



Code of Conduct

Employees and Contractors

Introduction

At 7N, we work hard every day to match the professional and social skills of the very best IT consultants to the specific needs of our Clients. We strive to be among the best in our field, whether we are agents or support staff, and use our knowledge and skills to benefit others. We are committed to helping companies build high-performance IT project teams, always having in mind to lower the social and environmental impact of our business activities. We are aware that our responsibility goes beyond our own activities, and we take a responsible approach throughout the entire supply chain.

At 7N, our core values: Professionalism, Mindset of a servant, and Respect; represent the foundation and the guidelines for the way that we do business, and function as a value base for our employees as to how you should conduct day-to-day business.

This 7N Code of Conduct for our employees and our contractors in Poland is one way for us to bring our values into practice. It describes the main principles of ethical behavior and our expectations to you as 7N employee or contractor in Poland. Further, it is aligned with the ten principles of the UN Global Compact, which we signed in 2017. If you are ever in doubt about what is the right thing to do, please ask your manager for guidance and support.

We thank you for your commitment to our Code of Conduct.



Sebastian Podlesny
CEO, 7N



Employees & Contractors

Employees

We are committed to be an employer with proper terms of employment and working conditions, not only for our own employees, but also for our contractors in Poland (“**Contractor**”). We aim to attract employees with passion for their work, who can challenge status quo in the pursuit of excellence. We believe in the power of teamwork, shared knowledge, and support of each other’s development through feedback and mentoring. Only by working closely together, we can fulfill our vision of developing and offering the best IT consultancy services.

Personal and professional development:

We want to be a company where there is room and opportunity for personal and professional development.

Working conditions: 7N is a responsible company and we work to ensure safe and healthy working conditions for our employees. We aim to build an engaging work culture with a focus on teamwork.

Health and well-being: At 7N, we want to make sure it is possible to maintain a healthy work-life balance and prevent concerns related to health or working conditions from becoming problems.

Freedom of association: In 7N we respect employees’ right to freedom of association and the right to collective bargaining consistent with applicable laws.

As an employee or Contractor working for/providing services to 7N:

- You are expected to be a strong team player, share knowledge and support others’ development through feedback and mentoring.
- Take care of your own and colleagues’ health, and bring up concerns related to health and well-being, e.g. related to stress or non-optimal working conditions.
- You are given the opportunity to take an active role in promoting your own professional development, we expect you to bring forward your wishing for certification, training, and development.



Human Rights

At 7N, we treat each other with respect, and we support and respect the internationally recognized human rights as formulated in the UN Human Rights Declaration and the internationally recognized labor rights as specified in the International Labor Organization (ILO) core conventions

7N does not accept child labor, forced labor or any form of human trafficking and strive to prevent and mitigate adverse human rights impacts with which we become involved either in our own business operations or through business relationships.

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Antidiscrimination and Diversity

At 7N, we focus on diversity, and we do not tolerate any kind of discrimination or harassment because of religion, race, skin color, gender, disability, age, sexual orientation, or political view. We promote a positive and inclusive work environment that respects the individual and is free from any form of discrimination or harassment.

The basis of recruitment, promotion, or development in 7N is qualifications, experience, and performance.

In support of 7N's overall commitment to secure a healthy work environment free of discrimination 7N has adopted a specific Harassment Policy and a specific Diversity Policy applying to all employees and Contractors of the 7N Group

Right to Privacy

We respect the personal data that we collect from our employees and Contractors. We are committed to complying with all applicable laws related to data privacy.

If you use personal data as part of your work in 7N, you must:

- Use least amount of personal data needed
- Where required by local law and regulation inform people on how we use their personal data
- Only share personal data with those who need to know
- Store personal data securely
- Delete personal data when no longer needed.

All personal data of our employees, and Contractors collected by 7N is handled with caution and in accordance with our procedures and applicable laws in the field. We have described processes and procedures in our Data Privacy Guidelines.



Physical Security and Clean Desk Policy

To protect both personal data and confidential business information, 7N maintains a Clean Desk Policy. All employees and contractors are expected to:

- Keep desks and workspaces clear of sensitive information when unattended.
- Lock away documents and devices containing personal or confidential data.
- Lock computer screens when stepping away from their workstation.

Dispose of printed materials securely using approved shredding or disposal methods. These measures are part of our broader commitment to data privacy and physical security.

Anticorruption and Business Ethics

At 7N we compete fairly and are responsible, ethical, and transparent in our business.

We do not bribe or provide improper advantages. Bribes and improper advantages can be monetary such as cash payments or illegal rebates. But they may also include non-monetary items such as improper gifts, products, hospitality and meals, travel and accommodation, or other items or services that ultimately mean the transfer of value in return for special consideration.

At 7N, we do not tolerate and work against corruption in all its forms and we always comply with laws and regulations applicable within the geographical business areas of the 7N Group.

We do not receive or give payment, gifts, or any other form of indemnity from and to third parties that may affect or give rise to doubts about our impartiality in business decisions. This is also the case for sponsorships and donations, where we have four-eyes principle and segregation of duty.

In support of 7N's commitment to compete fairly, ethical, and transparent 7N has adopted a specific Anti-bribery, Anti-corruption, and sanctions Policy applying to all employees and Contractors of the 7N Group.

Conflict of interest: We make business decisions based upon the best interests of 7N – not upon personal interest.

A conflict of interest arises when two or more interests are in conflict, i.e., a personal interest conflicting with the company's interests. At 7N, we strive to act with integrity which among others means to prevent all forms of nepotism e.g., regarding hiring, procurement etc. If ever in doubt, or you have a conflict of interest or suspect a conflict of interest, contact your manager.



Climate and Environment

At 7N, it is important for us to minimize our impact on climate and environment. We are also aware, that the products and services we buy from our suppliers and independent consultants have an impact, and we want to minimize this impact in our supply chain.

As an employee or Contractor working for 7N:

- You are responsible for protecting the environment through your daily actions.
- You must contribute to lower our environmental footprint and minimize our climate impact by reducing unnecessary consumption of energy and resources in your activities.
- We expect that you promote climate change and environmental impact in our entire value chain by safeguarding those suppliers and independent consultants live up to climate change and environmental impact standards.



Compliance with the Code of Conduct

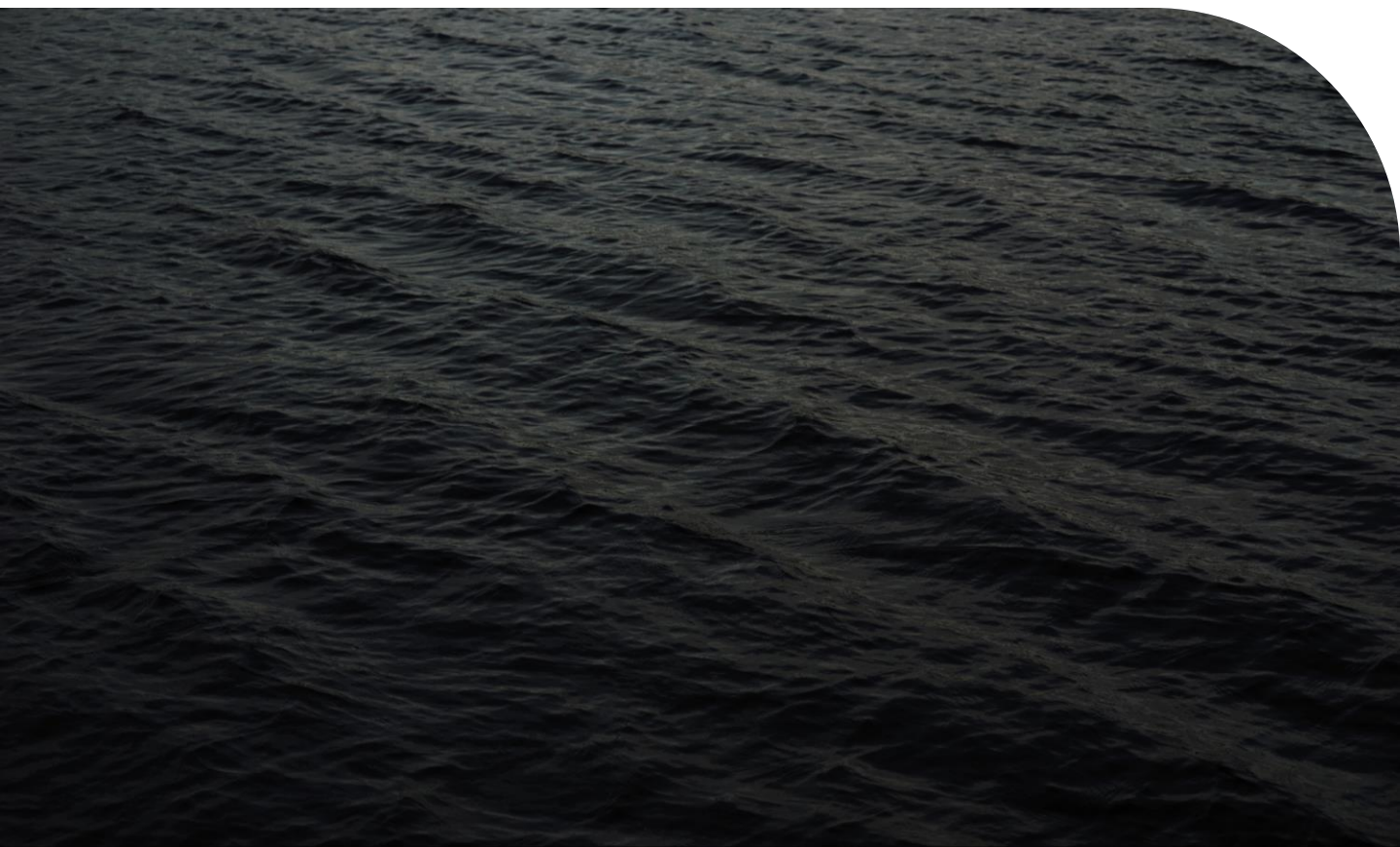
We expect all employees and Contractors of the 7N Group to know and follow the Code of Conduct. 7N will not tolerate any wrongdoing with respect to the Code of Conduct. Failure to follow the Code of Conduct can result in disciplinary action, including termination of employment. We will support all employees who report violations as well as those who request assistance or have concerns.

Whistleblower Policy – Report a Concern

7N is dedicated to acting and doing business in a way that is right for our employees and contractors. To continuously make sure that 7N does just that, we encourage that concerns are shared.

So, if you detect any concerns, illegal or unethical business behavior, harassment of any kind, or other serious non-compliance with internal policies or procedures, we ask that you report it to your manager or someone above them, as 7N cannot act on concerns that are not reported.

7N recognizes, however, that some concerns or suspicions of non-compliance may be considered too sensitive to report directly to your manager or a higher level of management. In such case, 7N encourages you to make use of the Group Whistleblower system which 7N has established for our mutual benefit. The use and operation of the Whistleblower system is governed by the 7N Group Whistleblower Policy, which provides you with guidance on how to report.





7N A/S is a global, elite IT consultancy and agency with 30 years market experience in serving all aspects of critical IT projects both within the public and private sector.

We have dedicated ourselves to finding the right match between our consultants and the companies we serve – we believe that is how the best results are created. At 7N, we have built a professional community of extraordinary people. A community dedicated to achieving professional and personal development. A place where the best gets to play with the best.

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