



MLP
GROUP



Code of Good Business Practice

www.mlpgroup.com



Code of Good Business Practice

for Business Partners of MLP Group S.A. Group Companies ("Code of Good Business Practice" or "Code")

In all their activities, MLP Group S.A. and its subsidiaries ("MLP Group") comply with applicable laws and regulations as well as upholding the highest ethical standards. We believe that our daily attitudes, behaviours, and business conduct are just as critical as the outcomes they produce. We are committed to the principles of integrity, inclusiveness, and fairness and are dedicated to ensuring the transparency of our operations. This has earned us the trust of our contractors, tenants, and other business partners ("Business Partners").

As an industry leader, we acknowledge the responsibility that comes with our position. Therefore, given the scale of our operations and their impact on our environment, we attach great importance to environmental protection, social engagement, and corporate governance.

What is the Code of Good Business Practice?

This document serves as a set of fundamental guidelines intended to shape the interactions between MLP Group and its business environment. It lays the foundation for any common efforts by not only establishing standards of expected business conduct but also by outlining our aspirations and trajectories for future growth in collaboration with our Business Partners.

The primary objective of this Code of Good Business Practice is to foster a sustainable value chain, rooted in the principles of partnership and shared responsibility.

This Code sets forth MLP Group's expectations for Business Partners in areas such as human rights, labour conditions, environmental protection, and business integrity.

By endorsing good practices, we encourage our Business Partners to embrace this Code and to extend similar standards to their agreements with their own business associates and thereby promote the principles contained herein throughout their business networks.

When selecting Business Partners, MLP Group aims to contract with those that most fully satisfy the expectations set forth in this Code.





ETHICAL BUSINESS CONDUCT

1. COMPLIANCE

MLP Group expects that all Business Partners keep themselves well-informed about and comply with the relevant laws and regulations across all jurisdictions in which they operate. This includes holding all requisite permits, licenses, and/or any other documents and registrations required by law

2. FAIR COMPETITION

MLP Group expects its Business Partners to adhere strictly to the principles of fair competition. This means avoiding any agreements that could constrain competition or abusing a dominant market position. Business Partners of MLP Group comply with all antitrust laws and other regulations governing competition, ensuring their business activities respect the tenets of free and fair competition

3. PREVENTING BRIBERY, CORRUPTION, AND MONEY LAUNDERING

MLP Group expects its Business Partners to counteract any form of corruption or fraud and engage in all necessary preventative actions.

Business Partners neither tolerate nor participate in any acts of corruption, bribery, embezzlement, or fraud. Any confirmed instances of corruption is thoroughly investigated, properly documented, and promptly addressed with suitable corrective actions. Business Partners of MLP Group comply with the prohibition from resorting to corrupt practices.

Moreover, MLP Group expects its Business Partners to comply with all applicable legal and regulatory standards aimed at preventing money laundering and the financing of terrorism and to implement effective measures to mitigate any related risks.



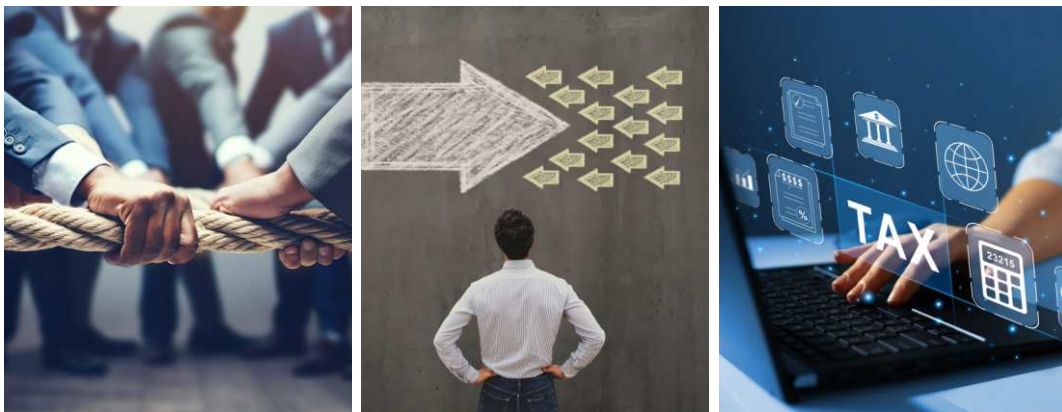
4. PREVENTING CONFLICTS OF INTEREST

Business Partners proactively prevent any conflicts of interest. They do not accept or offer any advantages, whether tangible or intangible, that could unduly influence business decisions.

5. CONFIDENTIALITY AND DATA PROTECTION

MLP Group's Business Partners protect the integrity of information, especially data and confidential information shared with them as part of business transactions, and that they exclusively use information which is sourced and processed lawfully.

They also respect the intellectual property rights of all their partners and collaborators.



6. TAX COMPLIANCE

MLP Group expects that its Business Partners to comply with all applicable tax laws and regulations in their activities and do not engage in any forms of unlawful tax avoidance, in particular not to use unauthorised tax optimisation and such practice is carried out throughout the Business Partner's business chain.

7. CODE OF CONDUCT

As regards business conduct, MLP Group's Business Partners manage stakeholder relationships in adherence to the highest ethical, transparency, and partnership standards.

Business Partners develop and maintain documents that define the norms of ethical conduct, including establishing whistleblowing procedures.





HUMAN RIGHTS, EQUITABLE WORKING CONDITIONS

1. PROHIBITION OF FORCED LABOUR

Business Partners do not use any form of forced labour, both in Poland and in other countries. It is expected that all work carried out for a Business Partner or for its subcontractors and suppliers is entirely voluntary. In their employment arrangements or those of their subcontractors, MLP Group's Business Partners do not tolerate any labour practices that exploit economic or political vulnerabilities of any region by coercing individuals into working under conditions that expose them to health risks or threaten their dignity, including, but not limited to, unfair wage practices. All work provided to a Business Partner and its subcontractors is voluntary and respects all fundamental labour rights, including with regard to working overtime and/or on public holidays.

2. PROHIBITION OF CHILD LABOUR

MLP Group's Business Partners strictly refrain from employing any form of child labour.

3. SAFE WORKING CONDITIONS

MLP Group's Business Partners comply with all applicable occupational health and safety laws and regulations, ensuring their employees and permanent associates can work in a safe and secure environment. Business Partners take measures aimed at minimising and ultimately eliminating any accidents, injuries, occupational diseases, and other adverse work-related incidents among their employees and permanent associates. Every Business Partner keeps thorough safety and health records to mitigate occupational risks and continuously enhance the safety of their workplace. MLP Group's Business Partners also provide routine health and safety training and education to all their employees.



4. FREEDOM OF ASSOCIATION

MLP Group expects its Business Partners to fully recognise and respect employees' rights to association and collective bargaining, without discriminating against any one for their trade union affiliation.

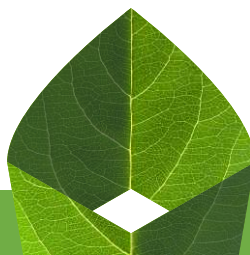
5. FAIR EMPLOYMENT TERMS

Business Partners ensure their employees are compensated when due and never at rates lower than the minimum wage as prescribed by law and to pay all related social security contributions and taxes. MLP Group's Business Partners also observe all laws and regulations regarding employment conditions, including, without being limited to, work hours, holiday entitlements, and parental and medical leave



6. PREVENTING WORKPLACE BULLYING, DISCRIMINATION, AND VIOLENCE

MLP Group expects its Business Partners to commit to fostering a work environment that is free from any form of harassment, discrimination, or violence. This includes, but is not limited to, preventing discrimination based on gender, age, disability, race, religion, nationality, political orientation, trade union affiliation, ethnic background, religion, sexual orientation, and the nature of employment contracts (whether fixed-term or indefinite, full-time or part-time). All employment practices and decisions, from recruitment to promotions, compensation, training opportunities, and termination, must be grounded in objective and fair criteria. Absolute prohibition extends to all physical violence, threats thereof, sexual violence, and any harassment, including verbal abuse and intimidation.





ENVIRONMENTAL PROTECTION

1. COMPLIANCE

MLP Group expects its Business Partners to comply with all laws and regulations relevant to their operations' environmental footprint and commit to reducing their adverse environmental impacts.

2. POLLUTION PREVENTION

MLP Group's business partners oversee their processes so as to ensure they are run in a manner that prevents environmental pollution.

3. GREENHOUSE GAS EMISSIONS

MLP Group's Business Partners take a proactive role in mitigating climate change by diligently working to reduce their direct and indirect emissions of greenhouse gases, including carbon dioxide, in the scope proportional to the scale and specific nature of their operations.

4. WASTE MANAGEMENT

MLP Group's Business Partners strictly follow all legal waste management protocols and strive to minimise the volume of waste their operations generate. They ensure the proper handling of all generated waste, including through engaging licensed waste collection providers to effectively minimise any adverse environmental impacts of waste.

5. ENVIRONMENTAL MANAGEMENT SYSTEMS

Business Partners whose operations have a severe impact on the natural environment apply well-structured and systemic environmental management practices, in particular to address any adverse impacts of their activities on different elements of the natural environment.





How to report

violations of this Code?

- 1.** Individuals who become aware of any violation of this Code of Good Business Practice must promptly report it in accordance with the relevant procedure as laid down herein, citing any pertinent facts, events, and circumstances known to them (“Report”). It is imperative that these individuals act in good faith and base their reports on substantiated facts.
- 2.** No misconduct reported in good faith may lead to any retaliatory action against the Reporting Person in connection with such Report, including, without being limited to, any threats, sanctions, or discrimination (“Retaliatory Action”), even if subsequent investigation reveals that no misconduct has in fact taken place.
- 3.** The Company reserves the right to take appropriate action with respect to all individuals who take or threaten to take any Retaliatory Action against the Reporting Person.
- 4.** This Procedure provides for both anonymous and non-anonymous reporting of violations.
- 5.** The Company gives assurance that a Report and data contained therein will be kept confidential. The information contained in a Report must not be disclosed to any individuals who do not need it to perform their responsibilities.
- 6.** Anonymous Reports are investigated to the extent allowed by the information disclosed therein. A Report should contain information enabling assessment of the severity of the reported violation and the conduct of an investigation.



- 7.** Reports may be filed as follows:
 - a) by email sent to: **zgloszenia.naruszen@mlpgroup.com**
 - b) by mail sent to: **MLP Group S.A., ul. 3 Maja 8, 05-800 Pruszków, Poland, marked for the attention of: Management Board Member responsible for handling Misconduct Reports.**
- 8.** A Report should be well documented and include relevant details so that its factual validity can be examined, also if the Reporting Person can no longer be contacted. It should contain in particular:
 - a) a detailed description of the relevant facts.
 - b) the date and place of the incident;
 - c) personal data and role of the individuals involved, or elements that can enable their identification;
 - d) a reference to any documents that can confirm the validity of the facts reported.
- 9.** If the Reporting Person has provided his or her contact details, the Integrity Officer will, within one week from receiving the Report, notify that person of how the Report is being dealt with from the email address specified in sec. 7 above. While verifying the validity of a received Report, the Integrity Officer may contact the Reporting Person for further information as required.
- 10.** If the Reporting Person voluntarily provides his or her personal data, it will be processed in accordance with the Company's personal data protection policy.

Failure to meet the responsible business criteria

If following the investigation of a Report, a Business Partner is found not comply with this Code, adequate remedial action must be taken to cure the non-compliance and prevent its recurrence. MLP Group reserves the right to cease or refrain from collaboration with a Business Partner that permanently or grossly violates the standards set forth in this Code.

This Code of Good Business Practice is available to Business Partners on the MLP Group's corporate website and any related information is updated on an as-needed basis.

This Code of Good Business Practice does not purport to constitute an exhaustive list of applicable standards of ethical business conduct, which is why in specific circumstances MLP Group may undertake an individual risk assessment to avoid any questionable or ambiguous engagements that could jeopardise its reputation.

This Code of Good Business Practice is effective from the date of its adoption by the Management Board.

