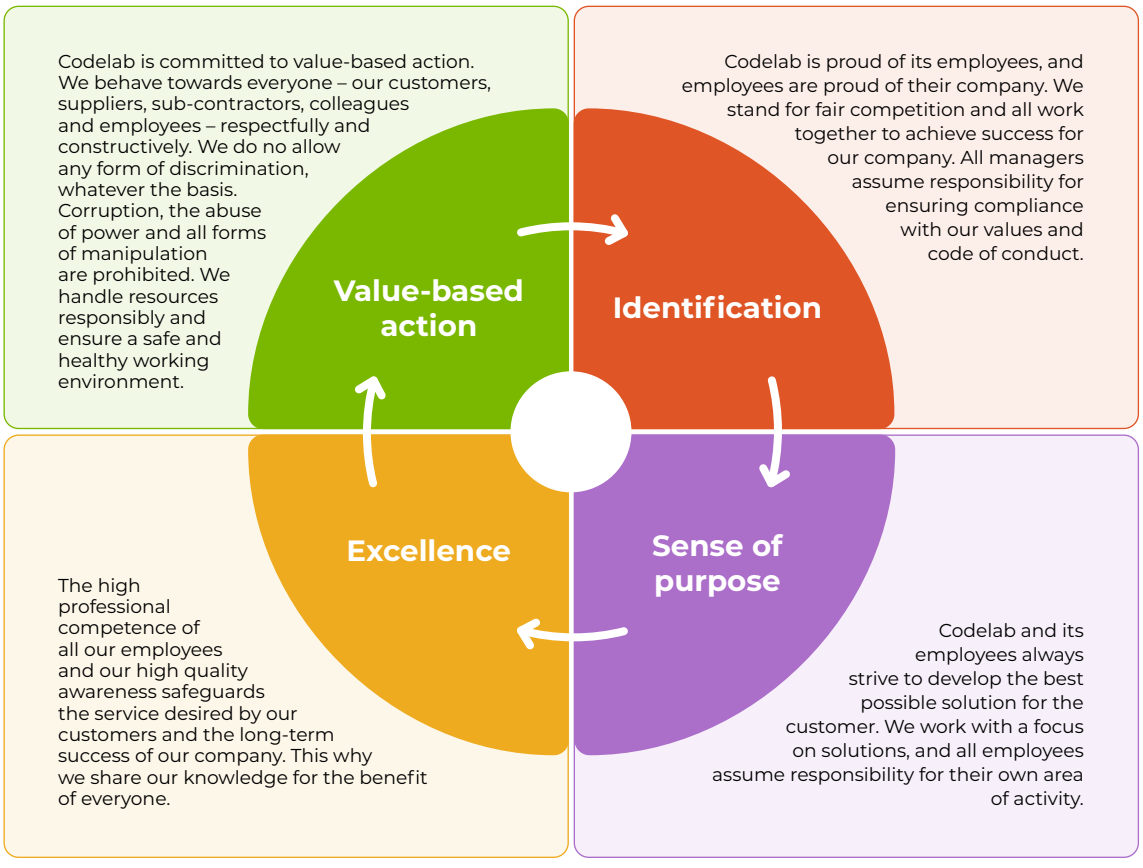
INTRODUCTION

The primary purpose of the code of conduct of the Codelab Sp. z o.o. (referred to below as Codelab) is to communicate to all employees and stakeholders our shared ethical values and business principles and, furthermore, to establish guidelines for our daily work. We encourage our suppliers and business partners to adopt the principles of this code of conduct.

Our business activities are based on high ethical standards. We promote fair competition in compliance with applicable legislation and expect our employees to observe the principles of fair competition in performing their work for Codelab.

Codelab complies with all relevant laws and regulations in every country in which it operates. In situations where legislation provides no settlement, we work on the basis of our own standards and principles, values and corporate culture. Should legal regulations conflict with the principles of the code of conduct, the law will retain validity. It is the responsibility of each and every employee to be aware of applicable legislation or to seek appropriate advice in order to ensure compliance therewith.



General principles of Codelab

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VALUE-BASED ACTION

2.1 Human rights

Codelab promotes and respects the principles of the United Nations Universal Declaration of Human Rights, the principles of the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention against Corruption. Fundamental human rights should be ubiquitous, recognized and respected, and applied to all employees – irrespective of whether they are engaged on a temporary or permanent basis.

2.2 Equal treatment and equal opportunities

Codelab does not permit any form of discrimination with regard to gender, nationality, religion, race, age, disability, sexual orientation, political opinion, trades union membership and social or ethnic origin. We treat all employees and colleagues with respect and dignity. We promote a culture of equal opportunity and diversity, with position, remuneration and personal success depending on individual skills and performance. All employees are remunerated appropriately – as a minimum in accordance with applicable legal regulations.

2.3 Corruption

The abuse of power, nepotism and corruption, including offers of illicit payment by an employee or organisation, will not be tolerated. Any attempts to bribe Codelab employees must be reported to management immediately.

Gifts and similar benefits may be offered to or accepted from third parties if they are of low value and can be deemed to be the sign of hospitality in the course of normal business practice.

2.4 Antitrust and Competition Principle

Codelab is committed to engaging in fair and vigorous competition, in compliance with antitrust and competition laws and regulations. Codelab is against activities, such as agreements between competitors that fix prices, certain restrictive supply agreements, or unfair use of a strong market position to harm competition. Codelab supports and upholds the principles of free and unrestricted competition between all players at all levels of the supply chain. It means that Codelab competes independently from other market players and does not seek to control the commercial policy and practices of its customers. Codelab does not coordinate its competitive behaviour with other companies to try to avoid or reduce the rigours and uncertainty of a competitive market place.

This Principle applies globally to all employees and may apply to third parties acting on behalf of Codelab. Failure to comply with antitrust and competition laws could lead to criminal and civil penalties for Codelab and any person (including employee) personally, discipline consequences for employees, business disruptions, and harm to Codelab's reputation.

2.5 Working conditions

Codelab opposes child labour and all other forms of forced labour. Codelab supports the freedom of association for all employees. All employees are entitled to join a trades union and to participate in negotiations for collective agreements. Employees must not be subjected to any form of physical punishment and any form of physical,

sexual, psychological or verbal harassment. All employees are assured a safe and healthy working environment.

2.6 Interaction with the environment

Codelab promotes careful interaction with ecological challenges and conducts its business in a responsible manner. All employees should follow and respect Codelab's ecological approach.

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IDENTIFICATION

3.1 Protecting companies' assets

Protecting the company's tangible and intangible assets (such as intellectual property) is essential for Codelab's business success. All employees are obliged to use assets only for legitimate business purposes and to protect them from loss and unauthorized use. Codelab's assets may not in any circumstance be used for illegal or improper purposes.

3.2 Political involvement

Codelab is neutral towards politicians, candidates and political parties and does not support them financially or in any other manner. Neither Codelab's name nor any resources under Codelab's control may be used to promote the interests of parties and politicians.

3.3 Insider dealing

Codelab expects all employees to behave as required of insiders even if they are not actually registered as insiders. Employees must treat all information and secrets relating to current and future business activity with the utmost confidentiality. Information relating to Codelab's business activities, its customers and partners as well as to individual projects may not be misused or disclosed to third parties.

3.4 Accounting and reporting

Codelab's accounting and reporting must be performed in accordance with generally accepted principles of accounting and its accounting records must provide a true and authentic insight into its financial position. Codelab must always strive to provide open, fair, reasonable, prompt and comprehensible reporting.

3.5 Responsibility

Codelab managers will ensure that the content and sense of this document is distributed, understood and observed within their respective areas of responsibility. Furthermore, employees will be encouraged to reveal behaviour that might conflict with this code of conduct.

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SENSE OF PURPOSE

4.1 Focus on success

All employees work to achieve the best possible solutions in the interests of our customers and business partners. We strive to achieve continuous optimization and act with short decision-making processes. We promote creative thinking and work with a focus on solutions without losing sight of process safety.

4.2 Conflicts of interest

In order to be able to conduct business in an open and fair manner, all employees and members of the management board must avoid any situation and any interest that might impair their judgement with regard to their duties towards our employees, customers, suppliers and other business partners.

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EXCELLENCE

5.1 Quality standards

All employees apply their high level of professional competence for the benefit of Codelab and its customers. The work of everyone is driven by a high standard and awareness of quality.

5.2 Awareness of information security

All employees treat the data entrusted to us by customers, partners and colleagues with the utmost care.

5.3 Knowledge management

All employees share their knowledge with each other. Employees support one another in achieving their targets and subordinate their own interests to the common good.

5.4 Continuous improvement

Codelab seeks to improve its business operations on a continuous basis and encourages all managers and employees to participate in this process.

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CONCLUDING REMARKS

This code of conduct applies to all business activities of Codelab in all countries. All employees are bound by this code of conduct and always strive to put it into practice in their daily work.

Infringements of this code of conduct will not be tolerated, whether explicitly or implicitly. Violations of this code of conduct may be reported anonymously and confidentially to the management of the legal department or via Codelab's compliance function mailbox. Anyone reporting a violation in good faith need not fear any form of reproach. In contrast, failure to observe this code of conduct may lead to corresponding disciplinary action.

Our code of conduct is regularly reviewed, communicated and made available centrally.

Codelab Sp. z o.o.

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