

# ZENTITY Code of Conduct

## Who We Are

ZENTITY is a technology provider focused on the development of mobile and web solutions and related services. In the course of our long history we have become a leader on the mobile and internet markets of Central and Eastern Europe. We can also boast of a presence in many other European markets, in the U.S.A. and the Near East. Our competitive edge is represented by long-term experience, a top team of dynamic and enthusiastic employees and a productive and open corporate climate.

We are aware that top-quality services, reliability and the high standards of work of our employees and partners are just and obvious requirements of our clients. To further develop our position as a market leader and serious partner to our customers and to take care of the pleasant and open work atmosphere of our employees as part of our competitive edge, we have decided to formulate the main principles of our corporate culture in this Code of Conduct.

## Code of Conduct

This Code of Conduct is a collection of moral principles governing the conduct of our Company, its employees and partners towards each other, towards our clients, suppliers, competitors, state administrative authorities and the environment. This Code of Conduct as an internal standard of our Company is neither an act of generally binding legislation nor a corporate bylaw. The rules of conduct are general and their particular application is a matter of

judgement for each of us. In the case of doubt consult your workmates, line managers or the Company management team.

This Code of Conduct applies to all members of the ZENTITY Group, its employees and other persons acting in its name.

## **1. Client Relationships**

Good relationships with clients are key for the long-term successful progress of our Company, therefore we strive for strong and stable customer relations. Our conduct towards clients builds our reputation. What we consider the basis for permanent and successful business relationships is reliability, trustworthiness and equality in our approach to every client or order placer.

We do not tolerate corruption (bribery, offering or receiving bribes in any form), corrupt practices and unfair competition. Any corruption practices in our client relationships are non-permissible. Neither our Company nor any of its employees are allowed to offer or receive bribes, gifts or other unfair benefits in connection with their work duties. This does not prohibit receiving and giving promotional objects used for marketing and publicity or small gifts of modest value.

Every employee or partner of ZENTITY is liable to immediately report any suspected corrupt practice both inside the Company or on the part of its suppliers or clients to their line manager. We reassure every informer reporting such suspicion in good faith that they will remain anonymous and will not have to face any negative consequences for their reporting.

We take care to provide high-tech and professional services to our clients within the agreed deadlines. We maintain the comfort of our clients by problem-free solutions of specific requirements in top quality and within the agreed time frame.

We respect the law, tradition and cultures of all countries our clients operate in. We treat all information received from our clients as strictly confidential.

## ***2. Supplier Relationships***

Our relationships to our suppliers always comply with the rules of fair competition and valid legislation. We consider any corrupt practices in the relationships to our suppliers unacceptable. We respect all contractual agreements including moral payment compliance. We keep all supplier relationship information strictly confidential.

## ***3. Relationships with Competitors***

We have adopted a fair approach to our competitors and respect for the good reputation of competitor companies and their representatives. We make our employees and suppliers respect the confidentiality of commercial and other information within contact with our competitors.

## ***4. Employee Relationships, Employee Liabilities***

We respect the dignity of every person and human diversity in the relations with our employees. Human rights compliance in employment relationships goes without saying in our Company. We recruit and employ staff on the basis of their professional competencies, provide equal opportunities to all without political, religious, ethnic or nationalist discrimination, regardless the gender, age, sexual orientation or marital status of the employee and regardless of any other unrelated job characteristics. When recruiting an employee we provide complete and correct information about our Company and the work conditions it offers.

We respect a fair approach to every employee based on the performance and skills of the employee adequately reflected in their evaluation and

remuneration. We require compliance with the established rules from all employees without exception.

We actively support the career development and improvement of the professional qualifications of our employees.

We are open to original employee (or partner) suggestions for the improvement of work conditions and settlement of work site complaints and issues. Every employee is encouraged to address their line manager or a member of the Company management team with their concerns. We guarantee the serious consideration of every comment or complaint, investigation of the situation and its settlement without delay with consideration to all related facts and circumstances.

We try to create safe, healthy and pleasant work conditions. We cherish corporate culture based on support for mutual cooperation and communication. We support truth-based, open and timely communication inside the company as well as on the outside towards our customers. We create a work environment based on sincerity and trust, with an emphasis on the individuality of every employee. We do not tolerate any harassment in the work place.

We strictly protect the confidentiality of personal and other data provided to us by our employees. We only require information we really need for the fulfilment of our legislative liabilities as a Company.

We all work together to strictly observe the principles of occupational safety.

We request that our employees effectively utilise their working hours and treat all entrusted Company assets with due care.

We do not tolerate the abuse of corporate or client information obtained in the context of the fulfilment of job-related duties.

## ***5. Relationships to State Administrative Authorities***

We responsibly communicate with state administrative authorities and provide true information about the Company on the basis of duly kept accounts and compliance with regulations and standards applicable to employers. We consistently fulfil financial and employer liabilities following from contracts and legislation.

## ***6. Environment and Corporate Responsibility***

We are sincerely interested in the improvement of environment quality. As a technological company we help improve the environment through the development of above-standard applications. Our everyday activities contribute to a better environmentally-friendly utilisation of hardware and office supplies. We enjoy waste sorting.