



Code of Ethics

Spoločnosti GLOBESY, s.r.o
(Hereinafter „the Code of Ethics“)

GLOBESY, s.r.o., Framborská 58
010 01 Žilina
Slovak Republic

The Company is registered with the Business Register of the District Court of Žilina,
section: Sro, insert no. 13764/L.

"The core values are humanity, cooperation, mutual support and constantly pushing and overcoming boundaries. We are aware, that we are really trying to create synergy. Not only within the company, but also in contact with customers."

Introduction

Dear employees, customers, suppliers, and business partners,

Writing a code of ethics is sometimes considered a formality. However, that is not our case. Since the very beginning, we have been trying hard to turn GLOBESY into a symbol of IT driven by humanity. We are striving to create a world, where the cold of technologies is balanced with the warmth of human approach.

The principles of ethical behaviour constitute one of the pillars of our identity and we adhere to them not only in our relations with business partners but also promote them among our employees.

For even greater support and promotion and to ensure compliance with business ethics, we are introducing The GLOBESY Code of Ethics.

In this Code of Ethics, we commit to supporting and respecting the protection of internationally recognized human rights. We also commit to following labour standards, fighting against corruption, and protecting the environment. In addition, we commit to fair and professional treatment of all our customers, abiding by our Company's mission to become a **Trusted Advisor**.

We would like to encourage you to follow the principles of this Code of Ethics and thus contribute to the preservation and improvement of a fair and responsible business environment.

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THE CODE OF ETHICS RESOURCES

The GLOBESY, s.r.o. Code of Ethics draws on the following sources:

- Civil Law Convention on Corruption – adopted by the Council of Europe, published in the Collection of Laws of the Slovak Republic (Notification of the Ministry of Foreign Affairs of the Slovak Republic No. 370/2003 Coll.),
- Criminal Law Convention on Corruption – adopted by the Council of Europe, published in the Collection of Laws of the Slovak Republic (Notification of the Ministry of Foreign Affairs of the Slovak Republic No. 375/2002 Coll.),
- Prevention of corruption – guidelines issued by the Ministry of Justice of the Slovak Republic,
- Act No. 357/2004 on the protection of public interest in the performance of offices by public officials,
- Illegal work – Act. No. 82/2005 Coll. on illegal work and illegal employment and on amendment of certain acts,
- Fair competition – Act No. 136/2001 Coll. on protection of competition and on amendments and supplements,
- European Convention for the Protection of Human Rights and Fundamental Freedoms – published in the Collection of Laws of the Slovak Republic (No. 209/1992 Coll. and No. 102/1999 Coll.),
- Anti-discrimination Act – Act No. 365/2004 Coll. on equal treatment in certain areas and protection against discrimination, and on amending and supplementing certain other laws as amended,
- Labour Code of the Slovak Republic,
- The Constitution of the Slovak Republic and other laws of the Slovak Republic,
- The Principles of the UN Global Compact initiative,
- Regulation (EU) 2016/679 (GDPR), Articles 29 and 32,
- Act No. 18/2018 on personal data protection and amending and supplementing certain acts.

THE PURPOSE OF THE CODE OF ETHICS

The aim of the GLOBESY, s.r.o. Code of Ethics is to establish the basic principles and rules of employees' conduct within and outside the Company, i.e. their behaviour towards their co-workers, customers, business partners, suppliers, as well as the general public. At the same time, this Code of Ethics defines the attitude and approach of GLOBESY, s.r.o. and its employees towards the protection of the environment.

The purpose of the GLOBESY, s.r.o. Code of Ethics is to strengthen and promote the protection of the environment. Furthermore, it also serves to strengthen and promote the main ethical and moral values of employees when performing their job duties and acting towards the public.

APPLICATION OF THE CODE OF ETHICS

- Each new employee at GLOBESY, s.r.o. is acquainted with the Code of Ethics during the onboarding process through the Employee guidance package.
- An employee acknowledges that they were fully acquainted with the Code of Ethics by their signature of the Document of Employee's initial training.
- Concise rules and procedures for the following of environmental policies are also presented to employees in the form of notices on Notice boards.
- The standards defined in the Code of Ethics must be met by all Company's business partners, as well the subcontractors of the business partners. The business partners must inform their subcontractors of the provisions of this Code of Ethics and require them to adhere to these principles and standards.

1 EMPLOYEE CONDUCT IN THE COMPANY'S INTERNAL ENVIRONMENT

- An employee performs their work in accordance with the Constitution of the Slovak Republic, the European Convention on Human Rights and Fundamental Freedoms, and other laws and regulations. At the same time, an employee does everything to act in compliance with the provisions of this Code:
 - everyone has the right to life, liberty, and security of person,
 - no one shall be subjected to cruel, inhuman, or degrading treatment or punishment,
 - everyone has the right to freedom of thought, conscience, and religion and everyone has the right to freedom of opinion and expression,
 - everyone has the right to equal treatment and protection against any discrimination,
 - no one shall be sexually or otherwise harassed, discriminated against, or encouraged to discriminate.
- Employees handle the information obtained when performing their duty with the necessary confidentiality and appropriate care.
- Employees show respect to their superiors. Employees perform their assigned tasks conscientiously, consistently, and effectively. They are creative and innovative according to their job position.
- Superior employees treat their subordinates with respect and dignity. They divide the job responsibilities justly and evaluate their subordinates fairly and objectively. Superior employees must not abuse their power against their subordinates.
- All employees are a part of the team and show mutual respect and tolerance in their relationships. They help other employees willingly, contribute to a good atmosphere, and avoid conflicts instead of creating them.
- Employees respect and follow the established principles of GLOBESY, s.r.o. concerning environmental protection, such as recycling of waste.
- Employees support the development and propagation of environmentally friendly technologies.

2 EMPLOYEE ATTITUDE AND CONDUCT IN THE EXTERNAL ENVIRONMENT

An employee is aware of the impact of their attitudes and expression on public opinion. An employee, through their behaviour, contributes to building and strengthening of a good reputation of the local authorities by providing a positive personal example in attitudes towards public affairs and public officials.

2.1 Conflict of Interests

Conflict of interest is a situation during which is or could have been disturbed or endangered the interest of an employee when impartially and objectively performing their function and duties in the Company GLOBESY, s.r.o. This could occur due to personal or other similar relationships of the stakeholders. Furthermore, employees must not encourage the following behaviour or engage in the following activities:

- Improperly influence the recruitment of new employees or promotions and reward family members or close friends.
- Prefer suppliers, business partners, and customers with whom they have friendly or family relationships.
- Influence and manipulate public tenders or business competition for their gain or the gain of their close friends or family members.
- Profit from operating in the competitive environment by harming the Company GLOBESY, s.r.o.
- Exploit the Company property, including e-mail accounts, trade name, or Company equipment for companies outside GLOBESY, s.r.o. seeking personal gain.

2.2 Corruption and Accepting Gifts

- An employee must not demand or accept gifts, favours, or other benefits that could actually or even seemingly influence a decision-making process, violate the professional approach to a case, or that could be considered a reward for work that is their regular duty. Moreover, an employee does not prompt third parties to offer gifts that could affect the proper performance of the employee's job duties.
- Employees of GLOBESY, s.r.o. are not public officials. Therefore, they will not give nor offer bribes to public officials or any other people. They will not accept or encourage bribes to gain, maintain, or secure any advantage for the Company. Bribes can take the form of money or benefits (club membership, school fees for children, travel expenses, etc...).
- Employees must not exploit their job, position, occupation, function for their own gain or the gain of another person.
- If an employee learns in a trustworthy way about the commitment of any corruption crime, they are obliged to report this event to the law enforcement agency.

2.3 Business Relations and Fair Competition

It is forbidden to report irregular or fabricated records or to receive and make unreported payments. Company employees or business partners must not destroy financial or other records to avoid investigation or disclosure during legal proceedings. Company employees must not forge documents or participate in making false documents covering unauthorized payments or unlawful unethical conduct. Such conduct may be classified as a crime.

Company employees must not use inappropriate ways and means to obtain information about competitors (such as obtaining a competitor's confidential pricing strategy through friends or consultants), act (or encourage others to act) against their duties or seek unfair advantages for the Company. Negotiations with competitors on the following topics may be considered as illegal anti-competitive practices:

- pricing policy,
- launch of a new product or service to the market,
- single market sharing or market sharing,
- refusal to supply customers,
- any coordinated approach to suppliers, distributors, or customers.

3 ATTITUDE AND PRINCIPLES OF GLOBESY, S.R.O.

The employer creates a decent working environment, so employees can properly perform their duties. GLOBESY, s.r.o. also follows the principles of The European Convention on Human Rights and Anti-Discrimination Act:

- No one shall be required to perform forced or compulsory labour.
- The Company will not employ anyone illegally.
- Child labour is prohibited.
- Everyone has the right to freedom of peaceful assembly and collective bargaining.
- The Company will follow the principles of equal treatment so that all employees receive the same treatment and are not discriminated against on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, and association with a national minority, property, birth, or other status.
- The Company will follow the principles of equal treatment in labour relations and business relations, in social protection, including social security, health care, education, and supply of goods and services.

To support the fight against corruption, GLOBESY, s.r.o. will report any detected and provable suspicion of corruption to the relevant state authorities. The Company is committed to acting honestly and according to the fair mechanism of the market economy. By its conduct, the Company will not undermine the trust in public institutions since such disturbance threatens the foundations of democracy.

Employees preserve the privacy, confidentiality of information, trade secrets, and the secrecy of telecommunications. Employees also follow the principles of protection and secrecy of the Company GLOBESY, s.r.o. and its suppliers and customers.

GLOBESY, s.r.o. acts in compliance with The Competition Act:

- it shall not restrict competition and freedom of action of the entrepreneur in the relevant market,
- it shall not exclude existing or possible competitive activities,
- it shall not reduce the scope of competitive activities or distort competitive conditions,
- it shall not make illegal agreements and practices of entrepreneurs that would distort the competition.

4 THE PROCESSING OF PERSONAL DATA AT GLOBESY, S.R.O. AND ITS PARTNERS

To protect the personal data of GLOBESY, s.r.o., its customers (referred to as Data Controllers) and suppliers (referred to as Other Data Processors), the data are processed only by authorized employees who are obliged to:

- Perform only permitted operations with personal data – according to written instructions provided by a Data Controller (or according to written instructions from a so-called Higher Processor of Controller’s personal data) and following the written Authorisation of Representatives.
- Follow the internal rules and guidelines that are governing the data protection and security of IT systems when working at the Data Controller’s offices.
- Report data breaches immediately to the Data Controller (including accidental access to personal data), regardless of who caused the breach.
- Follow other instructions and prohibitions stated in the written Authorisation of Representatives related to the given project or Personal Data Controller.

4.1 Following the Rules for Prevention and Management of Security Incidents

Authorized employees are required to:

- Immediately report security incidents or/and vulnerabilities in the information system to the employer and the Data Controller (only if it concerns the Data Controller).
- Immediately take corrective measures or take timely preventive measures in advance.
- Record security incidents, adopted solutions, and measures taken and report them to the authorized person (or contact person) for the area of data protection.
- Follow prescribed procedures during downtime, maintenance, or reparation of automated processing equipment (for example protection of personal data on the hard drive of a computer that is being repaired).
- Follow all security measures for the protection of personal data.
- During breakdowns, failures, and other emergencies, strictly follow established procedures (for example producers of OSHA or Workplace Fire Safety).

4.2 Personal Data Processing by an Authorized Employee

When processing the personal data of a customer it is forbidden to:

- Process the provided personal data (and/or data which were collected when working) for a purpose other than for which the personal data were collected.
- Perform processing operations other than those required and stated by the Data Controller, e.g. correct, delete, or restrict the processing of personal data without permission.
- Make backups of personal data without permission. If backups are necessary, they must be encrypted.
- Transfer any data to a third party and/or outside the EU and EEA and/or to an international organization without the prior written consent of the Data Controller.
- Transfer personal data from the information system digitally or via data carrier without the prior written consent of the Data Controller.
- Create copies or duplicates/reproductions of data without the Data Controller's awareness and consent (or instruction). This does not apply to backup copies, which are necessary to ensure proper data processing. Similarly, this does not apply to data, which are required to meet regulatory and archiving requirements for data storing (legal duty).
- Create malicious code or use harmful computer programs (Malware).
- Provide login information (usernames or passwords) to an unauthorized person to log into the system.
- Make duplicates or copies of accesses.

5 CODE OF ETHICS BREACH PROCEDURES

GLOBESY, s.r.o. will monitor the compliance with the Code of Ethics in the form of internal controls. An internal investigation will be conducted if a suspicion is raised that employees or suppliers operating on behalf of the Company have breached the principles of this Code. A breach might be classified as:

- Simple workplace misconduct
- Gross workplace misconduct
- Illegal behaviour

Simple and gross workplace misconduct will be handled by GLOBESY management. Such misconduct may result in basic verbal and written disciplinary action, financial sanctions, or suspension and employment termination. Detection of illegal behaviour of an employee will result in legal action in accordance with the Laws and regulations of the Slovak Republic.

Employees can use mailboxes for submitting information about suspected violations of this Code of Ethics. These mailboxes are anonymous.

In case of any suspicion of breaching this Code, please do not hesitate to contact GLOBESY, s.r.o. at the e-mail address **contact@globesy.sk**.

FINAL PROVISIONS

The GLOBESY, s.r.o. Code of Ethics applies to all managers, consultants, developers, and other employees of the Company, as well as any other persons acting on its behalf. Partners and subcontractors must also follow its principles.

All are obliged to adhere to this Code of Ethics, act according to its principles, and support it. Any violation of the ethical standards stated in this Code of Ethics will be considered workplace misconduct.

This Code of Ethics of GLOBESY, s.r.o. is effective on 1.1. 2023

