



CODE OF ETHICS

***of Hydromega Sp. z o.o.,
that defines the main principles
of our business activity***

Gdynia, 16.12.2019

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This Code of Ethics accepted by the Management Board, defines the principles of conducting business activity and building positive personal relationships based on:

- fair competition,*
- development through participation in the process of building an innovative economy,*
- Hydromega's Mission and Quality Policy.*

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1. INTRODUCTION

- As part of the Code of Ethics for employees of Hydromega Sp. z o.o. all employed persons undertake to carry out their daily work responsibly and ethically, irrespective of the functions they perform and the positions they hold.
- As employees, we know that we are perceived as representatives of the company and we are aware of this, and we want to appear to our clients as trustworthy and responsible and conducting business basing on the principles of ethics.
- Executives are required to set a good example, promote the Code, and monitor compliance with it.

2. MAIN RULES OF CONDUCT

2.1 Laws and regulations

- The company:
 - complies with the laws, rules and regulations of the country and with those in force in the countries in which our business clients are based,
 - does not cooperate with companies or entities violating sanctions imposed on them,
 - monitors the legitimacy of business clients,
 - has implemented and certified the Internal Control System.

2.2 Bribery and corruption

- The company:
 - conducts all transactions in a transparent and documented manner,
 - does not support any political parties or campaigns.
- Decisions on charitable donations or sponsorship agreements are always taken by the Board after verifying the credibility of the party concerned.
- Employees:
 - may not provide unlawful benefits to business clients or government officials or require or accept such benefits in exchange for favoring in commercial transactions (the term 'benefits' means gifts, cash equivalents, invitations and services the purpose of which is to obtain an unfair privilege or convincing another person to take some action),
 - know that the request or offer of a bribe should be rejected and reported to the immediate supervisor.

2.3 Competition law

- Employees:
 - take care of fair competition, i.e. they do not enter into any collusion with other companies and do not establish methods of action that could in any way prevent, limit or distort competition,
 - do not provide preferential conditions or conduct direct conversations with companies where they have their own interest,
 - are obliged to immediately inform the immediate supervisor about a potential or conflict of interest.

2.4 Confidentiality and data protection

- The company collects, processes and/or uses employees' personal data and third parties' only if they have given their consent or if there are legal grounds for doing so.
- Employees:
 - do not provide information (in any form) on prices, tenders or other business matters to non-clients of the company,
 - do not provide information within the company to persons to whom this information does not apply,
 - protect confidential business customer information,
 - are required to immediately notify their immediate supervisor about obtaining sensitive information,
 - keep the secret of the company also after the employment relationship has ended.

2.5 Respecting copyright and personal rights

- The company:
 - respects copyright and personal rights,
 - guarantees the use of images, photos, texts and products in the official media, only after earlier transfer of rights to Hydromega Sp. z o. o. or as part of concluded contracts,
 - guarantees the publicity of the image of persons only with their consent or as part of possibilities allowed by law.

2.6 Handling of company property

- The company provides the funds needed to carry out customer orders in the form of hardware, tools, software and information.
- Employees:
 - respect and care for the company's assets,
 - do not use the funds needed to carry out client orders for purposes private or out of business, except for outside services headquarters.

2.7 Work health and safety regulations

- The company cares for the safety of all employees and business clients.
- Employees:
 - comply with the security principles specified for the job,
 - interrupt their work and inform their immediate supervisor in the event of a situation posing a threat to occupational safety,
 - suggest changes to improve occupational safety,
 - are aware of the prohibition of drinking alcohol in any form, taking drugs or other substances on the company's premises or during business trips.

2.8 Working time and pay

- The company provides employees with:
 - fair pay for work, taking into account national minimum wage regulations,
 - breaks at work,
 - paid leave,
 - public holidays.

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2.9 Freedom of association and organization

- The company:
 - engages employees in the its development,
 - guarantees employees the right to form an organization and associate, as well as the right to conduct collective negotiations by appropriate entities representing their interests.

2.10 Employment of minors and forced labour

- The company:
 - does not employ children and young people under 16 years of age,
 - does not employ forced workers,
 - does not tolerate exploitation of minors,
 - complies with the International Labour Organization and UN conventions,
 - ensures that learners do not work night shifts and the working time does not exceed eight hours a day.
- Employees:
 - draw attention to issues regarding the employment of children and young people and forced labour, both in Hydromedia Sp. z o.o. as well as with business clients,
 - are free to leave the workplace after work.

2.11 Diversity, equal opportunities and mutual relationships

- The company is committed to respecting human rights in accordance with the UN Guiding Principles on Business and Human Rights.
- Employees:
 - do not tolerate violations of human rights,
 - do not distinguish, exclude or favor other employees and business clients in terms of: ethnic, social or national origin, race, skin color, sex, age, religion, political views, membership in organizations, physical or mental impairment, sexual orientation,
 - do not tolerate harassment, verbal and physical disturbance, violence and mobbing,
 - treat each other with respect.

2.12 Environmental protection

- The company undertakes to comply with laws and regulations regarding climate and environmental protection.
- Employees use resources (e.g. electricity, water, heating) and raw materials (tools and consumables) in their everyday work in a cost-effective manner, and also reduce waste production and segregate it for reuse.

2.13 Consequences of infringements

- In the event of a violation of this Code, the company reserves the right to hold the employee legally responsible and to apply disciplinary measures depending on the degree of the offense.

3. FINAL REMARKS

- In this Code, we refer primarily to:
 - The Act of 26 June 1974 - Labour Code and regulations implementing the Labour Code,
 - Universal Declaration of Human Rights adopted by the UN General Assembly, 1948,
 - International Labour Organization guidelines on work health and safety (ILO-OSH-2001),
 - Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, 1998,
 - ILO conventions: concerning freedom of association and protection of trade union rights, 1948 (No. 87) and concerning the application of the principles of the right to organize and collective bargaining, 1949 (No. 98),
 - the Convention on the Rights of the Child, the ILO Convention concerning the lowest age of admission to employment, 1973 (No. 138), the ILO Convention concerning the prohibition and immediate measures to eliminate child labour, 1999 (No. 182),
 - ILO Convention on Forced Labour, 1930 (No. 29), Convention on the Abolition of Forced Labour, 1957 (No. 105),
 - ILO Convention on Discrimination in Employment and Occupation, 1958 (No. 111) and ILO Convention concerning Equal Remuneration of Working Men and Women for Work of Equal Value, 1951 (No. 100),
 - the UN Convention against corruption,
 - Rio de Janeiro Declaration on the Environment and Development and Agenda 21 (on environmental protection).

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