



# **BISAR**

## **CODE OF ETHICS**



COLLECTION OF BEST PRACTICES AND WAYS OF CONDUCT  
FOR THE BISAR GROUP





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## We are the Bisar Group!

We are a long-lasting partner of our customers and provide comprehensive support in cross-border demographic solutions. We have rich experience in HR management and due to our practical knowledge of foreign labour markets our partners trust us and we provide top quality services. Our activity includes service provision in many fields of economy and industry where we provide our business partners with flexible development and contract management. The positive image of our company is an outcome of many years of consistent work of all people coming within the Bisar Group.

To maintain and develop the existing image, the relevant social and business way of conduct of the whole team of the Bisar Group, including employees, subsidiaries and business partners, is essential. This Code of Ethics was created to define principles of conduct that should be followed by all employees and partners of the Group. The way of conduct that is consistent with guidelines set out in the Code should be considered as a priority and one of key actions for further development of the company.



## Glossary

This glossary explains key terms used in this Code of Ethics.

The glossary defines the single and precise meaning of particular terms as used by the Bisar Group. Please, familiarise yourself with the glossary before you proceed to the document.



**Abuse** – a situation where the company or a person representing the company (employee, business partner, supplier) exceed ethical, legal or regulatory limits to achieve a benefit or avoid a loss and abuses trust of the company, customers or society.



**Corrupt activities** – any illegal acquisition of financial benefits or other individual benefits in exchange of the violation of law or ethical standards, frequently in a confidential way, in order to gain a business advantage.



**Conflict of interest** – a situation where personal interests of employees or other stakeholders of the company may have a negative impact on the company's decisions or actions and violate the company's interests, integrity and reputation.



**Control and audit** – a set of processes aimed at assessing and monitoring the company's activities to maintain compliance with legal and regulatory requirements and ethical standards, as well as locate weaknesses and potential threats and find solutions to handle them and improve the company's operating capacity.



**Mobbing** – purposeful and persistent actions, like scorn, humiliation, disregard or isolation aimed at a specific person (or a group of persons) to cause a sense of humiliation, threat or rejection.



**Cultural diversity** – social, cultural, language and religious diversity of employees or customers that must be taken into account and respected in business relationships and in the employment and marketing policy of the company in order to ensure integration and tolerance and avoid conflicts and discrimination.



**Discrimination** – uneven and unfair treatment or limitation of access to specific resources, services or benefits due to such factors like race, age, gender, sexual orientation, disability or other personal characteristics. It is contrary to ethical standards and legal regulations.



**Crisis situation** – an unexpected situation caused by internal or external factors which directly endangers the proper operation of the company by having a negative impact on such business areas like production, sale, finance, reputation or security. If a crisis situation is not managed adequately, it is likely to have a negative impact on the media image of the whole company.



# Introduction

## What is the Code of Ethics?

The Code of Ethics of the Bisar Group **is a set of principles applicable to all persons working for and cooperating with the Group.** The Code contains a number of regulations on the Group’s approach to social and business conduct and defines all principles and values that are superior for the Group both at work and in business. This document was developed on the basis of our long-lasting experience and precisely includes issues that are unique in our business.

### The Code of Ethics of the Bisar Group meets three basic functions:

**Inform** – this set of principles sets out requirements for an ethical way of conduct for employees and business partners of the Bisar Group and contains information on standards of business practices applied by the Group for the Group’s business environment;

**Prevent** – the Code describes how to identify and prevent undesired situations and their negative consequences to the Bisar Group’s image. Regulations applicable to specific areas in the Code are developed in a more detailed way in separate policies of the Group.

**Self-improve** – principles set out in the Code of Ethics are to develop approaches that contribute to the development of a non-discriminatory working and development environment among employees and business partners of the Bisar Group. The Code of Ethics is developed all the time and each employee/business partner of the Bisar Group can have an impact on particular aspects hereof.

### The Code of Ethics of the Bisar Group sets out clear principles in the following areas:

Respecting personal dignity | Preventing mobbing | Managing conflicts of interest | Using confidential information | Way of conduct in crisis situations.

## Purpose of the Code of Ethics

The purpose of this document is to present the ethos of conduct we expect from ourselves, as well as our employees and business partners. The Code is a benchmark for understanding legal and ethical obligations related to the performance of activities in cooperation with the Bisar Group. Guidelines set out herein apply to each person representing the Bisar Group and, as such, should be perceived, whatever the circumstances.

We believe that the detailed definition of principles for the ethical way of conduct in business will contribute to the maintenance and reinforcement of the positive image of our Company as a reliable business partner and an empathic employer.

## Addresses of the Code of Ethics

The Code of Ethics applies and is binding on all employees and business partners of the Bisar Group. All our business partners and persons employed by the Group under employment contracts, whatever their function, type of contract or working time system, are responsible for the development and maintenance of a positive image of the Bisar Group. We expect that each of our employees will be consistent with the application of guidelines set out in the Code and apply an honest way of conduct.

Each person representing or working on behalf of the Bisar Group must familiarise themselves with the Code and duly obey principles and guidelines set out herein. Employees of the Bisar Group that do not familiarise themselves with this document in detail are not exempted from the obligation to obey the regulations hereof.



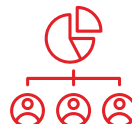
Directors



Employees



Business partners



Subsidiaries





## Activity of the Bisar Group

We are a nation-wide group of international cooperating companies. Our basic activity consists in supporting employees, customers and companies in everyday professional operations by providing finished solutions in the field of greater or smaller tasks. Due to the careful analysis of needs of our partners, we are able to provide services tailored to their need and frequently based on the unique character of a given sector. Due to our rich experience, employees of the Bisar Group are willing to face new challenges and each newly established cooperation enriches our competences.

## 5 pillars of the Bisar Group

The Bisar Group operates through strict cooperation with its related parties. Each of the related parties focuses on a specialised area, but they supplement themselves in other fields.



Although they operate in different areas, all member companies of the Bisar Group follow top standards of ethics and honesty in business. Each member company of the Group operates in accordance with applicable legal regulations, internal policies and other standards. Activities of all Group companies form synergy which aims at meeting existing requirements of the market and demographic challenges that employers and employees in European countries must face. During the time of crisis, demographic, economic and climatic, we make sure that our actions support the development of companies without prejudice to the respect for and protection of the natural environment.



# Our mission and values

## Mission of the Bisar Group

“We combine and support professional activity of people all over the world”

The Bisar Group has developed a unique system of values it applies in its everyday business practices. The system is made of the following values:

### Transparency



Due to the transparency of our actions, we are able to establish long-lasting cooperation with customers. All our messages are true, reliable and supported with evidence.

### Competences



The Bisar Group has developed a number of competences, including, without limitation, in-depth knowledge of national and international law, practical knowledge of foreign labour markets, highly developed interpersonal skills, full commitment to projects, sense of liability and honesty in business.

### Experience



Due to years of experience in work in the difficult and highly competitive market, we have managed to learn customer expectations and understand formal operating mechanisms of our sector. Thanks to the above, we are able to provide first-rate services, as well as a safe and stable process.

### Respect



We act in compliance with our values with due respect to rights of our employees and customers. Respect for other human being is our superior value. That is why we make sure that our working environment is based on evenness, tolerance and mutual support.

### Responsibility



We operate in accordance with social and business ethics and believe that we, together, contribute to the development of a better labour market that allows for the development of employers and employees.





## Areas of the Code of Ethics

### Respecting personal dignity

As an international company that employs people from many countries of different age, ethnical origin and religion, we promote the culture of diversity in an open way.

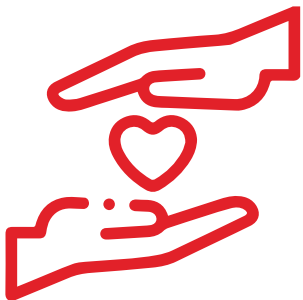
Respect for diversity is one of our major moral principles and preventing discrimination is a very important area of our operations. We know that a success of each business is based on successes of individual units. That is why we treat all our employees and business partners with due respect and expect the same from them. In life and business we require fairness, honesty, frankness, prudence and tolerance. People are our capital and we take actions to support individuals and help them develop their potential.

### How do we make sure that personal dignity is respected?

**We treat everyone in a respectful and even way** – we make sure that each employee is treated fairly and with due respect. That is why, we do not tolerate discrimination against race, age, skin colour, gender, national or ethnical origin, disability or other factors whose use as a basis of employee differentiation is illegal.

**We support individual development** – our team is made of a number of individualists following a single purpose. We take care that each of our employees is supported in their development and achievement of their own plans and professional goals.

**We have a number of regulations and clear rules for whistleblowing** – to minimise discriminatory actions, we have developed procedures for reporting alarming incidents. We analyse such situations on a case-by-case basis and, if reasonable, draw consequences. Each employee that observes any symptoms or becomes a victim of discrimination is requested to immediately report the incident in accordance with applicable abuse reporting rules.







## Preventing mobbing

We condemn and effectively counteract mobbing because we realise that it is a wide and serious problem. We take actions to identify and reduce such a conduct at the workplace.

Mobbing is an actual threat to employees, which may result in job loss, as well as damages to health. Taking actions that prevent mobbing is one of superior issues for us. Our organisation is large and dispersed, therefore we have defined a single way for reporting abuses related to mobbing. Employees that familiarise with mobbing reporting procedures will be able to report the abuse in two ways: anonymously or to the management division.

### How do we counteract mobbing?



**We verify** each alarming situation. We have established a verification commission which analyses each alarming situation reported by employees. We do not allow any of our employees to become a victim of any form of mobbing: offending, insulting, slandering, humiliating or threatening. No notice is underestimated by us.



**We draw consequences** – if the verification commission confirms mobbing within the entities of the Bisar Group, relevant consequences will be drawn. At the same time, we take care of the security of a person that reports the abuse by enabling them to report the incident in an anonymous way. Consequences of activities having hallmarks of mobbing are described in detailed procedures, which are developed in accordance with the values set out in the Code of Ethics and applicable legal regulations.





## Managing conflicts of interest

The Bisar Group actively monitors business events that are likely to result in a conflict of interest. The Group is decidedly against all actions that are intentionally aimed at the detriment of the Group and are not compliant with the Group's general interest. Therefore, we avoid situations where private interests are in conflict with the Group's interests.

Reliable performance of business duties for the Bisar Group, within the prior agreed scope of commitment and time, should be a priority of the Group's employees and business partners. Therefore, it is forbidden to take any actions which result in the negligence of obligations to the Group's member companies or actions that are in direct conflict with the Group's interests.



### How do we manage conflicts of interest?

**The Group's interests prevail over private interests** – we do not accept situations where private interests of our employees are met at the cost of interests of the Bisar Group. This also includes situations where there is a risk of such a conflict, including, without limitation, a family or personal relationship between an employee and personnel of our business partner where the employee takes actions both in the interest of the business partner and the Bisar Group.

**All notices are treated impartially** – each notice is reviewed individually and impartially without prejudice and based solely on content-related premises and facts.

**Clear abuse reporting procedures** – we have set out relevant procedures and rules of conduct in case of conflicts of interest. Each employee that has observed a conflict of interest must immediately report it.

**We draw consequences for non-reporting** – as a reliable employer that takes care of the Bisar Group's interests, we draw consequences for non-reporting an incident by employees that have become aware of a conflict of interest within the Group.



## Principles for solving disputes between employees

The Bisar Group perfectly understands that it is not possible to avoid stressful situations at work. However, creative dispute resolution may be beneficial not only to the effective performance of the Group's processes, but to employees finding an agreement, as well. In the case of a conflict, the Bisar Group obliges both parties to act in a cultural way, including listening to arguments of the other party, not interrupting each other and not raising one's voice. In the Bisar Group we believe that it is not always easy to reach a consensus, however with mutual respect and empathy it is possible to develop a solution that will be satisfactory to both parties.

If it is not possible to reach an agreement between the parties, the Bisar Group's conflict resolution procedures must be applied. Those procedures include:

- 1. Talk to a superior** – contact your superior or another person responsible for supervising your operating area at the company and present circumstances of the dispute. If one of parties to the dispute is the superior, you can report the conflict anonymously, e.g. via the company's website <https://bisar.trusty.report/>.
- 2. Mediation** – if the talk to the superior or responsible person does not bring about expected results, try to resolve the dispute via mediation handled by an impartial person to be appointed by the Compliance Coordinator of the Bisar Group. The Compliance Coordinator can be contacted in a confidential way to establish mediation by e-mail at: [compliance@bisar.pl](mailto:compliance@bisar.pl).
- 3. Arbitration** – if the previous steps did not bring about positive results, the Compliance Coordinator of the Bisar Group can decide to refer the dispute to arbitration proceedings. Arbitration proceedings is dispute resolution by an independent person or a panel of experts. The arbitrator's decision is final and binding on each party.
- 4. Court proceedings** – ultimately if none of the above options is effective, the disputes must be referred to the court.



## Using confidential information

In our organisation confidential information exist at each management level. We treat the protection of confidential information (including personal data) with due respect and diligence. Related actions are carried out both at the business and private level.

A number of procedures for the use of confidential information are set out by the GDPR policy, but confidentiality issues are handled to a much broader extent, both in the context of information concerning employees and trade secrets. The gradation of such issues differs depending on a function in the organisation, but a set of principles and guidelines is understandable to everyone.



### How do we take care of confidentiality?

**GDPR policy** – we use confidential information in accordance with the applicable GDPR policy. All data processed by the Bisar Group are protected against unauthorised access, i.e. against disclosure or provision to unauthorised persons or other entities.

**We take care that information is reliable** – we commit ourselves to ensure reliable information within and outside our organisation. We do not accept any hiding, distorting or manipulating of information.

**We use security methods** – to protect the confidentiality of our information, we use a number of relevant security tools. We develop our defence against cyber-attacks all the time, we have improved our Information Security Management and Continuity Management systems and protect our premises against physical access.

**We educate our employees** – we know that all employees are responsible for the confidentiality of information and that is why we take care that they are adequately educated. We implement programmes that develop their awareness of information security and personal data protection.

**Confidentiality limits** – each of our employees is expected to obey clearly defined confidentiality limits within which trade secrets must be protected.

**Abuse reporting methods** – we have defined procedures for reporting abuses to our confidentiality rules. Anyone that becomes aware of any abuse in this area must immediately report the incident.

**Consequences of confidentiality breach** – information is one of key values we use. Taking care of information security is superior to us. Therefore relevant consequences will be drawn in the case of any confidentiality breach or failure to report a confidentiality incident.



## Way of conduct in crisis situations

Crisis situations are an inseparable element of business. To ensure the stability and security of the Group and the Group's employees, we have enforced principles of conduct in crisis situations.

Procedures for crisis situations are particularly important in the Bisar Group, which employs staff from all over the world. The lack of knowledge about social and business principles applicable to crisis situations in a given country may result in long-lasting and negative consequences for the Group and the employee's frustration. Problems connected with fluent communication, a sense of alienation and a need to pull oneself together in the new working and private environment are several of numerous challenges immigrant employees must face. To make sure that the Group and the Group's employees are secure, we have developed a number of principles and best practices whose purpose is to define a clear procedure for crisis or difficult everyday situations.

### How to act in crisis situations?

**We offer support** – both in crisis and everyday situations, our employees are supported by the Bisar Group in a comprehensive way. We accept, analyse and review all notices and comments of our employees on a case-by-case basis. We make sure that our employees are safe both in their business and private life.



**We draw from our experience** – due to many years of our operation in the market, we have managed to identify symptoms of an approaching crisis situation. Based on that experience, we are able to develop possible scenarios of such situations and then define an adequate way of conduct that will minimise their negative consequences.



**We define the way of conduct** – although each crisis situation is different, we have developed a universal way of conduct which will let us minimise disturbances to the operation of the company. All employees of the Group must obey our guidelines for crisis and everyday situations.





## Crisis situations and related procedures

### Situations with a low level wrongfulness

#### Examples of situations:

Technical problems | Failure of equipment | Project delays | HR problems (e.g. lack of personnel)

#### How do we operate?

We implement procedures to prevent further damages | We diagnose damaged systems or equipment | We implement crisis management plans | We communicate the problem openly to employees and customers | We provide support to employees exposed to the crisis

### Situations with a medium level of wrongfulness

#### Examples:

Accidents at work | Problems with product/service quality | Violation of law

#### How do we act?

We provide immediate help to the injured | We protect the place of an accident | We conduct our internal investigation | We communicate the problem openly to employees and customers | We provide support to employees exposed to the situation | We implement our crisis management plans

### Situations with a high level wrongfulness

#### Examples:

Financial crisis and embezzlement | Natural disasters | Public security problems | Health crises

#### How do we act?

We provide immediate help to the injured | We conduct internal and external investigation | We implement our crisis management plans | We communicate the problem openly to employees, customers and business partners | We provide support to employees exposed to the situation | We cooperate with the authorities and relevant organisations



## Policies and whistleblowing

The Code of Ethics of the Bisar Group defines and describes superior ethical standards, values and principles of conduct in business. It is supplemented with specific policies and whistleblowing principles.

Supplementary documents are developed on the basis of applicable legal regulations and adjusted to specifics of our activities. Their purpose is to define precise areas and issues that are extremely sensitive from the ethical point of view.

The only way to ensure the effective enforcement of best practices, policies and codes is to establish the environment where related audits and whistleblowing guarantee that the principles are complied with and improved. Each procedure provides for a method of verification of the achievement of goals and the frequency of audits. The purpose of our whistleblowing system applied in HR divisions is to improve information flow and ensure compliance with the regulations.

The implementation of clearly defined procedures and whistleblowing principles is the first and basic step to collect data concerning ESG and protect space within the organisation. This is also an excellent starting point to define our position and direction in the widely understood ethics of business and social empathy.

### Specific policies of the Bisar Group:

- Counteracting corruption and abuses
- Counteracting money laundering and tax avoidance
- Counteracting unfair competition
- Privacy and personal data protection (GDPR)
- IT system security policy
- Recruitment and personnel acquisition policy
- Communicating irregularities and incident management policy



## Whistleblowing principles

Have you noticed that anyone in your environment acts contrary to legal regulations or principles set out in this Code? Report such an incident immediately!

### Reporting in the management division

You can report an alarming incident directly to your superior, a relevant manager, the Compliance Coordinator, the HR Department or the Board of Directors of the Bisar Group.

### Reporting anonymously

- The incident can be reported anonymously via our internal abuse reporting channel:  
<https://bisar.trusty.report/>
- By e-mail to: [naduzycia@bisar.pl](mailto:naduzycia@bisar.pl) or by mail addressed to:

Coordinator for Compliance  
Obrońców Westerplatte 5  
83-000 Pruszcz Gdański

### Protection of a whistle-blower

One of our whistleblowing principles is to prevent any forms of retaliation for whistleblowing. Our policy forbids to punish employees and business partners of our Group for whistleblowing. All employees are expected to cooperate to identify and report wrong ways of conduct.





## **We develop the Bisar Group in an ethical and responsible way**

This Code of Ethics is a set of principles, best practices and values that should be obeyed by all employees and persons cooperating with Bisar Group entities. Compliance with the guidelines set out herein is essential for the development of the company.

Consistent and coherent actions performed in accordance with the Code of Ethics will let us achieve strategic and brand goals of the Bisar Group, as well as the company's financial and business stability and, in consequence, the security of all employees.

All employees of the Bisar Group must act in accordance with principles and values set out in the Code of Ethics and will be demanded to obey that responsibility on an ongoing basis.

We expect that you will get involved and be consistent and honest in all your operations taken both in the business and private zone. We believe that our Code of Ethics will ensure the uniform way of conduct of all employees of the Bisar Group and will contribute to the individual development of each of our employees.

