



Code of ethics and business conduct

APC Instytut



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This document presents the company's policies and practices relating to legal compliance and business ethics, reflects the high ethical standards and values of APC Instytut. Each employee of APC Instytut is obliged to comply with the rules included in this code when conducting business as an employee and representative of the company.

This Code covers a wide range of procedures and principles, but does not take into account all possible situations. Its purpose is to provide general guidance on the company's expectations regarding the behavior of employees and their ethical responsibility as persons representing the company.

1. GENERAL PROCEEDINGS



APC Instytut always strives to comply with the law and regulations governing the conduct of business. Each employee of the company, without exception, avoids anything that could lead any aspect of the company's activities to being brought to a conflict with the law. In addition to compliance with the requirements imposed by law, employees of APC Instytut adhere to the highest standards of business and personal ethics. All questionable relationships with people or companies with which APC Instytut cooperates should be avoided. During employment at APC Instytut employees are obliged not to disclose any confidential information obtained while working in the company, and to avoid situations that could result in a conflict of interest with possible damage to the employee and/or the company.

2. CONFLICT OF INTERESTS



The private interest of any employee must not interfere in any way with the interests of the company. Such situations may occur when an employee takes steps that may impede the proper provision of work to the company or when the employee/board member or their relatives, derives improper personal benefits due to their position in the company. A conflict of interest may also arise when an employee works simultaneously for a client or a competing company.

Any potential conflict of interest should be reported immediately. The Management Board will evaluate whether the existing or potential conflict of interest may damage the interests of the company or prevent the employee from effectively performing the duties and will take action appropriate to the situation. Employees, without the consent of the Management Board, must not use the position of the company and/or information obtained through employment at APC Instytut. They also are not allowed to derive financial benefits by using the company's assets, confidential information or company's position in a manner inconsistent with the regulations.

3. CONFIDENTIALITY



The term "confidential information" is understood as any technical, technological, economic, financial, commercial, legal and organizational information provided by the contractor, in particular information regarding new products, commercial plans, technical information, know-how, designs, processes, projects, sketches, photos, plans, technical drawings, technical specifications, samples of merchandise, reports, customer letters, information regarding prices, information about counterparties, information about research, research results, inventions and ideas, regardless of whether or not this information has been marked in any form as "confidential".

An employee receiving confidential information commits to:

1. preserve confidential information secret to the same extent as this person protects his/her own confidential information of a similar nature, which does not exclude the obligation to exercise the utmost diligence in performing this duty;

2. take all necessary steps to ensure that confidential information is not disclosed to third parties;

3. not to use confidential information for purposes other than those for which it was disclosed, without the prior consent of the party disclosing the information issued in writing;

4. in the case of disclosure of confidential information obtained verbally or through an on-site verification, a person holding the confidential information is entitled, or, in case of a written request submitted by the person receiving the information prior to obtaining this information, obligated to confirm in writing each fact and nature of disclosing confidential information;

5. disclose received confidential information only to those employees of the APC Instytut or subsidiaries controlled by the APC Instytut, for whom such disclosure will be justified and only to the extent that the recipient of the information must have access to them for specific purposes, and provided that such persons are obliged to keep confidential the information disclosed to them in the scope resulting from this contract;

6. not copy, reproduce or disclose in any way any confidential information or any part thereof, except when it is necessary to assess the feasibility of project implementation, contract or other cases strictly related to the contractors' subject of business in which cases all such copies or reproductions will be the property of the company being the source of this information and with the proviso that any disclosure of received confidential information may only occur on the condition that persons receiving this information are obliged to keep their confidentiality to the extent resulting from this contract;

7. to return confidential information at the request of the person who disclosed it; and

8. in the case of the obligation to disclose any part of confidential information, to inform the person disclosing the information so that the person can take appropriate steps to secure its confidentiality.

The confidentiality clause will not apply to any part of confidential information that:

1. is known to the person receiving the information at the time of obtaining,
2. is or will be disclosed to the public in a manner for which the person receiving this information is not responsible,
3. essentially corresponds to the information provided to a person receiving information by a third party entitled to provide these and not obliged with the confidentiality clause in relation to the party obeying this clause,
4. an employee could obtain from a third party not bound by any confidentiality clause with each party,
5. has been requested by any public authority to be disclosed as part of the proceedings conducted based on and within the limits resulting from legal acts.

We guarantee full confidentiality and use of personal data of our employees and contractors for purposes consistent with the law and the wish of the particular person.

4. EMPLOYMENT AND THE WORKPLACE



The basis of APC Instytut's success are the employees who, through their integrity, reliability and talents, ensure that the common goals are achieved and the appropriate values are maintained.

APC Instytut does not discriminate against any candidate or an employee based on religion, race or skin color, ethnic, social, or national origin, gender, sexual preferences, age, disability, and political beliefs. Every employee has a responsibility to ensure that the above-mentioned discrimination does not take place.

APC Instytut provides employees with a workplace free from any signs of discrimination and harassment of either verbal (offensive comments, jokes, slander), physical (unnecessary touching, restraining movement), visual (offensive posters, cartoons, notes), and sexual abuse. Any employee who thinks or observes that such behavior has occurred should notify their direct superior, HR department or a member of the Board.

Complaints should be dealt with in a confidential manner, so as not to expose an employee to retaliation or reprisals. Any such complaint will be thoroughly investigated and appropriate action will be taken.

At APC Instytut, a man is always in the first place and every employed person is obliged to show respect to colleagues and people representing other companies with whom APC Instytut cooperates.

APC Instytut strives to provide good living and working conditions for its employees. The company's resources are used in such a way that employees can work safely and in a lawful manner.

The company's assets are not only physical objects and real estate, but also intellectual property, that is, valuable, proprietary business information constituting a trade secret. The company undertakes to take measures to protect the company's intellectual property and to avoid reducing its value. APC Instytut will not intentionally infringe on patents, trademarks, or copyrights of other business entities.

5. PROHIBITION OF CORRUPTION PRACTICES



Offering financial benefits to public servants and employees of contractors is strictly prohibited, regardless of the country in which the company operates.

6. FINANCES



All reports and financial statements are made in accordance with the law, internal regulations of the company in a diligent, transparent and professional manner.

7. COOPERATION WITH THE COMPANY'S CLIENTS



We offer to our external clients services and products of the highest quality, including reliable assistance as well as competent and professional service. We treat all business partners, regardless of the size of the company or its position on the market, according to the same standards of the highest quality. In cooperation with clients we rely on honesty and reliable fulfillment of obligations.

An additional value of APC Instytut is its excellent reputation, obtained through honest and reliable cooperation with clients and employees.

We do not cooperate with companies that are involved in illegal activities. We strive to check the integrity and commercial reputation of potential contractors on a regular basis.

8. COOPERATION WITH SUPPLIERS



APC Instytut cooperates with many suppliers in various scope. We strive to choose reliable and trustworthy suppliers delivering products/services at the highest level. In cooperation and communication with them, we are guided by the principles of mutual trust, integrity and open communication.

One of the priorities in cooperation with suppliers are timely payments for purchased services and goods. Thanks to this policy, we are perceived not only as a reliable client, but also have been repeatedly honored with decorations from various institutions (the company's decorations are listed below).

Employees involved in servicing suppliers and payments should ensure that said timeliness is maintained and in case of any delay in payment that the supplier is immediately informed of this fact.

Develop your business and ideas with us!

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