

INTRODUCTION

At the Mercator Medical Group, we recognize that it is essential to adhere to basic ethical principles in business operations, and acting in accordance with them affects the positive perception of the Group and is a prerequisite for its growth and success. The good reputation of the Mercator Medical Group is one of its greatest values.

GROUND RULES

1. In all aspects of its operations, the Mercator Medical Group adheres to the following basic principles Ethics, openness and transparency.
2. The Code of Ethics applies to all Employees and officers of the Mercator Medical Group, regardless of the place (country) and form of employment. The Code of Ethics also applies to persons employed under civil law contracts, including entrepreneurs performing activities for the Company as part of their business activities. All such persons will be hereinafter referred to as Employees.
3. Mercator Medical Group expects that the standards set forth in the Code of Ethics will also meet its suppliers and contractors.
4. During the performance of professional activities, each Employee of the Mercator Medical Group is obliged to observe the law and the basic rules of social coexistence.
5. If the provisions of the Code of Ethics conflict with the provisions of law or the rules of social intercourse, the provisions of law and the rules of social intercourse shall prevail. If the provisions of the Code of Ethics are more restrictive than the laws and rules of social coexistence, the more restrictive provisions shall be followed. If the provisions of the Code of Ethics contradict or are inconsistent with other internal regulations of the Group, the Employee should bring this to the attention of his/her immediate supervisor and agree with him/her on the appropriate course of action.
6. Failure to comply with the principles and guidelines set forth in this Code of Ethics may be considered a serious breach of basic employee duties or a breach of contractual obligations and may lead to the Employee being held liable under the terms of the Labor Code or the contract.

WORK ENVIRONMENT

1. The Mercator Medical Group strives to provide its Employees with fair remuneration in accordance with the conditions stipulated by labor laws.
2. Mercator Medical Group is committed to equal opportunity in its procedures recruitment, policy and practice.
3. Mercator Medical Group is committed to providing friendly and safe working conditions for Employees, taking into account both physical and psychological aspects, and strives to support the professional development of Employees.
4. The Group respects Employees' right to privacy and the right to maintain a reasonable balance between work and rest.
5. Mercator Medical Group does not tolerate discrimination based on gender, marital status, age, ethnicity, nationality, color, political beliefs, disability, religion or sexual orientation.
6. Mercator Medical Group does not tolerate bullying. Bullying means actions or behaviors concerning an Employee or directed against an Employee, consisting of persistent and prolonged harassment
7. or intimidation of the Employee, causing the Employee to have a low opinion of his/her professional suitability, causing or intended to humiliate or ridicule the Employee, isolate or eliminate him/her from the team of co-workers.
8. Mercator Medical Group does not tolerate sexual harassment. Sexual harassment shall be understood as any behavior that has the purpose or effect of violating the dignity of an Employee, relating to the Employee's sex or of a sexual nature.

CONFLICT OF INTEREST AND CONFIDENTIALITY

1. Mercator Medical Group expects its Employees to avoid any situation in which a conflict of interest exists or may arise. A conflict of interest occurs when, in a particular matter, the interest of an Employee or his or her affiliates is or potentially may be in conflict with the interest of the Mercator Medical Group, giving him or her, members of his or her family or persons with whom he or she has a friendly or social relationship the opportunity to obtain personal or material benefits
2. Employees of the Mercator Medical Group should refrain from making decisions on behalf of the Group on matters in which the Employee or his or her related persons have a direct or indirect personal or pecuniary interest.
3. Employees of the Mercator Medical Group should always engage in activities that are in the interest of the Group, avoiding situations in which private interests could conflict with their obligations to the Group. Group employees must not engage financially or in any other way in any other activity whose conduct could compete with the Group's business or be at the expense of the time and commitment to devoted to the diligent performance of their professional duties.
4. Group assets made available to Employees may only be used for business purposes and must be treated with due care. All Employees shall, in the course of their work, protect the Group's assets and act with honesty, integrity and in accordance with applicable rules in matters relating to such assets.
5. Employees of the Mercator Medical Group shall keep confidential and protect from unauthorized access documents and information concerning the Group and its contractors not made public, the disclosure of which could cause damage or otherwise harm the Group's interests. It is also impermissible to use such information and documents in one's own interests or those of others. Confidential information provided by customers and other contractors is similarly protected.
6. Any employee who has access to personal data is obliged to take all steps to prevent its loss, publication or misuse.

BUSINESS RELATIONSHIPS

1. Mercator Medical Group operates in a responsible manner. We strive to fulfill our commitments. We do not make promises that we do not intend to fulfill or promises that are impossible to fulfill.
2. Mercator Medical Group does not tolerate corruption or unfair business practices. Incentives, privileges, facilities, or other benefits that may adversely affect the ability to make objective business decisions that are in accordance with established principles are not offered, supported, accepted by us, either directly or indirectly - by third parties.
3. It is forbidden to give or offer money, services or other benefits to public officials, auditors and employees of other bodies in order to induce them to take or refrain from taking certain actions in their official capacity.
4. It is forbidden to grant public officials, employees or persons acting on behalf of state institutions and their family members any benefit of a material or immaterial nature.
5. It is forbidden to grant any benefits to political parties, organizations and political movements, their representatives, politicians and elected office holders and candidates for political office.
6. Benefits offered as part of promotion and marketing - to the extent permitted by applicable law - must not be excessive, inappropriate or contrary to accepted customs. It is forbidden to offer benefits in exchange for the expectation of impermissible consideration or preferential treatment in any other way. We refrain from providing such benefits that may meet with unfavorable public perception, negative reaction from the recipient, or harm the Group's reputation.
7. Group employees are prohibited from accepting gifts in the form of cash or cash equivalents (e.g., cash gift cards or gift certificates). Group employees may only accept small business gifts of small value from Group partners and only within the limits of law, accepted custom, and only if they are of an occasional or promotional nature and do not result in an obligation to reciprocate or to take or refrain from taking certain actions.

8. The Group observes the principles of fair competition. Advertising and promotional activities conducted must be in accordance with applicable laws, honest, fair and not misleading. We do not accept the provision of unreliable or untrue information to customers and business partners, or information that may be or ambiguous. We do not use such forms of conduct as deception or insinuation.
9. Mercator Medical Group complies with the relevant laws on combating unfair competition and does not enter into any agreements or arrangements affecting, in particular, prices or otherwise impermissibly restricting fair competition.
10. The group condemns child labor and all other forms of forced labor. As part of its activities, it respects internationally recognized human rights and fundamental freedoms. Through its activities, the Group makes a positive contribution to their protection and promotion.
11. The Group builds positive relationships with suppliers. We attach importance to our suppliers' respect for international standards in the protection of human rights, prohibition of child labor and forced labor, application of fair competition rules, anti-corruption and environmental protection.
12. We make every effort to ensure the safety and high quality of the products offered by Mercator Medical Group. We take care of this at every stage of their manufacture, storage and sale. The Group expects each of its Employees to feel co-responsible for the safety and quality of the products, and by performing their duties will contribute to maintaining the highest standards.
13. Mercator Medical Group primarily supports activities in the spheres of health and social care, as well as climate and environmental protection. Donations should be made to achieve the aforementioned goals. It must always be transparent and documented, and can only be done on a voluntary basis and without any expectation of reciprocal benefit. Any donations political parties, political organizations and movements, public officials are prohibited.
14. Mercator Medical Group uses sponsorship primarily to support sports. Sponsorship activities must not serve any hidden interests.
15. The Group does not in any way or under any circumstances engage in money laundering activities from unauthorized or criminal activities. The Group takes all necessary measures to prevent money laundering in areas it can influence.

ENVIRONMENTAL PROTECTION AND SOCIAL ENVIRONMENT

1. We strive to ensure good, partnership-based relations with local communities. We respect each other's expectations and commitments. We strive to participate in the development of local communities by contributing to economic, social and cultural development in a way that is appropriate to the scale of our operations in a given region. We support the social commitment of our employees.
2. We conduct our operations in accordance with applicable environmental laws and regulations, with concern for reducing the negative effects of our activities. We value and support the environmental improvement efforts of our Employees and contractors.

NOTIFICATION OF VIOLATIONS

1. An employee may report a violation of this Code of Ethics or a suspected violation in the manner detailed in the Violation Reporting Procedure (QM.PR10.PB09_Breach Reporting Procedure), available on the Q drive: [QM.PR10.PB09_Procedure for Reporting Violations](#) and on the BPM system.
2. Reports of violations can be made anonymously or by name.
3. Reporting persons shall not be subject to any reprisals, discrimination or other types of unfair treatment by the Group for this reason, in particular, such as termination of employment, unfavorable change in working conditions and pay, omission from promotion, etc. Persons who engage in reprisals, discrimination or other forms of unfair treatment against a whistleblower are subject to disciplinary action.

Dr. Wiesław Zyznowski
President of the Board