

MakoLab S.A. Code of Conduct for Partners

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MakoLab S.A., ul. Ogrodowa 8, 91-062 Łódź, Poland, tel.: 48 42 239 28 50, office@makolab.com, www.makolab.com. The company is entered into the National Court Register administered by the District Court for Łódź-Śródmieście, 20th Department of the National Court Register, under the number KRS 0000289179. Share capital of PLN 698,698,000 (six hundred and ninety-eight thousand, six hundred and ninety-eight zloty, zero grosze), paid in full. VAT No.: PL7250015526, REGON (National Official Business Register No.): 471343117.

PURPOSE AND SCOPE

The purpose of the *MakoLab S.A. Code of Conduct for Partners*, hereinafter referred to as the Code, is to ensure that every person and organisation entering into a business relationship with MakoLab S.A., hereinafter referred to as MakoLab, understands and shares our values and principles for conduct.

Compliance with the Code is required of entities running business activities with MakoLab, hereinafter referred to as Partners, including suppliers, distributors, sellers, contactors, subcontractors, clients and others.

Partners must comply with this Code, even if it provides for higher standards than those required by the applicable international or national law and regulations.

The Code is not exhaustive. The principle is that Partners will conduct themselves as responsible, honest, reliable and law-abiding people and business entities answering for their activities and proceeding ethically.

TERMS AND DEFINITIONS

<u>Słownik pojęć w Zintegrowanym Systemie Zarządzania - Dictionary of terms constituting part of the Integrated Management System</u>

HUMAN RIGHTS AND WORKERS' RIGHTS

Partners:

- 1. abide by human rights as protected under international law, including people's right to their faith, political convictions and personal views and the right to belong to and associate with any organisation permitted by law;
- 2. neither use nor tolerate forced, slave or compulsory labour;
- 3. do not accept, but combat any and every form of discrimination, unequal treatment and prejudice on account of sex, race, skin colour, ethic origins, sexual orientation, disability, age, marital status, parental status, religion, political views, nationality, social status and affiliation with organisations;
- 4. do not employ people who are younger than the minimum working age permitted under the local law;
- 5. comply with the local law, including regulations in respect of remuneration and working time;
- 6. comply with occupational health and safety regulations everywhere where they conduct their business;
- 7. do not tolerate any form of bullying or harassment whatsoever, particularly physical or verbal abuse, sexual harassment and any other kind of harassment, threats or intimidation;
- 8. are open to diversity;
- 9. respect the traditions, business customs and the social and cultural norms of every country they operate in and every country that their staff and stakeholders come from;
- 10. provide every member of their staff with the possibility, including anonymously, of lodging complaints or reporting information about irregularities without any negative consequences for doing so.

INFORMATION AND PERSONAL DATA PROTECTION *Partners:*

- 1. ensure that confidential information is protected and do not disclose it;
- 2. comply with the regulations on protecting personal data and privacy;
- 3. work to combat money laundering, following the local laws everywhere where they conduct their business. If they discover that a contractor is committing a crime or attaining financial benefits in a criminal manner, they break off their business contact with them immediately. They disclose any and all information in order to enable MakoLab to comply with the laws in question.
- 4. comply with national laws and the laws of the European Union and the United States of America in respect of the control of exports and with sanctions and trade restrictions imposed on countries, governments, organisations, business entities and citizens. They disclose any and all information in order to enable MakoLab to comply with the laws in question.

ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT *Partners:*

- 1. comply with national and international standards and laws in respect of environmental protection and with the local laws everywhere where they conduct their business;
- 2. ensure that they work to minimise their energy consumption and carbon footprint, reduce all types of waste and ensure that their waste is correctly disposed of;
- 3. monitor their impact on the natural environment wheresoever that is possible;
- 4. comply with the applicable law on disposing of hazardous substances.

INTELLECTUAL PROPERTY

Partners:

- 1. comply with the laws and regulations in respect of intellectual property, trademarks, service marks and patents;
- 2. undertake to protect the MakoLab brand and the brands of MakoLab's clients.

LAWS AND ETHICAL BUSINESS

Partners:

- comply with national laws and the laws of the European Union and the United States of America in respect of the control of exports and with sanctions and trade restrictions imposed on countries, governments, organisations, business entities and citizens. They disclose any and all information in order to enable MakoLab to comply with the laws in question;
- 2. prevent the occurrence of conflicts of interest and disclose any and all information which might lead to a real or potential conflict of interest with MakoLab or its staff;
- 3. neither use nor tolerate bribery and corruption;
- 4. neither bribe MakoLab's staff nor give them illegal or inappropriate benefits and gifts. In each case, they should check with MakoLab as to whether the benefits in question are appropriate;

- 5. comply with the applicable national laws on tenders and public procurement when engaging in business with governments, public institutions, state enterprises, government departments, local authorities and quasi-governmental bodies. In places where giving any kind of benefit whatsoever to public officials is prohibited, they refrain from doing so;
- 6. comply with fair competition and anti-trust laws and regulations;
- 7. settle their financial obligations on time;
- 8. document and communicate their economic situation honestly and transparently;
- 9. adhere to ethical business practices;
- 10. disclose any and all information which might threaten MakoLab's interests;
- 11. oblige their staff to comply with the principles of the Code and ensure that they work to improve in terms of ethical standards;
- 12. undertake to notify MakoLab of any and every suspected violation of the Code;
- 13. ensure compliance with the Code and promote its principles among their business partners and the organisations they collaborate with.

CONTACT

If you, as a Partner, have any questions or uncertainties as to whether your operations accord with the Code or if you know of any violations of the Code, please contact:

MakoLab Compliance Officer Address: ul. Ogrodowa 8, 91-062 Łódź, Poland e-mail: compliance@makolab.com

Violating this Code could result in the immediate termination of MakoLab's business relationship with the Partner concerned. In addition, MakoLab S.A. reserves the right to seek compensation for any and every loss incurred as a result of a Partner's violation of the Code.

ABBREVIATIONS

n/a

RELATED DOCUMENTS

n/a