

Company Code of Conduct MPC Properties

MPC Properties has been recognized as acting responsibly in the course of achieving its success in the area of work and engagement. Our strong reputation in real estate business, depends on maintaining our high standards.

Compliance with this Code is an essential part of our doing so.

This Code applies to all Relevant Persons and is applicable to all persons in the MPC properties assets. It is expected to act in accordance with this Code and to use reasonable endeavors to influence those with whom they are working to ensure they also act to similar standard of integrity and ethical behavior.

This Code establish general principles. Certain areas covered by the Code may be the subject of more detailed provisions and requirements established by other documents.

Doing the right thing, however, means not only following the rules, but also using our best judgment. Not all situations have a specific guideline to support our actions, nor can this Code address all decisions and potential dilemmas that we may face.

This is why in all of our decisions, we are guided not only by applicable laws and regulations and internal guidelines, but also by what is the right thing to do.

Report misuse

MPC is committed to an environment where employees and visitors feel comfortable to share their views and raise their concerns. We speak up promptly and report conduct that we believe, in good faith, violates laws, regulations, internal policies or this Code.

There are multiple channels to raise concerns, including to line managers, Legal, Corporate security or Human Resources. We reach out to our line managers or Human Resources regarding concerns, suggestions or questions about our jobs, working conditions or treatment that we or our colleagues are receiving.

In case of some misuse or violating the Law, employees get in touch with Corporate Security department. Head of Corporate department will inform highest governance body by sending report about misuse, if any. It will also inform and report the total number and the nature of critical concerns on annual basis.

Visitors can report concerns either via telephone or online via a web form or e-mail, for each Asset. Reports can also be made anonymously.

Anti-bribery and anti-corruption

In all aspects of our business, we know the legal requirements and internal guidelines and comply with them. We have an unwavering commitment to fair and responsible business conduct and to preventing and detecting potential misuse of our products and services for illegal, criminal or unethical purposes.

MPC is committed to fair and responsible business and prohibits all forms of bribery and corruption by employees and representatives, as well as any business conduct that could create the appearance of improper influence.

We refrain from giving or accepting any gifts, entertainment or other advantages in connection with business activities, with the value above 10.000 RSD per gift, or gifts received during calendar year which total value exceeds 30.000 RSD, unless they are appropriate to the circumstances, moderate in terms of value and frequency and in line with or internal anti-corruption policy.

We comply with applicable laws and our Anti-Bribery and Anti-Corruption Policy so that political, charitable and similar contributions and sponsorships made by MPC are not, nor are seen to be, used for any illegal, criminal or unethical purpose.

Protecting our assets and preventing fraud and crime are key to building and maintaining the trust of our stakeholders. We must all take precautions to safeguard and protect MPC property. We comply with information security standards and employ best practices to protect MPC's data and information assets from loss, theft or misuse. We use MPC property and resources only for business purposes and not for personal or professional gain or for inappropriate or unlawful purposes. We avoid unauthorized or improper use or disclosure of the MPC name, logo, service mark, trademark, trade secret, confidential document, patent or copyright.

Training

All employees need to receive Anti-corruption and anti-bribery training organized at least once every two years. Additionally, every new employee receives Rulebook on anticorruption policy and needs to sign statement about anti-corruption and anti-bribery.

Training is organized by Corporate security department, who is also in charge for the control of the implementation of this Rulebook.

All employees and governance body members are reminded about Anti-corruption policy by receiving an email with attached Policy.

Training was realized so far for 100% of employees and 50% of governance body employees.

Anti-competitiveness

The aim of procurement process is to obtain competitive bids that are an expression of goodwill from all included bidders. Respecting this principle, we obtain from potential tender participants signed statement in which they confirm that commercial terms and conditions given in tender are given in good faith, that terms are intended to be competitive and that they have not fixed the amount of the tender with or under

or in accordance with any contract or arrangement with any other person involved . They also confirm, under criminal and material liability, that they have not done and will not do, at any time, any of the following actions:

1. Communicate to persons other than the person organizing tender the amount or approximate amount of the submitted bid, except where the disclosure of the approximate value of the offer, in confidence, was necessary to obtain the price of the insurance premium, provided for the preparation of the tender.

2. Entering into any contract or agreement with any other person to refrain from tendering or as to the value of any tender to be submitted. 3. Offering or paying or agreeing to pay or give any sum of money or value directly or indirectly to any person in relation to tender participant. In this statement, the word "person" includes any person, legal entity, entrepreneur, company, association or any other form of organization and business, and "any contract or agreement" includes any such business, formal or informal whether it is legally binding or not.

GDPR

We are committed to the principles inherit in the GDPR and particularly to the concepts of privacy by design, the right to be forgotten, consent and a risk-based approach. In addition, we aim to ensure:

- transparency regarding use of data
- that any processing is lawful, fair, transparent and necessary for a specific purpose
- the data is accurate, kept up to date and removed when no longer necessary
- the data is kept safely and securely

In order to fulfil all mentioned above:

- -Our concept of information security is based on ISO 27001:2013 standard.
- -Principle of Least Privilege and segregation of duties has been implemented
- -Encryption has been enforced
- -User activities have been logged in event logs

-A cyber health check is performed on a monthly basis