



**TRANSITION**  
TECHNOLOGIES

# The Code of Ethics

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**We have been striving for 15 years of TT PSC's history to become a global integrator of the best IT solutions available on the market.**

None of this would be possible without being particularly focused on laws, existing regulations, practices and, most importantly, set ethical standards.

Following this direction, we have developed a Code of Ethics to promote the principles guiding our business growth.

**Szymon Bartkowiak**

Chief Executive Officer,  
Transition Technologies PSC



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**The Code of Ethics was created out of the need to regulate the principles that TT PSC cares for and develops, and which have been a guideline since the beginning of the of the company's operations, it provides a model for proceeding.**

Our goal is to promote ethics, and it can only be achieved with the full commitment of our employees and associates.

**Anna Wdowiak**

Chief People Officer,  
Transition Technologies PSC





01

## **The Highest Ethical Standards**

## **\_The mission of Transition Technologies PSC S.A. is to create a better world by using the power of digital transformation**

TT PSC declares that in its activities, both in Poland and internationally, it pays particular attention to compliance with the applicable regulations, legal provisions and procedures in its practices, in accordance with the ethical standards set for itself.

As a leader of the IT market in Poland, we aim to join the group of the best global integrators of IT solutions, adhering to and promoting the principles of ethics, corporate responsibility, human rights and environmental protection.



**Achieving the above goal is possible through the commitment of the Company's employees and associates, while specifying the principles of fair business activities contributing to the development of society in the Code of Ethics.**



The entire staff of Transition Technologies PSC S.A., including employees, associates, consultants, civil contractors, freelancers, representatives, managers, directors and other entities acting on behalf of the Company are obliged to read and adhere to the principles expressed in the Code of Ethics.

The Code of Ethics represents the values that TT PSC is guided by and undertakes to uphold. The set of principles expressed in the Code of Ethics is a model of conduct for the Company's staff, customers and partners, both in business relations and those of a similar nature. The Code of Ethics is based on both TT PSC and other standards and regulations applicable to the Company, i.e.:

- ✓ Universal Declaration of Human Rights

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- ✓ Conventions of the International Labor Organization

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- ✓ Ten principles of the UN Global Compact initiative

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- ✓ The rules of the Organization for Economic Cooperation and Development, in particular those concerning anti-corruption

This document has been approved by the Management Board of Transition Technologies PSC S.A., which has undertaken to regularly review compliance with the ethical principles expressed in the Code.







# 02

## **The Mission of Transition Technologies PSC S.A.**

## **\_TT PSC is one of the leaders in the area of digital transformation solutions for manufacturing and industrial markets**

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The company was founded in 2016 as a further development of the business started as part of Transition Technologies S.A. in 2001.

The company owes its position in the market to many years of experience and hundreds of projects implemented around the world, which were acknowledged in the business world primarily due to their innovation, competence and professionalism.



The software provided to clients is created based on the latest technologies and the latest scientific achievements.

TTPSC collaborates with the leading global suppliers of advanced IT technologies, such as **Microsoft, Atlassian, OneSpan, PTC** and **Rockwell Automation**. The technological certifications held by our staff confirm their high qualifications..



In order to cultivate the best reputation among our clients:



We make every effort to ensure that our solutions are of the **highest quality and maximum business value**.



We feel responsible for the success of our clients, and we make sure that the implemented solutions meet all the **expectations of our clients**.



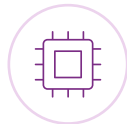
When it comes to cooperation with entities from the public sector, we do not interfere with tenders and we **comply with the provisions** of the Public Procurement Law.



We conduct all negotiations and commercial transactions **fairly**, in good faith, in compliance with applicable law.



We rely on open cooperation and building and maintaining **positive relations** with customers, business partners, associates and employees.



When purchasing services, equipment or materials, we select our business partners' offers **fairly**, based on objective factors supported by current business needs. Neither partner shall be discriminated against or favored.



# 03

**\_The Values**

At TT PSC, we are guided by the following values:



### **We delight our customers**

We care about relationships very much. Our team is always ready to do their best to not only meet, but even go an extra mile for our customer.



### **We earn trust**

This is the foundation of our relationship on which the success of each cooperation depends.



### **We respect others and create a helpful community**

Partners and customers are in direct contact with our team, so the values we follow have a significant impact also on business relationships.



### **We value innovation and continuous development**

People full of passion for creativity drive development and are always hungry for knowledge. Thanks to them, we can offer innovative solutions and always be one step ahead.



### **We build win-win relationships**

This statement perfectly sums up our approach, both in the context of corporate culture and business relationships.



### **We adapt to the needs of partners**

We deliver valuable solutions at an express pace and easily adapt our offer to the current market needs.

A photograph of a modern office environment with a pink overlay. In the foreground, a man with a beard is sitting at a desk, smiling while working on a laptop. A woman stands next to him, looking at the screen. In the background, another man is standing and talking to a woman who is sitting at a desk. The office has large windows and indoor plants.

04

## The Highest Work Standards



**\_At TT PSC, we cherish the people. It is them who are our greatest strength and value because they make up our company – and without them we would not exist**

Equality, respect and open dialogue are fundamental to us.

**We are aware that creativity and passion can develop only in an environment that provides a sense of security and creates an atmosphere that encourages people to express their beliefs.**

Which is why:

- ✓ We respect and adhere to international human rights norms and international labor standards.
- ✓ We condemn any discrimination based on: race, social status, ethnic origin, religion, disability, gender, sexual orientation, relationship or political affiliation, age, belief or marital status.
- ✓ We guarantee liberty of thought, conscience and religion as well as liberty of belief and expression.
- ✓ We ensure that everyone in the TT PSC is treated fairly, with dignity and respect, while ensuring everyone's right to privacy and work-life balance; we respect the rights of young parents.





- ✓ We respect the provisions of the labor law and health and safety regulations, ensuring that employees are provided with appropriate standards, monitoring the occupational risk of employees, developing employees' awareness of possible dangers through regular training, tailored to the duties performed by employees and associates.

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- ✓ We build our relationships on mutual trust and respect for the other person, regardless of the position and function.

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- ✓ Our staff is aware that the consumption of alcohol and other psychoactive substances as well as being under the influence of these substances is prohibited in the workplace and during work.

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- ✓ We make sure that our Staff is hired and remunerated based on objective factors justified by business needs as well as qualifications and experience of the Staff.

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- ✓ We strive to provide our staff with wide opportunities for personal development and qualification through courses, trainings, webinars or receiving funding for this purpose.

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- ✓ We are dedicated to the prevention of physical health as well as mental health.

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- ✓ We ensure that communications are conducted in a reliable and professional manner.

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- ✓ We demonstrate a far-reaching understanding of and respect for our contractors' and partners' laws, principles, values, labor standards, and ethical standards.

A background image showing a person in a dark suit sitting at a desk. They are holding a white document or folder. Their right hand is raised in a 'stop' gesture. The entire image is covered with a semi-transparent red overlay.

05

Counteracting  
Corruption and Abuse

## **\_Transition Technologies PSC S.A. adheres to the principle of "zero tolerance for corruption", opposing any form of corruption, influence peddling, and involvement in money laundering and financing terrorism**

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The Company undertakes to comply with statutory (both domestic and international) and contractual anti-corruption provisions, and strives to avoid situations in which a conflict of interest of the Company, its Staff and contractors could arise.



In particular:

- ✓ Any promises or transfers of **financial benefits** of any kind to public officials (both in Poland and other countries) in exchange for establishing or maintaining business relationships or privileged positions are prohibited.

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- ✓ We do not give or accept **gifts** that could potentially be considered inappropriate or illegal due to the fact that they may exceed the customary value of an occasional small gift.

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- ✓ We are **cautious** when assessing the credibility of a new contractor before starting co-operation with them.



- ✓ We build and develop **transparent business relationships**.

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- ✓ The Company's staff is obliged to **avoid any activities that could lead to a conflict of interest**, and if it is impossible to avoid it - the staff is obliged to inform the Company about this circumstance.

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- ✓ We encourage our Staff to **report any unusual or inappropriate third-party requests**.

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- ✓ We oblige our Staff to **keep confidential information** and not to use confidential information for financial and personal purposes, both during and after cooperation with TT PSC.

TT PSC makes every effort to ensure that employees, subcontractors, consultants and representatives who work using or distributing products, provide product maintenance or support the company in the distribution, sale or licensing of products, services or technologies, have **appropriate knowledge** of applicable laws, requirements and prohibitions set forth in Polish law and international agreements to which Poland is a party.

In addition, an internal instruction was issued for TT PSC employees on anti-corruption, which each employee and management is required to be familiar with and follow.

The full Anti-Corruption Policy is available at: <https://connect.tt.com.pl/space/display/TTPSC/Organizational+regulations+and+documents>



The background image shows a person's hands typing on a laptop keyboard. The entire image is overlaid with a semi-transparent magenta filter. There are several white, stylized digital graphics: a series of horizontal lines on the left, a large square frame on the right containing a bar chart, and various thin white lines and brackets scattered across the scene, suggesting a digital or data-related theme.

# 06

## Transparency

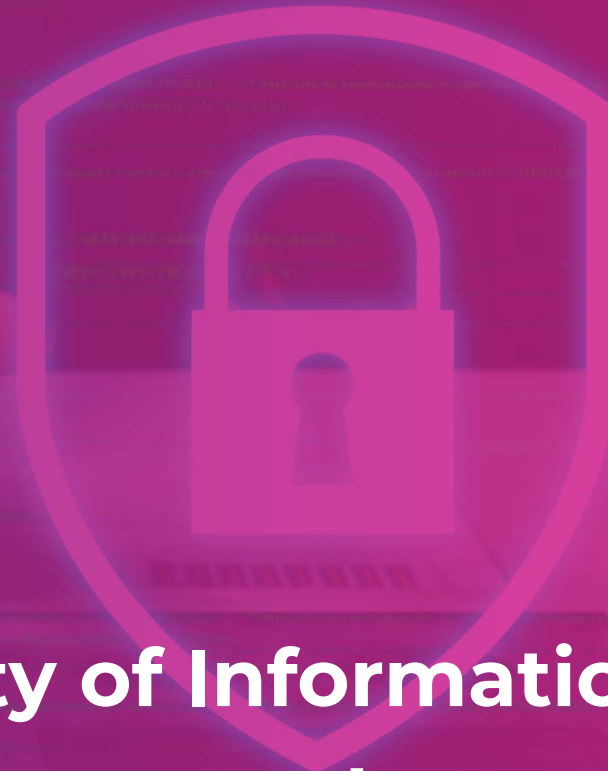
**\_TT PSC is committed to the integrity and completeness of the Company's business records and all transactions with our clients and contractors**

The documentation is kept and stored with due diligence, in accordance with the provisions of applicable law. TT PSC does not evade taxes and other public levies. Business expenses are reviewed each time in terms of justifying business needs.



# 07

## Quality and Security of Information, Confidentiality Management





## **\_TT PSC's focus is on the high quality of its solutions and services**

TT PSC has implemented the Integrated Information Security System in order to maintain constant supervision over confidential data. The security of IT systems implemented at our clients or our internal systems utilized to provide services and process data and information is guaranteed by the Information Security Management System effective at TT PSC in accordance with ISO / IEC 27001 & TISAX.

**Each contract signed with TT PSC is verified and requires the approval of the Management Board. The contract is the basis for contract execution. The contracts are also reviewed for compliance with applicable law and data security standards.**

Confidentiality is one of the main goals at TT PSC. This applies primarily to important information that is critical from the point of view of our customers, business partners, and our own commercial interests, in particular:

- ✓ Undisclosed to the public technical, technological and organizational information of the company or other information of commercial value protected under the Act on Combating Unfair Competition of April 16, 1993; TT PSC requires that all employees and collaborators specifically protect the above information.
- ✓ Personal data protected under the Act of May 10, 2018, on the Protection of Personal Data.
- ✓ Other confidential information provided by our clients and business partners.

# 08

## Fair Competition

## **\_TT PSC competes in the market with other companies providing IT services**

This competition is of a fair nature due to:



- ✓ Objective advantages of our offers that help us win customers.

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- ✓ Compliance with antitrust regulations, both Polish and European, in all areas of TT PSC's operations.

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- ✓ Fair competition in public sector tenders, in accordance with the Law of September 11, 2019 - Public Procurement Law.

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- ✓ Not using dumping prices, collusive pricing or excessive use of market position.

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- ✓ Not concluding agreements restricting competition on the market.

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- ✓ Compliance with the provisions of the Act of April 16, 1993, on Combating Unfair Competition.

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- ✓ Conducting marketing activities in a reliable, truthful manner, not misleading a potential client.

09

## Environmental Protection





## **\_TT PSC is aware of our environmental responsibility**

The company complies with the legal regulations in the field of environmental protection.

At the same time, we promote an ecological lifestyle among our Staff members by organizing events encouraging active participation in environmental protection.

We make every effort to minimize the impact of our operations on the environment by reducing the consumption of natural resources and the generation of waste from our activities.



A group of people's hands are stacked together in a huddle, symbolizing teamwork and corporate social responsibility. The image is overlaid with a semi-transparent pink/magenta filter. The hands are of various skin tones and are wearing different types of clothing, including a checkered shirt and a blue long-sleeved shirt. The background is slightly blurred, showing what appears to be an office or meeting environment.

# 10

**Corporate social  
responsibility**

## \_TT PSC is widely involved in social and educational activities

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As part of the **Women in Power** community, we support women in their professional development and building competences.



We cooperate with numerous **universities**, including the Lodz University of Technology, the University of Lodz, and the Kielce University of Technology. We run summer internship programs.



We encourage our Staff to **exchange knowledge internally**. We conduct Digital Transformation Lunch'n'Learn and Lightning talks sessions to share knowledge within the organization, as well as creative initiatives such as Coders Day, a day dedicated to the implementation of original projects.



Our staff can attend **training programs, e-books, language courses**. We provide access to workshops and conferences.



We promote the **integrity of life and work**, we organize events and activities for our Staff and their families and children.



TT PSC cares about the **health and well-being** of its staff. We conduct meetings and lectures aimed at building awareness in the field of health and disease prevention. We provide publicly available psychological consultations and flu vaccinations. We support the sports team and the TT PSC Running Family internal group.



TTPSC participates in **charity activities** and cooperates with local foundations and animal shelters. We conduct internal fundraising for those in need and support local initiatives. At TT PSC, we have an internal sport challenge (MoveIT Challenge), where employees burn calories together to achieve a set goal. The beneficiaries of the competition are charity foundations, to which we donate PLN 5,000 in each edition. We have supported refugees from Ukraine with many initiatives of, and donated PLN 50,000 to the Happy Kids Foundation.



More information on our activities in the field of corporate social responsibility is available at the website <https://tppsc.com/pl/csr/>



# 11

## Ensuring compliance with the Code of Ethics

## **\_Responsibility for verifying that the Code of Ethics is adhered to is borne by the Ethics Officer appointed by the TT PSC Management Board, who is also competent to resolve any ambiguities that may arise in connection with the interpretation of the Code of Ethics**

TT PSC staff are encouraged to submit any comments and modifications related to the content of this Code of Ethics.

The responsibilities of the Ethics Officer include:

- ✓ Active support of Staff members in adhering to the provisions of the Code of Ethics.
- ✓ Promoting the idea of the Code of Ethics within the organization.
- ✓ Updating the content of the Code of Ethics.
- ✓ Responding with appropriate measures to the current problems of the Personnel related to the ethics of their business activities.
- ✓ Preparing a periodic report on all preventive measures that TT PSC implements as part of its activities related to ethical issues.

**Unethical behavior can be reported by Staff members to**  
***ethics@ttpsc.pl***



TT PSC will exercise due diligence to objectively analyze each report, in accordance with the Company's values and ethical standards. In a situation where a Personnel member will be investigated in question, the person being investigated is required to cooperate in order to clarify the matter. Upon completion of the investigation, TT PSC will provide feedback to the reporting party on the consequences of the investigation.

