

THE CODE OF CONDUCT

Dear Colleagues,

The performance of any commercial company depends to a large extent on the performance of each of its employees. In turn, the effectiveness of work in a team largely depends on how employees interact, what rules of conduct they are guided by. In addition, reliable social conditions, honest and trustworthy cooperation with partners and our responsible behaviour towards the natural environment also have a great influence on the result. It obliges all of us in our business activities to comply with a legislation, respect the generally recognized principles and norms of working with other people and companies, act with integrity and protect the environment - in other words, MPS employees must behave responsibly at all times and in everything.

One of the achievements of European integration was the proclamation and adoption of a system of universal, democratic values and norms, the observance of which guarantees free living and harmonious development for every individual in the European area. Being aware of being a part of the European economic area, understanding its responsibility to the European community and following modern business practices, MPS has developed and is implementing this Code of Conduct. Recognizing the importance of the role of each team member in achieving the goals of our business, on behalf of the Company's management, I ask all employees to familiarize themselves with the Code of Conduct and steadily follow its principles as part of their personal responsibility to MPS, to colleagues and customers. If you have any questions related to the provisions of the Code of Conduct, you should seek clarification from management or the Legal Department.

Feliks Kusaiev,
General Director



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HEALTH AND SAFETY

MPS prioritizes the health and safety of its employees. Occupational health and safety is a fundamental element of all operational procedures and its level meets the highest international and European standards. Every employee must ensure that safety regulations are followed in the work environment and in the workplace. The active and conscious behavior of everyone must ensure safety for themselves and other members of the working community.

MPS is working towards compliance with the OHSAS 18001 standard.

The minimum safety requirement is compliance with applicable health and safety laws. We are actively working to continually improve our health and safety policy in order to offer attractive jobs to our employees.

We ensure that all employees know and comply with health and safety regulations. In warehouses and workshops, it is mandatory to wear appropriate protective equipment provided by the company. All employees are required to perform their jobs responsibly and safely. Managers are responsible for ensuring that their employees know the rules and act in accordance with them. In addition, it is their responsibility to identify the need for additional training and initiate such training if necessary.

HUMAN RIGHTS AND EMPLOYEES' RIGHTS

We do not accept violations of human rights.

MPS strongly rejects child's labour. Protecting children from economic exploitation is of paramount importance.

MPS strongly opposes forced labour and physical discipline. Working hours are determined strictly in accordance with local laws.

MPS guarantees its employees fair wages and reliable social conditions. MPS pays wages and provides Social Security benefits always in line with industry and local employment income.

Regardless of gender, workers are guaranteed for equal pay for equal work.

MPS does not tolerate discrimination against employees or business partners based on gender, nationality, origin, religion, ideology, marital status, age, sexual identity, or disability. Tolerance and mutual respect are essential aspects of our interaction within the company, as well as with our partners.

MPS motivates its employees to act proactively and maintains their loyalty and performance through continuous training, skills upgrading, and via everyone's performance recognition.

MPS respects the right of its employees to freedom of speech and the ability to protect their personal and privacy rights.

MPS respects the rights of its employees to join professional associations, form employee representative bodies and participate in joint meetings in accordance with applicable national legislation.

MPS provides its employees with fair and equal treatment and expects them to treat each other in the same way. We expect tact, respect, trust, reliability and mutual support in relationships between colleagues

OUR BUSINESS PRACTISES

MPS strives to treat all existing and potential business partners fairly and impartially. MPS selects business partners based on economic, human rights and environmental criteria. It is forbidden to give preference to counterparties through prejudice, and at the same time, it is forbidden to discriminate against counterparties in any form.

We believe in fair competition, our competitive advantage arises from quality of our products and services. Therefore, we strictly comply with legislation that protect and encourage competition, including applicable antitrust legislation.

All employees should familiarize themselves with the applicable legislation relating to their areas of responsibility within the company and, if in doubt, seek legal advice from the Legal Department.

FAIR COMPETITION

MPS rejects any form of cooperation or agreement with competitors in the form of price fixing or market sharing in terms of customers, suppliers, trade areas or

segments. We achieve success in the market only through effective products and services and do not accept any other means.

All MPS employees are prohibited from exchanging confidential data with competitors or competitors' representatives, such as product costs, product selling prices, price dynamics and pricing strategy, or any other information that may influence the behavior of competitors.

MPS complies with laws and regulations designed to promote fair competition and encourage ethical and legal behavior. MPS operates in full compliance with antitrust and fair competition laws, which prohibit activity that restricts free trade or competition.

MPS always complies with the legal requirements for lobbying practices. We do not exercise undue influence on legislations or policies, and in dealing with business associations, we strictly adhere to the rules of fair conduct and, in particular, respect for the rules of competition.

We expect the same behavioural standards from our business partners and competitors.

CONFLICT OF INTEREST

MPS employees must always act in the interests of MPS and avoid conflicts of interest. In the event of any potential conflict between an employee's personal, family, or financial interests and those of MPS, the employee must report it, obtain a decision from their manager, and adhere to that decision.

All MPS employees are prohibited from using their position for personal gain for themselves, third parties, or their families.

ANTI-CORRUPTION

MPS does not tolerate any form of corruption or bribery. All employees are strictly prohibited from offering, paying or accepting bribes. This includes all payments and activities that have the sole purpose of influencing the behavior of a third party. Corrupt behavior by our employees, managers or directors is unacceptable.

In our interactions with customers, suppliers or authorities in Poland, Ukraine or abroad, business partners or government officials cannot receive material benefits in exchange for illegal preferential treatment.

These rules are undeniable, even if compliance with them means that we, as a company, cannot enter into specific business relationships.

THE ETHICS OF GIVING AND ACCEPTING GIFTS

In many cultures, gifts and hospitality refer to polite social interaction; however, giving and receiving gifts is subject to ethical restrictions.

MPS employees are only permitted to receive gifts or other benefits from business associates in accordance with generally accepted business standards, and only when it is reasonably certain that it does not allow the employee to be influenced in their business decisions, and only when there is no obligation to provide any reward.

Likewise, all MPS employees must not give gifts or other benefits to employees of other companies, except as required by normal business practice. Any gifts made to gain an unfair advantage for MPS or others, and any gifts given to officials, are not permitted.

Behavior with officials is regulated by international and national legislation and therefore requires adherence to certain principles. Hospitality and gifts from officials may only be accepted if they comply with these principles. The same applies to giving gifts and hospitality to officials.

ANTI MONEY LAUNDERING

Every employee of MPS must ensure that no third party is able to use the business relationship with MPS for the purpose of money laundering.

TAX COMPLIANCE

We accept the responsibility to pay due taxes on time and thus contribute to the government budgets of the countries in which MPS operates. MPS employees are required to ensure that their business activities comply with the tax laws and regulations of the countries in which they operate. Responsible officials in each country should be familiar with national regulations and comply with them properly.

ENVIRONMENTAL PROTECTION AND ENVIRONMENTALLY-SOUND USE OF RESOURCES

Long-term success and sustainable business development are among the most important goals of MPS. We consider our social responsibility to be a fundamental factor in creating a sustainable business, including the responsibility to protect the environment from the impact of technogenic factors.

Environmental friendliness and resource saving in relation to our business is not just an expense item, but a necessary condition for the company's success. In this regard, each employee must be aware of their obligations to protect the environment in relation to colleagues, customers and shareholders, as well as a member of society. Therefore, the environmental initiative is supported by our managers of all levels.

Continuous improvement of applied technologies, aimed at optimizing energy consumption, efficient use of resources and reducing emissions, is designed to help minimize the negative impact on the environment. Thus, all MPS facilities must comply with legal regulations to protect the environment.

All activities are carried out in accordance with the legislation and regulations of the countries in which we operate and under international agreements and standards regarding the need to protect the environment.

The environmental efforts of MPS are certified according to ISO 14 001.

MPS requests all its current and potential partners to maintain the same high environmental standards.

CONFIDENTIALITY OF INFORMATION

MPS employees must treat as confidential and not subject to disclosure all inside information about the activities of the company, the content of contractual relationships with partners and customers, in particular those related to commercial transactions and trade secrets that they became aware of in the course of their activities during the period their work, as well as after leaving the company. Company documentation and data carriers must be securely protected from any access by unauthorized persons.

Employees are not allowed to disclose any information received from contractors and other third parties without prior approval from MPS management.

DATA PROTECTION

The protection of personal data is very important to us, especially the data of our employees, customers and suppliers. We collect and process personal data only when required by law or necessary to perform a specific task. No personal data is collected or processed without the consent of the person submitting it, except in cases where this is required by law.

DOCUMENTATION AND INFORMATION CIRCULATION

All business transactions must be fully and correctly documented in accordance with legal requirements as well as MPS internal policies. All business records and reports prepared internally and made available to third parties must also be written in an orderly and truthful manner.

All employees are required to ensure the prompt and uninterrupted exchange of information within the company. Any new information or know-how relevant to the performance of tasks by MPS personnel, when communicated solely through internal communication, must not be hidden, falsified or selectively transmitted.

APPLICATION OF THE CODE OF CONDUCT

All employees and managers of MPS, regardless of their position, status or location, are required in their daily business activities and decisions to comply with the provisions and be guided by the principles set forth in this Code. Managers are responsible for the implementation and adherence to this Code, including the necessary training to ensure employees know and follow the requirements of the Code.

MPS expects the same standards of conduct from all persons acting on its behalf. We do not accept violations of the above principles. All of our employees must be aware that any breach can have serious consequences for MPS.

Leaders must actively demonstrate adherence to the Code of Conduct.

Any employee who becomes aware of a violation of applicable law or this Code must immediately report the information to their supervisor. If, for any reason, you are uncomfortable talking to your manager, or if your manager is involved in the

situation or is otherwise in conflict, the situation should be reported to their superior. Such a report will not have a negative or discriminatory impact on the employee.

Violations of the Code and related offences may result in disciplinary and legal action and lead to termination of the employment contract.

If employees have any questions regarding the interpretation or compliance with this Code, employees may contact their line manager or the contact person designated for this purpose in the company for clarification:

MPS Technology Sp z o o, Poland:

General Director: Sergiy Arestenko, mob. +48 731 825 655, e-mail: s.arestenko@mps-tech.pl

Compliance responsible manager: Olena Ponamarenko, mob. +48 881 445 210, e-mail: o.ponamarenko@mps-tech.pl

Metpromservice Ltd., Ukraine:

General Director: Felix Kusaiev, mob. +38 067 619 9777, e-mail: felix@mps.zp.ua
Compliance responsible manager: Olena Ponamarenko, mob. +48 881 445 210, e-mail: o.ponamarenko@mps-tech.pl

All reports are treated strictly confidentially.

This CODE OF CONDUCT enters into force on the 1st of January, 2022.

MPS TECHNOLOGY Sp. z o.o.
ul. Legionów 94
42-200 Częstochowa
NIP 9492227724 REGON 369964226
BDO 000022824

Prezes Zarządu

Arestenko Sergii

