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INTRODUCTION

“BY ENDURANCE WE CONQUER”

ERNEST HENRY SHACKELTON

SOCIAL CORPORATE RESPONSIBILITY

Social corporate responsibility is the responsibility of an organisation for the impact its activities and decisions have on society, various stakeholder groups and the environment. It is verified through transparent and ethical conduct in major areas such as:

- Corporate governance
- Human rights
- Labour practices
- Environment
- Fair operating practices
- Consumer issues
- Community involvement and development of local community

When talking about corporate social responsibility, it has to be stressed that activities a company embarks on should be forward-looking and have a positive impact on future generations. This should include measures taken to protect the natural environment as well actions supporting the development and education of children. The notion of corporate social responsibility is also closely linked to the concept of sustainable business development which assumes that the business of the company is not limited to efforts to boost economic performance but also includes social initiatives.

SPIRIT OF THE CODE

We all observe the “Spirit of the Code” and not only the fundamental rules described in it. The Code is a guide that puts emphasis on the key principles and shows the way to accurate decision-making based on sound judgment.

MCKB'S ATTITUDE TO CSR

MCKB Sp. z o.o. seeks to address the issues of corporate social responsibility in a responsible way. All employees of MCKB Sp. z o.o. are guided by the values that form the moral foundation of our company. It is also especially important for us, as a company, to ensure that we enjoy a partner-like, friendly atmosphere within our organisation, and that people respect each other. We strive to ensure this is the case. In their activities, our employees demonstrate extraordinary commitment, solidarity, reliability and an innovative approach to problems.

By embracing corporate social responsibility, we hope to deliver added value to our business partners who will be able to demonstrate that they are working with a responsible and modern company, and to our prospective and existing employees for whom we will be a desirable employer. The trust that all the parties involved in our business place in us is our great success.

For everyone in our company, it is a priority to follow the letter of the law as well as the internally adopted rules and principles of business ethics. Any information we provide is always complete, unbiased, objective, understandable, and factual.

It is also important to note that many of our actions, which relate to corporate social responsibility, are incorporated in our Code of Ethics, which is a document compatible with the CSR Policy.

The key issues addressed in Corporate Social Responsibility refer to four areas: employees, contractors and customers, the natural environment and the local community.

OUR CORE VALUES

EMPLOYEES

- Employees are the greatest corporate asset
- Employee development is a guarantee of business growth
- Human rights, employee rights – our rules of conduct

BUSINESS PARTNERS

- Trustworthy partnership – our investment in future
- Our Code of Ethics
- Who we work with

ENVIRONMENT AND SAFETY

- MCKB's environmental responsibility
- Our OHS activities
- Our certification rules of practice

LOCAL COMMUNITY

- Supporting those in need
- Partnering with academic communities and the Lodz Construction Innovation Cluster
- Internships for students and graduates

EMPLOYEES

OUR VALUES

- Employees are the greatest corporate asset
- Employee development is a guarantee of business growth
- Human rights, employee rights – our principles

EMPLOYEES ARE THE GREATEST CORPORATE ASSET

We respect our employees and know that the company's success depends on their commitment, creativity and sense of constructive input. We seek to keep the atmosphere at work friendly and to make our employees feel comfortable. Due to the fact that the achievement of the company's goals is crucial for us, we focus on the competence of our employees. For this reason, we support them in continuous improvement, professional development and knowledge enhancement.

EMPLOYEE DEVELOPMENT IS A GUARANTEE OF BUSINESS GROWTH

Having regard to the industry in which we operate, occupational health and safety of both our office workers and those working on site are of foremost importance to us. Our employees are required to adhere to internal regulations designed to ensure the best possible coordination of work in each job position. Besides, each employee has a defined job description setting forth his or her duties and responsibilities. All MCKB employees have equal access to both the executive and managerial staff. In addition, employees are trained to update their knowledge so that they always act in compliance with applicable law. We apply the employment rules in accordance with Polish law, which are very transparent for both parties. Introduction and training is provided to each newly employed person relevant to their new job. We have also introduced a non-competition clause, and any conflicts of interest that might involve employees should be reported to the Company's Management Board.

HUMAN RIGHTS, EMPLOYEE RIGHTS – OUR PRINCIPLES

As a company, we promote behaviour in accordance with our Code of Ethics and all other moral and social norms, but additionally our employees are strictly required to comply with the law and with all standards applicable to our industry. We respect human rights and do not tolerate the practices of using children in the production of materials. We also oppose any form of discrimination.

As an employer, we believe in the effectiveness of the Work-Life Balance concept, and we are aware of the importance of healthy separation of work and family life. We encourage our employees to actively spend their free time by arranging weekly swimming lessons. We also run a Company Social Benefits Fund, which can be used by all our personnel. We regularly host students of the Faculty of Civil Engineering of the Lodz University of Technology on internships, and selected interns are offered career opportunities with our company.

BUSINESS PARTNERS

OUR VALUES

- Trustworthy partnership – our investment in future
- Our Code of Ethics
- Who we work with

TRUSTWORTHY PARTNERSHIP – OUR INVESTMENT IN FUTURE

The idea of partnership is one of the key issues in our business relationships. We desire to ensure that mutual trust is not compromised at any stage of our relationship. We strive to make the relationships we establish with our business partners valuable and long-lasting. Therefore, the contracts we enter into are always transparent and clear to each party. At the same time, we display care of mutual interests in our relations with customers, business partners, subcontractors or suppliers. We treat our partners with respect, keep our word, but we also do not make empty promises.

OUR CODE OF ETHICS

In line with our Code of Ethics, we do not engage in any practices that could breach the law or violate the competition rules. We do not tolerate any practices which consist of promising, offering, giving, soliciting or accepting, directly or indirectly, any undue gains, whether financial, personal or otherwise, that would benefit us or any other person, nor do we accept or promise any such gains in exchange for any acts or omissions in the course of business activity. We guarantee equal opportunities to all parties willing to become our business partners. Moreover, our marketing actions are always based on true information.

WHO WE WORK WITH

We work only with legitimate businesses that legally manufacture their products which are CE marked and come with other relevant certificates and approvals, and employ their personnel in compliance with the law. Having regard to the quality of our services, we rely on the experience and capacity of our duly selected suppliers of goods and services.

We do not work with companies that have an unclear legal status or are suspected of committing unlawful practices. It is also important for us, as a company, to adhere to the terms and conditions of our contracts as well as the terms of payment, both from our side and to us. We are very serious about respecting non-disclosure agreements.

Our activities are focused on meeting the requirements of our customers. This is possible because our policy is to cooperate closely both before a contract is concluded, during its term, and after its completion (during maintenance care of the customer).

Our clients are the world's leading companies that highly value partnering with businesses that meet the highest standards of operation, which we do guarantee.

ENVIRONMENT AND SAFETY

OUR VALUES

- MCKB's environmental responsibility
- Our OHS activities
- Our certification rules of practice

MCKB'S ENVIRONMENTAL RESPONSIBILITY

As a construction company, we are well aware of the impact our activities have on the external environment. For this reason, at each stage of our operations we make every effort to avoid any damage to the natural environment. In implementing our contracts, we strive for the sustainable management of raw materials and energy resources, and we care about minimising pollution and waste generation as much as possible. The primary goal of our company's occupational health and safety policy is to protect our employees' health and lives. We care about safety and prevent damage to property by constantly improving and upgrading activities for safe and healthy working conditions, and raising awareness and experience of our employees.

OUR OHS-RELATED ACTIVITIES

We take a number of measures to eliminate or minimise the occurrence of threats to the health or life of people and the environment by using safe work practices, state-of-the-art techniques and tools at workplaces, and offering our customers services based on advanced technologies and materials. We systematically identify hazards and occupational risk, and take measures to reduce the risk of accidents at work. Through training, we raise awareness of our employees about the occurrence of hazards to people and their property and their elimination. In order to implement the OHS policy, the Management Board provides adequate resources and funding, and obligates the company's management and employees to pursue the safety policy to the extent appropriate to the person's position and role in the organisation.

The Integrated Management System implemented at MCKB is based, with regard to occupational health and safety, on the guidelines of the international standard OHSAS 18001. Compliance with its requirements is confirmed by a certificate issued by DEKRA Certification Sp. z o.o.

OUR CERTIFICATION RULES OF PRACTICE

According to the environmental policy adopted, MCKB adapts the processes, methods and organisation of construction works to environmental protection requirements.

Wastes are an important environmental aspect of any construction project. Wherever possible, we run selective waste collection to reduce our environmental impact. By creating a site waste management plan, we reduce the amount of waste and the consumption of water and energy, aware of the need to keep down CO₂ emissions.

We comply with applicable laws, especially those relating to environmental protection, and hold our suppliers accountable for high standards of work quality and the use

of the environmental management system. We strictly adhere to our quality commitments while observing the principle of superiority of safety and environmental protection over production. The Integrated Management System implemented at MCKB is based, with regard to environmental management, on the guidelines of the international standard ISO 14001. Compliance with its requirements is confirmed by a certificate issued by DEKRA Certification Sp. z o.o. In addition, we regularly undergo OHS and environmental audits carried out by external, independent experts, so that our improvement efforts can be even more effective.

LOCAL COMMUNITY

OUR VALUES

- Supporting those in need
- Partnering with the academic community and the Lodz Construction Innovation Cluster

SUPPORTING THOSE IN NEED

As part of our activities, we strive to support the local community. For several years we have been actively supporting the St. Matthew the Evangelist Parish Day-Care Centre in Lodz. Thanks to our efforts, children using the Day-Care Centre can have a warm meal every day and, once a year, go on a sightseeing tour. If needed, collections of needed items are organised or new equipment is purchased. Our employees are also encouraged to engage in other actions to help people in need.

PARTNERING WITH THE ACADEMIC COMMUNITY AND THE LODZ CONSTRUCTION INNOVATION CLUSTER

To assist the academic community in our city, we are in constant contact with the Lodz University of Technology, the Academy of Fine Arts and the University of Computer Science and Skills. As part of our activities, we undertake social initiatives that involve both our employees and Lodz students. One of the goals of our company is to support and promote activity of young people who will foster the future development of the construction industry, but also for the city, the region and the country.

We are also one of the members and co-founders of the Lodz Construction Innovation Cluster. The activities of the Cluster are based on the development of business-science partnerships in order to create new and innovative technical and technological solutions, educational activities enabling students and graduates of universities and vocational colleges to gain professional experience and, above all, to provide a platform for Lodz-based construction companies to set up consortiums capable of implementing urban renewal and infrastructural projects in Lodz. We are also active under the Youth in Lodz Programme and each year we take care of several interns who very often become our employees at a later date.

COMPLIANCE WITH THE CSR POLICY

The issues raised in this **CSR Policy** are of paramount importance to our company, our shareholders and our business partners. Compliance with this Policy is essential for running a business that is consistent with established ethical values and standards.

By ensuring the appropriate conditions and working environment, we expect all our employees to follow the rules set forth above to ensure that their attitude and conduct are professional, ethical and moral.

The management of the company declares consistent monitoring of the application of this Policy, its periodic reviews and updates, continuous improvement of the Management System, support for all initiatives aimed at continuous improvement of performance, and gives assurance that specific sanctions will be imposed if any corrupt practices are detected.

Through the adoption of the CSR Policy by MCKB, all its Business Partners are guaranteed a relationship with a reliable, modern and responsible company.

Signed

MCKB Management Board

Lodz, 19 February 2016

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