

**GALAXY**

**SYSTEMY INFORMATYCZNE**

SINCE 1998

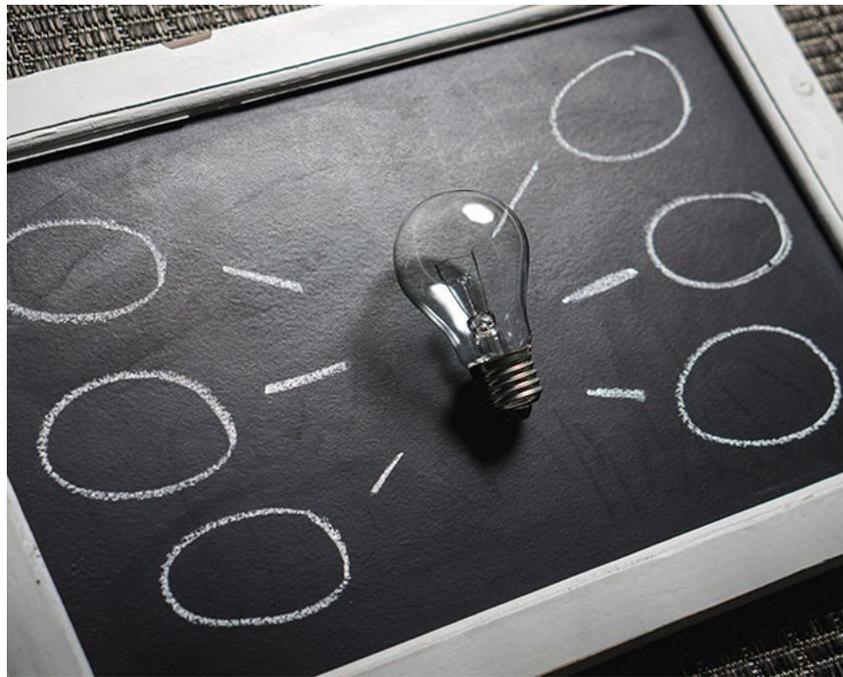


**CODE OF**

**CONDUCT**

## WHAT ASSURES

# THE COMPANY'S SUCCESS?



A good product or service is not decisive for success, nor is it the only element influencing the customer's decision to purchase. The reputation of the company also affects clients' decisions. Therefore, to succeed in business you need something more, namely the lawful conduct of the board of directors, directors, managers and the general company GALAXY Systemy Informatyczne Sp. z o. o. (GALAXY). It builds the foundation in the form of trust, credibility and good reputation of the company.

This „something more” also means honesty and individual responsibility of each employee for their own actions. The sum of these features is a value-based compliance culture for GALAXY. This culture influences business success. The way GALAXY achieves it is therefore just as important as the result itself, and the Code of Conduct is the framework of our activity. It combines two important aspects - all employees must abide by the law and act honestly. For GALAXY, this is both an internal

goal and a commitment to third parties. This also ensures the transparency of GALAXY's activities.

The Code of Conduct is not just a general guide to conduct. It must be connected with everyday life and be actively promoted by the persons representing the company. This role belongs primarily to the management team, presenting honesty, behaving in accordance with the applicable rules and trustworthy. They also need to make sure that their subordinates know the Code of Conduct and understand the expectations that arise from it. GALAXY also expects its suppliers and advisers to follow the rules of conduct set out in this Code.

**Jacek Michalski**

*Prezes Zarządu*

# CORPORATE GOVERNANCE

Galaxy adheres to all legal regulations regarding the management and supervision of a company regarding good and responsible corporate governance.



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## 1.1 CORRUPTION

To maintain the trust of clients and business partners, GALAXY definitely rejects all forms of corruption, not even allowing the suggestion of such actions. This means that employees cannot offer, promise or give any benefits to public sector employees or decision-makers in private enterprises, at home or abroad, in order to obtain favor or a favorable decision for GALAXY. Employees must remember this when making decisions related to gifts or invitations to parties.

Employees do not accept proposals or accept benefits when this may affect or even create an impression of influence on business decisions made by these employees. In addition, employees never demand personal benefits for themselves or third parties.

## 1.2 PUBLIC SECTOR

The public sector is an important market area for GALAXY. Employees adhere to the rules on avoiding improper influence during public tenders and ensure fair competition.

## 1.3 SHOPPING

People responsible for purchasing products and services in GALAXY make them in a professional manner and on optimal conditions. Purchases are made in accordance with the law. Skipping shopping processes can lead to losses on the company's side, and therefore all purchases can only be made by employees designated for this purpose.

## 1.4 SUPPLIERS

GALAXY maintains business relationships with its suppliers based on trust and integrity. Therefore, he expects them to treat GALAXY with the same respect and integrity as they are shown to them. Suppliers are also often customers. GALAXY does not use such situations to obtain unfair advantages, strictly separating the purchasing and sales activities. Bundled transactions require consent from the appropriate units responsible for purchase.

## 1.5 COMPETITION

GALAXY undertakes to comply with the principles of fair competition in all business relationships. We do not limit price competition in any way, nor do we participate in the division of markets due to products or geography. These rules relate in particular to our participation in tenders. Our business decisions are made independently and without exchange of confidential information with competitors. GALAXY does not distribute false information about competitors' products or services, nor does it strive to gain a competitive advantage in another dishonest or fraudulent manner.

## 1.6 TRANSPARENT FINANCIAL REPORTING

Financial reporting GALAXY is carried out in accordance with national and international financial reporting regulations and provides a true picture of the financial, as well as financial and performance situation.

## 1.7 INVOLVEMENT IN POLITICS

GALAXY does not transfer funds to political parties or government officials and does not provide them with any additional benefits over and above what is legally permitted.

## 1.8 MONEY LAUNDERING

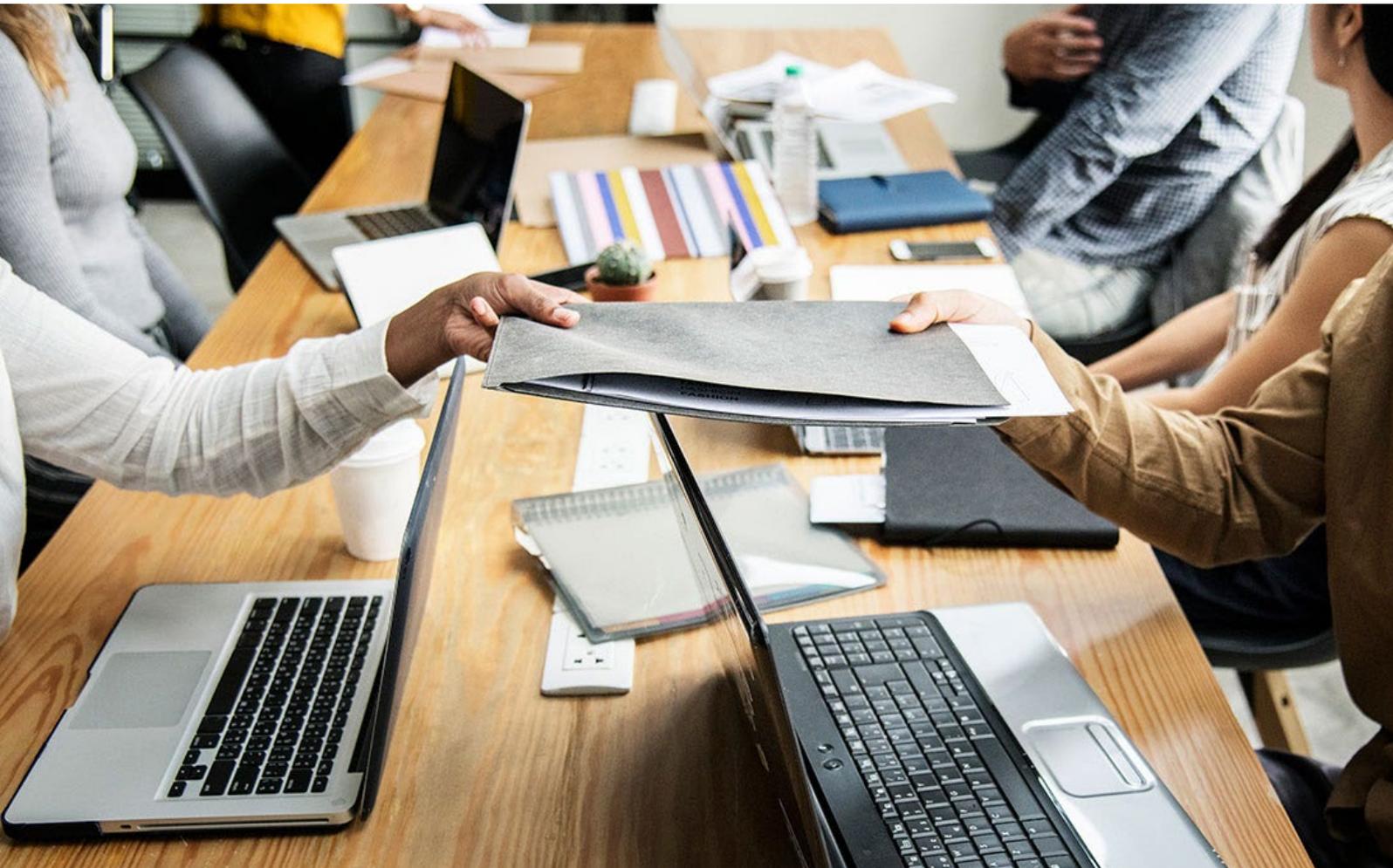
GALAXY takes all necessary steps to counteract money laundering within its sphere of influence.

## 1.9 SPONSORSHIP

Sponsorship is one of the communication tools used by GALAXY. All sponsoring activities are carried out in a transparent manner, in accordance with applicable law and internal policies, and require appropriate, verifiable, exchange of information between partners / organizations involved in sponsorship.



# PROCEDURE WITH INFORMATION



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## 2.1 DATA SAFETY

GALAXY puts a special emphasis on maintaining data security. This issue has a significant impact on commercial success and the image of the company in the eyes of the public. Therefore, we protect the data of our company, its clients and employees by all appropriate technical and organizational measures at our disposal to prevent unauthorized access to data, their misappropriation, loss or premature removal. These activities are undertaken in accordance with applicable law and internal regulations.

## 2.2 DATA PRIVACY

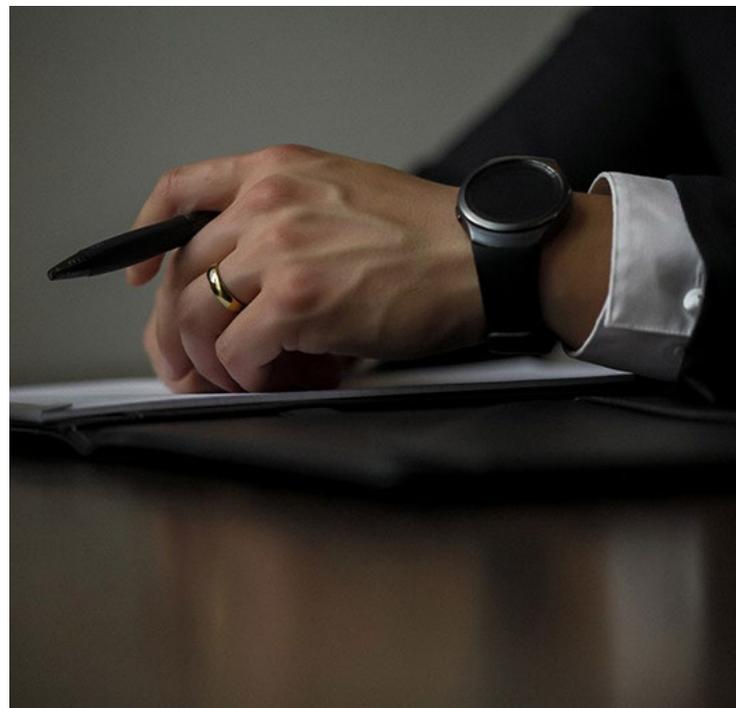
We are aware that the personal data of our clients, employees and suppliers is confidential; therefore, when processing them, we maintain the highest degree of discretion and caution to protect them. These efforts facilitate technical and organizational measures to ensure the confidentiality of personal data. Each employee is responsible for maintaining a high level of security in the performance of daily duties. Employees strictly comply with the applicable regulations, respecting the rights of persons whose data we collect, process and use.

## 2.3 GENERAL RULES FOR CONFIDENTIALITY

In addition to applying technical and organizational measures to maintain data privacy, all employees of the company are obliged to protect its interests. That is why we only provide information about the company to those authorized, regardless of whether they are employees or outsiders. We also protect company documents from outsiders.

## 2.4 CONFIDENTIAL INFORMATION

In order to protect investors' confidence in the functioning of the capital market, employees adhere to the rules prohibiting the use of confidential information in the scope regarding capital transactions or providing advice or suggestions regarding such transactions.



# COMPLIANCE WITH THE RULES OF CONDUCT



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## 3.1 COMPLIANCE WITH THE RULES OF CONDUCT

GALAXY expects all employees to comply with GALAXY. Violation of the rules of conduct, legal regulations, internal policies and regulations can have serious consequences not only for individuals, but also for the entire company. That is why such behaviors will not be tolerated. GALAXY applies effective disciplinary measures against persons deliberately violating the rules and breaking the law, regardless of the position and level of the employee occupied in the company. GALAXY creates a culture in which employees can report potential irregularities or violations without fear of negative consequences.

Direct supervisors are the first point of contact for any questions regarding the application of the Code of Conduct in their daily work. The rules only make sense if their violation is properly punished, and therefore violations of the rules should be reported.

Information on potential violations of the rules or the law may be communicated to the superiors. Persons reporting such cases, acting in good faith and in accordance with their knowledge, do not have to be afraid of negative consequences if they did not violate the applicable rules of conduct themselves.



Applications should be made to the best of knowledge and intentions. However, anyone who casually or deliberately presents unjustified accusations will have to bear the consequences of their actions. Employees should address their superior first. In this way, issues can be fully resolved. If this is not possible, instances of violation can also be reported by telephone, e-mail or regular letter. However, this method of reporting should only be used in special cases when employees are concerned about personal, professional and social security.

All reported information is strictly confidential and is only handled by specially trained employees who are bound by confidentiality.