



APATOR GROUP'S ANTI-CORRUPTION POLICY, ALSO KNOWN AS "POLITICS"

I. PREAMBLE

In order to ensure the highest standards in the scope of prevention of any corruptive actions or creating the conditions conducive to conflicts of interests and based on binding international and domestic legal regulations, the Executive Board of Apator S.A. adopts this Policy and all the entities cooperating with Apator S.A. and entities in Grupa Apator, regardless of the role they play, be it employees, service providers, suppliers, customers or other business partners, recommends to follow it in relationships with persons employed in entities in Grupa Apator or collaborating with entities in Grupa Apator regardless of legal base of such collaboration.

II. POLICY OBJECTIVE

This Policy has been adopted to promote in Grupa Apator and among entities collaborating with Grupa Apator ethical behaviours, to eliminate bribery and corruption and situations of conflict of interest and to recommend to extend the knowledge in this area and to take actions aimed at minimising the risk related to the described behaviours.

The Anti-Corruption Policy is also a commitment of the Companies in Grupa Apator to analyse and assess the practices of its counterparties or other business partners performed before entering into cooperation with them, and to enforce from them the respect of ethical principles in business, including in particular those based on objective and independent criteria for the selection of employees, collaborators and business partners.

The policy is also a commitment of the Companies in Grupa Apator to react actively to all manifestations of corrupt activities, bribery, conflict of interest and, where possible and reasonable, to apply appropriate sanctions or to inform relevant authorities about the violations that have occurred.



III. BASIC PRINCIPLES RELATED TO ANTI-CORRUPTION POLICY

All persons employed or cooperating with the entities in Grupa Apator are obliged to act in accordance with legal and ethical standards, including the Code of Ethics of Grupa Apator and also internal regulations binding in the entities in Grupa Apator, to make decisions in a transparent, reliable and responsible manner and not to accept or give illegal benefits.

2 All persons employed or co-operating with the Companies of Grupa Apator are obliged to prevent any corrupt, dishonest or illegal activities, including, in particular, those bearing the hallmarks of bribery, inducement or extortion, trading in influence or legalising income from illegal sources.

3 All persons employed or cooperating with the Companies of Grupa Apator are obliged to inform contractors, suppliers or other business partners about the applied ethical principles and their role in the organisation.

4 All persons employed or cooperating with the Companies of Grupa Apator are obliged to observe the anti-corruption provisions included in the Code of Ethics of Grupa Apator.

5th All the persons employed or collaborating with the entities in Grupa Apator should act in the best interest of the entities in Grupa Apator and not to allow the occurrence of the conflict of interest, i.e. the situation where the personal or property interest of the employee or collaborator or extra-territorial criteria of the selection of particular entities in relations with Grupa Apator may have the influence on the decision, including the observance of the provisions included in the Code of Ethics of Grupa Apator concerning the conflict of interest.

IV. REPORTING OF ABUSE. THE WAY THEY ARE HANDLED AND DOCUMENTED

1 Any abuse of this Policy may be reported via email: compliance@apator.com.

2 Whistleblowers shall be guaranteed confidentiality and shall not be subject to sanctions of any kind.

(3) Each report should be investigated and the process for dealing with it documented, in accordance with the established compliance reporting procedure.

4 In order to ensure transparency and independence of the management process in Grupa Apator, the employees are obliged to report family relationships and informal connections between persons employed in these companies in order to eliminate possible conflicts of



interests in the form of influence on objective assessment of the employees, use of official dependencies within the subordination and connections or unjustified granting of benefits. Reports should be addressed to the direct supervisor, who ultimately forwards such information to the Compliance Team.

(5) If there are business, family or similar relationships of the persons deciding on the selection of a supplier, contractor or other business partner with these entities or influencing this selection at the bidding stage, the Compliance Team must be informed.

V. IMPLEMENTATION OF AN ANTI-CORRUPTION POLICY

The Management Boards of the companies in the Apator Group are responsible for the performance of this Policy, which undertake to:

- to inform the employees, suppliers and other business partners about the adopted Anticorruption Policy and to oblige them to apply it in a customary manner in the companies of Grupa Apator,
- to place the information on binding and application of the Policy and at least the most important provisions thereof on the websites of the companies in Grupa Apator,
- inclusion of relevant contractual provisions in concluded contracts concerning the suppliers' and other business partners' familiarisation with the Anti-Corruption Policy binding in Grupa Apator and containing the obligation to apply it,
- adopt specific procedures to implement the provisions of the Policy,
- training of employees on business ethics, including in particular to raise awareness of activities that may be regarded as corrupt or negatively viewed by others, including employees, business partners or the social environment,
- analysing the risk of exposing employees or business partners to ethically questionable situations in order to develop appropriate methods to minimise these risks,
- to delegate the duties related to monitoring the observance of the Anti-Corruption Policy to the persons employed in the Companies in Grupa Apator.