

# Code of ethical conduct in business relations

# Code of ethical conduct

## in business relations

**Code of Ethical Conduct in Business Relations** (the: **Code**) is a collection of our principles of ethical conduct and standards of behaviour. We build it on the values which we follow every day. It contains both our commitments and expectations of our business partners in the areas of conduct that are important to us.

**All our suppliers are required to comply with the Code.** We will regard any breach of its provisions as a material breach of the contract concluded with Grupa Pracuj. We believe that a shared commitment to act ethically is an essential basis for successful cooperation.

**Grupa Pracuj** – jointly or separately Grupa Pracuj S.A. and eRecruitment Solutions sp. z o.o.

Whenever we use the following terms in the Code:

- **we** – we mean Grupa Pracuj and all its employees and co-workers,
- **you** (when we address you) – we mean each of our suppliers.

## Table of contents

Observing the law	3
Preventing corruption and conflicts of interest	4
Safe and friendly working environment	5
Information security and protection of business secrets	6
Personal data protection	7
Preventing unfair competition	8
Reporting irregularities	9

# 1. Observing the law

At Grupa Pracuj, we operate ethically, with integrity and responsible decision-making. We comply with the law and are guided by the highest standards of ethical conduct.

We expect the same from our partners. We work with entities that are guided by the principles of **accountability, transparency and observance of the law** in their activities and **comply with regulations and good market practices** when performing the contracts concluded with us.



## OUR COMMITMENTS

- We act in accordance with the law and our internal regulations.
- We act transparently, ethically and with integrity.
- We take care of the quality of our services to ensure safety and legal compliance.
- We work with suppliers who meet the highest ethical standards.
- We make business decisions based on fair and clear principles.
- We ensure that the financial data is correct. We document transactions reliably and only accept documents that are accurate and complete.
- We systematically remind our employees of Grupa Pracuj's values and principles. We organise training for them and provide them with the necessary information as part of onboarding.



## WHAT WE EXPECT OF OUR SUPPLIERS

- Know the laws that apply to your business and comply with them.
- Do not engage with entities on sanction lists, do not provide services that are subject to sanctions and constantly monitor developments in this area.
- Treat legal requirements as a minimum standard of conduct.
- Observe the Code. Your employees and subcontractors should have access to it so that they can get to know the rules that apply while cooperating with with Grupa Pracuj.
- If you need permits or licences to operate, comply with all requirements.
- Control your environmental impact and the security of your supply chain.
- Perform transactions transparently and record them accurately in your books and business documents.
- Avoid situations that may negatively affect our business and reputation.



## WHAT WE DO NOT ACCEPT

- Failure to comply with the law and the provisions of the Code.
- Behaviour contrary to generally accepted principles of ethics and integrity in business relations.
- Violating our good name.

## 2. Preventing bribery and conflict of interest

At Grupa Pracuj, we have introduced an absolute prohibition on taking actions that could be considered bribery. We operate in accordance with the adopted Anti-Bribery Code and Gift Policy.

We expect our business partners to **completely disapprove of bribery practices** and to take effective actions to detect them. In the interest of preventing and eliminating possible abuses, we are committed to **disclosing any potential or actual conflicts of interest in our relations**.

**Bribery** – giving, accepting, promising, or demanding benefits (e.g. money, expensive gifts, promotion) in return for:

- abuse of powers;
- failure to fulfil an obligation;
- other unlawful use of position held;

**Conflict of interest** – a situation where personal interests or connections (e.g. family relations) can affect the objectivity of decisions taken.



### OUR COMMITMENTS

- We comply with all anti-corruption and conflict of interest regulations.
- We do not offer or accept benefits and do not tolerate any form of influence that could be considered bribery.
- We respect the rules observed by other entities – we do not send gifts or invite people to certain types of meetings if they do not approve of such practices.
- We report and resolve conflicts of interest in accordance with the internal Anti-Bribery Code.



### WHAT WE EXPECT OF OUR SUPPLIERS

- Comply with applicable anti-bribery legislation.
- Eliminate potentially bribery behaviour and take appropriate remedial measures.
- Never offer or accept bribes, inappropriate gifts (even small ones if they can influence decisions related to our cooperation), invitations or other inappropriate incentives in your business.
- Prevent and avoid conflicts of interest when applying for and working with Grupa Pracuj. Inform us if such a conflict occurs.



### WHAT WE DO NOT ACCEPT

- Offering or giving gifts or providing services to our employees in order, for example, to increase the chances of establishing cooperation with Grupa Pracuj or to influence business decisions during its course.
- Using the information obtained in the course of our cooperation for the purpose of obtaining benefits not arising from the contract concluded between us for yourself or the entity you represent.
- Monetary transactions, especially cash transactions, which are not part of performing our contract and have not been documented in the manner we approve of.
- Including in our cooperation individuals whose connections (e.g. political or family) may damage Grupa Pracuj's reputation.

# 3. Safe and friendly working environment

We provide services in the recruitment industry, so we have a special obligation to maintain the highest standards regarding the labour market. We want everyone to enjoy working at Grupa Pracuj and identify with us on a daily basis.

**We are committed to working only with partners who attach importance to the safety, wellbeing and dignity of their employees.** We expect respect for the principle of tolerance and opposition to any form of discrimination or workplace bullying.

**Workplace bullying** – repeated actions or behaviour consisting of persistent and prolonged harassment or intimidation of an employee, causing lower assessment of professional usefulness in the employee; causing or intended to cause:

- humiliation or ridicule;
- isolation or elimination from the team

**Discrimination** – differentiating the situation of an employee on the grounds of, for example: gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religious denomination, sexual orientation, type of contract and working hours.



## OUR COMMITMENTS

- We comply with labour legislation and other related regulations.
- We provide safe and healthy working conditions.
- We do not approve of child labour, any form of slave or forced labour.
- Everyone at Grupa Pracuj has equal opportunities for employment, development and promotion, regardless of factors such as gender, race, ethnic origin, disability, nationality, religion or world views, age or sexual orientation, among others.
- We do not condone behaviour that bears the hallmarks of workplace bullying and discrimination, in accordance with the adopted Policies against workplace bullying and discrimination.
- We evaluate employees on the basis of their skills, knowledge and commitment, not by subjective criteria.



## WHAT WE EXPECT OF OUR SUPPLIERS

- Provide your employees with healthy and safe working conditions that meet the right standards and take into account the specific nature of the industry in which you operate.
- Do not take advantage of or tolerate slave or forced labour or human trafficking.
- Do not use child labour. Employ minors only for vocational preparation in accordance with labour legislation.
- Ensure a work environment that is free of bullying, harassment, and discrimination.
- Respect employees' right to unions and to conclude collective agreements.
- Meet all legal requirements in terms of pay and working hours.



## WHAT WE DO NOT ACCEPT

- Improper treatment of employees related to workplace bullying, violence or discrimination.
- Behaviour that may endanger or harm the health of employees.
- Using threats, invectives, or coercion in connection with our cooperation.

## 4. Information security and protection of business secrets

Information security is a priority for us – in terms of our own know-how, but especially in terms of the security of the data entrusted to us by our clients. We protect business secrets and apply the detailed security guidelines adopted at Grupa Pracuj.

**Business secret** – information that has economic value and is not generally known or readily available. This includes, for example, specialised know-how, sales data, strategic plans, source code.

**We expect the same from our partners.** We only enter into business relations with entities that **adequately safeguard the information and property entrusted to them**, adhering to best market practices in their daily work.



### OUR COMMITMENTS

- We observe the principles of confidentiality and prohibition of dissemination of business secrets of both Grupa Pracuj and of our business partners.
- We ensure that confidential information and other data is properly secured and not accessible to unauthorised persons.



### WHAT WE EXPECT OF OUR SUPPLIERS

- Properly secure the data you are entrusted with and check the effectiveness of the security measures in place.
- Protect confidential information acquired in the course of working with us, including intellectual property, trade secrets and financial information. Use them only for their intended purpose.
- Require appropriate safety standards from your subcontractors as well.
- Report information security incidents to us at [incidents@pracuj.pl](mailto:incidents@pracuj.pl).



### WHAT WE DO NOT ACCEPT

- Sharing information, especially confidential information, with people who should not have access to it.
- Failure to comply with data security rules.
- Use of data obtained from us in an unauthorised or accidental manner.
- Informing the public about our company's concepts, business or marketing plans that emerge during the course of our cooperation.

# 5. Personal data protection

A special place in the area of information security is taken by the protection of personal data. We protect the privacy and personal data of our clients, employees and business partners. We have appointed a Data Protection Officer to ensure that all our operations are compliant with the GDPR.

We require that our business partners, like we do, to exercise due diligence in the processing and protection of the personal data we provide to them, and also to be able to ensure accountability for the actions required of them in this area.

**Controller** – determines the purposes and means of processing. We are the data controller of, among others, our users and employees. On the basis of an appropriate contract, we can entrust them with suppliers who act as **processors**. When our business partners entrust us with data, we also act as **processor**.



## OUR COMMITMENTS

- We carry out all the obligations of either the controller or the processor as indicated in the GDPR.
- We ensure that our processing is compliant with the GDPR principles.
- We ensure that the data subjects' rights are observed.
- We conduct risk analyses and implement appropriate security measures to ensure the confidentiality, integrity, and availability of data.
- We verify the entities to which we want to entrust data and we enter into appropriate agreements with them.
- We provide employees with data protection knowledge through regular training.



## WHAT WE EXPECT OF OUR SUPPLIERS

- Comply with the regulations and implement all obligations under the GDPR.
- Ensure that appropriate security measures are applied whenever you process personal data on our behalf.
- Use the entrusted data only for the purpose of fulfilling contractual obligations.
- Ensure that your employees are aware of and comply with the data protection principles when working with us.



## WHAT WE DO NOT ACCEPT

- Using personal data we have entrusted with you for purposes unrelated to our cooperation.
- Failing to inform us of breaches of data protection.
- Disclosing personal data to unauthorised persons.
- Ignoring security rules and exposing personal data to accidental loss or destruction.
- Transmitting personal data in an unsecured manner.

## 6. Preventing unfair competition

We comply with all applicable competition-related legislation. We do not engage in improper practices that may restrict competition or seek to gain an unfair advantage.

**We expect the same from our partners.** We seek business relationships based on trust, transparency and mutual accountability.

**Unfair competition act** – an act contrary to the law or morality, if it threatens or infringes the interest of another entrepreneur or the client. This includes, for example, misleading the client, including unfair or prohibited advertising.



### OUR COMMITMENTS

- We are guided by the principles of fair competition. We do not enter into agreements that have the purpose or effect of distorting competition in the market in which we operate.
- We always treat customers and suppliers fairly and provide them with transparent information.
- We do not favour anyone. We do not exclude anyone from cooperation if they offer goods or services that are in line with our needs.
- We are transparent and do not impede other entities' access to the market.



### WHAT WE EXPECT OF OUR SUPPLIERS

- Act with respect for the rules of fair competition.
- Compete fairly and ethically with Grupa Pracuj.
- Apply a zero-tolerance policy for all forms of corruption, blackmail and embezzlement to gain undue advantage.



### WHAT WE DO NOT ACCEPT

- Misleading us or our clients in communications and business arrangements.
- Lack of transparency in working with your subcontractors.
- Using unfair practices in the relationship with Grupa Pracuj.
- Undertaking actions to the detriment of Grupa Pracuj or actions which may adversely affect our reputation.
- Communicating the details of our cooperation to our competitors or making them publicly available.



# 7. Reporting irregularities

We place great importance on preventing irregularities and limiting the impact of those that do occur. We have a procedure in place to respond appropriately and quickly to all reports.

We operate a website [gp.zalezymi.pl](http://gp.zalezymi.pl), through which our business partners can report irregularities to us. This can be done anonymously, but you must provide all the information necessary to identify the case and take appropriate action.

**Irregularities** – all events that affect us and constitute a breach of:

- provisions of law;
- Grupa Pracuj's Code of Ethical Conduct;
- other applicable regulations defining the mutual business relationship between Grupa Pracuj and the supplier.



## OUR COMMITMENTS

- We provide secure channels of communication and full confidentiality for those who report irregularities to us.
- We handle each report fairly and investigate it in accordance with established principles.
- We protect the data contained in the report against unauthorised access.
- We have prohibited retaliation and protect reporting persons from such actions.



## WHAT WE EXPECT OF OUR SUPPLIERS

- Inform us of any irregularities that concern us.
- Ensure that your employees and subcontractors know that they can report irregularities to us.
- Protect employees from retaliation (i.e. mistreatment because they made a report).
- Cooperate with us so that we can quickly and effectively investigate irregularities by providing us with the necessary documents or information.



## WHAT TO REPORT

- Suspected breaches of the law that may concern us or affect Grupa Pracuj.
- Important legal and ethical issues related to our cooperation.
- Unlawful forms of influence and conflicts of interest related to our cooperation.
- Situations that can be dangerous or harmful to the health of our employees.
- Manifestations of discrimination, bullying or violence in situations related to our cooperation.
- Information security risks and breaches of the data we have entrusted to you.
- Situations that may be considered contrary to the rules of fair competition.



grupa pracuj