

CODE OF VALUES

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ATEC.
Advance Tech Engineering Center

MS GALLEON
GROUP

Dear Sir/Madam

At MS Galleon Group, the principles of ethics and compliance with applicable laws, internal regulations and good market practices are applied in all Group companies. They form the basis for trust and transparency in our activities and support the building of a coherent organisational culture.

Our professional attitudes and behaviours and the way we do business are as important as the outcomes. We are judged not only for what we do, but also for how we do it. This applies to each and every one of us, regardless of our role or length of service.

The complexity of today's world, however, makes it more difficult than ever to distinguish between appropriate and unacceptable attitudes. That is why I am handing over to you a document that I am convinced will allow you to meet the challenges of your daily work. Its purpose is to help us all make ethically sound decisions and choices, in line with the Group's values, i.e. the set of beliefs that guide our actions.

Due to its general nature, the Code of Values cannot take into account all possible situations and this is not its purpose. It should be used as a valuable source of information and a guide regarding our expected behaviour when interacting with each other, with our clients, with the communities in which we operate and with other stakeholders. The guidance it contains should be reflected in everything we do.

The standards set out in our Code are not optional and we are absolutely required to comply with them, to ensure their effective implementation in daily professional life, and to react in the event of their violation.

All the decisions and actions we take have a direct impact on both our own and the Group's reputation. Knowing, understanding and adhering to the guidelines of the Code of Values is therefore of fundamental importance and a duty for each of us.

Michał Sotowow

Values

MS GALLEON

RESPONSIBILITY

We are responsible for what we do and say and for the consequences of our actions. We honour our commitments to our clients, business partners and each other. We are responsible not only for performing our own work, but also for achieving the objectives of the entire organisation, thereby shaping the Group's image in line with our accepted values. We also have a sense of responsibility for our products and services - a commitment to maintaining and increasing customer satisfaction, quality and safety guarantees, and awareness of their environmental impact.

COOPERATION

Cooperation is based on good relationships, trust, partnership and mutual respect, regardless of the place of work or position held. At the heart of our success lies a coherent understanding of the goals we have set, as well as the skills and commitment needed to achieve these goals together. This makes us one team, working to achieve the best possible results and dealing effectively with the difficulties encountered. We clearly set about our business goals, are flexible in our approach, communicate regularly and provide each other support. At the same time, we do not forget to exercise due diligence in the selection of business partners, checking them thoroughly not only before the relationship is established, but also during the course of the relationship. We also nurture values in our relationships with our business partners.



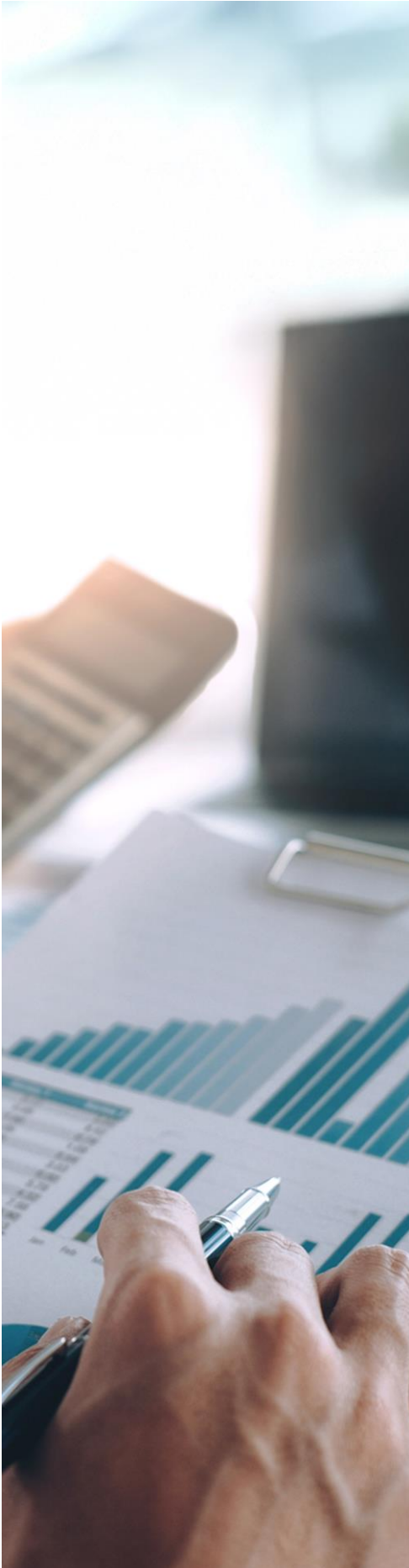


INTEGRITY

We are transparent in dealing with our business partners and clients, and expect the same from them. We carry out tasks based on objective premises, avoiding conflicts of interest. We tolerate no fraud and no kind of activity that may bear the hallmarks of corruption. We do not accept violations of the principles of fair competition - we believe in business relationships based on integrity, transparency and openness. If we have made a mistake - we are able to admit it. We also rely on trust in internal relationships - a process that takes time and effort, but the results are important for the long-term success of our organisation. We communicate and make decisions openly, knowing that honesty is fundamental to building a sense of security.

COURAGE

We are brave because every day we make business decisions, we set ambitious goals. We accept risks, going out of our comfort zone. We boldly realise our dreams. Bravery is also a feature of people who act in a non-standard way, seek new solutions and share their opinions and ideas. In our thinking, we focus on opportunities and not on limits, and we seek possibilities, not obstacles.



DEVELOPMENT

Our work is characterised by thoroughness and careful preparation. We want to provide products and services of the highest quality, tailored to the needs of individual stakeholder groups. We constantly strive to improve our professional qualifications and enhance our skills in order to keep up to date with the changing expectations of the modern world. We focus on innovative solutions that increase our efficiency and shorten our lead times, while maintaining the highest standards. We constantly analyse market trends, the needs of our clients and the actions of our competitors. We use new technologies to improve processes, production and communication. We create a positive working environment that fosters commitment and motivation, while providing a sense of satisfaction, understanding and comfort. We motivate people to broaden their skills by providing equal opportunities in terms of pay, bonuses, skills development and promotion. We highly value an attitude of commitment, creativity and openness to change. We support ideas and help develop them both in the professional sphere and in social engagement.

COMMITMENT

We care not only about employee and market relations, but also about environmental or social relations. We constantly improve all processes in order to minimise the negative impact of our operations on the environment. In our operations, we follow the principles of a sustainable development strategy that integrates environmental aspects into business decisions. We implement solutions to improve energy efficiency and technologies based on renewable energy sources. We reduce consumption, reuse and recycle as many resources as possible. We are engaged in pro-social activities. We nurture the development of the areas in which we do business, support local events and provide jobs. We maintain an open dialogue with local communities and strive to take their needs into account.



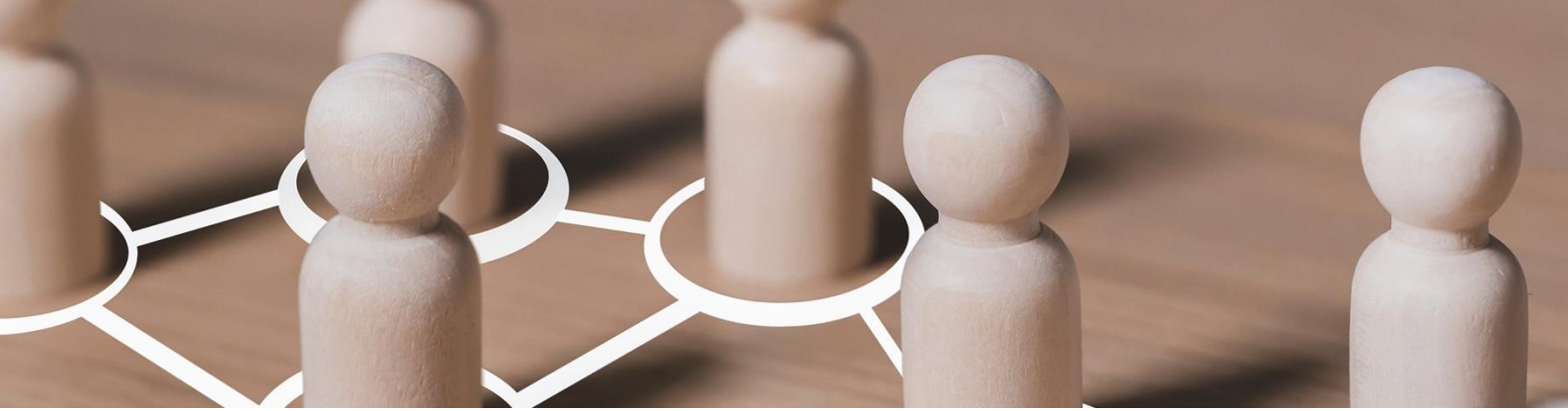
What is the Code of Values?

The Code of Values is a set of principles, values and standards of conduct that define how we should act, both internally within our Group and in our dealings with external stakeholders (clients, business partners and society). It is a tool that supports making ethical choices that are in line with our values and complements the laws that apply to each of us.

Adherence to the Code helps to strengthen the Group's reputation as a responsible, transparent and trustworthy organisation, promoting activities that take into account social or environmental interests, while minimising the risk of violations. The Management Boards and top management have a special task in this regard: they are expected to act as role models, promoting the ethical standards we have adopted with their attitude and actions.

We do not tolerate any form of violation of the guidelines we have adopted or ignoring the obligation to report observed irregularities.

In order to facilitate whistleblowing, our Group has set up an online platform (at www.zalezynam.eu) that makes it possible to conduct a properly secured dialogue, guaranteeing full confidentiality and anonymity, on situations that violate legal, corporate and social principles. We care about the well-being of our organisation, ourselves, our clients, our business partners and the public.



Our internal relations

WE CREATE A VALUES-BASED ORGANISATION

We build a friendly working environment where everyone feels respected and valued. We focus on relationships, believing that they are the foundation of effective collaboration. Our communication culture is based on active listening and constructive criticism, which allows us to develop and build trust. We are committed to treating all our employees equally, thus eliminating all forms of discrimination.

- We focus on trust, partnership, mutual respect and a culture of equal and different opportunities, regardless of the position held or place of work.
- We hire, evaluate and promote people based on objective criteria such as measurable performance, competence, individual ability, subject matter expertise, experience and commitment. We care about their constant development and broadening of their competences and skills necessary to perform their duties better and better.
- We are open to initiatives, new ideas and innovations.
- We support professional and personal development.
- We do not discriminate on the basis of age, gender, sexual orientation, religion, nationality, ethnicity or political beliefs.
- We do not accept any manifestation of physical, psychological or sexual violence, insults, bullying, intimidation or harassment or a passive attitude when such situations are noticed.
- We do not tolerate the spread of slanderous and defamatory rumours.

For more information, please refer to the Group's Anti-Mobbing Policy.

WE CARE ABOUT OUR SAFETY AND HEALTH

- We act responsibly and occupational health and safety is of paramount concern to us. We provide regular health and safety training and carry out risk assessments to eliminate potential hazards. In addition, thanks to the already well-established whistleblowing process through the We Care Platform, we analyse specific situations in order to continuously improve our safety standards.
- We exercise due diligence in the performance of our day-to-day duties, with a view to the common good expressed, among other things, in the mandatory health and safety rules for individual positions or by taking necessary and reasonable precautions.
- We report every instance of infringement of the rules and regulations regarding occupational health and safety, accidents, injuries, as well as near misses that pose a potential threat to life and health.
- We support employee preventive health care.



- We aim at facilitating methods for hazard detection, workplace accident preventions and occupational diseases.

WE PURPOSEFULLY AND RESPONSIBLY USE THE GROUP'S RESOURCES

Our intellectual, material and technological resources are the foundation for developing and building the Group's success. Their protection is in the hands of all of us. Therefore, we carry out our daily duties in a way that does not allow these resources to be lost, damaged, stolen, misused or disclosed without authorisation. Otherwise, we may expose the Group to significant risk of financial, reputational, developmental or business losses.

- We are responsible for protecting the confidential information we receive, create or record in connection with our work, and we do not use it for personal or third party gain, or disclose it in any form.
- We process all personal data in accordance with accepted standards and regulations, following the principle of minimisation. The designated data protection officers are contacted immediately if breaches are identified.
- We respect the right to privacy.
- We protect intellectual property, our patents and know-how, trademarks and materials and products protected by copyrights.
- We protect the company's tangible assets and use them only to achieve its business goals. We dispose of and use all Group property in a proper manner and treat it in accordance with the principles of care, respect, honesty, loyalty and reliability.

Our relationship with the external environment

COOPERATION WITH CLIENTS AND BUSINESS PARTNERS

The Group's relationship with the external environment is crucial to its success, long-term development and reputation. In order to gain and maintain the trust we enjoy, we ensure that the information and communications we provide are verified and reliable and that the standards of product and service delivery are as high as possible. We build trust through transparency and by keeping our promises.

- We treat all our clients with respect and proper interest remembering that their satisfaction is our most important goal.

- We provide all necessary information on our products and services, and we keep our promises regarding quality, delivery times and service.
- We do not compromise on safety and quality.
- We do not include misleading information in our promotional materials.
- In the process of selecting our business partners, we avoid favouritism and any conflict of interest and operate on the basis of formalised internal procedures.
- We work with business partners who act in compliance with the law and internal regulations adopted by the Group, including those contained in the Code of Values. We monitor them regularly.
- We do not conclude prohibited understandings/agreements with competitors with regards to prices, terms and conditions of sales, dividing markets and customers, and other actions limiting competition on the part of both sellers and buyers.
- We do not engage in practices that are unfair, manipulative or misleading.
- We respect the intellectual property of our business partners and do not copy ideas.
- We protect personal data and confidential information.

COMBATING CORRUPTION AND CONFLICT OF INTEREST

Our common goal is to conduct our business with honesty and integrity, which is why we make countering corruption and conflict of interest a priority. In our business relationships, we avoid situations leading to private gain or those where our personal interests could come into conflict with those of the Group.

- Any conflict of interest may be eliminated or solved without any problems if it is disclosed. We have therefore made an internal commitment to inform about the risk of such situations.
- We organise tendering, purchasing, sales or other selection-related processes in a way that minimises the risk of unilateral, incomprehensible decisions dictated by personal considerations.
- We focus on quality, high standards, experience and innovative approaches that are not guided by private interests, also in recruitment, remuneration and/or promotion processes - our decisions must not be influenced by relationships of a personal nature.
- We do not tolerate any actions that may cause suspicion of violation of law applicable to giving, receiving and demanding financial or personal benefits.

For more information, please refer to the Group's Anti-Corruption Procedure.

WE CARE ABOUT OUR REPUTATION

In today's world, effective media communication is - from a business point of view - increasingly important. It increases both brand recognition and brand trust, but only if it is carried out properly and professionally. Failure to harness its potential could cause a great deal of damage, including, in particular, to the Group's reputation. That is why we establish clear guidelines indicating what is allowed and what behaviour we do not accept.

- We only allow the publication of content that is fair, accurate, verified and appropriate, and that does not violate anyone's personal dignity, trade secrets or other legally protected information.

- We do not publish any information or materials concerning ongoing projects, negative evaluations or comments on our internal relations with clients or business partners, or any images of people without their express consent (including those recorded outside the workplace, e.g. on business trips or team building events).
- We do not accept speaking on behalf of the Group without authorisation. We avoid giving the impression that our personal opinions are the Group's position.
- We do not publish comments, photos or videos that could be considered inappropriate or otherwise damaging to the Group's reputation, including those of a harassing, controversial or inflammatory nature.
- We regularly report on the Group's activities, challenges, missions, values and achievements.
- We maintain good relationships with business partners, investors and other stakeholders, including customers and local communities.
- We invest in activities that contribute to the long-term positive image of the Group, not just short-term profits.
- We monitor opinions about the Group in the media and on the Internet in order to react in real time to changes in the perception of our activities.



WE CARE ABOUT THE ENVIRONMENT AND LOCAL COMMUNITIES

Sustainable development is the foundation for a healthy society, a stable economy and a safe environment, making it essential for future generations. It allows the responsible management of natural resources, translating into better financial performance, due to the efficient use of potential and innovation. We engage locally - so we can unite around common goals and values and gain inspiration.

- We use environmentally friendly solutions.
- We optimise the use of raw materials, making maximum use of recycled materials.
- We implement environmentally friendly practices that improve the quality of life for residents.
- We offer scholarships and invest in the development of education.
- We take part in local events and meetings that allow us to build relationships with the public as well as other businesses and organisations.
- We support charitable activities, sponsorship of local events and cooperation with non-profit organisations - we have established dedicated Foundations for this purpose.
- We promote entrepreneurship to improve the quality of life.
- We inspire public debate on the key challenges of the future regarding energy, medical development, environmental protection and an innovative economy.



The Code of Values constitutes the foundation for an organisational culture that promotes appropriate behaviour and creates a healthy working environment, while influencing the growth and long-term sustainability of our Group. It is an expression of what is expected of each of us and therefore all of us, without exception, should follow its guidelines.

Any concerns regarding possible violations of the principles set out in the Code and the procedures detailing it should be reported **through the online “We Care” Platform** at **www.zalezynam.eu**. The platform allows for a properly secured dialogue, with a guarantee of full confidentiality and anonymity, on situations where legal, corporate or social rules are violated.

