

Code of conduct



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- Raising questions and concerns

Introduction

At Itransition, we are committed to conducting our business in a lawful, ethical, and transparent manner, wherever we operate in the world. Our reputation as a global provider of software engineering and consulting services relies on our ability to maintain the highest standards of professional behaviour and integrity.

Our values

This Code of Conduct outlines the principles and guidelines we expect all personnel to follow to ensure we achieve our goals while upholding our values.

We believe adhering to these standards can build trust, respect, and accountability within our company and with our clients, partners, and suppliers.

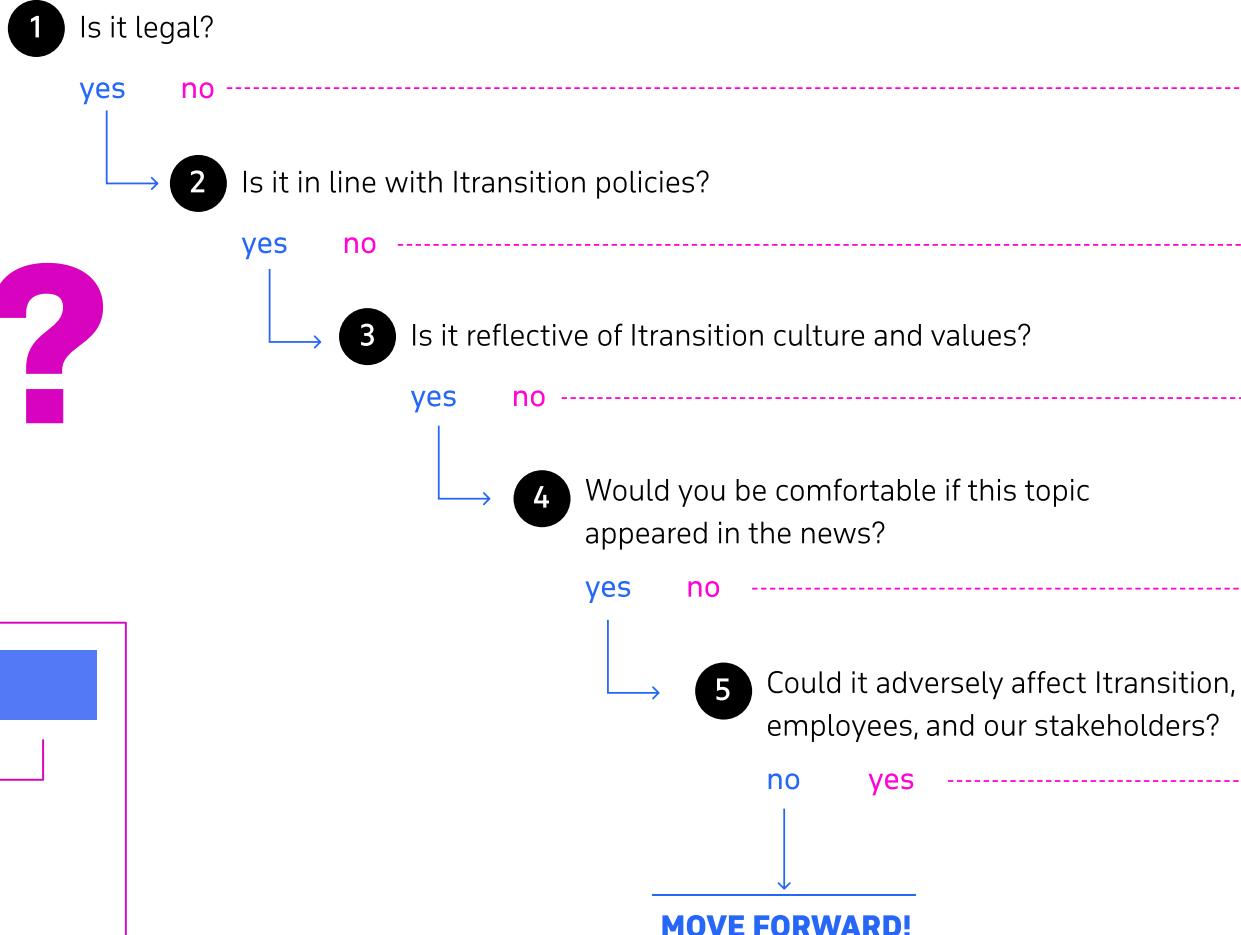
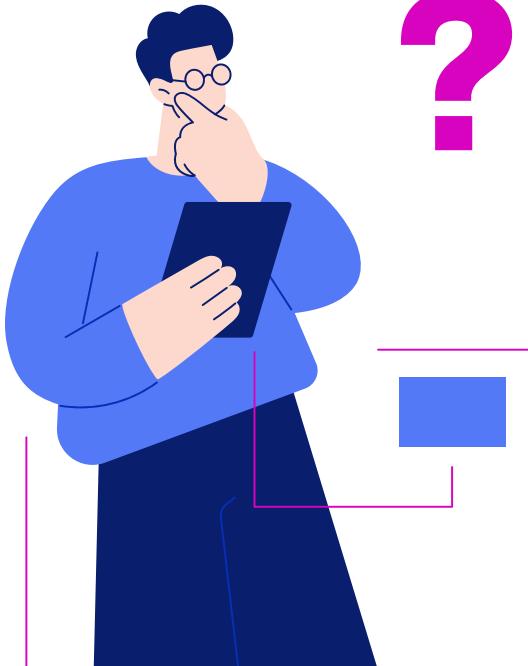
What is my role?

As a member of the Itransition team, you are expected to embrace our values and **comply with this Code of Conduct at all times.**

By doing so, you will play a vital role in maintaining our reputation as a responsible and ethical business that makes a positive impact on the world.



Ask yourself



DON'T DO IT!

Not sure?

Review applicable policies, check with your manager if necessary, or ask the respective experts for support.

What is a code of conduct

The Code of Conduct

is a set of guidelines and principles that define the ethical and responsible behaviour expected of all employees, contractors, suppliers, and partners at Itransition.

The purpose of the Code of Conduct

is to promote a safe, respectful, and inclusive environment and foster trust, respect, accountability, and transparency within our company culture.

If you witness or experience any behaviour that violates the Code of Conduct, please report it immediately. We encourage you to report concerns through any of our reporting channels, including an anonymous hotline or online reporting system.



Who must follow it

All personnel and third parties dealing with transition must adhere to these guidelines without exception, and everyone is accountable for their actions.

This includes behaviour that violates the Code of Conduct, such as unethical behaviour, harassment, discrimination, conflicts of interest, and more.

It's essential to act in a responsible and ethical manner at all times to maintain the integrity of our company and uphold our values and goals. If you have any questions or concerns about the Code of Conduct, please speak with your manager or use any other channel to raise your concern.

Violations of the Code of Conduct may result in disciplinary action, up to and including termination of employment or suspension of cooperation.





Human rights

Respect for human rights

At Itransition, we believe that upholding human rights is essential to creating a just and equitable workplace. We are committed to respecting the personal dignity and privacy of all individuals and complying with international principles, labour standards, and local legislation.

We prioritise fair and transparent recruitment, legal employment, and ensuring our employees are fairly compensated and have a healthy work-life balance. We value diversity and strive to create an inclusive workplace that supports the professional growth and development of all personnel.

To achieve these goals, we regularly assess our policies and practices to ensure they align with our commitment to human rights. We encourage all employees to report any concerns related to human rights violations, and we have policies in place to protect employees who report such violations from retaliation.



We believe prioritising human rights creates a workplace culture that promotes dignity, respect, and fairness for all individuals.

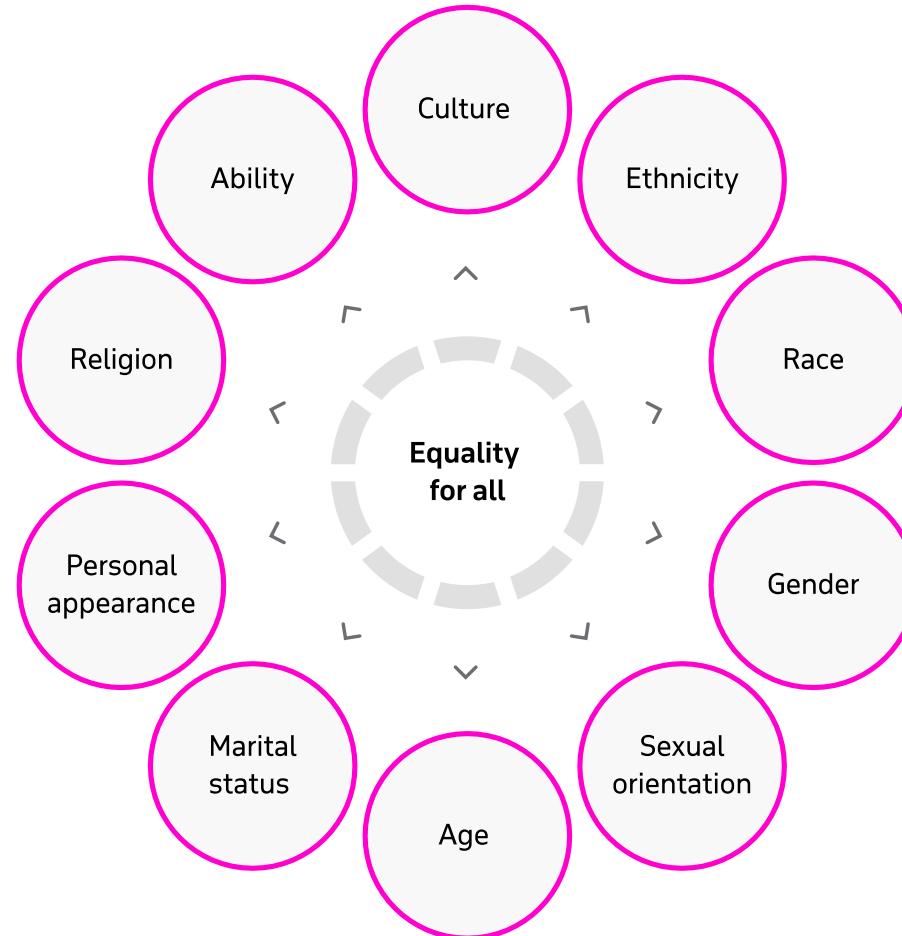
Equality, diversity and inclusion

Itransition is committed to creating a fair and inclusive workplace where all employees are treated with respect and dignity.

We believe that a diverse workforce enhances our creativity, productivity, and ability to deliver outstanding results to our clients.

What does it mean in practice:

we are not asking potential candidates or colleagues about their private life, not making any jokes about gender, nationality, etc



We do not tolerate any form of discrimination, harassment, or disrespectful behaviour towards any employee or group based on their culture, ethnicity, race, gender, sexual orientation, age, marital status, personal appearance, religion, or ability.

Equality, diversity and inclusion

To achieve this, we ensure that all employment-related decisions, including hiring, promotions, and compensation, are based solely on an individual's qualifications, skills, expertise, and aptitude.

We use transparent criteria to evaluate each employee's performance and provide equal opportunities for career development and growth.

We encourage all employees to embrace diversity and be respectful of each other's differences.

We strive to maintain a working environment where offensive behaviour is not tolerated, and everyone feels safe and comfortable.

At Itransition, we recognise that diversity and inclusion are not only moral imperatives but also business imperatives.

Therefore, we commit to continuously improving our diversity and inclusion efforts by promoting awareness, providing training, and holding ourselves accountable.



In summary, Itransition is committed to promoting diversity and inclusion in the workplace and ensuring that all employees are treated with respect and dignity, regardless of their personal characteristics.

No bullying and harassment

At Itransition, we are committed to maintaining a workplace that is free from bullying and harassment. We promote a positive and respectful work culture where colleagues can work together productively and thrive.

We take all allegations of harassment seriously and will investigate and take appropriate action to address any reports of harassment. We also ensure that those who report harassment are protected from retaliation.



Harassment can take many forms, including behaviour that is unwanted, offensive, or creates an intimidating or hostile work environment.

We take a zero-tolerance approach to all forms of harassment and expect all employees and third parties to treat others with respect and dignity.

No bullying and harassment



Verbal harassment

Such as insulting or derogatory comments, offensive remarks, or jokes.



Physical harassment

Such as unwanted touching, assault, or other physical contacts.



Sexual harassment

Such as unwanted advances, requests for sexual favours, or other unwelcome sexual conduct.



Cyber harassment

Such as bullying or harassment online, including through social media, email, or other digital channels.



Discrimination

Such as harassment based on race, gender, religion, sexual orientation, or other protected characteristics.



Ageism

Such as harassment based on age.



Health and safety

Workplace health and safety environment

The physical and moral integrity of our personnel is our priority. We are committed to upholding international principles and labour standards, as well as local legislation, when it comes to issues related to recruitment, employment, remuneration, and work-life balance.

Our commitment to protecting the physical and moral integrity of our personnel means that we take proactive measures to prevent safety hazards by utilising engineering and administrative controls, preventative maintenance, and safe work procedures.

We believe that all incidents can be prevented and strive for zero harm to personnel, property, and the environment.

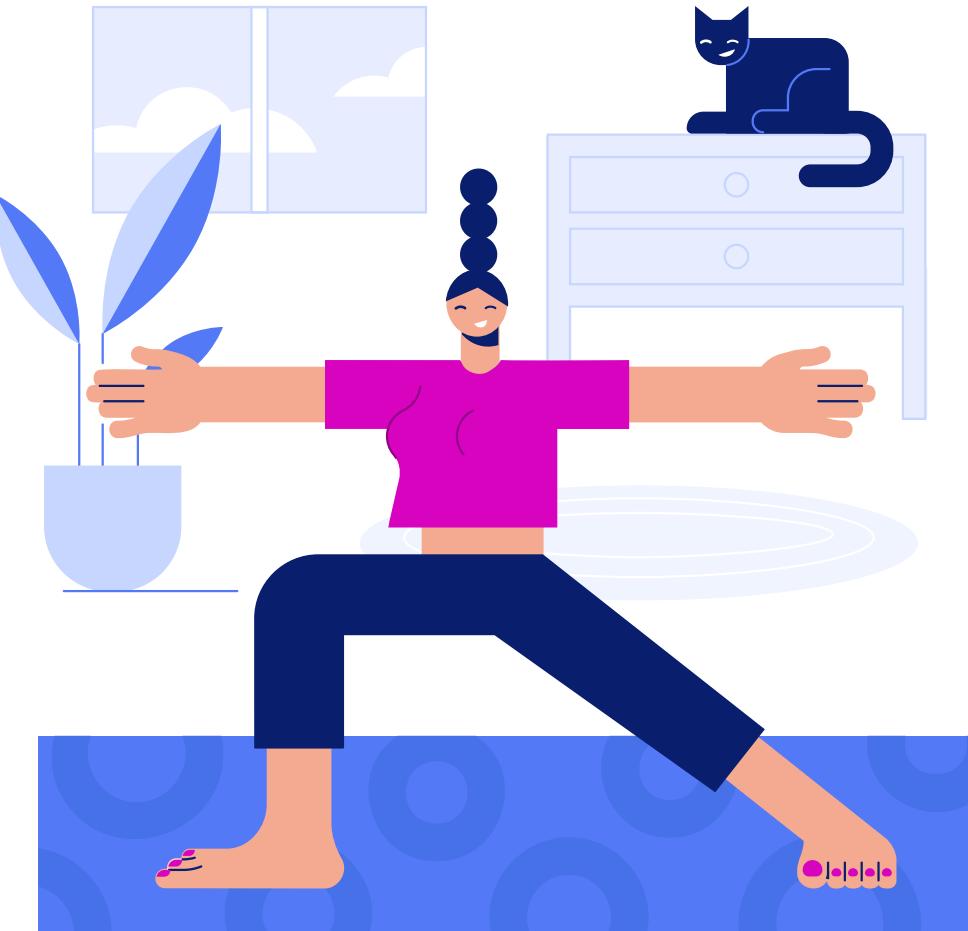


Workplace health and safety environment

Health and safety behaviour at work includes:

- Following safety procedures and protocols
- Reporting hazards and unsafe conditions and situations
- Keeping workspaces secure
- Avoiding violent or threatening acts
- Participating in safety training and meetings

Prioritize your mental health and well-being by taking breaks, seeking support when needed, and doing self-care.



Workplace health and safety environment

- We are committed to promoting environmental sustainability and reducing our negative impact on the environment.
- Itransition management has implemented effective practices to reduce our environmental impact, including gradually replacing outdated equipment with energy-saving hardware systems and utilising renewable energy whenever possible.
- Our outdated equipment is gradually being replaced with energy-saving hardware systems. Renewable energy is utilised whenever possible.



*We encourage you to participate
in reducing waste and our carbon footprint*

- The company's environmental footprint consists primarily of the carbon emissions generated through air travel and the use of electricity, and appropriate measures are taken to reduce them.
- We also follow the principles of the Waste Electrical and Electronic Equipment (WEEE) Recycling Program to promote the recycling and reuse of waste electronics and reduce the amount that is disposed of in landfills.

Ecological tips and tricks

-  Avoid printing documents if it's not necessary.
Minimise the number of pages (for example, by printing on both sides).
-  Switch off devices completely when you finish your job.
In standby mode, your device is still consuming energy.
-  Before you leave your working place, be sure you switched off all electric lamps and devices.
-  Use glasses instead of paper or plastic cups, stainless steel cutlery instead of plastic forks, knives and spoons, reusable lunch boxes instead of takeaway paper boxes during the lunch break, and air dryers instead of disposable dry towels.
-  Always separate your waste by using an appropriate trash receptacle.



By following these guidelines, we can all contribute to creating a positive and sustainable workplace culture that upholds our values and respects the well-being of our personnel and the environment.



Fair play

Competition and fair dealing

Itransition is committed to delivering quality services to our customers whilst competing fairly with our competitors in every location we do our business.

We expect our personnel to conduct business in line with the principles of fair competition and applicable legislation.

You must never enter into any agreements, whether expressed or implied, that violate the letter or spirit of anti-competition laws.

If you are unsure about the legitimacy of any activity, seek guidance from your manager or Legal Department. We are committed to competing fairly and ethically and ensuring that our personnel uphold these principles at all times.



In particular, personnel must never discuss the following topics with competitors:

- the approach to pricing and the price structure
- splitting potential customers or territories
- any other tactic to unreasonably restrict the competition

Anti-corruption and bribery

It transition prohibits all types of bribery, corruption, and gifts to private persons or officials that aim to influence a business decision or otherwise encourage them to the contrary to their obligations.

Bribery involves the following

- Offering, giving, or promising a financial or other advantage to another person to induce or reward them or another person to perform their responsibilities or duties improperly [it does not have to be the person being offered the bribe that acts improperly].
- Requesting, agreeing to receive, or accepting a financial or other advantage by another person to induce or reward them or another person to perform their responsibilities or duties inappropriately [it does not have to be the person who receives the bribe that acts improperly].

It does not matter whether the bribe is given or received directly or through a third party or for the benefit of the recipient or some other person.



Anti-corruption and bribery

We expect you to conduct business in line with the principles of fair competition and applicable legislation. You must never enter into any agreements, whether expressed or implied, that violate the letter or spirit of anti-competition laws.

If you are unsure about the legitimacy of any activity, seek guidance from your manager or Legal Department. Any violation of this policy, including offering, giving, or accepting bribes, will result in disciplinary action, up to and including termination of employment.

As part of this commitment, we must ensure that any third party acting on our behalf does not act corruptly in our dealings with any other person.

Bribes can take many forms:

- Money.
- Unreasonable gifts, entertainment or hospitality [please refer to the section "Gifts and Entertainment" below].
- Kickbacks [for example, the return of a sum paid or due to be paid as a reward for fostering a business arrangement].
- Unwarranted rebates or excessive commissions.
- Unwarranted allowances or expenses.
- Facilitation payments/payments made to people to make them perform their normal job more quickly and/or prioritise a particular customer.
- Political/charitable contributions.
- Uncompensated use of company services or facilities.
- Anything else of value.

A breach of bribery laws can result in fines for both the company and/or the individual involved and, in some jurisdictions, could also result in imprisonment.

Gifts and entertainment

Itransition recognises that in some cultures and business settings, it may be customary to exchange business courtesies. However, we are committed to ensuring that all such exchanges are transparent and ethical and do not compromise our integrity or create a sense of obligation.

Gifts and entertainment may be offered or accepted only if they are of a nominal value and are not intended to influence business decisions or create a sense of obligation. Generally, Itransition personnel should not offer or receive gifts or entertainment valued at **over \$50 per gift or event**.

During Requests for Proposal (RFPs) or other vendor selection processes,

Itransition personnel should not offer or receive ANY gifts or entertainment to customers and partners.

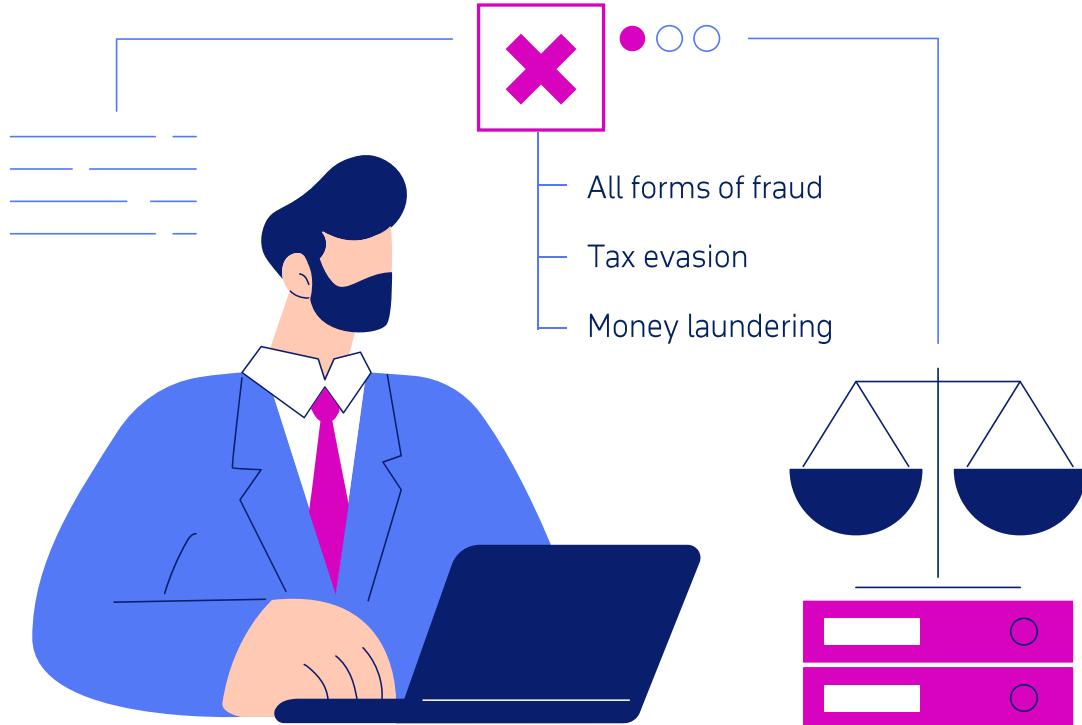
Any exchange of gifts or entertainment must be accurately recorded in our books and records and be compliant with all applicable laws and regulations.

If you are unsure about the appropriateness of a gift or entertainment, seek guidance from your manager or Legal Department.

You must not accept gifts or entertainment that could be perceived as a bribe or conflict of interest.



Fraud, tax evasion and money laundering



At Itransition, we conduct business with reputable and reliable customers and suppliers engaged in legitimate business activities. However, we take fraud, tax evasion, and money laundering very seriously and expect all personnel to make all possible efforts to remain alert to the possibility of unlawful activities.

We prohibit

All forms of fraud, tax evasion, money laundering.

We have all relevant policies in place to prevent and detect such activities.

Please familiarise yourself with these policies and be aware of the following **red flags** ↓

Be aware of the following red flags

Payments

- Payments made in cash.
- Unusually excessive payments compared to the customer's normal activity.
- Payments to third parties for unusual or vaguely specified services.
- Payments to offshore accounts.

Transactions

- Transactions that involve multiple accounts with similar patterns of activity.
- Transactions that involve individuals or entities that have been sanctioned by a government or regulatory agency.
- Transactions that involve a customer who refuses to provide required identification or other documentation.

Contributions

- Contributions to political parties or particular charities.

Other

- Payments "in kind" (payments made with goods or services for other goods or services).

If you suspect any fraudulent, evasive, or suspicious activity, please report it immediately to the appropriate internal or external authorities.

Financial integrity, records, and accounting

Itransition places a high value on the integrity of its financial information and the accuracy of its accounting records. Our reputation for honesty and transparency is vital to our success. Therefore, we require all transactions to be supported by appropriate documentation and comply with applicable laws and accounting practices.

As an employee, it is your responsibility to ensure that financial records are accurate and complete.

If you suspect any improper activities, including fraud or accounting irregularities, you should report them immediately to your manager or the Legal Department.



We encourage open and honest communication, and we will not tolerate retaliation against anyone who reports a suspected violation in good faith.

Our accounting records are relied upon to provide reports to our management, shareholders, regulatory authorities, and other third parties, as required by law. Failure to comply with these obligations can result in legal and financial penalties and damage to our reputation.

We are committed to maintaining the highest standards of financial integrity.

We encourage all employees to act with honesty and transparency in all financial matters.

Recognising conflict of interest

At Itransition, we expect all personnel to act in the best interest of the company and avoid conflicts of interest. A conflict of interest occurs when an individual's personal interest interferes with their ability to act impartially and objectively in performing their duties, or when it could appear to do so.

If you believe you have a conflict of interest or a potential conflict of interest, you must disclose it to your manager or any other designated contact immediately. Failure to disclose a conflict of interest may result in disciplinary action or termination of employment.



Conflicts of interest

They may include, but are not limited to:

- Outside employment or consulting work that interferes with the individual's ability to fulfill their duties at Itransition.
- Financial gain or other benefits received from a potential customer or contracting party.
- Personal relationships or affiliations that may influence or appear to influence their decision-making or actions related to their professional responsibilities.

We take conflicts of interest seriously and will work to manage and resolve them appropriately.

By being transparent and accountable, we can ensure that our decisions and actions are aligned with our values and goals.



Communications

Company communications

At Itransition, we expect all employees to communicate in a professional and respectful manner in all forms of interaction, including emails, chats, service desk requests, and verbal communication.

We recognise that our communication reflects **the values and reputation of our company**, and we encourage employees to carefully consider the impact of their messages on our stakeholders.

Before sending any communication, please, imagine that your text will be published at your favourite professional resource, and reread and edit it with that thought in mind.



Social media responsibility

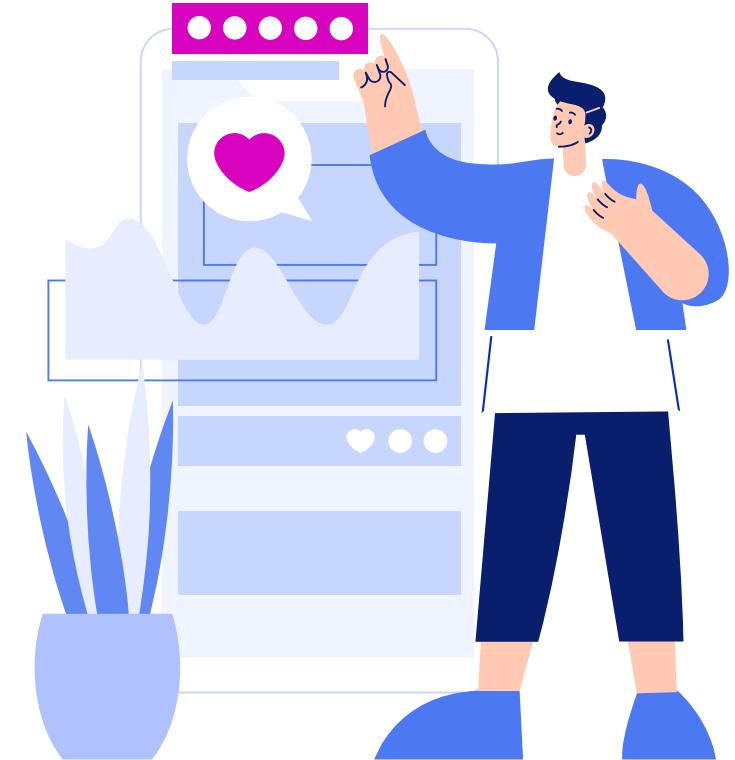
We recognise the importance of social media in today's digital age, but we expect all personnel to use social media and other online platforms responsibly and in a manner that does not harm the company's reputation or that of their colleagues, partners, or customers.

**Respect the company's right
to speak for itself.**

We provide social media training to all employees to help them use social media and other online platforms responsibly.

Remember, **you are an ambassador for the company**, and your behaviour online should reflect our values and principles.

*Consequences for violating this policy may include disciplinary action
up to and including termination of employment.*



Guidelines when using social media



Company representation

When any individuals identify themselves as being affiliated with the company on social media, they should make it clear that their views and opinions are their own, and not necessarily those of the company.

Use of company logos

Personnel should **not use the company's logos or trademarks** in any way that could be considered misleading, false, or inappropriate.

This includes using the company's logos or trademarks in personal social media profiles or in content that is unrelated to the company.

Individuals should not imply or state that they are speaking on behalf of the company unless they are specifically authorised to do so.

Guidelines when using social media

Confidential info

Personnel should not disclose any confidential information about the company, its products or services, or its customers on social media or other online platforms.

This includes but is not limited to

- Financial information
- Trade secrets
- Personal information of colleagues, partners, or customers

Reporting violations

Personnel who become aware of any violations of the company's social media policy should report them to their supervisor or the TDM department as soon as possible.

This includes

- Any instances of harassment
- Bullying
- Discrimination
- Violations of confidentiality

Respect for others

Personnel should maintain professional and respectful behaviour on social media and should not engage in any behaviour that could be considered harassment, bullying, or discrimination.

This includes

- Avoiding offensive or derogatory language, images, or comments that could be perceived as discriminatory
- Sexist
- Racist
- Otherwise offensive



Security

Information security

As a trusted vendor and responsible employer, Itransition takes information security seriously.

Therefore, Itransition maintains the Information Security Management System to ensure business continuity and sustainability, prevent or mitigate potential risks, and maximise the conversion of business opportunities.

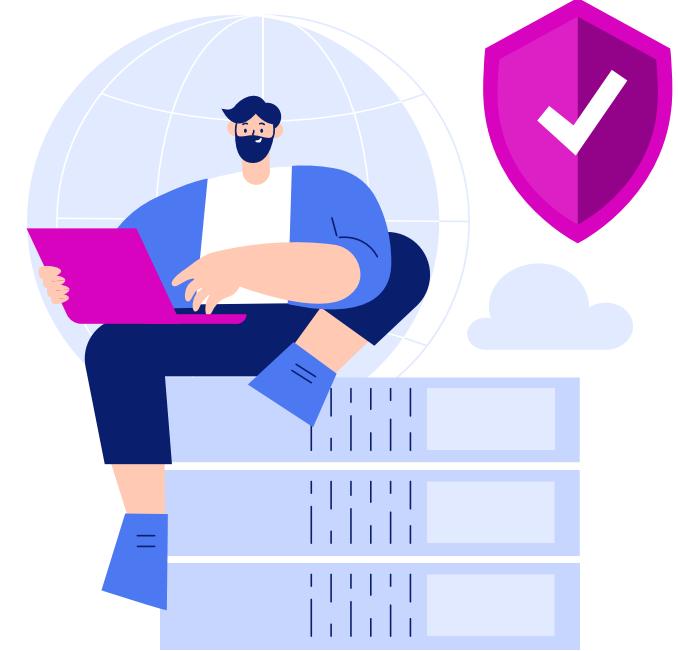
All Itransition employees must be aware of and adhere to corresponding [information security policies and instructions](#).

Itransition reserves the right to access, review, delete, or preserve any data stored on Itransition-owned or supplied equipment and networks.

We take data privacy and security very seriously and have policies in place to ensure the integrity and security of our systems and data, and to comply with legal and regulatory requirements.

Employees should be aware that their use of Itransition's equipment and networks is subject to monitoring and review and should use these resources in a responsible and professional manner.

If an employee has concerns about their privacy or the handling of their data, they should contact Itransition's IT department for assistance.



If any employee encounters an issue or concern related to communication or data privacy, they are encouraged to report it to their manager or to privacy@itransition.com for further investigation and resolution.

Protecting confidential information

At Itransition, the information created and used during its working processes is a key business asset. Therefore, information confidentiality and integrity are of crucial importance for Itransition's business efficiency and further development.

Our personnel must hold the Confidential Information in strict confidence and protect its confidentiality using all reasonable precautions at any time.

Information related and received by Itransition from its customers, potential customers, partners or other contracting parties and to which Itransition has access through any means or systems by providing services or during any other cooperation shall be treated as confidential at all times.



Each new employee must accept and sign a non-disclosure agreement as a part of the contract or a supplementary form.

Our personnel must annually confirm acceptance of the provisions of this Code of Conduct and receive training on how to protect confidential information.

If you learn of an actual or potential data security breach involving Itransition information, you must notify us immediately via privacy@itransition.com

Any violation of this policy may result in disciplinary action, up to and including termination of employment or legal action.

Confidential information types

Confidential Information means any information, technical data, or know-how, including, but not limited to:

Personal data

- Personal data of Itransition personnel, customers, partners

Project resources

- Source codes and binary artifacts
- Specifications
- Engineering documentation
- Database schemes, etc.
- Any data received or made accessible during a project (the content of databases, services, reports, files, etc.)

Information security

- Information related to information security of Itransition



Business activities info

- Lists of counterparts
- Development plans,
- Internal procedures and business processes
- Employment terms (including financial terms)
- Financial and management accounting data

Other information

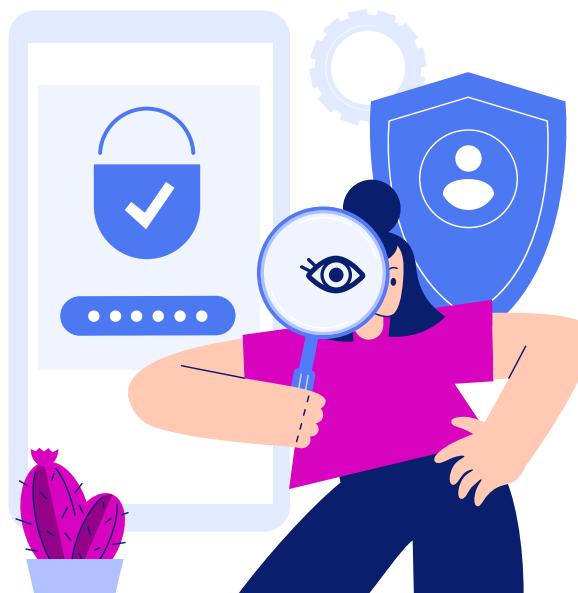
- Other information not listed above but falling within the general definition of trade secrets according to the legislation of countries where Itransition operates

Protect information rules

To further protect confidential information, Itransition personnel must adhere to **the following rules:**

Need-to-know basis

Access to Confidential Information must be granted on a need-to-know basis only.



Stored securely

Confidential Information must be stored securely and protected against unauthorised access, theft, damage, or loss.

Transmitted securely

Confidential Information must be transmitted securely and encrypted if necessary.

Not disclose

Itransition personnel must not disclose Confidential Information to unauthorised third parties, including family, friends, and colleagues outside of Itransition.

Not use for personal gain

Itransition personnel must not use Confidential Information for personal gain or benefit, including but not limited to trading securities or providing confidential information to others for their own personal gain.

Not access outside of the scope

Itransition personnel must not access or attempt to access Confidential Information outside of the scope of their employment duties or without proper authorization.

Data privacy

Itransition is committed to protecting the privacy and personal data of our employees, contractors, customers, and suppliers.

We comply with all applicable laws, regulations, and guidelines related to data protection and information security.

We recognise the potential risks associated with data breaches, which can cause irreparable damage to our business and reputation. Therefore, we take all reasonable measures to safeguard personal data and implement sustainable practices and procedures.

As a member of our team, you play an essential role in maintaining the security and confidentiality of personal data.

Guidelines

- Only collect and process personal data when you have a sufficient legal basis to do so.
- Limit the use of personal data to what is necessary for the purpose for which it was collected.
- Store personal data securely and never share your passwords with anyone.
- Always lock your device screens when they are not in use.
- Discuss personal data only with those who have a legitimate "need to know".
- Participate in training activities provided by Itransition to learn how to handle personal data correctly.
- Report any suspected or actual data security breaches immediately to privacy@itransition.com
- By following these guidelines as well as Itransition's information security policies, you will help ensure that we maintain the highest standards of data protection and information security. If you have any questions or concerns, please contact our privacy team at privacy@itransition.com



Raising questions and concerns

Raising questions and concerns

This Code of Conduct is intended to provide guidance on ethical conduct, and we encourage our employees to raise concerns and report any violations. Raising concerns helps us all to do business ethically and proactively address problems or issues.

When reporting a concern, please provide us with sufficient details, including dates, names, background, and other participants of the incident, so that we can conduct a proper investigation. We will treat all reports confidentially and protect whistleblowers from retaliation.



Talent development department talent.development@itransition.com

Legal department legal@itransition.com

Data privacy issues privacy@itransition.com

Anonymous feedback form [follow the link](#)

Questions or concerns

If you have any questions or concerns regarding the Code of Conduct or if you become aware of a violation of the Code, you can use any of the following channels:

- Talk to your unit manager or head of your department
- Contact the Talent Development Department or Legal Department
- Contact our Privacy Group via privacy@itransition.com
- Submit your feedback using an anonymous form through our workplace platform

Thank you

