

**RULES OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF
ALTKOM AKADEMIA S.A.**

Page 1 z 5

RULES

Title	Rules of Conduct for Suppliers and Business Partners of Altkom Akademia S.A.		
Confidentiality	For internal use	Date of implementation	06.08.2024 r.
Version number	1	Date of revision	-

**RULES OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF
ALTKOM AKADEMIA S.A.**

Spis treści

1. Environmental Responsibility	3
2. Labor Rights	3
3. Human Rights	3
4. Compliance with Law	3
5. Responsible Procurement	4
6. Monitoring and Control	4
7. Information Security	4
8. Final Provisions	5

At Altkom Akademia S.A. (hereinafter referred to as “the Academy”), we operate in compliance with the law, act ethically and safely, and care for both the environment and society. We believe that the success of our organization is built on strong and lasting relationships with our business partners and suppliers. Together, we strive to achieve high standards of quality, innovation, and efficiency in fulfilling our goals.

We want our Suppliers to understand that working with us requires adherence to specific values and ethical standards. The Supplier Code of Conduct defines the general principles we expect all our business partners to uphold.

To this end, we have established these **Rules of Conduct for Current and Future Suppliers**. “Suppliers” refers to all entities that provide or intend to provide us with goods, energy and utilities, intellectual property rights, services (including advisory and consulting services), or human resources, regardless of whether we have a contract with them, as well as all subcontractors, assistants, and other entities with whom we maintain any business relationship.

The Supplier Code of Conduct is intended to facilitate cooperation and to ensure that all activities align with the values we uphold: **Partnership, Professionalism, and Agility**. We believe that adherence to these principles strengthens our relationships and contributes to shared success.

Partnership: We view partnership as the foundation of our cooperation. We strive to build relationships based on mutual respect, openness, and understanding.

Professionalism: We expect all suppliers and partners to operate according to the highest ethical and quality standards, fostering trust and long-term collaboration.

Agility: In a rapidly changing business environment, agility is crucial. We support a flexible approach to cooperation, allowing for quick responses to change and adaptation to market needs.

**RULES OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF
ALTKOM AKADEMIA S.A.**

Page 3 z 5

1. Environmental Responsibility

- We expect our partners to take actions that minimize the negative impact of their operations on the natural environment and actively contribute to its protection.
- Suppliers and partners must comply with applicable environmental laws and standards.
- Suppliers should pursue efficient management of water, energy, and raw materials and implement energy-saving technologies.

2. Labor Rights

- We expect our suppliers to comply with applicable labor laws, including regulations on minimum wage and maximum working hours.
- Suppliers must provide safe and healthy working conditions in accordance with occupational health and safety regulations.
- Suppliers should follow all relevant safety standards, prevent workplace accidents, and protect employees from occupational diseases.

3. Human Rights

- Suppliers must respect internationally recognized human rights, ensuring the dignity, privacy, and rights of all individuals. Forced labor, coercion, threats, abuse, or exploitation are strictly prohibited.
- Suppliers must not discriminate based on gender, age, ethnic origin, nationality, religion, or disability.
- Suppliers must not benefit from or tolerate forced labor in any form.
- Suppliers must comply with laws governing the employment of minors at all stages of their operations.
- Suppliers should implement mechanisms that allow employees to report irregularities and protect whistleblowers from retaliation.

4. Compliance with Law

- Suppliers and business partners must comply with all applicable laws in all jurisdictions where they operate.
- Suppliers are expected to uphold the highest standards of business ethics, avoiding corruption, bribery, and unfair practices.

**RULES OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF
ALTKOM AKADEMIA S.A.**

Page 4 z 5

- Suppliers must comply with national and international competition laws and must not engage in price-fixing, market division, or customer allocation with competitors.
- Suppliers must maintain the confidentiality of all non-public information obtained from the Academy and respect the Academy's intellectual property rights.

5. Responsible Procurement

Academy suppliers should procure goods and services responsibly, ensuring the supply chain complies with this Code of Conduct to the greatest extent possible.

6. Monitoring and Control

- We reserve the right to conduct supplier audits, either independently or with an independent auditor, after prior notice.
- Suppliers may also be required to provide statements confirming compliance with ESG criteria.
- Negative audit results may lead to corrective action plans; failure to comply may result in restriction, suspension, or termination of the business relationship.

7. Information Security

Suppliers and business partners must comply with all applicable information security regulations and implement appropriate technical and organizational measures to protect data from unauthorized access, loss, destruction, or alteration.

Specifically, suppliers should:

1. **Data Protection:** Use advanced encryption methods for data in transit and at rest to prevent unauthorized access.
2. **Access Control:** Implement strict access control procedures for IT systems and documentation to ensure only authorized personnel have access to confidential information.
3. **Training:** Regularly train employees on best practices in information security and incident response procedures.
4. **Monitoring and Auditing:** Continuously monitor IT systems and conduct regular security audits to detect and address potential threats.
5. **Incident Management:** Maintain procedures for the rapid and effective response to information security breaches.
6. **Personal Data Protection:** Comply with data protection regulations, including GDPR, ensuring that personal data is processed lawfully.

**RULES OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS OF
ALTKOM AKADEMIA S.A.**

Page 5 z 5

Suppliers must also ensure that all confidential information received from the Academy is handled with the highest care and is not disclosed to third parties without prior consent.

8. Final Provisions

Suppliers are required to inform the Academy of any violations of this Code of Conduct by their employees or those of their subcontractors, if engaged in fulfilling a contract with the Academy.

*We hereby acknowledge that we have read the **AltKom Akademia S.A. Supplier Code of Conduct** and commit to adhering to its principles.*