

# The Code of Ethics

MMR GROUP Sp. z o.o.



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## INTRODUCTION

MMR Group Sp. z o.o. is aware of the importance of complying with applicable regulations and laws in its operations, as well as of the importance of acting in accordance with globally defined ethical standards.

As a fast-growing company in the industrial and printing sector on the Polish market, MMR Group Sp. z o.o. feels obliged to promote socially responsible business and wishes to join a group of globally recognized companies in terms of credibility, reliability, respect for human rights and protection of the environment. The responsibility for achieving this goal lies with all employees of MMR Group Sp. z o.o.

The aim of developing and observing the Code of Ethics is to maintain sustainable development in three areas: economic, social and environmental. MMR Group Sp. z o.o. wishes to strengthen the trust between its stakeholders, to provide high-quality products and services serving the society and not endangering the environment, as well as to build and maintain the image of a company that is committed and socially responsible.

The Code reflects the ethical values that MMR Group Sp. z o.o. is committed to and will uphold. It constitutes the foundation for the conduct of all employees of the Company in relation to co-workers, supervisors, customers, suppliers, partners and local communities, both in business and near-business relations.

The present Code of Ethics has been approved by the Management Board of MMR Group Sp. z o.o., which undertakes to assess regularly the observance of the principles contained in the Code and to update its content on the basis of the conclusions achieved.

The person responsible for the content and popularization of the Code of Ethics of MMR Group Sp. z o.o.:

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## 1. Mission of MMR Group Sp. z o.o.

MMR Group Sp. z o.o. is a modern provider of original and customized product and service solutions. For almost 30 years, it has been operating on the Polish market in the industry and railway sector (through MMR Group TransComfort), in the printing industry (through MMR Group PrintSolutions) and in media transfer (through MMR Group MediaTransfer).

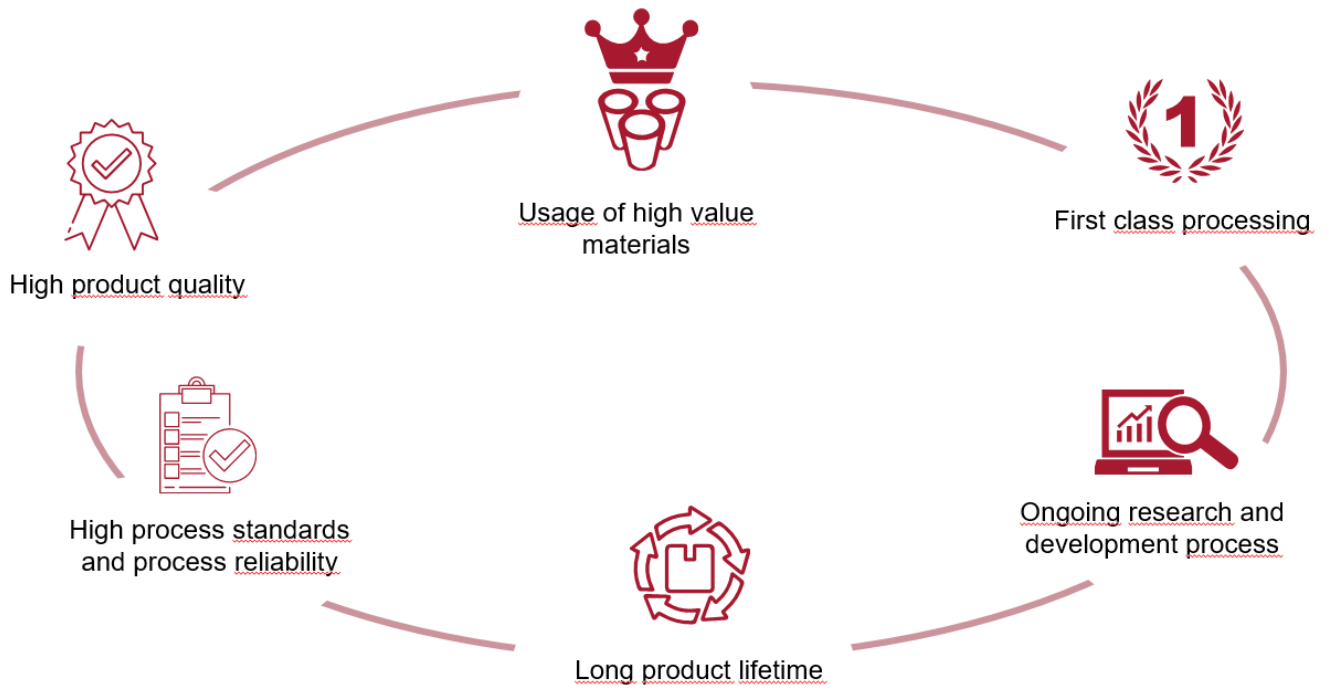
The company's philosophy goes beyond just offering a product. The company provides the know-how developed over the years and delivers comprehensive system solutions, always adjusted to the specific field and customer needs.

MMR Group Sp. z o.o. is guided by a clear and long-term development strategy that focuses on building relationships based on trust, both with customers and suppliers as well as employees. The strategic goal is to be a strong, reliable business partner and to build a reliable offer based on knowledge and experience. The company intends to continue developing as one of the leading providers of comprehensive, complete and modern solutions for the industrial and printing market in Poland. The mission of MMR Group Sp. z o.o. is to remain a company with tradition, drawing on the values of family relationships, focused on innovation and sustainable development.

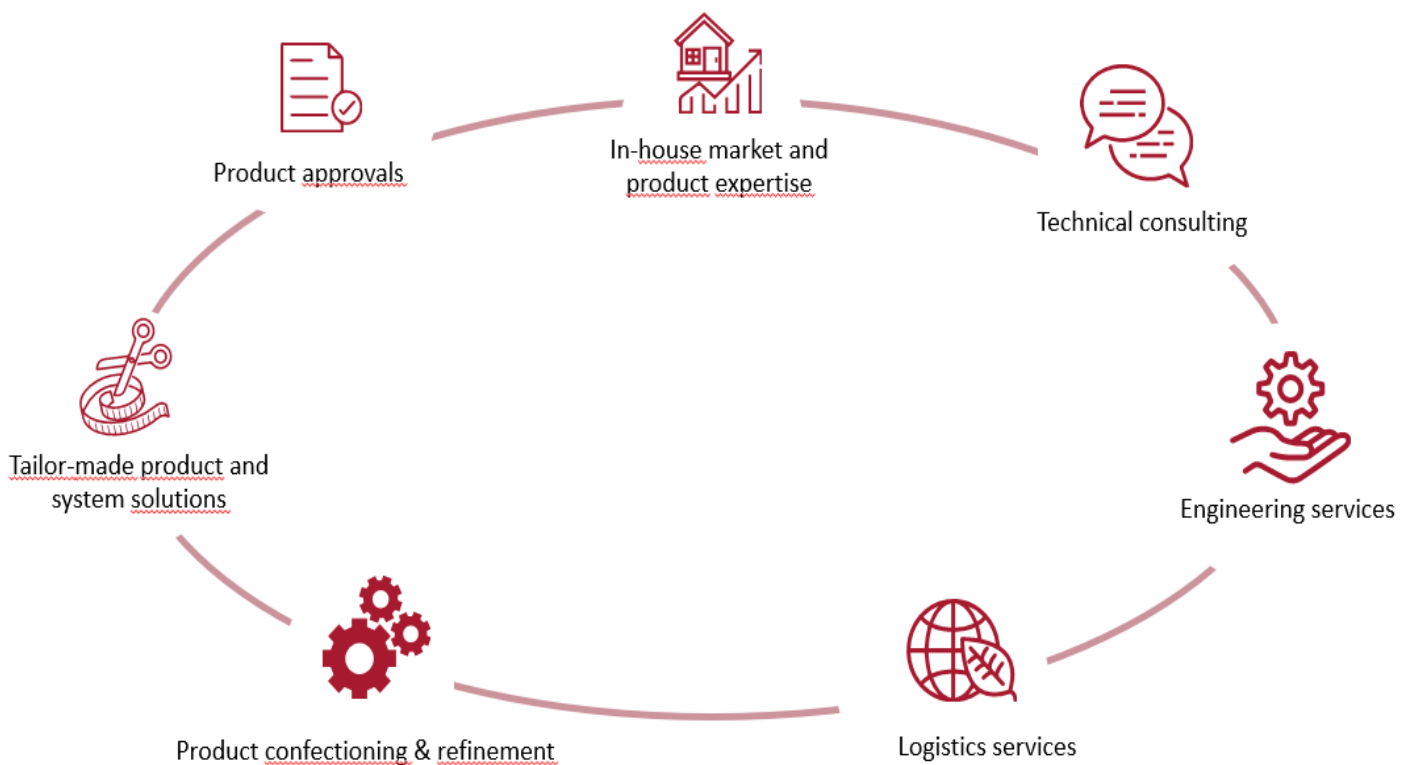
### COMPANY PHILOSOPHY:



## PRODUCT PHILOSOPHY:



## ADDED VALUES:



Both in internal and external relations with its stakeholders, MMR Group Sp. z o.o. follows universal values, promoting honesty, hard work and diligence in the execution of entrusted tasks, quality and innovativeness, open cooperation for the common good, building and maintaining trust among co-workers and business partners, as well as respect, consideration and support, regardless of the position held or diversity of views.

## **2. Taking care of the highest standards of work**

### **International standards**

MMR Group Sp. z o.o. respects and complies with international standards on human rights and international labour standards, treating them as fundamental and universal. It respects and implements labour law as well as health and safety regulations, and ensures that employees are always treated in accordance with applicable requirements.

MMR Group Sp. z o.o. respects the prohibition of discrimination based on: race, gender, social status, ethnic origin, religion, impairment, disability, sexual orientation, union or political affiliation, age or marital status. It guarantees freedom of opinion, conscience and religion, as well as freedom of belief and expression. MMR Group Sp. z o.o. promotes teamwork free of any prejudice and consciously draws strength and values from the diversity of its employees. In return, it makes every effort to ensure its employees receive fair and regular remuneration, the opportunity for development and further education, interesting and ambitious challenges, and decent working conditions.

MMR Group Sp. z o.o., in accordance with international standards, respects intellectual property as an individual good, safe from abuse. It respects the prohibition of child labour under the age of 15, forced labour, corporal punishment, mental and physical constraint, insults and sexual harassment, and considers the workplace to be free from such practices.

### **Personal policy**

MMR Group Sp. z o.o. is committed to maintaining the highest possible standards for its employees. Communication between employees, including dialogue between supervisor and employee, is based on openness, honesty, fairness, equality and the idea of teamwork. The basis of all relations is the correct flow of information. Employee development is the highest good of MMR Group Sp. z o.o., hence the opportunity to participate in training, conferences and forums, which allow of self-development and achievement of desired business objectives.

Each employee undertakes to:

- perform their duties conscientiously, honestly, responsibly and on time,
- promote the highest standards and practices of sustainable development,
- expand their knowledge,
- use property, work tools and equipment rationally and for their intended purpose,
- take care of personal culture and safety at work,

- not consume alcohol or drugs at work or in the workplace,
- fulfil the company's mission and goals,
- be loyal to the company and co-workers,
- build effective communication within the company,
- maintain confidentiality and discretion with regard to company knowledge and resources.

### **Responsibility of the Management Board, executives and employees**

The Management Board and the Executive Board of MMR Group Sp. z o.o. aim to implement the provisions of the Code of Ethics, thus setting an example to other employees. It is responsible for managing employees in a way that enables them to constantly develop and achieve job satisfaction. Each employee complies with the laws, regulations and standards adopted by MMR Group Sp. z o.o., as well as commonly adopted moral and ethical standards.

All employees of MMR Group Sp. z o.o. are responsible for customers and suppliers, who are treated with due diligence, while maintaining the principles of trust and reliability, in accordance with the concluded contracts as well as social and moral norms, including the absolute prohibition of seeking benefits from customers or business partners.

### **Problem-solving**

An employee is obliged to report any failure in complying with this Code of Ethics to his/her direct supervisor. Management is committed to providing assistance and support to each employee and to handling each reported case through investigation. If inappropriate conduct that violates ethical or moral standards is found, the persons responsible will be held accountable and will face disciplinary consequences in accordance with the law.



### **3. No tolerance for corruption; fair competition**

MMR Group Sp. z o.o. observes the principles of fair competition as well as the prevention of bribery, illegal payments and corruption.

It is the duty of all employees of MMR Group Sp. z o.o. to avoid activities leading to conflicts of interest, i.e. accepting and offering gifts in the course of business and commercial activities. It is forbidden to pay or offer bribes or illegal benefits to government officials or representatives of political parties in order to conclude or retain a transaction. Employees of MMR Group Sp. z o.o. must not derive any benefits or assist in deriving benefits from situations that may arise as a result of using the information or position in question.

## **4. Business partnership**

### **Customer relations**

The most important principles of MMR Group Sp. z o.o. in relationships with clients are: responsibility for the product and service solutions provided to them as well as respect and openness to their needs. MMR Group Sp. z o.o. actively participates in the daily life of its customers and therefore can learn about the important aspects of their work: successes, development plans, dilemmas. Relationships based on openness and trust allow the company to predict, meet and anticipate the needs of its customers while maintaining the principles of fair competition.

### **Relations with suppliers**

In terms of cooperation with suppliers, MMR Group Sp. z o.o. is guided by the principles of openness, respect, loyalty and mutual support. The Company cooperates only with global, reputable suppliers who are similarly aware of the need for sustainable development and socially responsible business. MMR Group Sp. z o.o. strives to ensure that suppliers have a real impact on the respective industries on the Polish market – together with them it develops new solutions and implements ongoing changes as part of individual project needs.

## 5. ISO 9001:2015 Integrated Quality Management System

MMR Group Sp. z o.o. places particular emphasis on the quality of products and services provided. Actions to increase this value are taken in order to meet the growing and well-defined expectations of customers.

The ISO PN-EN 9001:2015 Integrated Quality Management System ensures proper, system-administered execution of all business processes affecting the quality of products and services. The efficient operation of the system ensures that all processes are monitored, improved and adapted to constantly changing market conditions, technological requirements and customer demands. The high quality of products and services is supported by a constant concern for the environment and the safety of employees and suppliers.

Applying the principles in accordance with ISO PN-EN 9001:2015 contributes to increasing trust between the company and its customers and suppliers. It also strengthens the image of MMR Group Sp. z o.o. in the eyes of all the entities interested in the effects of the company's activities in the areas of quality of the offered products and services, environmental impact, ensuring occupational health and safety, guaranteeing information and data security and control in goods trading.

All other quality and product certifications of MMR Group Sp. z o.o.:

- ISO certifications: DIN EN ISO 9001:2015, DIN EN ISO 14001:2015, DIN EN ISO/ IEC 17025:2005
- Bisnode Polska Business Credibility Certificate, Business Gazelle Certificate, Trustworthy Company Certificate
- IRIS certification rules: 2017 and based on ISO/TS 22163:2017
- Certificate of a product manufacturer recognised by PKP Cargo S.A. for i.a. air suspension systems, brake blocks, wheel sets, bearings and axle boxes
- Technical certificates of the Road and Bridge Research Institute for vibration isolation mats, RCS system and VeloGleis safety system
- SMS certificate – Approval for use of CL-E1ws BA lubrication systems on railway lines managed by PKP Polskie Linie Kolejowe S.A.
- Positive TDT evaluation for putting the B36 brake pads into use in selected types of EMU, DMU and passenger carriages
- Certificate of admission to operation for the SMCV type vertical load measurement system from the Urząd Transportu Kolejowego (No. PL 59 2022 0001)

- Official Distributor's Certificates (i.a. from the manufacturer Continental Group regarding metal-rubber elements, suspension systems and industrial hoses)
- TDT welding technology qualification certificate according to PRCT-01/ PN-EN ISO 15613:2006, directive 2014/68/EU
- TDT welder competence certificate in accordance with PN-EN ISO 15613:2006
- TDT (Transportation Technical Supervision) certificate for manufacturing in the scope of assembly, modernization and repair of devices for filling and emptying of transport tanks and flexible pipes constituting equipment of transport tanks in the scope of their filling and emptying
- EU Certificate of Conformity No./No. 93152/JN/001/04 Transportation Technical Supervision Notified Body UDT-CERT No. 1433
- ISEGA Certificates for removers, lacquers and offset coatings intended for processes of production of packaging materials for food products
- FOGRA certification for sheetfed press removers
- Bureau Veritas Italia certification for adhesives intended for food packaging

## 6. Environmental awareness

MMR Group Sp. z o.o. is aware of the contemporary challenges which business and production activities have to face in terms of sustainable development and climate protection. It complies with the legal regulations on the protection of the natural environment and knows the UN Sustainable Development Goals and the assumptions of the 2016 Paris Climate Agreement. The company cooperates with ISO 14001 and FSC certified producers and at the same time members of environmental initiatives, such as UN Global Compact, Global Platform for Sustainable Natural Rubber or World Business Council for Sustainable Development.

MMR Group Sp. z o.o. consciously limits the impact of its activities on the natural environment by minimizing the consumption of natural resources and waste generated as a result of current activities (e.g. implementation of green tracks; production of elastomer forms only with water, without any solvents; distribution of products of e.g. the German concern Continental, which are based on specially developed blends which reduce CO<sub>2</sub> emissions and with a waste recycling rate of 81% in 2020).

MMR Group Sp. z o.o. cooperates with producers which use renewable energy sources and trigeneration in their production (e.g. the Italian manufacturer of adhesives – Diamelt). In turn, the German supplier Continental declares 100% neutrality in terms of CO<sub>2</sub> emissions in production processes by 2040 at the latest, and in the entire value chain by 2050 (in accordance with the Paris climate agreement of 2016).

MMR Group Sp. z o.o., together with its suppliers and business partners, develops innovative product and service solutions, contributing to environmental and climate protection. It offers products which work well at every stage of the implementation processes, and at the same time reduce carbon dioxide emissions. The company promotes solutions with higher ecological, innovative, functional and economic value. For years, it has been trying to maintain a balance between the needs of customers, the technologies used, the requirements of standards and the specificity of local conditions.

MMR Group Sp. z o.o. also promotes an ecological lifestyle among its employees, for example by promoting cycling to work (participation in the Gdynia action "Going by bike to work") or by initiating internal employee eco-campaigns (e.g. campaigns "Print more economically" or "Save electricity"; resignation from bottled water for the benefit of sparkling and still water dispensers; collection of old books for the Retirement Home/ Nursing Home in Gdynia; providing outdated or additional printing materials to the Koło Inicjatyw Lokalnych in Lipki or kindergartens).

## 7. Socially responsible business

Since the beginning of its activity, MMR Group Sp. z o.o. has been widely involved in social activities, promoting only safe and certified solutions that contribute to the increase of society's comfort and environmental protection.

As part of its sports activities, the main social commitment of MMR Group Sp. z o.o. is to support the table tennis clubs (formerly "IKTS Noteć", "Gotyk Toruń", "Gwiazda Bydgoszcz", and currently "MRKS Gdańsk"), the MMR Group employee soccer team, which is a participant of the League of Sixes NL6 (the team is composed of employees of various levels, created on the initiative of the employees themselves) and MMR Group employees taking part in local running competitions. In the previous years, the company supported the rugby club "Biało-Zielone Ladies Gdańsk", the kick-boxing club "KEBON Swarzędz" and the golf clubs "Vistal" and "Tokary".

MMR Group Sp. z o.o. also provides its employees with permanent access to medical care, cafeteria and benefit programmes, as well as group life and health insurance. The company is also member of the "Pracodawcy Pomorza" ["Pomeranian employers"] association.

Employees of MMR Group Sp. z o.o. get involved in social campaigns for foundations (e.g. "Trzeba Marzyć" Foundation, "DKMS" Foundation), hospices (e.g. St. Wawrzyniec Hospice in Gdynia), animal shelters (e.g. "Ciapkowo" in Gdynia), retirement homes (Nursing Home in Gdynia at Pawia St.), as well as in fight against COVID-19 pandemic (donation of gloves and masks for medical services) and support of war refugees from Ukraine (collecting and purchasing food, clothes, basic necessities and hygiene items for the "Pomagamy Nie Ziewamy" Foundation in Gdańsk and the Temporary Aid Collection Point for Ukraine in Primary School No. 9 in Rumia). The company also supports campaigns to fight diseases and actively supports employees (and their families) affected by health problems.

MMR Group Sp. z o.o. emphasizes popularizing knowledge in the field of innovative technologies. In 2017, the company organized the first edition of the nationwide "Engineer Student Award" competition for students of technical universities, which concerned designing a modern solution for Polish rail infrastructure. The competition was co-organized by long-standing supplier MMR Group Sp. z o.o., a German manufacturer of sealing systems – SEALABLE Solutions GmbH. The next edition of the competition is planned for 2023 (in the formula of a best engineering diploma thesis competition). MMR Group Sp. z o.o. thus supports

Polish science and Polish innovations, and gives young people the opportunity to gain international professional experience.

For MMR Group Sp. z o.o. sustainable development is not just an empty phrase – the company operates within accepted standards and sets new ones in accordance with state-of-the-art technology. It acts as an intermediary between the end user of a given system, the legislator and the manufacturer in creating modifications to solutions, in order to adapt the applicable standards and required parameters to a new product. Reliability, ethical approach to business, well-considered and honest solutions, as well as responsibility for them – this is what MMR Group Sp. z o.o. is guided by in every cooperation in order to deserve the name of a reliable partner.

## **8. How the provisions of the Code are implemented and enforced**

All ambiguities and problems related to the interpretation of the content of the Code of Ethics are resolved by the Management Board of MMR Group Sp. z o.o. (Margareta, Marek, Martin Rochlitzki), the Board's Representatives (Beata Nakielska, Karina Wojtecka-Czech), the Board's Proxy for the Quality Management System (Beata Rukszan) or the Advertising and Public Relations Coordinator (Joanna Kisterska).

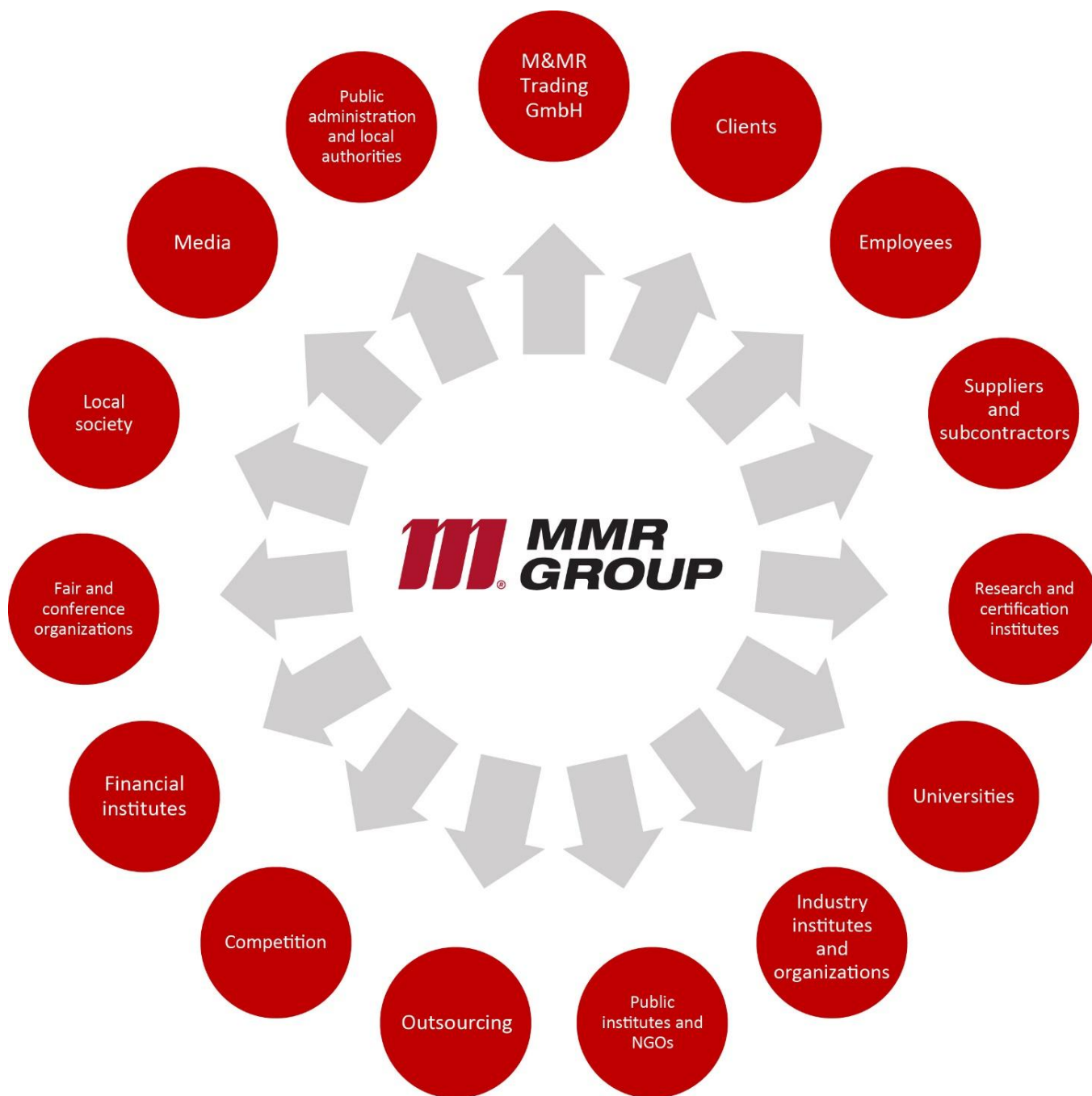
The role of the above-mentioned persons is:

- supporting employees in complying with the Code of Ethics,
- promoting the idea of the Code within the company,
- responding with appropriate measures to employees' current concerns regarding the ethics of their business activities.

MMR Group Sp. z o.o. employees are encouraged to submit any comments and modifications relating to the content of this Code of Ethics.



## 9. MMR Group Sp. z o.o. stakeholders' map



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