

CODE OF ORGANIZATIONAL CULTURE

We are a large enterprise - we employ nearly 400 people. A great challenge for such a large organization is to define common values for a diverse group of employees. Since 2021 (?), We have been jointly applying the CODE OF ORGANIZATIONAL CULTURE - a key document on the ethical culture of the organization.

In the MARATHON Group, we respect ethics and applicable law.

We believe that ethics has a much greater influence on compliance with the law than the law itself. The best legal system is helpless in the face of the lack of an ethical culture in the organization. Illegal actions can be explained by individual workers' mistakes, but the person breaking the rules must have had the opportunity to do so. An established ethical culture can help a company overcome the difficulties caused by the actions of its individual employees.

We are convinced that all values - including corporate ones - begin and end in a person. Therefore, corporate values also come from us - individuals, employees of the company. The implementation of corporate values is primarily influenced by the personal values of each of us.

We believe that all our employees identify with the values and principles of the CODE OF ORGANIZATIONAL CULTURE.

Pillars: PARTNERSHIP, DEVELOPMENT, RESPONSIBILITY

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| <ul style="list-style-type: none">• sustainable, safe development• we are there for our clients• we care for the natural environment | <ul style="list-style-type: none">• we care for friendly working conditions• we improve• we care about the safety of our employees |
| <ul style="list-style-type: none">• we compete fairly• we do not tolerate corruption• we use company information responsibly | <ul style="list-style-type: none">• we care for relations with business partners• we build trust thanks to reliable information |

The CODE OF ORGANIZATIONAL CULTURE defines the attitudes and behaviors expected of all employees and managers. The Code organizes and collects in one place the principles that should be followed by employees inside and outside the organization when dealing with business partners or colleagues.

Awareness

Each new employee of the MARATHON Group undergoes adaptation training, shortly after starting work, where he learns about the applicable code and about the right and obligation of employees to react to possible irregularities. New employees have a chance to learn the details of the Code.

The MARATHON Group has distributed the Code of Ethics in printed form, also in English (?).

Communication

The Code is available to employees of the MARATHON Group on the Intranet, as well as in paper form. It is also posted on the MARATHON Group website.

The communication regarding the Code emphasizes the personal responsibility of employees for their actions in accordance with the ethical values of the MARATHON Group and the principles expressed in the Code, as well as with internal regulations that detail our processes and procedures.

Daily prevention of irregularities

Adopting the Code and communicating the principles set out in it is aimed at minimizing the risks of non-compliance, which may result in penalties, sanctions or loss of reputation as a result of non-compliance with regulations and standards, sanctioned by law or being the best practices in the area.

Principles of cooperation

In 2021 (?), We adopted the MARATHON Group's CODE OF COOPERATION WITH SUPPLIERS AND SUB-CONTRACTORS. Under the Code, we only work with suppliers and business partners who conduct their business with integrity. Relations with our business partners are based on mutual trust, respect and professionalism. Purchases and orders are carried out on the basis of transparent and objective rules, in accordance with applicable law and clearly defined internal procedures.

In order to maintain the highest standards of business, as the MARATHON Group, we want to cooperate with business partners who abide by the law, share our principles and apply them in everyday business practice.

The CODE OF COOPERATION WITH SUPPLIERS AND SUBCONTRACTORS sets out the minimum requirements for the business partners of the MARATHON Group in terms of respect for human rights, working conditions, environmental protection and integrity in business operations.

We oblige entities we work with to adhere to the same standards of integrity as those we adhere to. We have developed a standard set of agreements with suppliers, subcontractors and business partners regarding the requirements of work safety, fire protection, waste management, property protection and environmental protection.

All companies of the MARATHON Group have introduced a CODE OF COOPERATION WITH SUPPLIERS AND SUB-CONTRACTORS and make it available on their websites. Information on the conduct of the procurement procedure, in accordance with the principles of the Code, should be included in the Terms of Reference, as well as in other purchasing documents (e.g. contract templates). Business partners should read the code and submit a declaration of compliance with its provisions during the purchasing procedure.

A. OUR COMPANY

SUSTAINABLE, SAFE DEVELOPMENT

We think in the long term. We plan and run our business in such a way as to ensure long-term sustainability. Our daily decisions take into account the long-term perspective and anticipate the effects of our actions.

We take care of our infrastructure. The MARATHON Group secures the key elements of infrastructure for society. Our activity meets the strictest safety requirements. We protect our employees and resources, both material and intellectual (e.g. information). Each Superior is responsible for the continuous improvement of the safety level in the supervised area of operation.

It is the responsibility of all employees, contractors, consultants and other persons working for the MARATHON Group to report security incidents as well as weak links in the security system.

WE ARE FOR OUR CUSTOMERS

At the MARATHON Group, we are customer-oriented. We strive to provide products, services and solutions that not only meet customer expectations in terms of quality, safety and care for the natural environment. Integrity in the marketplace requires that each of us treat our customers ethically and in accordance with the law. We acquire new customers thanks to the high quality of our products and service as well as the competitiveness of our prices. We do not use unfair or misleading commercial practices. We present our offer to clients in a clear and understandable way. We keep our promises to our clients.

- We treat our clients with respect
- We attach great importance to building long-term, positive and trust-based relationships with our clients.
- We adhere to high ethical standards in all business relationships with our clients. We approach the processing of data and information, in particular sensitive data, regarding our clients, or important information regarding their business, with honesty and caution.
- We take into account the interests of customers in the decision-making process in the MARATHON Group.
- We apply fair contractual conditions to our relationships with our clients.
- We inform our customers about the prices and the terms of our contracts in a way that they understand.
- We apply transparent rules applicable to business in relations with our clients.

WE CARE ABOUT THE NATURAL ENVIRONMENT

At the MARATHON Group, we comply with the applicable environmental regulations in all aspects, including emission standards to the atmosphere, water and soil. We operate in such a way as to minimize the nuisance of our activities for the environment. All employees use natural resources rationally.

- We regularly monitor and reduce the negative impact of our activities on the environment. We constantly strive to reduce the environmental impact both in the area of technologies used in our operations and in our daily work duties.
- We use natural resources efficiently. We reduce the environmental impact of our operations and promote the sustainable use of the natural resources we need.
- We support innovative solutions that contribute to reducing the environmental nuisance of our products and services.
- We assess the impact of our activities on the natural environment. When making decisions on modernization and new investments, the environmental effect is always an important criterion for us.

B. PEOPLE IN OUR COMPANY

WE CARE ABOUT FRIENDLY WORKING CONDITIONS

In the MARATHON Group, we respect each other. We promote cooperation, honesty and initiative. Our employees are our greatest competitive advantage. We are proud of their experience, knowledge and skills.

We respect the privacy of our employees. We always operate in accordance with applicable law and professional standards. People holding managerial positions in the MARATHON Group should be a role model in every aspect of professional life, and their behavior should shape high standards of operation in the workplace. We consistently strive to ensure that the working environment in our company is free from all forms of mobbing, discrimination, harassment and other reprehensible behavior.

• We make all employment decisions based on the applicable corporate employment rules. In our company, we use objective and non-discriminatory criteria for hiring and promoting employees, respecting all applicable formal regulations and arrangements with social partners. In the first place, we conduct internal recruitment, thanks to which we retain people with extensive experience and qualifications in our organization, while ensuring their professional and personal development.

- All employees are employed with the highest standards in terms of the organization of a safe work environment.
- From the moment of hiring a new employee, we care about building a sense of belonging to the MARATHON Group, therefore each newly hired employee is covered by the adaptation program.
- We make every effort to create a friendly working environment for our employees. We create workplaces where employees can effectively and efficiently carry out their tasks, and thanks to their successes, gain satisfaction and motivation for further professional and personal development.
- Responsible supervisor. People in managerial positions should act as role models in every aspect of working life. It is the behavior of superiors that shapes the standards in the workplace. Each supervisor in the MARATHON Group should be familiar with the TSL industry and should be guided in making decisions by the primary goal of providing economic, ecological and safe TSL services. Supervisors should enable employees to develop their own potential by setting goals, delegating responsibility, and giving honest and constructive feedback. As a result, employees can develop their competences and perform the tasks entrusted to them even better and more effectively. Supervisors should feel especially responsible for always following ethical principles.
- Mutual respect. In our organization, we respect people employed at all levels and value their contribution to the work of the entire MARATHON Group. We are convinced that the success of the entire organization is built on the diversity of knowledge, skills, professional qualifications, experiences, personality and points of view. In employee relations, we maintain high standards of personal culture and mutual courtesy, both in the workplace and outside.
- Freedom of opinion and expression. We promote teamwork free from any prejudices. We respect all people and their right to privacy. We accept all diversity in terms of origin, race, gender, sexual orientation, culture, age and marital status, as well as religious or political beliefs or membership or non-membership of social and professional organizations.
- In our organization, we do not tolerate any form of discrimination, offensive or inappropriate behavior or making offensive remarks to others.

WE ARE PERFECTING

In the MARATHON Group, we create an environment that fosters the development of competences, improvement of professional qualifications and a sense of individual responsibility. It is important to us that all our employees have the opportunity to be successful through their skills and effective work. In our company, we promote cooperation, honesty and initiative.

- We strive for the proper use of employees' competences and effective management of the transfer of knowledge and skills in the MARATHON Group, therefore we make every effort to support employee mobility through appropriate mechanisms and standards.
- We know the importance of continuous development and improvement of competences, therefore we make every effort to ensure financial resources for the implementation of training and development activities. We are aware that the development of our employees takes place not only through dedicated development programs, but primarily through participation in the work of project teams and performing tasks at the workplace.
- Proactive employee relations are very important to us, therefore we strive to create such an atmosphere that our employees can express themselves freely. We are convinced that a wide range of different attitudes and opinions is a source of benefits for the organization. In our organization, we guarantee freedom of views and freedom of belief and expression. We respect the right of employees to associate freely, at their own discretion, in trade unions and other organizations representing them.
- In our organization, we highly value the attitude of commitment, creativity and openness to changes. We attach great importance to ensuring that our employees are informed about the directions of activities of their team, their company and the entire MARATHON Group.

WE CARE ABOUT THE SAFETY OF OUR EMPLOYEES

The safe operation of our facilities and vehicles is a prerequisite for ensuring the health of our employees.

- We comply with occupational health and safety standards and regulations. We require all employees to know and follow the rules of health and safety at work in the MARATHON Group. It is extremely important for us that employees inform managers about all observed dangerous situations. We do not tolerate work under the influence of any intoxicating substances, including alcohol and drugs.

- We develop a safe and healthy work environment. We care for the health of our employees and constantly monitor and develop good working safety and safety conditions for our facilities and technical devices.
- Each employee is personally responsible for safety and health and life protection.
- Each supervisor informs employees about the obligation to observe safety rules and the principles of health and life protection, and actively supports employees in observing them.
- All accidents and violations of regulations in this regard are reported immediately to the appropriate services.

C. HONESTY IN OUR COMPANY

WE COMPETE HONESTLY

Honest and fair treatment of all entities and people with whom we have contact on the TSL market should be our priority.

We obey the law. All employees of the MARATHON Group comply with applicable laws and internal regulations, and act in accordance with the principles of ethics. We build our relationships on mutual trust, responsibility and respect.

We follow the rules of competition protection. We believe that fair competition is an essential factor in economic efficiency. All agreements with our competitors carried out in a manner that ensures compliance with antitrust rules. We do not operate in a way that restricts or eliminates fair competition, we operate in accordance with business standards that meet customer expectations. We believe that companies operating on a fair and transparent basis are valued by consumers and create value for their shareholders.

- We build awareness of the applicable law as well as internal regulations and standards of the MARATHON Group. Everyone is obliged to know the current legal regulations and contracts regulating everyday duties at the workplace. All employees, including management, are required to familiarize themselves with the applicable legal regulations related to the work they perform and to participate in training courses on applicable regulations, organized by the MARATHON Group.
- We build our competitive advantage based on legal sources of information.
- We conduct financial operations in a transparent and legal manner. Our company maintains business contacts only with companies with a good reputation, the operation of which does not raise any objections and complies with the law.

WE DO NOT TOLERATE CORRUPTION

At the MARATHON Group, we follow the principle of "zero tolerance" for bribes and other forms of corruption. We do not give or accept any improper material, personal or other benefits that could be considered inappropriate remuneration. An improper benefit is an advantage that may be considered a bribe to the recipient, given to keep him or her in the manner expected by the giver of the pecuniary benefit.

We are careful about gifts or invitations. Gifts or invitations of a value greater than what is acceptable to our company may only be accepted from third parties with the express consent of the supervisor. The same applies to the presentation of a gift or invitation by an employee of the MARATHON Group. Be aware of the risk that the limit of what may be acceptable is easy to cross.

We avoid a conflict of interest. Employees should avoid investing, engaging in and additional employment with companies that are customers, suppliers or other business partners of the MARATHON Group, and above all competitors, so as not to create a conflict of interest with the MARATHON Group.

WE USE COMPANY INFORMATION RESPONSIBLY

At the MARATHON Group, we protect the business value of our information, concepts and ideas. The source of innovative projects, concepts and ideas that we use at work are work, knowledge, experience and creativity. The way in which this information is used and shared can add or harm to your business. To guard this precious value, we must use specific ways to document, protect, process and safeguard our proprietary information and ideas. In particular, we must secure information against disclosure to unauthorized persons and against alteration, loss or destruction. Properly securing such data facilitates protection and contributes to our business development.

- We protect company information, especially business secrets, confidential information and we observe professional secrecy. We ensure proper and adequate protection of our corporate information and information entrusted to us by our clients and business partners. All employees are fully aware of the need to protect information, which translates directly into the obligation to make every effort to ensure that the information of this category, concerning the MARATHON Group and our contractors, is kept confidential.
- We protect privacy and personal data. We respect privacy and protect our personal data and that of other clients and partners. We collect data of both employees and associates of our company, as well as data of employees of other entities and customer data, only within the limits permitted by law and internal regulations and only to the extent necessary. We only use information obtained in connection with human resource management and marketing for legitimate purposes. We comply with applicable laws regarding the collection, use, sharing, storage, transfer and deletion of personal data. This serves to protect privacy and respect the rights and freedoms of data subjects. We do not share personal information with anyone who is not authorized to view it for compelling business reasons. If in doubt, contact the Information Security Administrator supervising compliance with the provisions on the protection of personal data.
- We protect confidential information. We do not use confidential information in trading securities. We protect confidential information until it is made public - we do not disclose confidential information to unauthorized persons, we do not provide recommendations based on confidential information. We follow transaction prohibitions during closed periods.
- We protect intellectual property. Any work performed by an employee of the MARATHON Group, in part or in full, in connection with professional duties and / or during work time, using company resources or information, is the property of the MARATHON Group. We protect our intellectual property. We also respect the confidentiality and intellectual property rights of others. We use studies and materials available to us to the extent authorized on the basis of agreements concluded with their authors. We list the sources of the information used. Intellectual property includes: trademarks, brands, packaging designs, logos, copyrights, inventions, patents and trade secrets. Our trademarks should never be used disrespectfully or in offensive manner.

D. EXTERNAL RELATIONS WITH OUR COMPANY

WE CARE FOR RELATIONS WITH BUSINESS PARTNERS

We only work with suppliers and other business partners who conduct business with integrity. Relations with our subcontractors, business partners and suppliers are based on mutual trust, respect and professionalism. Purchases and orders are carried out on the basis of transparent and objective rules, in accordance with applicable law and clearly defined internal procedures. We oblige entities we work with to adhere to the same standards of integrity as those we adhere to. The unethical or unlawful actions of these entities may damage the reputation of the MARATHON Group and damage the good name of our company.

- We work with suppliers, subcontractors and business partners who share our commitment to rule of law and integrity. We believe who we choose to include in our supply chain and how our partners and suppliers operate affects our reputation and business. When selecting a new contractor or when re-evaluating an existing contractor, we make sure that he or she understands the principles we follow. We pay close attention to anything that could violate our standards.

- Employees selecting suppliers base their decisions on the substantive criteria and supplier's reputation. When selecting and cooperating with suppliers, we follow the MARATHON Group purchasing procedure. We perform appropriate analysis to assess whether the supplier is acting legally or has a reputation for being ethical and fair. We also avoid potential or actual conflicts of interest with suppliers.
- We have developed a standard set of contract provisions with suppliers, subcontractors and business partners regarding the requirements of work safety, fire protection, waste management, property protection and environmental protection, which we include in each contract.
- We pay close attention to the problem of abuses when hiring subcontractors and suppliers, and when selecting business partners.
- We do not tolerate abuses related to the selection of subcontractors and suppliers as well as other business partners.

WE CARE FOR RELATIONS WITH BUSINESS PARTNERS

We are a partner of local communities. We care for the development of the areas in which we conduct business, improve the quality of life of the community, support local events, and provide jobs. We know that our activities affect the life of local communities and we try to be their partners.

· We support the activities of legal entities and natural persons as well as local communities in areas such as science and education, sports, children and youth on a transparent and objective basis.

WE BUILD TRUST BY RELIABLE INFORMING ABOUT OUR ACTIVITIES

Transparent rules of communication are extremely important to us.

- We adhere to the MARATHON Group's communication standards. Communication is a natural part of our business activities. How our company is perceived externally depends on what we do and what we say. The same standards apply to internal and external communication. The information should be:
 - True - our information is truthful and based on facts.
 - Understandable - communication is tailored to the recipient.
 - Essential - the principle is to provide the right information at the right time to the right recipient.
 - Transparent - we provide information in an open and proactive manner, both about positive and negative events. On this we build faith and the dignity of the MARATHON Group.
 - On time - whenever we obtain information, we communicate it both internally and externally.
- We pursue a transparent, reliable and active information policy.
 - We pursue a reliable information policy both inside and outside the organization.
 - We care about good contacts with customers. We put emphasis on the development of modern solutions that facilitate communication between the client and the company.
 - We care about the image of the MARATHON Group. We build the company's value through communication. We make sure that the information provided is true, complete and legible.