

BENEFIT SYSTEMS GROUP CODE OF ETHICS

BS_WAY



Dear Colleagues,

For many years we have been promoting a healthy and active lifestyle, trying to change the world for the better.

We act responsibly for the benefit of our stakeholders and the entire market environment.

As one of the companies belonging to the global B Corporation movement, we are committed to building a balance between achieving business goals and social responsibility.

We present you the **Code of Ethics of the Benefit Systems Capital Group** describing the values and principles that guide us in our daily work.

We develop an organisational culture that emphasises the importance of complying with the law, internal regulations, and ethical standards.

Benefit Systems Capital Group's employees and associates are **obliged to follow the rules described in this Code**.

We expect our stakeholders to familiarise themselves with the presented values and principles and that adhering to them will enable sustainable development of our business relationships.

We are convinced that the presented principles will contribute to the development of an ethical culture and will support us in achieving our goals.

Benefit Systems S.A. Management Board

Introduction

BS_WAY Code of Ethics describes the basic principles that we follow every day. It presents our commitment to all stakeholders.

Applying the principles contained in the Code of Ethics ensures transparency of decisions made in our business activities and is our guidepost in ethical matters.



Our goal and our values

Our goal is to work **towards an active lifestyle**.

We believe that being more active means more energy, health, wellbeing and, as a result – a better life.

The main principle that we follow in cooperation is the win-win approach, based on which we build relationships with all our stakeholders. Acting in line with our values – **respect, cooperation, and responsibility** – we create a socially responsible organisation. We take care of the needs of the present and future generations.



RESPECT

We respect one another and treat all stakeholders with respect. We believe that each of us is unique, that is why we perceive and appreciate diversity in a special way. We do not tolerate mobbing or discriminatory behaviour due to gender, age, nationality, origin, religion, disability, sexual orientation, family and civil status, political beliefs, personality traits, education, or interests.



COOPERATION

The combination of knowledge and skills of our employees and associates is a guarantee of success. Trust, communication, ability to listen, and respect to the other person are crucial for the Benefit Systems Group. We care about good cooperation and partnership. We build lasting relationships with our stakeholders in which the overriding principle is the win-win approach.



RESPONSIBILITY

By building relationships and cooperating with our stakeholders, we are responsible and make promises that we can keep. We provide information about our services in a precise and understandable way, and we execute all our obligations on time. Our responsibility is to respect human and employee rights, apply the rules of fair competition, counteract corruption and act for the natural environment.

What is important to us?



Since 2018 we have been a **B Corp certified organisation** belonging to the global movement of companies whose goal is to participate in creating a better world.

Our Capital Group not only meets high business standards, but also contributes to strengthening corporate social responsibility. In our business decisions, we consider the impact we have in five areas: corporate governance, employees, society, natural environment, customer and consumers relations. Being a B Corporation organisation, **we are obligated to comply with the rules of business ethics.**



COUNTERACTING CORRUPTION

We do not accept any abuse of positions by our employees and associates for material or personal gain. We accept and give gifts only if they are symbolic in nature, are given openly and are related to generally accepted habits of giving presents (e.g.: holidays). We do not tolerate corruption, including accepting and giving financial benefits, as well as other unfair behaviour. We inform all our stakeholders about this principle.



COUNTERACTING CONFLICTS OF INTEREST

We avoid behaviours that may affect our impartiality in the process of making business decisions. We also avoid situations that pose or may contribute to a conflict of interest within the Benefit Systems Group. We have established communication channels for reporting cases that constitute or may constitute a source of a conflict of interest, and we take steps to minimise adverse consequences of such situations.



CONFIDENTIALITY OF INFORMATION AND DATA PROTECTION

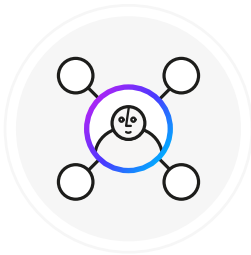
The personal data of our stakeholders are of great importance to us. We process all personal data in compliance with the law, paying special attention to the access and security of storing this information. The correctness of these processes is overseen by the Data Protection Officer at the Benefit Systems Group.

What is important to us?



HUMAN RIGHTS

We care about respect for human and employee rights. We commit ourselves to act in accordance with the Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO). We adhere to the adopted rules of the Diversity Policy and respect the implemented good practices in the event of mobbing and discrimination. Ensuring respect for dignity, the right to privacy, tolerance, equality, and mutual respect is our priority.



SOCIAL RESPONSIBILITY

We value the involvement of all stakeholders in counteracting social and environmental problems in their surroundings. We support sports activities among children and youth, and we activate seniors. We get involved in voluntary work and philanthropic activities for various social initiatives.



NATURAL ENVIRONMENT

We care about the natural environment, regardless of the place and type of work, because we play fair with nature. We undertake activities that promote pro-environmental attitudes and contribute to the protection of the natural environment and consider our impact on the surroundings.



Partners and contractors

At the Benefit Systems Group we follow the principles of honesty, integrity, and ethical behaviour. Therefore, we expect the same attitude from our partners and contractors.

When establishing and maintaining business relations, we comply with the provisions and rules of competition protection and we expect the same from our partners and contractors. We avoid situations that may lead to potential or actual conflicts of interest. We exercise due diligence when concluding contracts and executing the provisions contained therein.

We expect knowledge of our Code of Ethics and compliance with the ethical standards contained in it. We believe that acting in accordance with the presented principles of ethics will ensure professional and lasting cooperation with all entities.



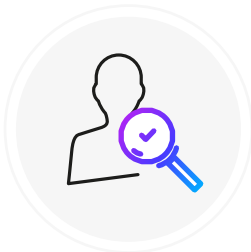
Providing information about suspected violations



We provide the opportunity to confidentially report suspicions of violations of the law, internal regulations and ethical standards.

ETHICS COMMITTEE

The **Ethics Committee** supports compliance with ethical principles and is responsible for handling cases related to compliance with this Code, as well as violations of law or internal regulations, **maintaining objectivity, independence**, as well as confidentiality of the reported information.



QUESTIONS TO HELP ASSESS IF THE OBSERVED BEHAVIOUR SHOULD BE REPORTED:

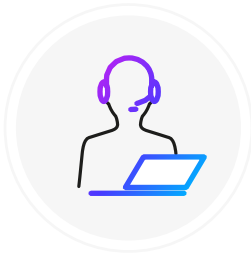
- Is the behaviour legal?
- Is the behaviour consistent with the provisions of the Code of Ethics and other internal regulations of the Group?
- Could the behaviour affect objectivity and integrity of official duties?
- Could the behaviour have a negative impact on the Group's image?



Providing information about suspected violations

The procedure for reporting irregularities depends on the subject of the report:

1. PROCEDURE FOR ANONYMOUSLY REPORTING SUSPECTED VIOLATIONS OF LAW, INTERNAL REGULATIONS AND ETHICAL STANDARDS this allows employees and co-workers to anonymously provide information via the communication channels indicated below.



FORMS OF CONTACTS:

- **platform for anonymous reports** - an external system enabling anonymous submission of reports electronically - in writing or orally, available at a dedicated address:
benefitsystems2.whistlelink.com
- **in writing** - by anonymous reporting to the correspondence address (with the note “Confidential”), in the event of reporting:
 - to Compliance Officer:
Compliance Officer, Benefit Systems S.A.
Plac Europejski 2, 00-844 Warsaw
 - to the Ethics Committee:
Ethics Committee, Benefit Systems S.A.
Plac Europejski 2, 00-844 Warsaw
 - to Member of the Board:
Member of the Board, Benefit Systems S.A.
Plac Europejski 2, 00-844 Warsaw



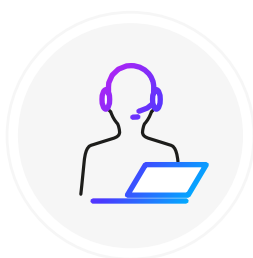
Providing information about suspected violations

2. REPORTS FROM WHISTLEBLOWERS IN THE CONTEXT OF PERFORMED WORK in the scope of violations of law indicated in Polish Act on the protection of whistleblowers (art. 3 par. 1) including, among others:

- corruption;
- public procurement;
- financial services, products and markets;
- counteracting money laundering and terrorism financing;
- product safety and compliance with requirements;
- environmental protection;
- consumer protection;
- protection of privacy and personal data;
- security of networks and IT systems;
- constitutional freedoms and rights of humans and citizens.

Who can be a whistleblower: the notification may be submitted by an employee, a temporary employee, a person performing work on a basis other than an employment relationship, including under a civil law contract, as well as an entrepreneur, commercial proxy, shareholder or partner, a person performing work under the supervision and direction of a contractor, subcontractor or supplier, an intern, volunteer, intern. Applications may also be submitted by a person whose work or cooperation relationship has ended, as well as by persons who are in the recruitment process.

Retaliatory actions against whistleblowers, as well as attempts or threats of such actions, are prohibited. A whistleblower is protected provided that he had reasonable grounds to believe that the information he reported was true and that it constituted a signal of a violation of the law to the extent indicated in the procedure.

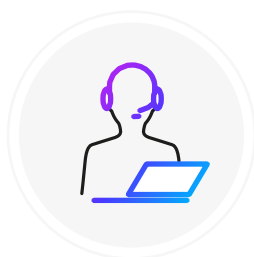


FORMS OF CONTACTS:

- **platform for whistleblowers** - an external system enabling anonymous submission of reports electronically - in writing or orally, available at a dedicated address: benefitsystemspl.whistlelink.com
- **personally** - during a meeting with selected members of the Ethics Committee
- **in writing** - by anonymous reporting to the correspondence address (with the note „Confidential”), in the event of reporting:
 - to Compliance Officer:
Compliance Officer, Plac Europejski 2, 00-844 Warsaw
 - to the Ethics Committee:
Ethics Committee , Plac Europejski 2, 00-844 Warsaw
 - to Member of the Board:
Member of the Board, Plac Europejski 2, 00-844

Providing information about suspected violations

3. THIRD PARTIES, in particular, clients, partners, suppliers and other stakeholders of the Benefit Systems Capital Group may contact the Compliance Officer if they need to discuss in detail any issues raised in the Code of Ethics or identify violations of the law.



FORMS OF CONTACTS FOR THIRD PARTIES:

- Compliance Officer,
Benefit Systems S.A., Plac Europejski 2, Warsaw
compliance@benefitsystems.pl





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