

MATERGROUP

MATER SRL | SISCO SRL | MATER BIM SRL

MATERGROUP LTD

MATERGROUP INC

MATERGROUP SPZ00

000SZ21-GC001_C0 | CODE OF ETHICS

25.05.2022 page 1 of 5

TO ALL EMPLOYES AND STAKEHOLDERS

This Code expresses MATERGROUP ethical commitments and responsibilities in performing business activities and corporate operations by the employees of MATERGROUP and its associates, whether executives or employees of any sort of these enterprises.

Our mission is to create, distribute and recognise value to our customers' needs, our shareholders' investment, the competitiveness of the countries in which we operate, respecting the environment and the safety of individuals, aiming to create a better world for the future generations.





CODE OF ETHICS

The value of reciprocity

Inherent in the Code is an ideal of cooperation meant to work to the mutual advantage of the parties involved, in accordance with the role of each. With this in mind, MATERGROUP requests that each stakeholder deal with the Group according to principles and rules based on a similar idea of ethical conduct.

Promote fair competition

We do not collaborate with competitors on how to price our services or whether to pursue opportunities and we do not share/accept confidential information with/from competitors or confidential information of others, including former employers.

Collaboration Across Our Network

We collaborate and share knowledge across our network, using proven methods and applying consistent standards.

Innovation as a Value

We share and bring innovation and focus our efforts on value and outcomes.

Delivery Performance

We only commit to what we can deliver with high standard of quality and we follow contract commitments.

Protect People, Information and Our Business

We work together to build a better, stronger and more durable company for future generations, protecting our brand, meeting our commitments to protect information and intellectual property, acting with an owner mentality and protecting and developing our people.

Meritocracy and Non-Discrimination

Meritocracy is one of our pillars of our decisions on personnel management policy. MATERGROUP promotes inclusiveness and fights any form of discrimination.



Personal Conflicts of Interest

We ensure our personal interests and relationships don't create conflicts.

Confidential Information

We protect confidential information, clients, business partners, suppliers, former employers and others from unauthorized use or disclosure.

Data Privacy

We process and protect personal data in compliance with data privacy laws.

Information Security

We follow MATEGROUP requirements for protecting and using information, devices and technology belonging to MATERGROUP, clients, business partners, suppliers and others.

Responsible Use of Data and New Technologies

We use data and new technologies responsibly.

Make Your Conduct Count

Respect, inclusiveness and shared ethical values and behaviours are at the heart of MATERGROUP culture. We are proud to be ambassadors of MATERGROUP and we act accordingly.

Anti-Money Laundering

We do not engage in any money laundering or terrorist, financing activities or assist any other party in doing so.

Comply with Laws

We comply with all laws, whether local, national or regional. Our people, and those acting on our behalf, are responsible for understanding the applicable rules and must work with Legal to ensure compliance. Violations of law can result in significant harm to Sisco, including financial penalties, denial of government contracting privileges,



imprisonment for criminal misconduct and damage to our business relationships and reputation.

Anticorruption

We do not give or accept bribes—including inappropriate gifts, meals, entertainment or travel— and we get approval before offering any gifts, meals, entertainment or travel to Public Officials.

We do not use or allow third parties to give bribes or make questionable payments on our behalf, which is why we only work with approved Business Intermediaries—companies or individuals that we expect to interact with our clients or represent Sisco before a government body.

Intellectual Property

We protect and honor the intellectual property rights of othersand safeguard our intellectual property and knowledge.

Social Media

We participate in constructive online dialogues and use ourbest judgment when posting to external or internal social media.

Brand

We manage all media relations and industry analyst activities and events, rather than through employees' or engagement teams' own initiatives.

Asset Protection

We act as owners of the company and do not jeopardize MATERGROUP future by losing our assets through theft, misuseor carelessness.

Workplace Safety and Business Continuity

We follow all safety and emergency procedures at our facilities and at client sites—including incident response guidance and business continuity measures.



Run Our Business Responsibly

We are agile and we commit for high performance. We use sound business judgment to make decisions and do so within our authority, using informed judgment to take appropriate risks and remaining accountable even where decision making is automated. We recognize the limits to our individual authority. When situations arise that require a more specialized or senior-level review, we are prudent in our decision making and seek counsel.

Time & Expense Reporting

We accurately report all hours worked and vacation hours taken, even ask or suggest that those under our supervision inaccurately report hours worked, and submit accurate and legitimate business expenses within policy and the appropriate timeframe.

Financial Reporting

We provide accurate, timely and complete financial disclosures and reports.

Travel and Visa & Immigration

We conduct all business travel in the most cost-effective, safe manner and we get the proper visas or work permits required for international business travel or assignments.

Be a Good Corporate Citizen

We support and respect human rights, promote environmental responsibility and encourage our people's involvement in the communities where we work and live.

Community Impact

We support our people who choose to volunteer their time and skills to make a measurable difference for individuals, communities and society.

To raise a concern about a violation of this Code of Ethics, you may report by writing your concern to MATERGROUP Ethics Helpline: ethics@matergroup.com