



CODE OF CONDUCT
FOR BUSINESS PARTNERS
OF THE STEAM CAPITAL GROUP

www.steam.jobs



Dear Partners,

We would like to familiarize you with our Code of Conduct for Business Partners of the Steam Capital Group, which is part of the international Exact x Forestall Capital Group, in which we have included all the most essential principles and standards that we, as a Capital Group, follow in our daily work and which we expect from you as well.

As entrepreneurs, we are committed to continuous development and raising the bar for ourselves; also, in the field of ethical conduct.

In this Code of Conduct of the Steam Capital Group you will find the most important guidelines and principles that we expect you to comply with on a daily basis both in your business relations with Steam and outside of them.

We do believe that this Code will become a signpost to reinforce the ethical culture in our businesses.

Dawid Bąk
CEO Steam





MISSION AND VISION

The Code of Conduct of the Steam Capital Group, which is part of the international Exact x Forestall Capital Group, (hereinafter collectively as “CG” or “Steam” and separately, each of the Companies comprising the Capital Group as: “Company”) is a set of rules that guide us in our daily work and when making critical decisions for the CG and each of the Companies.

At Steam, we place emphasis on the compliance of our activities with the law and ethical principles. Steam's mission is to be close to the client and have a real impact on safety by providing flexible solutions in the field of quality control, production support and logistics for the automotive and other industries, as well as to effectively connect employers with employees by providing a complete offer of recruitment and temporary employment solutions.

In the field of temporary work and recruitment, Steam places particular emphasis on the quality of candidates: speed, diligence, effectiveness. This strategy is reflected in the brand name, which symbolizes the full-time work of S-class employees. The vision of Steam is to be a leader in the outsourcing, recruitment and temporary work industry in Europe, using the opportunities offered by globalization with respect for the natural environment at the same time.

We believe that only by observing the law and acting in a transparent and ethical manner are we able to constantly develop and meet the adopted goals. We also require our Business Partners to comply with the principles and standards set out in this Code. We are jointly responsible for shaping the business environment in which we operate.



OBJECTIVES OF THE CODE OF CONDUCT

The purpose of this Code of Conduct for Business Partners of the Steam Capital Group is to set clear rules and standards of conduct that will help prevent violations of applicable laws and ethical standards, both within the organization and in relations with Business Partners.

SCOPE OF THE SUBJECT

1. This Code is addressed to all Business Partners of the Group – customers, contractors, suppliers (hereinafter jointly referred to as: "**Business Partners**").
2. The key role in creating the organizational culture, promoting the principles set out in this Code and managing the implementation of this Code is performed by the Management Board of Steam, in particular the Member of the Management Board responsible for administrative matters.



COMPLIANCE WITH LAWS AND REGULATIONS

At Steam, we act in accordance with the law and principles, and we expect the same of our Business Partners – clients, contractors, and suppliers.

Steam Business Partners shall adhere to ethical standards and take into account the rules, customs, traditions and social norms in force in the places where they provide services. In the event of a conflict of generally applicable law provisions with local customs or traditions – the provisions of generally applicable law shall prevail.

HUMAN AND LABOUR RIGHTS

Business Partners are obliged to strictly respect human rights in all countries in which they operate, also if there is no relevant legislation in this area in a given country.

In particular, our Business Partners should be close to the values set out in the United Nations Charter, the Universal Declaration of Human Rights, the European Convention on Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and local law.

We expect from our Business Partners in particular:

- do not do business with entities connected with child labour;
- do not allow any forms of forced labour, including modern slavery, human trafficking and any unfair recruitment practices;
- to maintain a work environment free from violence, harassment and discrimination in any form;

- to offer a fair salary and adhere to local laws on minimum salary and minimum hourly rate;
- to comply with regulations on working hours and breaks;
- to respect employees' right to association;
- to create safe and hygienic workplaces and comply with health and safety regulations.



PREVENTION OF DISCRIMINATION AND HARASSMENT

Steam Business Partners may not use any discrimination. At Steam, we do not tolerate any manifestations of harassment or discrimination, direct or indirect, due to gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religion or sexual orientation.

We want to create an environment free from prejudice and an atmosphere of equality and support, where every Employee and Business Partner feels respected. Harassment or discrimination in any form will be severely punished.



SUSTAINABLE GROWTH

Sustainability and integrity make the pillars of our business. We strive to ensure that the services offered to our Clients meet the highest quality standards. At the same time, our goal is to optimize the negative impact of our activities on the environment.

We expect that our Business Partners will also do their best to run their business in a responsible manner, in accordance with the principles of sustainable development.

Decisions regarding the purchase of goods and services and the scope of processes are made not only with the business side in mind, but we are also guided by the care of minimizing their negative impact on the environment.

ENVIRONMENT PROTECTION

At Steam, we are aware of the importance of environmental protection. We treat the protection of the environment and the planet as our commitment to Employees, Business Partners, local communities and future generations.

We expect our Business Partners to comply with all environmental protection regulations and take the initiative on their own to minimize the negative impact on the climate and the environment, in particular by limiting the emission of harmful gases and dust and appropriate waste and sewage management, reducing electricity consumption, as well as through implementation and application of internal environmental and climate policies.



**HANDLING
CONFIDENTIAL
INFORMATION,
PERSONAL DATA
AND
INTELLECTUAL
PROPERTY RIGHTS**

At Steam we protect confidential information and the information made available to us by our Business Partners.

Confidential information is unknown to third parties and is not disclosed to them because they have or may have economic value. Each Group company's confidential information includes information on the selection check, inspection, production methods, cost data, business plans and strategies, information on employees, a list of customers, and financial information. All of the information listed here is an important asset to Steam.

We are aware that by entering into business relationships, we may also come into possession of the confidential information of our Business Partners. We protect the information shared with us just like our own. We expect our Business Partners to protect our confidential information in the same way.

We are aware of the value of the intellectual property. We respect and protect all forms of intellectual property belonging to Steam and our Business Partners. We also expect our Business Partners to respect the property of Steam.



FAIR COMPETITION

Free, unlimited and fair competition is the main principle of the market economy and the foundation of Steam' organizational culture. Our competitiveness policy is based solely on the quality of our services and focuses on our Clients' needs.

Therefore, we do not tolerate any behaviour that violates national and international regulations and competition standards on the part of our Business Partners.

Any anti-competitive practice is prohibited, and Steam will strongly condemn any display of such behaviour.

ANTI-CORRUPTION

Steam promotes a zero-tolerance policy for corruption in all aspects of the Capital Group's operations. Preventing, reporting, detecting and combating bribery and corruption is the responsibility of each Steam Business Partner.

Bribery and corruption are always and in any form prohibited, regardless of whether they are direct or indirect actions, both inside the CG and in external relations with its Business Partners.

There are no circumstances that would exclude the application of a zero-tolerance policy towards corruption. Steam operates in a transparent, responsible manner and with respect for the highest ethical standards and requires the same of its Employees, Associates and Business Partners.



**PREVENTION
OF CONFLICT
OF INTEREST**

We expect our Business Partners to behave in a manner that does not lead to a conflict of interest and, in the event of such a conflict being detected, immediately report this fact to Steam.

We expect our Business Partners not to offer, promise or give any kind of benefit in return for gaining a privileged position in business dealings.

Partners must require their employees to prevent situations in which such benefits are offered or received.

**ANTI-MONEY
LAUNDERING AND
COMBATING
TERRORISM**

We comply and expect our Business Partners to comply with anti-money laundering laws and do not participate in any money laundering activity.

We do not engage in any way, and do not tolerate our Business Partners getting involved, direct or indirect, in terrorist activities, regardless of their nature.



IMPLEMENTATION, COMMUNICATION AND ACHIEVEMENT OF THE OBJECTIVES OF THE CODE

1. Steam implements this Code and any amendments to it by publishing the Code on the Company's website.
2. The implementation of the assumptions of this Code takes place, among others, through cyclical promotional campaigns, reminding the principles applicable in Steam, contained in the Code, and requiring Business Partners and potential Business Partners to sign the Business Partner Declaration of conduct in accordance with the Code of Conduct for the Business Partners of Steam Capital Group.
3. Steam has a whistleblowing system in place where anyone associated with the Group, directly or indirectly, can report a suspected breach of ethics or the law.
4. Steam is committed to taking proportionate and appropriate action in relation to the risks and practices that occur in breach of the Group's ethical standards.

REPORTING BREACHES

1. In the event of a suspected breach of the law or the principles adopted in this Code, each Business Partner should report this fact.
2. The possibility of reporting violations of this Code applies to both Steam Employees as well as external stakeholders, i.e. all entities and persons who directly and indirectly cooperate with a given Company.
3. The reporting procedure is described in the Internal Procedure for Reporting Breaches and Taking Follow-up Actions (whistleblower policy).
4. Reports can be made, i.a., via the online form available at: whistleblow.forestall.com.
5. All reports will be treated confidentially and investigated with due diligence. Reporting can also be made anonymously.
6. If you are unsure about how to behave in the event of a risk of corruption, bribery or influence abuse, please contact Steam Legal or a member of the Steam Management Board directly.

CONTROL

1. Compliance with the principles set out in this Code is subject to ongoing control and assessment by the Management Board of Steam.
2. Violation of the provisions of this Code may lead to the termination of cooperation with a given Business Partner, as well as constitute the basis for initiating criminal proceedings by national entities appointed to prosecute crimes.
3. Familiarization with this Code does not exempt the person to whom it has been submitted to familiarize himself with other generally applicable legal regulations.

FINAL PROVISIONS

1. Each Business Partner and potential Business Partner is obliged to read this document and comply with its contents.
2. Steam reserves the right to change and update this Code at any time, and such changes or updates are effective upon acceptance. Steam will inform Business Partners of the changes adopted by publishing the current version of the Code on the website.
3. Steam monitors the validity of the individual provisions of the Code and makes changes to the extent necessary on an ongoing basis.

CONTACT

In case of questions or doubts related to the issues contained in this Code, please contact the following e-mail address: **compliance@steam.com**.

CAPITAL GROUP

This Code of Conduct of the Steam Capital Group applies to Business Partners of all Steam Capital Group companies, both existing at the time of its issuance, as well as those created or which will become part of the Steam Capital Group in the future.



Dawid Bąk, CEO Steam

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