

BS_WAY



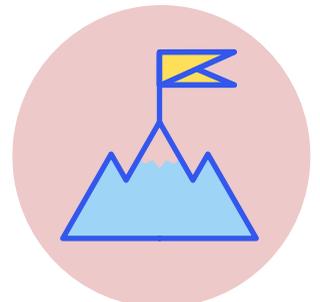
BS_WAY is the Benefit Systems S.A. Code of Business Ethics which describes the basic principles that we follow on a daily basis. It also presents our commitment towards clients, business partners and other stakeholders and it gives us guidance that we follow in our everyday work.

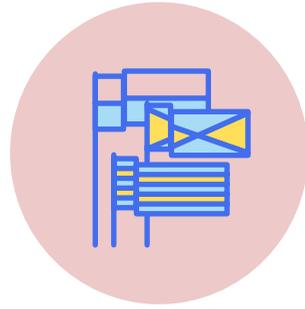
As Benefit Systems S.A. employees and associates we are responsible for following the BS_WAY principles. Senior personnel and board managers are particularly responsible for giving a good example of complying with the BS_WAY and they commit themselves to take proper actions when the agreed rules of conduct are violated.

OUR GOAL, OUR DNA

Our goal is to work towards an active lifestyle and people's development. We believe that being more active means more energy, health, wellbeing and, as a result – a better life. The guiding

principle of our activities is the win-win approach which we build all our relations with clients, business partners, employees, associates and other stakeholders on.





RESPECT AND DIVERSITY

Respect is one of the most important values in our company. We respect one another and we respect our clients, business partners, employees, associates and other stakeholders.

We believe that every one of us is different and therefore we distinctively notice, respect and appreciate diversity of our employees and associates. We do

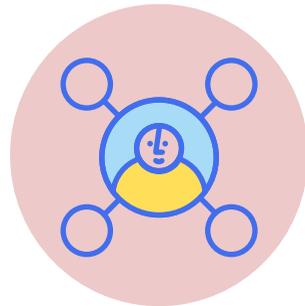
not tolerate any mobbing and discriminatory behaviours connected with gender, age, nationality, origin, disability, sexual orientation, family and marital status, beliefs, political views, personality features, education level or interests.



RESPONSIBILITY TOWARDS STAKEHOLDERS

While building relations and cooperating with our clients, business partners and other stakeholders we are responsible and we make promises that we can

keep. We deliver information about the services that we provide in a precise and comprehensible way.



SOCIAL RESPONSIBILITY

We are socially responsible and we attach great importance to respecting human rights, employment rights, following fair competition principles, counteracting corruption and the environmental protection both by our employees, associates and business partners.

We appreciate the commitment of our employees, associates, clients, busi-

ness partners and other stakeholders to counteract social and environmental problems in their surroundings. In particular, we support our employees' and associates' activities based on volunteering and we promote philanthropic actions towards various social groups and animals.



THE ENVIRONMENT

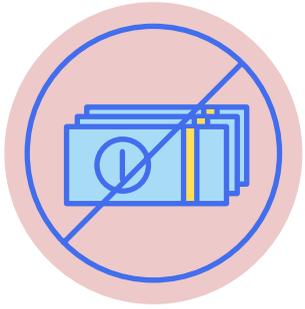
We look after the environment regardless of where we work and we do it because we play fair with nature. We take actions that promote pro-environmental attitudes among our employees and as-

sociates as well as those that contribute to protecting the environment and consider our impact on the surroundings.

COUNTERACTING CORRUPTION

We do not accept any abuse of position by our employees and associates in order to gain financial or personal benefits. We receive and give presents only when they have a symbolic character, are given in the open and are connected with a generally accepted custom (e.g.: Christmas). We do not tolerate corruption, including receiving and giving financial benefits or any other dishonest

behaviours. We also notify our clients, business partners and other stakeholders about this principle.



COUNTERACTING CONFLICT OF INTERESTS

We avoid behaviours that could influence our impartiality in the process of making business decisions. We also avoid situations in which our private interests can conflict with the interests of Benefit Systems S.A. When the con-

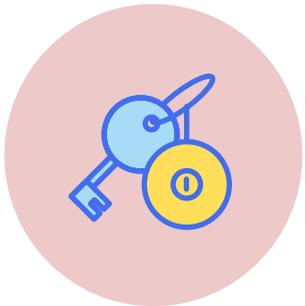
flict of interests happens, we inform our supervisors and refrain from any further actions.



CONFIDENTIALITY OF INFORMATION AND DATA PROTECTION

Personal data of our clients, business partners and other stakeholders is particularly important for us. We process all personal data with respect for the law, paying special attention to the access

and data storage security. We protect our company's secrets as well as the secrets of our clients, business partners and other stakeholders.



EXPLANATIONS AND NOTIFICATIONS

We are not afraid to undertake difficult matters described in BS_WAY. We organise training courses and workshops connected with ethical aspects for our employees and associates. We can always discuss any potential doubts and

our observations with the immediate superior, HR Director or Compliance Officer.

