



M2C GROUP Czech Republic	A1.4-D
CODE OF CONDUCT	

1. Introduction

As one of the leading providers of complex security and facility management services, M2C holding companies (hereinafter "M2C") consider their obligation to take responsibility for the impact of their activities and decisions on society and the environment, including responsibility for ethics of business. The principles of the Code of Conduct set out how the behaviour and approach of the organization in relation to third parties and co-workers should be governed.

2. Implementation of the Code

2.1 Development of the Code

The Code was developed by the M2C top management. The following sources were used for its preparation:

Version of the EICC Coalition Code in full, in the Czech version on the EICC website:

<http://www.eiccoalition.org>

The version of IWAY directive in full, in the Czech version on the IKEA website:

http://www.ikea.com/ms/en_US/pdf/sustainability_report/CZ_IWAY%20Standard_august_2016.pdf

CSN 010391

ISO 27 000

ISO 14 000

OHSAS 18001

International Labor Standards (ILO):

www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org

United Nations Convention Against Corruption:

www.unodc.org/unodc/en/crime_convention_corruption.htm

2.2 Communication of the Code

M2C enforces its principles in relation to the persons concerned within the M2C as well as outside M2C, and informs the persons concerned about the Code through its websites and internal regulations.

2.3 Application of the Code

The M2C Code of Conduct applies to all business companies and employees of Mark2 Corporation's holding, including the supplier network.

3. M2C Code of Conduct - Provisions

3.1 Labour

- **Free choice of employment**

M2C does not use forced or compulsory work, and employees can terminate their employment based on notice with an appropriate length of the notice. The employment relationship is always concluded on the basis of a written employment contract in accordance with legal regulations.

- **Child Labour**

M2C does not employ any person under the minimum legal age permitted for employment ¹ in accordance with national law and has established age verification procedures and child labour elimination policies.

- **Working hours**

Working hours of M2C employees are in accordance with national legal regulations and is not disproportionate.

- **Wages**

M2C employees understand the terms and conditions of the employment contract concluded with them and a reasonable salary corresponding to the concluded employment contract is provided to them in due time for the performed work and a payslip is provided. A wage cut as a disciplinary measure is not permissible.

- **Fair treatment**

Employees in M2C are treated with respect and honour. Physical or verbal abuse and any threats or other forms of intimidation are prohibited.

- **Discrimination**

In M2C any negative discrimination ³ is prohibited.

- **Freedom of association**

M2C employees and/or their representatives have the opportunity to communicate openly with the company's management on working conditions, without fear of discrimination, reprisals, intimidation or harassment.

3.2 Health and safety of employees

- **Health and safety**

M2C employees are provided with healthy and safe working environment in accordance with international standards and national legislation and provided with appropriate information, training and protective equipment.

- **Preparedness in case of emergency**

In M2C, procedures are created, implemented and maintained to identify emergencies and responding to emergency situations in emergency plans.

- **Occupational accidents and diseases**

M2C prevents potential occupational accidents and occupational diseases of its employees, takes corrective actions to eliminate their causes. In the event of an accident or disease, records are made.

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¹ The minimum age is the age of completion of compulsory schooling or at least 15 years (or the minimum age for employment in countries where the educational establishment is not at a sufficient level).

² Consideration should be given to the type of work performed and the acceptable working time according to the job and country.

³ Forms of discrimination may include discrimination on grounds of race, complexion, sex, sexual orientation, religion, political opinion, nationality, social origin, social status, ethnic origin, disability, age and membership in an organization

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- **Industrial hygiene**

Health of M2C employees when working with chemical, biological and physical agents is protected by the use of protective work equipment.

- **Physically demanding work**

In M2C, workers are protected from the risks associated with physically demanding work.

- **Protection when working with machines**

M2C evaluates the security risks of production and risks associated with the use of work equipment.

- **Accommodation and catering**

Spaces provided by M2C for accommodation and their accessories meet the basic needs of workers.

- **Health and safety information**

M2C provides its employees with appropriate training on health and safety at work.

3.3 Environment

- **Authorization and reporting obligations in the field of the environment**

M2C has all necessary environmental permits in a field of the environment related to its business activities and manages its processes, related statements and reports according to legal requirements.

- **Prevention of pollution and shortage of resources**

M2C applies recycling practices within its activities, uses environmentally friendly technologies, and uses scarce resources efficiently.

- **Dangerous substances**

M2C has defined and monitored procedures for the handling of chemicals in order to ensure their secure transmission, storage, use, recycling or disposal.

- **Wastewater and solid waste**

M2C has defined and monitored procedures for disposal of wastewater and solid waste, which follow current legislation.

- **Harmful emissions**

M2C puts appropriate management, operational and technical controls to minimize the release of emissions harmful to the environment into the air into practice.

- **Limitation related to content of products**

M2C complies with all applicable laws and regulations regarding the limitation of harmful substances in products, including their labelling.

- **Energy consumption and greenhouse gas emissions**

M2C monitors and documents energy consumption and greenhouse gas emissions. It seeks cost-effective methods to improve energy efficiency and minimize energy consumption and greenhouse gas emissions.

3.4. Business ethics

- **Fair trading**

M2C does not tolerate any form of bribery, corruption, extortion and fraud. Trade negotiations are transparent.

- **No undue advantage**

No form of undue advantage and bribery and other benefits to employees, suppliers, clients, organizations or political parties and movements or from employees, suppliers, clients, organizations, the public, political parties and movements are tolerated in M2C.

- **Disclosure of information**

M2C publishes unbiased information regarding its business activities, structure, financial situation, performance, health and safety practices in the field of the environment according to current regulations.

- **Intellectual property protection**

M2C has established procedures to ensure compliance with intellectual property rights and customer protection.

- **Fair trading, advertising and competition**

Advertising of products and services provided by M2C is honest, accurate and in accordance with applicable laws, statements are based on facts.

- **Identity protection and ban on retaliation**

M2C has an established policy to ensure confidentiality, anonymity, and protection of information related to informants from a side of suppliers and employees. Employees can make suggestions about the policy compliance.

- **Protection of personal data**

M2C complies with all legal requirements for the protection of personal data of all persons it trades with, including suppliers, customers, consumers and employees, even in cases where personal data are collected, stored, processed, transmitted and shared.

3.5 Management system

M2C has an established management system that supports compliance with all applicable laws and this Code.

- **Requirements arising from laws and regulations**

M2C has established procedures to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this Code.

- **Risk assessment and management**

M2C has established processes to identify and manage the risks to the environment, health and safety, working practices and ethics related to its operation.

- **Objectives of improvement**

M2C is constantly improving its sustainability performance and regularly evaluating it.

- **Training**

In M2C trainings are performed to comply with the Code of Conduct and related procedures and comply with relevant legal and regulatory requirements.

- **Communication**

M2C communicates all accepted principles of the Code to its employees, suppliers and customers through the company's website

- **Feedback and worker's participation**

M2C continuously assesses how employees understand the conditions set forth in this Code.

- **Audits and evaluation**

M2C carries out periodic self-assessment to ensure compliance with the legal and regulatory requirements and content of this Code of Conduct for Corporate Responsibility and the Environment.

- **Corrective measures**

M2C provides an immediate remedy for activities that do not meet the standards set by the Code.

- **Documentation and records**

M2C creates and maintains documents and records to comply with the rules and principles set out in the Code and maintains an appropriate level of confidentiality.

- **Responsibility of suppliers**

M2C suppliers should have procedures to comply with A1.4-Ethical Purchase and Service Code in place and monitor their compliance.

- **Monitoring**

M2C monitors the implementation and enforcement of the A1.4- M2C Code of Conduct, A1.4-M2C Code of Ethics of Employees and A1.4 - The Code of Ethics for Purchasing Goods and Services in its Supply Network. The email address interniaudit@m2c.eu is used to receive any suggestions, warnings and findings from employees or other parties about related issues.

In, Date:

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for M2C holding