

_code**lab**

BUSINESS RESILIENCE **POLICY**

**WE KNOW,
WE CARE,
WE DO**

TABLE OF CONTENTS

1 SCOPE	3
2 ROLES AND RESPONSIBILITIES	3
3 ATTRIBUTES FOR ORGANIZATIONAL RESILIENCE	3
3.1 Shared vision and clarity of purpose	3
3.2 Culture and shared values	4
3.3 Empowered Leadership	4
3.4 Shared information and knowledge	5
3.5 Development and coordination of management disciplines	5
3.6 Anticipation and managing risks	7
3.7 Availability of resources	7

1

SCOPE

Our Business Resilience policy is created in accordance to ISO/IEC 22316:2017(E). The document provides guidance to enhance organizational resilience. Describes roles and responsibilities, the Company's purpose, goals and culture, change anticipation and management, monitoring, assessment with all relevant documents.

2

ROLES AND RESPONSIBILITIES

The organization is supported by appropriate management structures that enhance effective communication, coordination of all activities, and provides needed resources. Business resilience related teams are as below:

- Management Board
- Information and Communication Technologies (ICT)
- Security Team
- Project Management Office (PMO)
- Finance and Human Resources (FAH)
- Team Managers
- Marketing and Communication (MarCo)
- Recruitment
- Sales
- Business Development

3

ATTRIBUTES FOR ORGANIZATIONAL RESILIENCE

3.1

SHARED VISION AND CLARITY OF PURPOSE

The Company's purpose is to support our customers in successful transformation towards digital economy with efficient and innovative ICT products and services. We aim extraordinarily high level of customer satisfaction.



According to Company's Quality Policy all persons belonging to company or working for it, are responsible for implementing and maintaining our common Quality and Information Security Management System (QMS and ISMS)

The goal of the QMS is the achievement of stable relationships with customers and suppliers as well as the constant improvement of the quality standard. In this respect, we orientate ourselves towards the requirements of ISO 9001.

The goal of the ISMS is to protect information against internal and external threats, to support the continuation of business operations, to identify and minimise possible risks as well as to mitigate potential damage through security incidents to a large extent via the initiation of suitable measures. Interfaces must be described. Information can be available in diverse forms. This includes information and data processed both electronically as well as on paper.

The security goals are confidentiality, availability and integrity. The ISO/IEC 27001 standard and TISAX serves as guideline for the company's information-security management. Technical and organizational measures support the security goals.

3.2

CULTURE AND SHARED VALUES

The Company's core values are also its motto: **We know, We care, We do.**

Our business activities are based on high ethical standards. The Company 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. We are committed to value-based action, focused on high professional competence and excellence. We are proud of our employees, and employees are proud of their company and together work on the best possible solutions, with a strong sense of purpose. Our values are communicated in Code of Conduct.

We make sure that all new employees and potential ones understand the Company's culture and values during recruitment and onboarding.

3.3

EMPOWERED LEADERSHIP

The Company operates in matrix organizational structure model with only a few levels of middle management which enhances:

- better communication and relationships between different roles
- simple, faster decision making
- better ability for the business to change and adapt
- self-direction and autonomy of the employees

In line with our culture and vision the Company's leadership model puts the focus on key areas and required competencies. We value and promote empowered leadership which involves placing trust and confidence in team members and encouragement of others to lead under a range of conditions and circumstances.

The Company resilience is supported by involving all levels and organizational areas in variety of internal changes. Cross-functional working groups are formed along all volunteer employees to support implementation of quality norms and standards, improve day-to-day operations, creation of processes and many others.

The Company encourages different teams to share stories about success and failure and promote best practices during teams sync meetings, lessons learned session or project achievements presentations.

Management Board and Team Managers use Scrum framework to enhance organizational agility and decision-making. Team retrospectives are performed regularly for continuous improvement and transparency.

3.4

SHARED INFORMATION AND KNOWLEDGE

Information and knowledge are valued and effectively shared to support the organization's objectives and decision-making. While sharing knowledge we always prevent sensitive information from being shared with unauthorized persons according to applicable NDA. We perform all these activities while maintaining the Communication policy.

To ensure knowledge retention and correct data processing the Management Employment Process is used, including End Employment Process. The process defines mandatory tasks, results, roles and templates to systematically handle employee related information. Mandatory steps in employee training and development are described in the Training process.

3.5

DEVELOPMENT AND COORDINATION OF MANAGEMENT DISCIPLINES

The development and coordination of management disciplines are in alignment with the organization's strategic objectives. The following activities for each management discipline are performed:

No	Management discipline	Description
1	Asset Management	All equipment assets are recorded, identified and managed by ICT Team. Information assets are identified and analysed for security information risks once a year. All information created or managed within the Company is in scope of Information and Assets Classification Policy.
2	Business Continuity Management	Business Continuity Plan (BCP) is available and reviewed once a year. As a consequence BCP testing is performed. Crisis Management – Crisis Coordination Team (CCT) for the organization is defined and responds to any crisis.
3	Cyber Security Management	the Company implemented the certified Information Security Management System in accordance with ISO 27001 and TISAX.
4	Communications Management	implemented in accordance with the Communication Policy and the requirements of ISO 9001 standard
5	Emergency Management	managed by Accident Investigation Team appointed by Management Board. First aid is provided by authorized employees.
6	Environmental Management	covered by the Company's Environmental Management System (EMS) compliant with ISO 14001 Standard and described in Environmental Safety Policy.

7	Facilities Management	implemented according to ISMS compliant with ISO 27001 standard.
8	Financial Control	The Company is subjected to a financial audit once a year. The Company Statements is published in KRS and examined by statutory auditor according to article 64 of the Accounting Act. The Company complies with all relevant laws and regulations in every country in which it operates.
9	Fraud Control	The Company's business activities are based on high ethical standards. Code of Conduct provides guideline for all employees and stakeholders.
10	Governance	the Company is managed according to certified ISO 9001 Standard.
11	Health and Safety Management	coordinated by Health and Safety Committee.
12	Human Resources Management	managed according to certified ISO 9001 Standard. Recruitment Process is designed to identify, engage and bring into the Company the most talented candidates. Consecutively, Onboarding Process helps newcomers become acclimated to the organization, and facilitates relationship-building between employees. Employee Management Process together with Career Path Change Process help enhance efficiency, identify ways to engage and retain talent and increase motivation. Staffing procedures are defined to effectively provide competences to the projects. Lastly, to resolve any issues or problems that show no progress or cannot be resolved Escalation Procedure is created.
13	Information Security Management	the Information Security Policy is the foundation of the Company's Information Security Management System (ISMS) implemented in accordance with ISO 27001 Standard and TISAX. All activities regarding ISMS are coordinated by Security Team.
14	Information, Communications and Technology	ICT Team works in accordance to ITIL® and all activities are recorded, monitored and updated.
15	Physical Security Management	Managed according to certified ISO 27001 Standard and TISAX.
16	Quality Management	the Quality Policy is the foundation of the Company's Quality System implemented according to ISO 9001 Standard and coordinated by dedicated Quality Team.
17	Risk Management	All decisions are analyzed in terms of risks together with expected positive and negative effects.
18	Supply Chain Management –	Suppliers Evaluation Process and Subcontractors Handling Process create the Company's framework for Supply Chain management. Supplier Sustainability Policy is under construction.
19	Strategic Planning	Each Company's sector defines its activities and all areas exchange information and aligns their planes.

Monitoring and continuous improvement of all management disciplines is implemented and additionally, systems based on ISO Standards have a built-in monitoring and continuous improvement system. To enhance communication, coordination and cooperation between management disciplines their execution, statuses and risks are reviewed quarterly.

3.6

ANTICIPATION AND MANAGING RISKS

The Company emphasizes its ability to consistently meet its obligations in changing circumstances and adapt to the impacts of sudden and unexpected incidents. Therefore, Business Continuity Risks were analysed and assessed. Business Continuity Plan is created to ensure that critical business processes can be maintained in the event of a disaster. BCP covers Business Continuity Strategy, Disaster Communication Strategy, Recovery Plan and procedures.

Business Impact Analysis for crucial resources, projects, infrastructure, systems and services is updated yearly.

ISMS implemented in the Company ensure protection of information against internal and external threats.

The Company's operating business environment is rapidly changing and the ability to anticipate and adjust to new technologies, labour market, industry development trends or customer requirements is crucial. Business Development Team is created to regularly monitor the market and update Service Catalog. Various Centres of Competence are created as a response to arising technologies and business areas. Changes in legal regulations are constantly monitored by Finance and Administration Team and documentation and processes

are updated accordingly. Most importantly, organizational resilience is cultivated by systems mindset emphasizing agility, empowered teams, adaptable processes and talent.



3.7

AVAILABILITY OF RESOURCES

The Company is monitoring key competences on the basis of its service catalog to ensure employees development with a diverse set of skills and knowledge. Competences diversity contribute to the organization's ability to respond and adapt to change.

Employment changes are planned and discussed during regular Management Meetings between Team Manager and Management Board. The number of unassigned employees is monitored and maintained on the annually set level.

Key services, hardware, network and crucial personnel responsible for services is monitored and reported yearly in BIA.

Codelab Sp. z o.o.

Address Plac Brama Portowa 1, 70-225 Szczecin, Poland

Phone +48 91 819 91 16

Email DLPLEnvironmentalSafety@codelab.eu

Management Board Radosław Borek, Marek Kopyto, Joerg Winkler

KRS 0000461356 **NIP** (VAT No) PL8513169010

REGON 321372658 **Share capital** 670 000 PLN

www.codelab.eu

