Pelion

PELION CODE OF ETHICS

INTRODUCTION

For the purposes of the Pelion Code of Ethics "Pelion" means both Pelion S.A. as well as any of the subsidiaries of Pelion S.A. (also referred to as: "Pelion Companies"), in which employees are required to follow the provisions of this Code.

OUR VALUES

The Pelion Code of Ethics is based on the company's key values and with a view to consolidating them among employees and business partners. They reflect the way we operate; we owe them our market success so far and perceive them as a chance for continuing growth of our organisation.

Responsibility

We feel responsible for the health of patients and it is care for them that gives sense to our actions and determines the existence of Pelion on the market. By placing the patient in the centre of business attention, we recognise our responsibility for supplying the market with medicines, ensuring proper quality and safety of marketed products, pharmaceutical care and promoting healthy attitudes.

We manage the capital entrusted with us responsibly, focusing our activities on building the company's sustainable value on the market. By creating a company with global impact, we take responsibility for jobs created in the country and abroad, as well as for relations with partners in all areas of our operations. We are striving to minimise the negative impact of our activities on the natural environment and we constantly engage in overcoming social problems.

Leadership

The development of Pelion is a history of progress based on the ability to draw on experience and the best pharmaceutical traditions and the courage to break new ground in search of solutions and answers to ambitious challenges. Innovation and active search for opportunities to be ahead of changes occurring in the environment allow us to co-create market and social reality and set standards for enterprises both on the domestic and foreign markets. Assuming responsibility for the impact of the business environment created by Pelion on the social and economic environment, we strive to implement a business leadership model that is responsible, supports and promotes sustainable development, and embodies business ethics and fair success.

Trust

Orienting our aspirations to building lasting relationships with business partners, patients or employees, we make best efforts to make sure they are based on trust in Pelion resulting from the transparency and integrity of our actions, responsible decisions, reliable information policy, and finally: positive experiences confirming our professionalism and the top quality of cooperation.

We want others to be always certain that by contacting our entities and employees they have made the right choice a committed pharmacist, reliable business partner, good employer or valuable investment.

We have been building a team that pursues Pelion values together with us. To this end, we carefully verify both competences and the moral attitude of job candidates. We do it in particular according to references from previous places of employment, whenever possible.
We provide employees with professional development in Pelion companies to build lasting relationships with the employees who share our values. Pelion companies do not cooperate (regardless of the form

of cooperation) with anyone who has worked with another Pelion company without receiving positive recommendations from the Management Board or Supervisory Board of that previous employer, to confirm the candidate's high competence and ethical qualifications.



The Code of Ethics applies to all persons employed at Pelion

The Code of Ethics applies to all persons employed at Pelion, irrespective of their position, seniority, type and form of contract, work time and scope of responsibilities. Employees should be well familiar with its provisions and comply with them in their daily work.



The provisions of the Code do not replace legal regulations

The provisions of the Code do not replace legal regulations. All employees are primarily required to know and strictly apply national and international laws and detailed internal Pelion procedures to the extent that they are relevant to their activities on a given market.

In case of doubts as to the interpretation and application of the Code of Ethics, please contact the Ethics Officer, your supervisor, or HR Department at Pelion.

OUR MISSION AND PRINCIPLES



WE CARE ABOUT THE QUALITY AND LENGTH OF LIFE

Through Pelion subsidiaries, the core business of Pelion has an impact on the availability and safety of pharmacological therapy for the Patient from supplying wholesalers, hospitals and pharmacies with medical and pharmaceutical products, their transport and storage, to direct sale and communication to the Patient in pharmacies. Internal organisational processes are being improved and the modern pharmaceutical care tools are made available to Patients for their health and convenience.

Pelion's commitment

To maintain the highest care for Patients' health and continually improve pharmaceutical care and increase its availability through the activities of subsidiaries.

Our employees

- ensure the highest standards of work and care for the improvement of their competences;
- are involved in processes aimed at improving organisational solutions and tools for efficient support for Pelion Companies and services;
- make sure that what they say or write about the products offered by companies associated with Pelion and a healthy lifestyle, in particular medicinal products, is reliable, fair and objective, based solely on information supported by scientific evidence, avoiding statements that may be misleading, so as to ensure responsibility for possible impact on patient's decisions;

- give priority to issues related to guaranteeing the quality and safety of product distribution by subsidiaries;
- immediately notify their supervisor in the event of being aware or suspecting any situations and events that may threaten or negatively affect the quality of the products distributed and the safety of patient's health (including possible doubts as to the original origin of medical products and any of reports relating to adverse drug reactions).



WE WORK TOGETHER FOR TRUST

We are aware that the quality of Pelion's relationships with partners on the healthcare market translates into the health and safety of Patients. Therefore, we select our partners carefully, with high expectations regarding the quality of our cooperation and its value for the company; we set the same high standards for ourselves.

Our ambition is to build lasting relationships with partners of all business lines and on every market. We build trust in the company in particular through fairness and transparency of relationships, high quality of products and services delivered, professionalism in action, mutual respect and orientation to mutual benefits.

We inform you about our activities fairly and in a manner regulated by law, especially caring for proper relations with financial institutions and supervisory authorities.

Pelion's commitment

To be a desirable business partner because of the values that are important to us and to work with companies that share them.

Our employees

- are engaged in relationships with partners in a fair and transparent manner, and are well-mannered, show respect and high standards of professionalism in mutual contacts regardless of the scope, intensity and area of cooperation, including: responding without undue delay to correspondence and telephone contact, examining any complaints from partners and clients accurately and efficiently, according to the company's internal procedures;
- keep their commitments (both written and oral declarations) and make promises only when they are capable of fulfilling them;
- refrain from discrimination against business partners, e.g. based on their nationality, country of origin, religion, market position, etc.;
- inform partners of the objective criteria for making decisions that apply to them, in particular regarding the aspects relating to the establishment, course or termination of cooperation;
- do not take actions that would unduly damage the good reputation of partners and refrain from disseminating information that could threaten the reputation of competing companies;
- do not disclose to third parties or unlawfully use confidential information obtained in the course of mutual cooperation;
- do not unlawfully obtain information about business partners and competitors by misleading or by concealing the fact of representing the company where there is a high probability that the information would not be disclosed otherwise;

- do not encourage employees who were previously employed by competitors or partners to disclose confidential information obtained during that period;
- cooperate with business partners in the company's interest and in particular avoid actions that may lead to a conflict of interest, such as transactions with participation of the employees, their family or companies in which they hold shares or with which they have business ties, and immediately report to the supervisor any conflict of interest or suspicion thereof;
- make sure that all actions taken to advertise our operations take into account relevant legal regulations, do not violate the rights of third parties, and in particular respect the principle of fair competition.



WE PROTECT FREE COMPETITION

As a company with a strong market position, Pelion ensures that its activities are consistent with the principles of free and fair competition in every aspect. The fact of operating on a sensitive health care market and, to a large extent, at the intersection of private and public sectors also requires us to actively fight corruption.

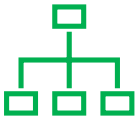
Pelion's commitment

To hold and promote high standards of fair competition.

Our employees

- apply the principles of fair competition to competing companies as well as domestic and foreign clients;
- are guided only by reasonable grounds when selecting partners, including the company's credibility, its reputation, economic situation as well as the quality and competitiveness of the offer, the issue of sustainable development (both for the entity's operations and the consequences of establishing potential cooperation); ensure that, if necessary, they can present fair and objective criteria for the choice of partner and scope of cooperation;
- avoid persuading others to terminate their contracts with the existing employer (this does not preclude offering cooperation to people employed in other companies, provided that this is done in accordance with good practices and principles of fair competition) in the recruiting process;
- do not initiate, engage in or knowingly participate in any actions restricting competition on the market, such as agreements regarding the division of the market, clients, price levels, boycott of selected suppliers or customers, etc.; do not share or exchange with representatives of competing companies information that may affect their prices, discounts, pricing policy, etc.; each time immediately inform their supervisors about contacts made by external entities (competitive companies, business partners or other entities) that are intended to or could result in a restriction of competition;
- avoid situations that may give rise to the suspicion of hidden forms of bribery;
- accept or offer invitations to participate in business meetings (such as training, meals or entertainment) only with the consent of the supervisor, to the extent consistent with generally accepted hospitality standards given the nature of business relations, and do not threaten the good reputation of the company in the case of public evaluation;

- accept gifts from third parties only if they are given in the ordinary course of business and do not raise doubts as to their symbolic character and only if they can serve to support the process of establishing, maintaining and developing significant business relationships, as long as their receipt or giving is not for a purpose beyond the scope of maintaining good and customary business relationships;
- do not accept or give gifts in relations with public administration bodies and units, political parties and organizations, as well as in relations with public officials or persons performing public functions;
- do not accept or give cash or cash equivalents (vouchers, gift cards, prepaid cards, etc.) that do not directly result from applicable internal regulations or special events organized by Pelion;
- never participate directly or indirectly in any act of corruption regardless of the practices and customs adopted in a given market: they do not accept and do not expect bribes or other unfair benefits; do not offer or promise including through others undue financial or nonfinancial benefits in exchange for administrative or business decisions of third parties in the public or private sector, which may have an impact on the company's operations; they actively oppose bribery and immediately report to their supervisors any requests for unauthorised financial gain.



WE CARE ABOUT CORPORATE VALUE

An important element of building Pelion's sustainable value is the ongoing protection of corporate property, including itangible assets relating to reputation, the company's information and intellectual property. Pelion implements and continuously improves solutions and tools that ensure the protection of its tangible and intangible resources, and minimizes the risk of impairment resulting from their potential violation.

Pelion's commitment

To protect the company's reputation and secure its tangible and intangible assets against loss, theft, damage or misuse.

Our employees

- are always guided by the best interests of the company, protect its reputation and promote its key values;
- never disseminate negative information about the company and its activities;
- always react to any perceived situations that may adversely affect the company's reputation, threaten its interests or key values (e.g. they try to solve the problem personally, report the issue to their supervisor, Ethics Officer or PR Director);
- actively protect the company's intellectual property and use it responsibly;
- strictly comply with the rule that providing information about the company and its operations to the public is within the competence of the Spokesperson and the Press Office; report and forward any requests for information regarding the company's finances and operations or press statements to Pelion's spokesperson or the Press Office; this rule also applies to informal requests for information;

- are responsible for the proper use of confidential information regarding Pelion, never disclose it to third parties without the prior conclusion of an appropriate NDA, and exercise extreme caution when using IT systems and data carriers containing such information;
- consult the legal team in the case of any doubts regarding the use of intellectual property rights and confidential information;
- secure against unauthorised access all data on the company's operations (stored in any form and on any carrier), to which they have physical or electronic access; in particular, they apply internal procedures for using company IT systems and mobile devices;
- respect the intellectual property rights of third parties and confidential information about external entities, ensuring that they have protection comparable to that applied to Pelion;
- protect the equipment and devices owned by the company against loss, theft, damage or misuse;
- do not use the company's property for personal gain, use the company's equipment and resources only for business purposes, unless otherwise permitted by corporate procedures;
- process and share personal data in accordance with applicable legal requirements and internal procedures, provide adequate data protection and store them only for as long as absolutely necessary;
- are well-mannered both in personal contacts with business partners and in their presence.



WE ARE BUILDING AN EMPLOYEE-FRIENDLY ORGANIZATION

Employees are the key capital of Pelion. An important element of the company's corporate social responsibility is ensuring secure employment and decent working conditions. Pelion makes every effort to ensure that employee salaries are adequate to the results achieved, the type of work performed and the position held, attempts to provide the environment in which they work is safe, free from mobbing, discrimination and other forms of violence, and the atmosphere in the company is conducive to effective performance of duties.

In addition, depending on the resources available, Pelion supports employees through the social policy and implements solutions that help care for health and psychophysical condition.

To gather the most talented employees in its structures, Pelion pursues a personnel policy that helps employees develop their competences and fully realise their potential.

It supports the cultural diversity of the countries where the employed people come from, respects the differences in views and interests.

At the same time, the company does not tolerate behaviours and attitudes that may adversely affect the atmosphere at work and relationships between employees.

Pelion's commitment

To offer decent employment conditions in a friendly working environment, support professional and personal development, and promote a healthy lifestyle among employees.

Our employees

- know and understand the scope of their duties and the provisions of the applicable Work Regulations;

- care for and actively contribute to a good atmosphere in the workplace; they are open to diversity and actively promote the principle of equal treatment in the workplace;
- are well-mannered in mutual contacts and respect each other regardless of the nature of professional dealings as well as personal likes and dislikes;
- seek to resolve any disputable issues amicably;
- make decisions concerning other persons in terms of employment, evaluation, promotion, remuneration, duties or access to specific information solely based on reasonable grounds, such as qualifications or effects of work; they do not discriminate others because of appearance, race, nationality, gender, sexual orientation, religion, age, political views, disability, etc.;
- do not use any form of verbal, physical or mental humiliation, ridicule or harassment of other employees;
- do not use their position to violate or in a way that violates the personal rights of other employees, including their dignity and good name;
- do not disseminate information that is false or infringes the personal rights of other employees;
- do not claim the merits and successes of other employees of the company;
- avoid conflicts of interest (or situations that in the opinion of other employees may give an impression of such) regarding the employment of family members or friends, in particular involvement in their recruitment and a situation when family members would be their direct supervisors and subordinates. In addition, members of Pelion's management boards are required to submit periodic declarations of no conflict of interest. This practice is intended to ensure transparency in decision-making and build trust in the actions of management. Regular confirmation of no conflict of interest is an important element of the culture of ethics and responsibility in our organization. Through this practice, we strengthen the sense of community and security among our employees, showing that everyone—regardless of their position—operates in accordance with the same values. It also sends a signal to our external partners that transparency and ethics are the foundation of our daily operations;
- do not undertake any additional activities outside Pelion that could adversely affect the ability to perform their duties to Pelion, the company's reputation or would otherwise be in conflict with its interests;
- comply with the occupational health and safety rules in force at their positions and immediately react to any noticed situations when employees fail to comply with health and safety rules or create a threat to the health and life of themselves or others;
- react and actively oppose any noticed forms of harassment, discrimination and mobbing;
- do not work under the influence of alcohol, drugs or other intoxicants and do not smoke tobacco on the company's premises;
- never retaliate against anyone who has reported a suspected violation of the Pelion Code of Ethics.



WE CREATE A BETTER REALITY

Combining the willingness to engage in solving social problems with the assumption that the company should focus on the area in which it has the highest competences and can operate most effectively, Pelion uses its potential to actively take on challenges in the field of health care. It is engaged and gives its employees the opportunities to be engaged in activities aimed at protecting the resources and the

community in which it operates, including in particular those related to overcoming barriers in access to pharmacotherapy for people in difficult life situations and promoting health prevention.

Pelion's commitment

To engage in improving the health condition of society.

Our employees

- engage and encourage others to engage in social initiatives and activities of nongovernmental organisations, including in particular the operations of organisations run by subsidiaries of Pelion (DOZ Foundation, "Urtica for Children" Foundation and the DOZ Marathon Łódź project) to the extent to which it does not impair their ability to properly perform their daily duties at the company and is not subject to a conflict of interest;
- appreciate social engagement as an expression of responsible attitude, a source of experience and an opportunity to develop personal and professional competences;
- actively promote social engagement projects undertaken by Pelion and related entities in their business relations;
- do not exert pressure on their colleagues or members of subordinate teams with respect to the involvement of any charity, religious or political organization;
- do not criticise the choices of their colleagues and members of their subordinate teams regarding engagement in social activities, including the activity of charitable, religious or political organizations;
- do not criticise the company's social engagement projects in business relations, and in the event of such criticism in non-business relations they always indicate that this is their private opinion;
- can report any objections to the company's social activity to the Ethics Officer without fear.



WE RESPECT HUMAN RIGHTS

With a direct impact on people's health and lives, Pelion makes it a priority to respect and promote human rights both in its core business and throughout its value chain.

Pelion's commitment

Ensure respect for human rights by countering the adverse impact of Pelion's activities on respect for human rights, minimizing related risks, and promoting good human rights practices.

Our employees

- comply with human rights regulations in the work environment;
- in business relations, expect contractors to act on the basis of the highest standards of business ethics and in accordance with laws and applicable international standards;
- consider it a key aspect of establishing cooperation with contractors to verify their compliance with the principles of respect for human rights, including respect for international and domestic laws, which include the elimination of forced labor and the worst forms of child labor, the

provision of decent working conditions and wages, non-discrimination, respect for privacy and protection of personal data.

Pelion is committed to supporting fundamental human rights and freedoms at every stage of its operations. It also implements solutions to comply with comprehensive human rights standards and prevent the appearance of irregularities. In its operations, Pelion is guided by ethical values and standards of ethical conduct.
Pelion fosters a culture of equality and diversity, providing all employees with the same working conditions regardless of age, gender, religion, nationality, family situation or disability.

Pelion is committed to fully respecting the rights of its employees, guaranteeing decent, fair, and safe working conditions. As part of this commitment, it complies with all applicable labor laws and international standards, primarily:

- ensuring equal opportunities for employment and professional development and eliminating all forms of discrimination, including discrimination based on age, gender identity, sexual orientation, physical ability, origin, socioeconomic status, race, religion, or lack thereof;
- guaranteeing safe and hygienic working conditions, regularly monitoring and improving the working environment;
- opposing forced labor and child labor;
- ensuring fair remuneration that is in line with market standards and offering additional benefits that support the health of employees;
- respecting the right of employees to freely associate, form trade unions, and engage in collective bargaining;
- providing protection against mobbing;
- investing in the professional development of employees through regular training, development programs, and opportunities for promotion;
- promoting attitudes based on values derived from respect for diversity, acceptance of differences, and openness to manifestations of diversity;
- counteracting corruption, bribery, money laundering, and unfair competition;
- complying with the principles of confidentiality and copyright protection;
- promoting ethical attitudes among employees.

Pelion is committed to respecting and promoting human rights in relation to consumers of its products and services, ensuring that all interactions are conducted with respect for their dignity, privacy, and freedom of choice.

Pelion takes special care to ensure that the products and services it offers are safe and comply with applicable quality and ethical standards.

In striving to build trust and long-lasting relationships with consumers based on mutual respect and responsibility, Pelion is committed to transparency and honesty in communication, providing complete and understandable information about its offers. All reports of consumer rights violations are treated as a priority, and complaint and dispute resolution procedures are transparent and easily accessible.

Pelion is in constant dialogue with stakeholder groups that may be significantly affected by the company's activities. The purpose of social dialogue is to understand and take into account the needs, expectations, and concerns of stakeholders in the business decision-making process. This dialogue also concerns the protection of human rights.

Pelion considers it a priority to minimize any risks to the local community resulting from its business activities.

Pelion implements health-related activities aimed at strengthening ties with local communities, such as health education, campaigns promoting a healthy lifestyle, and assistance to sick and socially excluded people, contributing to the improvement of their health and quality of life.



WE CARE ABOUT THE ENVIRONMENT

Pelion assumes the responsibility for its impact on the environment. In accordance with the adopted Environmental Policy, the company has a preventive approach to its protection, focusing the attention on limiting the negative environmental impact in everyday operations. At the same time, Pelion regards respect for the principles of sustainable development as one of the key conditions for the continuing growth on the international market.

Pelion's commitment

To always look for new opportunities to minimise the company's negative impact on the environment in all areas of its activity.

Our employees

- apply and expand their knowledge of current legal regulations on environmental protection that are applicable to their scope of duties and official activities carried out in practice;
- take care of effective management of energy, water, paper and other consumables or raw materials used at their workplace;
- promote the assumptions of the company's Environmental Policy in the supply chain, including the treatment of issues of environmental impact (of a given company and processes related to the use of its services and products) as one of the criteria considered by them in supplier selection;
- actively seek opportunities to optimize logistics processes and organizational solutions in the company in order to increase the efficiency of energy and raw material use and reduce the amount and nuisance of waste and pollution generated;
- segregate waste in the workplace, including the collection of reusable raw materials;
- when using company cars, drive economically and responsibly towards other road users, and improve their economical driving skills as much as possible;
- immediately inform their supervisors about identified or potential threats in the area of environmental protection and any non-comliance of the company's activities with environmental protection regulations.

REPORTING VIOLATIONS OF THE CODE

The organisation ensures full discretion to any employee who reports abuse. It is strictly forbidden to harass an employee who has reported a violation or to exert any pressure to withdraw or mitigate the report. In the event of retaliation by anyone, the company will hold such persons responsible, regardless of their positions.

If you want to remain anonymous, you can use one of the available channels:

Anonymous communication channels	Contact
E-mail address	etyka@pelion.eu
Helpline	(+48 42) 200 80 80
Website platform	https://pelionkodeksetyki.integrityline.com/

Each employee is responsible for complying with all laws and the principles of this Code and commits to respond to behaviours that violate the company's rules of conduct.

Behaviour that seems unethical, unlawful or inconsistent with the rules adopted in the organization should be reported through available communication channels.

In the case of problems that can be solved inside the team, it is a good idea to take independent actions to eliminate them.

Issues should always be reported in good faith. An employee who reports his/her doubts in good faith and makes a mistake need not fear the negative consequences of his/her behaviour. If an employee submits false information on purpose, the company will take appropriate action against them.

Whistleblowers may, but do not have to disclose their personal data submissions may be anonymous. The details of such persons are protected and shared only with those responsible for handling the case.

Each report is analysed in terms of the importance and legitimacy of the necessary actions, therefore the whistleblower should provide reliable and accurate information to help identify the cause of the problem and take the necessary actions to resolve the issue.

Who can an employee raise ethical concerns to?

In the event of a suspected violation of any of the principles of the Code, an employee may contact one of the following:

- immediate supervisor
- Pelion HR Department
- Pelion Legal Team
- Ethics Officer

ETHICS OFFICER

The Ethics Officer performs their duties independently in terms of appropriate subordination and reporting within Pelion's organizational structure, as well as performing tasks in a manner that ensures objective resolution of matters referred to the Ethics Officer.

The Ethics Officer is a professional with the necessary expertise, skills, and qualifications. In the organizational structure of the company in which the Ethics Officer is appointed, he or she reports administratively to the president of the management board. The Ethics Officer reports on his or her activities to the management board and the supervisory board of the company, and if the company does not have a supervisory board, to the shareholders' meeting. In exceptional circumstances, such a report may be submitted only to the supervisory board or, respectively, to the shareholders' meeting. The dismissal of the Ethics Officer from his or her duties requires the consent of the company's supervisory board or, respectively, the company's shareholders' meeting.

The president of the company's management board is obliged to provide resources in such a way and to such an extent that the function of the Ethics Officer can be fully and properly performed.

QUESTIONS AND ANSWERS

1.

I have just been employed at Pelion for a trial period. So far, I have spent time getting acquainted with the organisation and its rules, I am participating in training. Am I already bound by the Code of Ethics?

Yes. Each employee, regardless of their position, seniority or type of contract, is obliged to comply with the rules adopted in the organisation when performing their official duties and in their private life, if their decisions and actions could have a negative impact on Pelion. The Code applies without exception in any situation related to operation of the company.

2.

I work with Pelion under a mandate contract, am I also bound by the Code of Ethics?

Yes. The Code of Ethics applies to all persons employed at and cooperating with Pelion, irrespective of their position, seniority, type and form of contract, work time and scope of responsibilities. Persons cooperating with us under agreements other than an employment contract should know and follow the Code of Ethics.

3.

What are the consequences of failure to comply with the rules of the Code of Ethics?

The consequences of not complying with the rules described in the Code may affect the employee, the organisation or its other stakeholders. If a violation of the Code of Ethics is also a violation of law, it may have legal consequences (prosecution and punishment or other legal liability). If the violation applies to other rules of the Code, it will be reviewed by the supervisor with consideration to the effects of the violation (such as costs incurred, financial losses or bad publicity). This evaluation, taking into account the Officer's opinion and the employee's attitude, may result in applying the relevant provisions of the Work Regulations.

4.

The Code contains examples of provisions that in practice do not apply to the scope of my responsibilities. Do I need to read them in detail?

Yes. The rules of conduct apply to all employees, regardless of the scope of their official duties or the place in the company's organisational structure. Even if some of the rules set out in the Code do not correspond to a given job position, it does not release the person holding the position from the obligation to respond or report any noticed violations of the Code, e.g. in relation to employees from other departments or subsidiaries.

5.

I work in the secretary's office. I have the impression that my daily duties do not require detailed knowledge of the laws regulating the principles of informing about pharmaceutical products. Should I supplement my knowledge in this area?

Yes. Every employee, regardless of their position, is obliged to be familiar with and follow current laws to the extent that they apply to the employee's activities and scope of responsibility. If there are any doubts regarding the scope of legal regulations that should be strictly adhered to, please report to your immediate supervisor or the Legal Department for such information.

6.

I manage a team of several people. Will implementation of the Code mean additional duties for me?

Yes. Management is expected to consolidate the desired model of conduct among members of the subordinate team by uncompromisingly adhere to the provisions of the Code. Management is also responsible for informing employees about the company's rules of conduct and react immediately when there are any deviations in their application. Supervisors should also help in clarifying the doubts raised about their interpretation of the Code or cases of its violation by clarifying the case in person or assisting in obtaining an opinion from the Ethics Officer or a representative of another organisational unit of Pelion. However, the matter should be each time clarified in a way that encourages employees to decide to turn to their supervisor with another problem.

7.

What should be done when there are ethical doubts in areas not governed by the Code of Ethics?

If there are questions or doubts about issues not governed by the Code of Ethics, contact your supervisor or directly the Ethics Officer or the Personnel Management Department at Pelion. Perhaps in addition to answering the question, the reporting of such a case will also be a good opportunity to add new aspects to the Code it is not a closed set of rules and the company plans to continuously improve it.

8.

My colleague is a journalist at one of business magazines. Recently, he asked me to comment on employment relations in our company. Can I give him an interview?

You should inform the Pelion Press Officer or the Pelion Press Office, which is competent for dealing with the media, about any attempt to contact you by a journalist of any editorial office. Incorrect presentation of information about the company may expose it to the risk of loss of reputation and disclosure of confidential information. It is best to report any negative information about the company to the Ethics Officer.

9.

I am a frequent guest on Internet forums. Recently, I have noticed a discussion about employment at Pelion on one of them. Some posts were very unfavourable. Should I intervene personally as an employee of the company?

Any situation that threatens Pelion's image should be reported to the PR Director, who is the appropriate person to take action to protect the company's reputation. Personal intervention is not recommended as it carries the risk of disclosing confidential information or information that may adversely affect the company's image.

10.

My manager has been ambiguous towards me for a long time he makes inappropriate suggestions and comments that make me uncomfortable in his presence. I have tried to explain the issue and told him I do not want to be put in this situation again. He downplayed the subject and his behaviour did not change. How should I react?

The described behaviour is unacceptable, and such attitudes - violating the employee rights are not accepted by Pelion. Each case where a supervisor violates the dignity of a subordinate or takes actions that can be considered mobbing or harassment should be reported to the Ethics Officer.

11.

During a training trip, my colleague made me an inappropriate offer. I ignored the situation and made it clear that I wasn't interested. We have not talked about this again. Should I report his behaviour to the Ethics Officer?

Situations in which an employee's personal dignity is violated should never happen. However, we encourage you to try to resolve them on your own first if they are incidental. If the situation persists or you feel unable to face it yourself, please report it to your supervisor or the Ethics Officer.

12.

One of my colleagues is notoriously making unflattering comments about the skills and competences of women in the team without any reasonable grounds. How should I react?

Whenever there is a situation in which a person is discriminated against based on sex, age, religion, sexual orientation, place of residence, etc., they should inform the immediate supervisor or Ethics Officer.

13.

My colleague has appeared at work several times under the influence of alcohol. I know that she has family problems and I would not like to hurt her more, but her repeated indisposition has a negative effect on the work of our department. What should I do?

Doing work under the influence of alcohol, drugs or other intoxicants is unacceptable. Such a situation should be absolutely reported to the immediate supervisor or the Ethics Officer, however, bearing in mind the rules of social conduct and coexistence, and hence the need for extreme discretion.

14.

I found out about the possibility to purchase shares in a certain company that manufactures medicines. As a Pelion employee, can I buy shares in an enterprise that is a supplier for subsidiaries?

Such a situation creates a potential conflict of interest, especially when decisions made can have an impact on the company's operations. In such a case, you should first ask the Legal Team for a clear interpretation and analysis of the situation.

15.

My sister works in a marketing agency. I would like her firm to design a leaflet for my department, since she has presented a competitive bid. Is it possible?

Such a situation creates a risk of a conflict of interest, in particular if a member of the family has an influence on the terms and conditions of the contract. Any case where a potential subcontractor has a family connection to an employee that may influence their employment by the Pelion should be consulted with the superior if they do not object, such cooperation is possible.

16.

I work as an assistant. My supervisor notoriously responds with delay or does not respond at all to contact requests made by phone or correspondence by colleagues or clients. I understand that he has many responsibilities, but this behaviour is not only rude, but also does negatively affect the perception of myself as a professional, since most of these requests are passed through me. How should I react?

All Pelion employees should be characterised by good manners, respect and high standards of professionalism in dealing with each other and with the company’s partners, which also means responding to correspondence and telephone contact without undue delay. The issue should be reported to the Ethics Officer, unless you feel strong enough to attempt to resolve it in a direct conversation with the person violating the Code.

17.

I recruit employees. We recently have had a candidate who introduced himself as a former employee of a competing company. In the conversation he suggested that he could bring in the competitor's database if he was hired in the company. How should I react to such cases?

These types of documents are confidential data. There is a real probability that the person who makes such a proposal not only breaks the terms of the contract under which he was employed, but also the law. The Company does not want to be associated with people who commit unethical and illegal activities.

18.

I have a business laptop, which I often take home. Can I install some games for my child on the device?

No. Equipment provided by the company can be used only for business purposes, as governed by the relevant internal regulations.

19.

I suspect my boss is acting to the detriment of the company. I would like to talk to the Ethics Officer about this matter, but I am afraid that this will lead to troubles caused by my supervisor and will threaten my position in the company.

Taking any retaliatory action against a person reporting a violation of the rules of the Code of Ethics is unacceptable and always entails severe consequences. The whistleblower's details are protected and shared only with those responsible for handling the case. At the same time, it should be remembered that every Pelion employee can report an issue anonymously, e.g. using the e-mail address: etyka@pelion.eu, the helpline at (+48 42) 200 80 80, or the platform https://pelionkodeksetyki.integrityline.com/, protected by software that prevents sender identification.

20.

To celebrate a successful transaction, the client invited me to dinner at a restaurant. The atmosphere of the meeting was very informal, and at the client's request we drank alcohol in amount exceeding a mere glass of wine. In my opinion, our behaviour did not go beyond accepted moral and business standards. How to maintain a compromise between caring for the company's image and good client relations without being accused of taking advantage of excessive hospitality in such situations?

Accepting an invitation to participate in meals or entertainment to the extent that, for business relationships of a given nature, it corresponds to the generally adopted standard is a common practice and, in principle, does not create any doubts of ethical nature. It should be borne in mind, however, that the employee representing Pelion should behave within the limits of decency, so as not to pose a threat to the company's reputation in public opinion.

21.

The client I work with on a regular basis has invited me and my wife on a trip to Masuria on his yacht. In my opinion, it is not inappropriate because we have also been friends privately for a long time. May I accept the invitation?

Such a proposal in general may give rise to the suspicion of bribery and may seem an excessive display of hospitality. That being said, Pelion in no way interferes with the private acquaintances and friendships of its employees, but probably the business relationship with the client should be taken over by another employee. Therefore, this situation requires careful assessment. It is necessary to inform your immediate superior about the invitation and the existing friendship.

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