

**MakoLab**



# **MakoLab S.A.**

# **Code of Ethics**

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## PURPOSE AND SCOPE

MakoLab S.A., hereinafter referred to as MakoLab, provides services related to the digitalisation of products, services and processes in order for our clients to gain business value. This might take the form of an improvement in economic indicators, such as an increase in sales or a reduction in costs. However, it could also be obtaining results which either have no impact on those indicators or affect them indirectly, such as the introduction of new products, entering a new market, increased security or greater satisfaction on the part of a service's recipients. Given that digital systems and services play a pivotal role in the economy and protect health, education, entertainment and other aspects of public and social life, the significance of MakoLab's operations is vital.

The company's fundamental products are IT systems, computer programmes and applications made to order for its clients. MakoLab provides services encompassing the entire supply chain for the production of software, from an analysis of requirements, via user experience (UX) and user interface (UI) design, developing the architecture, prototyping, programming, testing, configuring the environments and installation, to the production deployment of the system. The company's essential activities also include analysing, monitoring, improving, optimising, maintaining, providing technical support and developing systems which are up and running. This includes not only its own systems, but also those produced by a third party.

All the staff, in other words, the consultants, UX and UI designers, testers, project managers, Scrum Masters, administrators, service staff, analysts and people performing other tasks indispensable to running a business, contribute to the properties of the products and the way in which the company's services are provided. They thus have the possibility of doing good or causing harm through their activities or their influence on other people. The purpose of introducing the *MakoLab S.A. Code of Ethics*, hereinafter referred to as 'the Code', is to ensure, as far as possible, that the conduct of staff members will be directed towards achieving good and that their work will be respected by the company's stakeholders, primarily its associates, clients and shareholders.

The Code contains eight broadly formulated principles for staff members' conduct and the decisions they make. A number of provisions have been assigned to each principle, illustrating them and indicating the most important ethical obligations identified for staff members in the context of the nature of MakoLab's business and operations. However, they should be treated not as a complete list, but as examples of typical situations which staff might encounter.

The principles and provisions should not be considered separately. The Code is not an algorithm for ethical conduct. Its primary purpose is to induce every member of staff to reflect on how their actions and the outcomes they produce affect other staff members, the company, its clients and its stakeholders. In any situation, staff members make their own ethical judgement, treating the provisions of the Code as obligations, guidelines and pointers. In situations which give rise to doubts, staff members can turn to their managers or other members of staff and to people outside the organisation who might support them in deciding how to proceed.

MakoLab's external and internal context is a dynamically changing one, primarily as regards technological progress in the field of digitalisation, including the emergence of new tools and working methods. The principles of the Code should also be applied to these, even when the situations in question are not directly described in the provisions. The Code is a living document, but the updates may not always keep pace with changing circumstances.

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## TERMS AND DEFINITIONS

Whenever the Code makes mention of:

1. **members of staff/staff members**, this should be understood as everyone employed at MakoLab, regardless of the form and length of their employment. The term also encompasses people performing tasks on an irregular basis, interns, people on work experience and other similar cases;
2. **the employer**, this should be understood as MakoLab;
3. **associates**, this should be understood as other MakoLab staff members and as people employed by a third entity, such as subcontractors performing work for, and in collaboration with, MakoLab;
4. **clients**, this should be understood as MakoLab's clients, which is to say, entities for which MakoLab makes products and/or performs services;
5. **products**, this should be understood as any and every effect of work supplied by MakoLab, primarily software, but also analyses, projects, test results, reports and so forth;
6. **services**, this should be understood as any and every service performed by MakoLab for the purpose of supplying products, services related to them and services not related to the creation of products, such as software audits for other entities.

## I. CONCERN FOR PUBLIC INTEREST

***Members of staff bring concern for public interest to bear when working on behalf of the employer.***

***In particular, they:***

1. take full responsibility for their own work and its outcomes;
2. balance the interests of the employer, associates, clients and product and service users with the public good;
3. only confirm the products of their work when they are justifiably convinced that they are safe, accord with the specifications, have undergone the appropriate tests and will not reduce quality of life or violate anyone's privacy or harm the environment. The final outcome of their work should serve the public good;
4. report any and every real or potential threat to users, society or the environment to their manager or another appropriate person when they are justifiably convinced that the threat in question is connected with products and/or service or the documents relating to them;
5. collaborate on resolving issues which are arousing public concern and are caused by services or products, their installation, operation, maintenance, support or documentation;
6. are honest and avoid deception in statements, particularly made in public, concerning products supplied and services rendered or the documents, methods and tools connected with them;
7. draw attention to, and warn of, factors which might reduce the benefits arising from products and services, such as the necessity of allocating excessive resources to servicing them, for example, or the possibility of users' economic circumstances deteriorating as a result of their use.

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## II. CONCERN FOR THE EMPLOYER'S AND CLIENTS' INTERESTS

***Members of staff act in a way which is in the best interests of the employer and its clients and, at the same time, in line with public interest.***

***In particular, they:***

1. perform the work set out in their job descriptions, speaking out honestly and frankly about any limitations arising from their knowledge and experience;
2. use no resources, including software, for their work, if, to their knowledge, the resource in question has been obtained or made available to them illegally or unethically;
3. use the employer's and clients' resources solely with their knowledge and consent and appropriately for the performance of the work assigned to them;
4. ensure that, whenever required, every document they use in performing their tasks has been accepted by an authorised person;
5. maintain the secrecy of all confidential information obtained in the course of their work whenever confidentiality is required by the client or employer and in accordance with the applicable law;
6. identify and document situations where they believe that a project may end unsuccessfully, prove to be too costly or to violate the applicable laws or give rise to other crucial problems and report any such situation to the employer or client without delay;
7. identify and document critical circumstances which could give rise to social problems connected with their work or its outcomes and report any such circumstances to the employer or client without delay;
8. take on no additional work or employment which will be disadvantageous to their performance of their duties and tasks for the employer;
9. do not promote interests which are disadvantageous to the employer or a client unless they believe that the greater good is in jeopardy. In those circumstances, they notify the employer first.

## III. HIGH-QUALITY WORK AND ITS OUTCOMES

***Members of staff make every effort to ensure that their work and its outcomes meet the highest possible professional standards.***

***In particular, they:***

1. plan and perform their work striving for high quality, acceptable costs and a reasonable schedule, ensuring that crucial compromises are clear, communicated and accepted by the employer and the client;
2. provide appropriate and attainable goals for every product or service they work on or propose;
3. identify and participate in resolving ethical, economic, cultural, legal and environmental problems in relation to the products and services they are working on;
4. ensure that they have the knowledge, skills and experience indispensable to attaining the quality anticipated for every product or service they work on or propose;
5. use work methods appropriate to each task they perform and to each product or service they work on or propose;
6. work in accordance with the professional standards which are available and are the most appropriate to the task they are performing. They should only deviate from those standards when doing so is ethically or technically justified;

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7. pursue a full understanding both of the specifications for the products and services they co-create and of the legal requirements relating to them. They ensure that the results of their work are properly documented, meet user requirements and have received the requisite acceptance;
8. draw up realistic estimates of the workload, staff, costs and schedule for, and risks related to, products and services to be worked on or proposed;
9. compile meticulous and reliable documentation for the products and services they work on. The documentation should encompass the solution(s) applied and the problems identified;
10. ensure that the products, services and related documents that they work on do not interfere with the privacy of the people who will be affected by the said products or services;
11. only use data obtained by ethical and legal means after having received the appropriate authorisation;
12. treat every type of service and product servicing with the same professionalism they bring to creating new solutions.

## **IV. HONESTY AND INDEPENDENCE**

***Members of staff maintain honesty and independence in their judgements, professional opinions and activities.***

***In particular, they:***

1. only approve documents when they agree with the contents and which were compiled under their supervision and in line with their skill sets;
2. maintain their professional objectivity with regard to each product or service and related documents which they are asked to evaluate;
3. focus on the features and properties of products or services when formulating technical opinions and not on the skills of the people who created or provided them;
4. do not participate in false or improper financial practices such as bribery or double accounting;
5. make every interested party aware of conflicts of interest which cannot reasonably be avoided or prevented;
6. refuse to participate as a member or advisor in private, governmental or professional bodies dealing with questions relating to products and services where they themselves, the employer or the client have undisclosed potential conflicts of interest.

## **V. ETHICAL MANAGEMENT**

***Staff members performing management functions comply with and promote an ethical approach to managing the development and maintenance of products and services.***

***In particular, team and project managers:***

1. provide good management for every project where products or services are the object. This includes using effective procedures which ensure quality, mitigating risks and proceeding in accordance with the standards adopted by the employer;
2. ensuring that the staff members they supervise are familiar with the standards before they undertake to comply with them;

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3. ensure that the staff members they supervise are familiar with the employer's information security, personal data protection, environmental protection and occupational health and safety policies and procedures;
4. assign tasks to staff members, taking into consideration not only their knowledge, skill sets and experience, but also their desire to develop professionally;
5. provide realistic estimates of the costs, workload, staff, schedule, criteria for quality and results for, and risks related to, projects they are managing or proposing where products or services are the object;
6. offer employment to people who are interested, providing full and precise information as to the terms and conditions;
7. offer members of staff honest and fair remuneration for the work they do;
8. do not use unfair or unjustified reasons as a means of preventing members of staff from taking on positions for which they are properly qualified;
9. provide members of staff with honest contractual terms and conditions in respect of intellectual property which they have been instrumental in creating;
10. conduct themselves appropriately both when receiving allegations from staff members concerning violations of the employer's policies, including the principles of the Code, and when examining the allegations;
11. neither require nor request members of staff to act in any way not in keeping with the Code;
12. do not penalise members of staff for expressing doubts concerning the ethics of work assigned to them and its outcomes.

## **VI. PROFESSIONAL ACTIVITY**

***Members of staff support and promote the employer's ethical operations and its reputation for professionalism, in line with public interest.***

***In particular, they:***

1. assist in creating an organisational environment which supports ethical activities;
2. publicly promote the professionalism of the employer's activities;
3. contribute to broadening professional knowledge by, *inter alia*, membership of professional organisations, participating in topic-based events, leading workshops and webinars and writing publications;
4. support their co-workers in complying with the Code;
5. do not promote their own interest at a cost to the position they hold, the functions they serve, the employer or its clients;
6. comply with the laws regulating their work, apart from exceptional circumstances where, in their opinion, to do so would be contrary to public interest. In those circumstances, they notify the employer;
7. describe the features of the products and services they work on accurately, avoiding not only false claims, but also statements which might justifiably be assumed to be speculative, groundless, deceptive, misleading or dubious;
8. take responsibility for discovering, reporting and correcting errors and irregularities in the products, services and related documents they work on;
9. ensure that their managers, the employer and clients are aware of their obligation to comply with the principles of the Code and of the consequences incumbent on this;
10. avoid relationships with organisations with operations which are contradictory to the Code;

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11. recognise that violating the principles of the Code is incompatible with being a professional member of staff;
12. are ready and willing to voice their opinion to the people responsible when they discover significant violations of the Code. Should this be impossible, counterproductive or unsafe, they report the significant violations to the appropriate person or authorities;
13. do not influence anyone to undertake activities associated with violating the principles of the Code.

## **VII. RESPECT FOR CO-WORKERS**

***Members of staff treat their co-workers with respect, are fair towards them and support them in performing their tasks and duties.***

***In particular, they:***

1. do not treat co-workers unfairly as a result of any prejudice whatsoever;
2. do not interfere unfairly in the career of any co-worker whatsoever;
3. support their co-workers' professional development;
4. acknowledge their co-workers' work and results to the full and never credit themselves undeservedly;
5. evaluate their co-workers' work objectively and honestly, with proper documentation;
6. listen to co-workers' opinions, concerns and complaints without bias;
7. assist their co-workers in acquiring full knowledge of the employer's information, personal data, environmental protection and occupational health and safety policies, along with the employer's procedures and standards;
8. refer to the opinions of appropriately qualified co-workers in situations exceeding their own knowledge, skills and experience;
9. encourage their co-workers to comply with the Code.

## **VIII. IMPROVING QUALIFICATIONS**

***Members of staff add to their knowledge and develop their skills of their own accord in terms of the work and tasks they perform.***

***In particular, they:***

1. increase their skill sets as regards creating and providing high-quality, secure, reliable and useful products and services at a reasonable cost and within a reasonable lead time;
2. improve their ability to draw up accurate and transparent documentation;
3. develop their ability to understand how products and services operate, the environments in which they are installed or provided and the documents describing them;
4. add to their knowledge of the standards and laws regulating the products they create, the services they provide and the related documents;
5. increase their knowledge of the principles of the Code, their interpretation and their application at work.

## **RESPONSIBILITY AND AUTHORISATION**

The staff member and associates of MakoLab S.A.

## **ABBREVIATIONS**

n/a

## RELATED DOCUMENTS

n/a