

**MakoLab**



**MakoLab S.A.**  
**Code of Conduct**

24 MAY 2023

# MakoLab

## PURPOSE AND SCOPE

In our organisation, we believe in the values set out in this code of conduct and the procedural rules arising from them.

## TERMS AND DEFINITIONS

[Słownik pojęć w Zintegrowanym Systemie Zarządzania - Dictionary of terms constituting part of the Integrated Management System](#)

## FREEDOM AND EQUALITY

***We believe in respecting every person's freedom and freedom of choice. We also promote equality and tolerance, irrespective of sex, race, health, age, ethnic origin, affiliation to organisations or other characteristics. We prize diversity and recognise how important it is to enable freedom of expression for our staff and stakeholders and we continually work to build and develop an environment which is conducive to respect and tolerance for everyone.***

***In particular, the following procedural principles are our guidelines:***

1. We abide by human rights as protected under international law.
2. We respect the right of every member of staff to their faith, political convictions and personal views. In all these areas, our position is neutral and we are vigilant in ensuring that neither we nor our staff make any imposition on anyone in this respect.
3. We uphold our staff members' right to belong to and associate with any organisation permitted by law.
4. We do not tolerate forced, compulsory or slave labour in our company or at any point along our supply chain. Every member of staff may end their working relationship with us in accordance with their contract and the applicable laws. We accept no form of discrimination whatsoever. This includes unequal treatment and prejudice on account of sex, race, skin colour, ethnic origins, sexual orientation, disability, age, marital status, parental status, religion, political views, nationality, social status and affiliation with organisations.
5. The only criteria by which we assess our staff, assign them to positions, remunerate them and reward them are their skills, the way they carry out their tasks and duties, their compliance with our principles, rules, policies and procedures, their commitment to MakoLab S.A. and their activities on the company's behalf.

## RESPONSIBILITY AND ENVIRONMENTAL PROTECTION

***We take responsibility for our activities and decisions and for minimising our impact on the environment. We comply with the laws and regulations concerning privacy, the confidentiality of information and combating negative practices. We are vigilant about protecting the natural environment and follow measures designed to reduce our carbon footprint and promote sustainable practices in all our operations. We encourage our staff and suppliers to act responsibly towards organisations, stakeholders and society, taking into consideration the impact of their activities on the environment at the same time.***

***In particular, the following procedural principles are our guidelines:***

1. Protecting confidential information is obligatory for us as an organisation and for our staff. We make every effort to ensure that information of this nature is defined in the contracts we sign and marked accordingly when it comes into our keeping. We require compliance with our in-house information security policy and all staff members are obliged to

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familiarise themselves with it on starting employment or collaboration with us. When an employment relationship comes to an end, the disclosure of any confidential information received during its course is unauthorised. In cases of ambiguity, we recommend treating the information as confidential and clarifying any doubts whatsoever with us.

2. Personal data are securely obtained, with the consent of their owners, solely for the purposes for which they are given to us and in accordance with the applicable law. We require compliance with our in-house personal data policy and all staff members are obliged to familiarise themselves with it on starting employment or collaboration with us.
3. We work to combat money laundering, which is to say, financial transactions serving to introduce illegally acquired financial resources into the legal financial system. In this area, we follow the laws everywhere where we conduct our business. If we discover that another party is involved in any activity of this kind, we break off our business contact with them immediately. All staff members are obliged to notify us of any suspicious transactions or behaviour on the part of a contractor.
4. We comply with the regulations for the control of exports and with sanctions and trade restrictions imposed on countries, governments, organisations, business entities and citizens. We are aware that they prevent the spread of arms, goods and technology for use contrary to international law and the interests or policies of our country, our allies' countries and international organisations. Any uncertainties and suspicions entertained by staff members in this respect must be reported to us for evaluation and resolution.
5. Compliance with national and international regulations and standards for protecting the environment is our responsibility and that of all our staff, as are activities intended to minimise our energy consumption and carbon footprint, reduce all types of waste and ensure that our waste is correctly disposed of. We also take this into consideration when selecting our suppliers and business partners.
6. We make every effort to monitor our impact on the natural environment wheresoever this is possible. We work to increase our awareness in terms of protecting the natural environment and we promote pro-ecological conduct among our staff and contractors.

## **HONESTY, INTEGRITY AND SINCERITY**

***We believe that we are honest, truthful, upright, sincere and transparent in all our activities. We expect high standards and ethical conduct from our staff in this respect. We make every effort to proceed appropriately and fairly in all our interactions and to communicate openly and honestly and be truthful and accurate in all our operations and decisions.***

***In particular, the following procedural principles are our guidelines:***

1. We are aware of the importance of our intellectual property, trademarks, service marks, patents and trade secrets, as well as those of our clients and other third parties. We neither use them nor make them available in any way whatsoever without the owner's consent. We always use software in accordance with the licence granted to us.
2. Our intellectual property, our products and our brand are vital assets and we guard and protect them. We draw attention to the fact that any and every use of them for purposes unrelated to performing work on our behalf may lead to a violation of the related contract we have signed and requires consultation with us.
3. We respect all of the resources we have at our disposal in carrying out our work. This relates primarily to computer equipment and IT systems. We are vigilant in ensuring that they are used solely for purposes related to performing work on our behalf and in accordance with

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the rules. All staff members are informed of this on starting employment or collaboration with us.

4. We document our economic situation honestly and transparently. We are all responsible for our financial results, including sales and increased costs. We require our staff to ensure that any financial information they report reflects the actual status, is accurate, on time and accords with the law.
5. We comply with the regulations and good practices in respect of our share transactions and our contractors' and partners' shares if they are listed on the public market. We do not avail ourselves of confidential information which might have an impact on share values in order to carry out transactions of this kind on our own or via another person. These obligations are also binding on our staff.
6. We avoid conflicts of interest, which can occur when a staff member's activities, relationships and capabilities might have an influence on their judgement as to what is beneficial to them and what is beneficial to our organisation. This concerns, for example, family members working in the company, relationships with our clients or other third parties, additional employment, financial investments or being a member of the governing bodies of outside companies. We wish to be notified of any and every potential conflict of interest in order to be able to express our opinion on the matter.
7. We neither tolerate nor do we ever make use of bribery and corruption and we require the same conduct from our staff. Bribery and corruption encompasses accepting material benefits or promises thereof from, or giving or promising such benefits to, holders of public office, clients, suppliers, business partners or anyone else whatsoever. We support any employee who encounters a situation of this kind. In doubtful circumstances, we judge what the appropriate behaviour will be and instruct our staff accordingly.
8. We recognise that giving and receiving gifts or other benefits can be part of building good relationships with clients and business partners. However, it should occur in compliance with our rules. When a client or partner gives a gift or benefit with a value of up to PLN 150, no action is required on the part of the recipient. Anything exceeding that value must be reported to us and our approval is required for its acceptance.
9. For giving gifts to our clients and contractors, our rule is that it should only occur occasionally and that it should be of a reasonable value. All gifts or benefits worth more than PLN 150 must be disclosed.
10. We comply with local laws which limit the value of gifts and benefits given to public officials. Any doubts as to who is a public official must be reported to us and the instructions we issue must be adhered to.
11. We observe ethical business practices, including fair competition and anti-trust laws and regulations. We do not participate in explicit or implicit agreements or undertakings where the intention or outcome is price fixing, limiting production, market sharing or any other restriction of competition. We require this of all our staff.

## **HEALTH, PRIVATE LIFE AND DEVELOPMENT**

***We believe that health, fulfilment and a private life are important to the well-being of all of us and we work to provide a safe and friendly work environment which supports the balance between our staff members' professional and private lives and promotes physical, mental and emotional health. We nurture the development and knowledge of our staff, stakeholders and organisation alike.***

***In particular, the following procedural principles are our guidelines:***

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1. We do not employ people who are younger than the minimum working age and we require the same of our suppliers.
2. We comply with the occupational health and safety laws applicable in each of the countries where our staff work. If we delegate staff to work at our contractors, we abide by the contractors' rules and procedures in this respect.
3. We do not tolerate any form of harassment or bullying whatsoever. At MakoLab, we consider this to encompass, in particular, physical or verbal abuse, sexual harassment and any other kind of harassment, threats or intimidation.
4. We respect the free time and leisure of all our staff, along with their family and other commitments and activities outside of the workplace. We comply with the applicable law as regards working outside the established working time, overtime and working at night, on public holidays and non-working days. We only permit this when it results from the nature of the job in a given position or in exceptional, essential and justified cases.
5. We encourage, and create the conditions for ongoing learning, innovation and continual improvement, supporting our staff members' personal and professional development in this way.

## **TRUST, RESPECT AND OPENNESS**

***We believe in building trust and positive relationships with our staff, with stakeholders and with society. We promote mutual respect and understanding and we encourage open communication, active listening and constructive feedback, while simultaneously appreciating different points of view and opinions.***

***In particular, the following procedural principles are our guidelines:***

1. Everyone has the right to lodge a complaint or notify us about irregularities they have noticed, including concerns relating to compliance with this code of conduct. This can be done through official channels by contacting us either directly or anonymously via our whistleblower system without incurring negative consequences from the company. Every complaint or notification of irregularities is examined and the person submitting it receives a response detailing how it is handled.
2. We are open to ideas and initiatives which will serve to improve our work.
3. We exercise care over the form and content of our communications, both in-house and in contact with our clients, suppliers and business partners. They must be pleasant and demonstrate mindfulness as to what we are communicating and how we are communicating it. Sending and conveying unnecessary content should be avoided, as should sending communications to people they do not concern.
4. We respect the traditions, business customs and social and cultural norms of every country we operate in and every country that our staff and stakeholders come from.

We expect all the staff of MakoLab S.A. and all our stakeholders to share the values set out in this code and to conduct themselves in accordance with its principles at all times.

## **CONTACT**

1. Compliance team: [compliance@makolab.com](mailto:compliance@makolab.com)
2. Legal Team: [legal@makolab.com](mailto:legal@makolab.com)
3. Personal Data Protection Proxy for the Management Board: [gdpr@makolab.com](mailto:gdpr@makolab.com)
4. Management Board: [mlb-management-board@makolab.com](mailto:mlb-management-board@makolab.com)

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5. Whistleblower system: [Whistleblower](#)
6. Reporting gifts and benefits: [gifts-benefits@makolab.com](mailto:gifts-benefits@makolab.com)

## **ABBREVIATIONS**

n/a

## **RELATED DOCUMENTS**

1. [MakoLab Spółka Akcyjna Łódź Organisational Regulations](#)
2. [MakoLab S.A. Łódź Regulations for Staff Remuneration](#)
3. [POL#027 MakoLab S.A. Human Rights Policy EN Rev.A](#)