



Code of Ethics

Our Values and Responsibility

17th March 2021

Introduction



Since its founding in the early 1990s, CEC has been providing public affairs services to the world's leading multinationals, performed to the highest ethical standards. As a result, CEC has earned its reputation as the leading public affairs consultancy in Eastern and Central Europe.

CEC's reputation is the result of our commitment to professional responsibility as well as professional excellence and depends on our adherence to the highest standards of professionalism and expert advice. Those qualities, together with honesty, integrity and accountability, are the principal values that govern all our conduct.

With our Code of Ethics, we want to give all our employees and our business partners a clear presentation of our values and principles.

The Code is both a promise and an obligation: a promise to our partners and public, and a commitment by each individual employee to the company.

To ensure that the Code of Ethics remains an integral part of our work, we have established a binding, partners-wide, compliance and integrity management system.

We are convinced that, in addition to high professionalism and operational reliability, our success is based on our values and principles of honour, professionalism, ethics, and security – and which are the obligation of every employee to acknowledge, respect and implement in their work for our clients.

Marek Matraszek
Chairman, CEC Group



“This „knowing what to do”... is a matter of having the right purpose, the purpose appropriate to the situation in hand... The one who „knows what to do” is the one on whom you can rely to make the best shot at success, whenever success is possible”: Sir Roger Scruton

1. Our Values

Since the creation of CEC, our culture and business practices have been guided by our values. These are the principles that we collectively and individually stand for, and they are at the heart of our approach as an ethical and responsible business.

Our Values also provide the basis for our rules of conduct and principles of action. They shape our code of ethics and produce a mindset that encompasses integrity and ethical behaviour. Our values are the foundation for respecting, defending, and upholding CEC as an ethical and responsible business, and for protecting our reputation.

Ethics

We always do the right thing and conduct our business by the highest professional and ethical standards.

Experience

We are confident in what we do, having supported our clients with our professional advice for almost 30 years in the region.

Effectiveness

We always do things the right way.

Quality

We aim to exceed client expectations and work to the highest professional standards.

Confidence

We keep our word and respect your commercial confidentialities.

The management board and senior executives play a key role in setting the example, thus motivating and supporting employees in the practical implementation of this Code of Ethics: Michał Koczalski,
Managing Partner, CEC Warsaw



2. Our Employees and Our Profession

Public Affairs is our profession and is an integral part of the democratic process. Government officials make public policy decisions that affect the interests of individuals, corporations, labour organizations, NGOs and other entities. So public officials need to receive factual information from affected parties and to know each parties' views in order to make informed policy judgements.

We, as professional public affairs consultants, have a clear obligation to always act to the highest ethical standards in our dealings with all parties.

We conduct public affairs activities with honesty and integrity. We are truthful in communicating with public officials and with other interested persons. We seek to provide factually correct, current and accurate information.

We comply fully with all laws, regulations and rules applicable to public affairs activities.

We conduct public affairs activities in a fair and professional manner.

We do not undertake representations that may create conflicts of interest without the informed consent of the client or potential client involved.

We maintain the confidentiality of our clients' information.

Michał Koczalski
Managing Partner, CEC Group

3. Workplace Integrity

One of our most valuable assets are people. We embrace the unique combination of talents, experience and perspective of each employee.

We endeavour to provide a positive work environment respectful of privacy. We build a harassment-free workplace that is free of discrimination of any person based on race, colour, religion, sex, pregnancy, national origin, age, political views, disability, social status or any other characteristic protected by law.

We do not tolerate bullying and mobbing.

We understand the importance of achieving a work-life balance and we support all of our employees in such efforts.

Employee behaviour at work and work-related events can have an effect of the Company and our own professional reputation. Employees are expected to follow socially acceptable rules of behaviour at work and on social media.

Protection of Information

We are all obligated to protect the assets and information of our Company and to use them appropriately, with integrity and to meet the needs and expectations of our business partners.

We are committed to handling personal data responsibility and in compliance with applicable privacy law.

Legal compliance

We comply with all applicable laws, statutes, regulations and codes relating to anti-corruption, bribery, anti-trust, competition and procurement in our home country and abroad.



4. Business Integrity

Protecting our clients is one of our core values

Trust, mutual respect, security and ethical behaviour are essential to our relationships with our clients. In these relationships, we conduct our business with the highest ethical standards and integrity – always assuring that our behaviour is consistent with both laws and culture of our organization.

We seek to ensure that our services delivered to our valued clients are of the highest quality.

Preserving Third-Party Information

To uphold our Company's reputation and best serve our clients, CEC is committed to protecting the privacy of third-party information as vigilantly as we do our own. We collect, use and safeguard client information as we would our own confidential information. We never share the material, non-public information of our clients – whether inadvertently or intentionally – with a third party or any other colleague who does not have a business need to know it.

Conflicts of interest

A conflict of interest may arise when private interest interferes or only appears to interfere with our Company's interests.

We work to identify and remove conflicts of interest involving employees who may not have financial interests, a job or a position on the board of directors with any of our competitors, suppliers, partners or clients.

Exchanging gifts and Entertainment

Providing or accepting inappropriate gifts and entertainment has the potential to harm our business and reputation and may be treated as corruption and illegal. Giving and/or receiving gifts and entertainment is never appropriate if it creates an obligation, puts the giver in a situation where either party appears biased or is done with the intent to influence a business decision.

We comply with our Anti-Corruption Policy, local and international laws, regulations and standards, related to exchanging gifts and entertainment to avoid corruption risks.



Zero tolerance to corruption

We prohibit bribery and corruption in all our projects in every country we operate by complying with our Anti-Corruption Policy, local and international anti-corruption laws (FCPA – Foreign Corruption Practices Act and United Kingdom Bribery Act).

Due diligence – verification of partners in supply chain

We cooperate with third parties to deliver tailor-made services for our clients. We ensure that our partners (consultants, experts) share our commitment to conducting business with integrity, in a secure manner and based on lawful, efficient and fair practices.

We often meet our obligations through partnerships with third parties, such as consultants, independent consultants, and agents. We are aware of the liability based on the improper conduct of third parties. We therefore take appropriate steps to help ensure that business relationships are formed only with trustworthy and qualified third parties.

5. Our Ability to Make Ethical Decisions

CEC employees are expected to read, understand, stay apprised of and comply with our Code of Ethics, all other Company policies, and all applicable laws and regulations. This Code reflects general principles to guide us in making ethical decisions and although it is not intended to address every situation it may arise, in those circumstance we hold our employees to the principle of “do what is right”.

CEC Group is the leading independent public affairs agency and network in Central Europe, offering integrated public affairs and strategic communications services to multinational clients across a full range of policy areas, including but not limited to Energy & Climate, Digital & Technology, Pharma & Healthcare, Financial Services, FMCG, Mobility & Infrastructure, and Defence & Security.

We advise on the political operating environment in the region, and work to protect investment and business models from legislative, regulatory and reputational disruption.

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