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Prepared by:	Group Head of Sustainability & Group Legal Counsel
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GOOD BUSINESS PRACTICE

MM Grupp is an Estonian capital-based investment company focusing on broad-based cross-sector investments while also contributing to the development of a better life in Estonia. The objective of MM Grupp and its subsidiaries (hereinafter the “Group”) is to be the market leader in its main fields of activity in the Baltics, while providing the best customer experience.

For the Group, the everyday application of our core values and the principles of responsible business is essential. The Group’s core values are: professionalism - we are dedicated experts who act purposefully to achieve results while remaining understanding, polite and humane; innovation - we are future-oriented; our work should contribute to a better future for the Group and for broader societal development; caring - caring is a value that characterises our company as a whole: caring about our staff, the environment and society. It is a value that shines through in everything we do; flexibility - we are able to direct and reshape, and also to listen, understand and adapt when needed. Only a solution that suits all parties matters.

The purpose of Good Business Practice is to consolidate and describe the key principles that Group companies and employees must follow in their activities, and the same principles are also expected from our partners. In all situations, the Group expects honest, ethical and law-abiding behaviour from its employees and partners.

The Group’s Good Business Practice has been prepared based on national and international guidelines and principles, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Principles of responsible business in the Group

The Group follows the principles below, which apply to the Group itself, Group employees, and members of the management board and supervisory board (together: “employees”). The same principles are expected from partners (“Partner”).

Ethics and compliance with the law

- Our activities are always based on applicable laws and international standards and are aligned with good practice in the relevant fields of activity.
- If internal principles or agreements differ from legal acts, international standards or good practice, we always follow the stricter requirement.
- The Group and employees act ethically, honestly, fairly and professionally in all situations.

Conflict of interest

- Employees act in a trustworthy manner and avoid situations where financial or other personal benefits influence (or appear to influence) loyalty, professional judgement or job performance.
- Employees immediately inform their direct manager, HR, or the compliance and/or legal function representative about any conflict of interest or potential conflict, in line with the Group’s internal procedures.

Prohibition of corruption and prevention of money laundering

- The Group and employees apply zero tolerance towards all forms of corruption, including bribery, fraud and any other prohibited business practices. Position or authority must not be used to gain benefits or provide unfair advantage to any third party.
- The Group follows the United Nations Convention against Corruption, ensuring alignment with international anti-corruption standards.
- Gifts and hospitality are only for goodwill and friendly working relations, not for influencing preferential behaviour. Employees must follow applicable laws and internal rules; in case of doubt, consult the direct manager and prefer not to give/accept the gift or hospitality.
- The Group assesses corruption/bribery risks especially in higher-risk functions such as procurement, sales/customer relations, activities involving

partners/third parties, and interactions with the public sector and supervisory authorities.

- The Group implements preventive measures and ensures regular monitoring and assessment of these risks.
- Group companies train employees regularly on preventing corruption and bribery; training scope and frequency depend on risk level and focus on higher-risk roles.
- The Group opposes all forms of money laundering and takes measures to prevent financial transactions from being used for money laundering.

Handling confidential information, trade secrets and inside information

- The Group and employees treat as confidential all non-public information relating to the Group, including trade secrets and information about operations, technology, assets, financial position, contracts, customers, suppliers, partners and pricing policy, and other business information. Such information has value due to its secrecy and is protected by reasonable measures.
- When communicating with third parties, the Group and employees avoid discussing confidential information and do not use improper means to obtain third parties' trade secrets or other confidential information.
- Secret information must be stored and transmitted securely and must not be misused; handling of confidential information/trade secrets/inside information follows legal acts, contracts and internal rules.

Fair competition

- The Group and employees follow fair competition principles. All business activities and transactions are transparent and comply with the law.
- The Group and employees act in compliance with competition rules and do not enter into illegal agreements or coordinated practices that harm fair competition.

Social responsibility

- The Group treats everyone equally and respects internationally recognised human rights. It follows the ILO Declaration on Fundamental Principles and Rights at Work, ensuring respect for employees' fundamental rights across the Group and value chain.

- No group or individual is discriminated against on any grounds, including gender, age, race, sexual orientation, nationality, ethnic origin, disability, political beliefs, union membership, or religious beliefs.
- The Group supports employees' personal and professional development, ensures working conditions comply with local laws, and provides a safe and healthy working environment, including compliance with occupational health and safety requirements.

Data protection

- The Group and employees ensure the privacy and personal data protection of customers and employees. Only the minimum necessary data is collected and its confidentiality, integrity and security are protected by appropriate technical and organisational measures.
- The Group and employees follow applicable laws and mandatory rules/guidelines issued by competent authorities. When personal data is no longer needed, it is deleted or anonymised, except where legal exceptions apply.
- Data protection is integrated into the Group's services, processes and IT infrastructure. Transparency and the ability for data subjects to exercise their rights are ensured.

Information security and cyber awareness

- The Group and employees handle information obtained in the course of work carefully and in line with confidentiality requirements.
- Digital work tools are used responsibly and in compliance with security requirements; potential information security risks or incidents are reported immediately to a Group manager or direct manager.
- The Group and employees comply with relevant laws and regulations in digital activities, including GDPR requirements.
- The Group cooperates with employees to promote cyber awareness and reduce digital risks through prevention, training and security measures.

Environmental awareness

- The Group and employees act in an environmentally responsible manner and strive not to harm the natural environment.
- The Group and employees consider reuse and sustainable consumption important, including saving electricity, water and heating, and protecting the surrounding natural environment.

Reporting breaches (whistleblowing)

- The Group encourages employees, Partners and other stakeholders to report in good faith any breach or suspected breach that may be contrary to legal acts, ethical standards, or the Group's Good Business Practice principles.
- The Group ensures information about reporting channels is accessible and understandable and raises awareness through internal communication and training, including the reporting procedure, the reporter's rights and protection from unfair treatment.
- Employees may report to their direct manager, HR, or management. Partners and other stakeholders can use contact details published on the MM Grupp OÜ website.
- Work-related breaches can also be reported anonymously via the Group's whistleblowing line: vihje@mmgrupp.ee.
- Reporting channels are confidential, secure, and anonymous when necessary; whistleblowers are protected from pressure and unfair or harmful treatment.
- All reports are handled impartially, professionally and appropriately. Where needed, the content is assessed first and then the next steps are decided, including internal handling by competent functions, involving an independent third party, and notifying competent authorities/law enforcement as required by law.
- The Group ensures transparency of the process and informs relevant parties about progress and outcomes to the extent permitted by law and confidentiality requirements.

Enforcement of Good Business Practice

Good Business Practice is published on the Group's website www.mmgrupp.ee; where necessary, it may be signed as standard terms as an annex to contracts. Compliance is mandatory for all Group companies and employees, and we also expect our Partners to follow these principles.