

Code of conduct tedgifted.com

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1.Preamble

In light of the fundamental principles that guide our organization, we adopt this Code of Conduct as a reflection of our commitment to maintaining the highest ethical and professional standards in all areas of our activities. As a company, we strive to create an environment based on mutual respect, integrity, and responsibility, which will not only contribute to our success but also foster positive relationships with our employees, customers, and business partners.

Our values form the foundation of our actions and decisions, and therefore, we are committed to adhering to the norms that ensure our conduct is always in line with societal expectations and applicable laws.

Tedgifted.com is a place where we aim to foster an atmosphere of collaboration based on trust and responsibility, and where every individual is treated with respect.

This Code serves as a set of principles that helps us make the right decisions, act transparently, and remain true to our values. We are committed to following these principles so that our organization can not only achieve success but also make a positive contribution to the development of the community and industry in which we operate.

Prezes Zarządu

Bartłomiej Farjaszewski

CEO of tedgifted.com

2. Code of Conduct

The Code of Conduct applies to all employees—regardless of position, tenure, or place in the company's organizational structure—as well as to suppliers, business partners, and all other B2B business partners (hereinafter referred to as „Business Partners”) collaborating with tedgifted.com It particularly applies to members of the company's management, managers, and supervisors, who, through their decisions and actions, play a key role in shaping the organizational culture.

Adhering to the principles outlined in the Code is not merely a formal requirement—it is a reflection of respect for the values and principles that form the foundation of our organization's operations. Any violation of the principles contained in the Code should be considered as detrimental to the company, as it can undermine the trust of our stakeholders, negatively affect our reputation, and expose the company to legal and financial risks.

The Code of Conduct is not a document that can be treated selectively. Every individual connected to the company has the obligation to follow its principles in their daily work, both in direct actions and in relationships with clients, business partners, and colleagues. Only through joint and consistent implementation of the standards set out in it can we build an organization based on integrity, responsibility, and mutual respect.

3. Application of the Code of Conduct and How to Proceed in Case of Doubts

The Code of Conduct is a guide that helps make proper decisions in daily professional activities. However, it does not replace our individual responsibility or eliminate the need to make appropriate judgments independently. No procedure or regulation can cover all potential situations we may encounter during work. Therefore, a key element in applying the Code is our ability to analyze situations and follow ethical principles in every decision.

The Code does not exempt anyone from complying with applicable laws or industry regulations. On the contrary, our standards should go beyond the minimum legal requirements, following the principle that ethical conduct is an integral part of conducting responsible business.

Anyone who faces difficulty in interpreting the principles of the Code must seek help from their supervisor or the HR department. Joint consultations and open communication on ethical matters are fundamental to making decisions that are both legal and ethical, as well as building a work environment based on integrity. This Code of Conduct cannot anticipate all situations that may arise in daily work. Therefore, we all have an obligation to uphold the highest standards of integrity and respond to behaviors inconsistent with the adopted principles. A person who reports a violation or submits a complaint in good faith will not face any disciplinary sanctions or other forms of retaliation. The company ensures that all actions related to reviewing reports are conducted confidentially. The company guarantees that the procedure for reviewing reports and the processing of personal data will prevent unauthorized access to information covered by the report and will protect the identity of the reporting individual, the individual the report concerns, and any third party mentioned in the report.

4. Role of Management in Maintaining Standards

Managers have a particular responsibility for implementing and promoting the principles set out in the Code of Conduct. Organizational leaders are not only role models but also the first line of support for their teams on ethical issues. Their behavior and decisions shape the work culture and set the standards by which all employees and business partners should follow.

Management's responsibility is to create a work environment that promotes adherence to ethical principles, where every employee feels obligated to act in an honest and transparent manner. An important aspect of this responsibility is openness to dialogue and readiness to address situations that may raise doubts about appropriate conduct.

Management should also actively support educational and training initiatives that deepen employees' understanding of the principles of the Code. Their task is to monitor compliance with these principles and take appropriate action in case of violations. In this way, they contribute to building an organization that not only achieves business success but also gains the trust of its stakeholders through its ethical approach to conducting business.

5. Cooperation with Business Partners

When deciding to cooperate with business partners, the organization follows clear and transparent criteria that reflect its values and the standards outlined in this Code of Conduct. Cooperation is based on mutual trust, transparency, and adherence to the law and ethical norms.

Business partners are required to comply with the principles that the organization considers fundamental. These include honesty in conducting business, zero tolerance for corruption, respect for human rights, and compliance with environmental protection regulations. All business relations must be documented in a clear and legally compliant manner to avoid potential misunderstandings or abuses.


The organization commits to verifying its business partners' ability to comply with these principles. In the event of serious violations, cooperation may be terminated to protect the organization's reputation and values.

6. Conflict of Interest

Business decisions are made by our employees according to their best knowledge and judgment, solely based on merit-based criteria, and primarily in the interest of tedgifted.com, while considering the legally justified interests of our business partners. Actions by an employee in their own interest to the detriment of the company are unacceptable. Employees must refrain from participating in processes and making decisions that create or could be perceived as creating a conflict between their interests and those of the company. A conflict of interest arises when an employee's interest is directly or indirectly contrary to the company's interests. In particular, a conflict of interest arises when an employee's decision-making in the course of their duties could affect their personal interest or the interest of a close associate.

In case of any doubts about the existence of a conflict of interest, immediate consultation should be made with the employee's supervisor or the management board of the company.

We also expect our business partners to provide relevant information about any existing or potential conflicts of interest on their part.



7. Principles of Fair Competition, Anti-Corruption, and Prevention of Misuse

The organization operates in accordance with the principles of fair competition, promoting openness and transparency in the market. Competition based on fair rules is the foundation of trust in relationships with clients, contractors, and other market participants. The organization aims to build stable, ethical business relationships that strengthen its image and contribute to long-term development.

7.1 Compliance with Fair Competition Principles

Commitment to promoting fair practices is a sign of respect for customers, contractors, and competitors. The company bases its operations on the principles of healthy competition, which is the foundation of trust in relations with business partners, clients, and other market participants. Transparency and equal treatment are integral to functioning in the free market, and therefore the company is committed to adhering to the highest standards in this area. Understanding that fair competition fosters innovation and sustainable economic development, the company actively promotes practices that support open trade exchanges and eliminate barriers to cooperation.

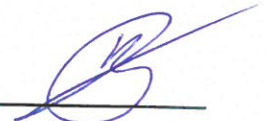
Any agreements with other entities that may violate the principles of free competition are strictly prohibited. Any suspected violations of these principles should be promptly reported to the relevant persons or departments within the organization.

7.2 Compliance with Regulations on Restrictions to Competition

The organization complies with all legal regulations concerning the prohibition of anti-competitive practices, such as price-fixing, market division, or actions aimed at excluding competitors from the market. These actions not only violate the law but also undermine trust in the organization as a fair market participant. Therefore, the organization makes every effort to prevent such practices both within the organization and in relations with business partners. Any agreements with other entities that could violate free competition regulations are prohibited. Every employee and collaborator is required to report any situation raising concerns about potential violations of these rules to their supervisors or the company management.

7.3 Prohibition of Bribery and Corruption

The organization strongly condemns all forms of bribery and corruption. Actions involving the offering, giving, or accepting financial or non-financial benefits to gain a business advantage are unacceptable. The organization believes that honesty and integrity in business relationships are key to building long-lasting and reliable relationships with clients and business partners. Combating these practices is not only a legal requirement but also a moral obligation that fosters a work environment based on trust and transparency. Every employee and collaborator of the organization must report any situations that may involve corruption. Any violations will be treated with the utmost seriousness and may result in disciplinary consequences as well as legal liability.



7.4 Prohibition of Offering, Demanding, and Accepting Benefits

Employees and collaborators of the organization may not accept, receive, promise, offer, or transfer any material or non-material benefits related to their duties, either directly or indirectly, that could undermine the impartiality of either party, influence business decisions, lead to compromised quality in the performance of professional tasks, or contradict the principles of preventing corruption. They are required to avoid situations that may be perceived as attempts to gain improper benefits. An exception is gifts of symbolic value, consistent with generally accepted customs. Such gifts must not cause a sense of obligation on the part of the recipient or create unreasonable expectations of reciprocation through favorable business decisions. Cash gifts are strictly prohibited.

7.5 Prevention of Money Laundering

The organization makes every effort to prevent its structures and resources from being used for money laundering purposes. Employees and collaborators are required to exercise particular caution with transactions that may raise doubts about their legality. Such transactions must be immediately reported to the company's management or the board. In the event of detection, the organization will take appropriate action, including reporting such events to the relevant authorities.

7.6 Protection of Intellectual Property Rights

The company treats the protection of intellectual property as one of the pillars of its operations and a key element in building a responsible business culture. The company takes decisive action to prevent violations of intellectual property rights, both for its own resources and those of business partners, clients, or other third parties. Any violation, particularly illegal copying, unauthorized use, or distribution of protected materials, is strictly prohibited. Every employee and collaborator is required to comply with intellectual property laws and use developed tools, technologies, and other resources only within the legally permitted scope.

Developing and respecting intellectual property rights is crucial for maintaining innovation and building a competitive advantage in the market. The organization ensures that its employees and collaborators understand the importance of these principles and adhere to them in their daily work.

7.7 Protection of Information and Personal Data

Guided by the principles and values specified in the European Parliament and Council Regulation (EU) 2016/679 of April 27, 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data (General Data Protection Regulation; GDPR), the company makes every effort to ensure that personal data it processes is handled in compliance with legal requirements and with appropriate security measures to ensure safety.

In this regard, the company follows the principle of „privacy by design“ and „privacy by default.“ This means that the security and compliance of data processing are taken into account from the design stage of the services offered by the company. The company's Privacy Policy, available on its website, provides more detailed information on data processing.



7.8 Confidentiality

Maintaining confidentiality is the foundation of relationships within any organization, ensuring the security of information and protection of the entity's interests. Employees, collaborators, and business partners are obligated to protect all internal company information, including but not limited to strategies, financial data, trade secrets.

8. Human Rights, including Workers' Rights

8.1. Prohibition of Discrimination

The organization strongly opposes all forms of discrimination, regardless of its nature or cause. Discrimination means any unjustified differentiation, exclusion, or limitation of individual rights based on characteristics such as gender, age, ethnic origin, nationality, religion, sexual orientation, or disability. The prohibition of discrimination applies to all areas of the organization's operations, including recruitment, wages, promotions, access to training, working conditions, and termination of employment. One form of discrimination is harassment, which refers to unwanted behavior that violates the dignity of the employee or coworker and creates an intimidating, hostile, degrading, humiliating, or offensive atmosphere. Harassment occurs when the cause of the unwanted behavior is one of the discriminatory criteria. The organization strives to create a work environment in which everyone feels respected and treated fairly. In practice, this means equal access to recruitment processes, career advancement opportunities, as well as access to training and other forms of development. The organization fights all forms of prejudice and takes action to ensure pay equality and equal working conditions. Each case of discrimination will be thoroughly analyzed, and responsible individuals will face the consequences of their actions.

8.2. Counteracting Mobbing

The organization does not tolerate any form of mobbing or harassment in the workplace. Every employee and coworker has the right to work in an environment free from intimidation, psychological or physical violence, or any other form of inappropriate treatment. Each case of mobbing will be treated with due seriousness and will be subject to a detailed investigation. Individuals who engage in such behavior will face disciplinary responsibility. tedgifted.com provides support and protection to individuals affected by mobbing.

8.3. Working Conditions and Compensation

tedgifted.com guarantees fair wages for its employees and ensures working conditions in compliance with applicable legal regulations. The company firmly opposes all forms of forced labor, as well as any forms of modern slavery and human trafficking.

[Tedgifted.com](http://tedgifted.com) business partners comply with employment regulations. It is unacceptable, in particular, to exceed the legal maximum daily working hours, the legal provisions regarding night work, daily rest, annual leave, and breaks at work. Business partners pay their employees on time, applying at least the minimum wage required by law and bearing all legally required work-related costs, including social security and taxation.



8.4. Prohibition of Child Labor

Tedgifted.com adheres to the highest ethical and legal standards regarding the employment of workers. We strongly oppose all forms of child labor exploitation and do not accept this phenomenon within our organization or throughout our supply chain. We do not employ individuals who have not reached the minimum age specified in ILO Convention No. 138, and in exceptional cases – when the law permits the employment of minors – we guarantee that such work will not interfere with their education, health, or proper physical and psychological development.

tedgifted.com works only with suppliers, subcontractors, and business partners who strictly adhere to the prohibition of child labor. As part of responsible supply chain management, we conduct audits, control working conditions in factories, and require our contractors to implement effective measures to prevent the employment of minors. If violations are found, we take corrective actions, and in the case of serious breaches, we terminate the cooperation.

Our goal is not only to ensure compliance with legal regulations but also to contribute to the global elimination of child labor by raising awareness and supporting systemic solutions in this area.

9. Health and Safety at Work and Environmental Protection

The company takes all necessary actions to ensure safe and hygienic working conditions and to protect the natural environment. Responsibility for the health, life, and well-being of people, as well as the protection of biodiversity, is at the core of its activities. The organization is committed to promoting a safety culture in which all employees and collaborators are aware of the risks associated with their duties and take appropriate preventive measures.

Concern for the environment also means responsible use of natural resources. tedgifted.com takes actions aimed at minimizing the negative impact on the ecosystem, including reducing pollution emissions, saving water and energy, and properly managing waste. Every employee is required to comply with workplace safety rules and actively support initiatives related to environmental protection.

We expect our suppliers, subcontractors, and business partners to minimize their negative impact on the environment in terms of land, water, biodiversity, climate, and air, and to manage all waste in compliance with applicable regulations and the manufacturer's instructions.

We also care about the safety of our products at every stage – from design, through production, to use by customers. Each product undergoes rigorous quality and safety compliance testing to ensure its full reliability and no harmful impact on human health or the environment. We cooperate with certified suppliers who are obligated to adhere to strict environmental and quality standards, and we regularly monitor their activities to ensure they meet our requirements.

We believe that through conscious and consistent actions, we can make a real contribution to the protection of the natural environment and improve the quality of life for current and future generations

Prezes Zarządu
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Bartłomiej Farjaszewski