

## Anti-corruption Policy

**ETP ELEKTRO SP. Z O.O adheres to the principle of zero tolerance towards all manifestations of corruption. Corruption runs in counter to our aspirations to be a responsible company. We want to actively participate in business as a responsible and trustworthy company.**

The zero-tolerance policy for corruption applies to all of us, as well as associates and business partners acting on our behalf. The entire management team is obliged to assume a key role in creating an organizational culture in which corruption will not have a chance to occur and is not accepted in any form. The Anti-Corruption Policy should be widely communicated and promoted among the employees of our Company, with the support of training initiatives that enable proper understanding and use of its principles in everyday work.

### 1. Purpose

The purpose of the Anti-corruption Policy is to establish - both for us and our associates and business partners - an obligation to apply a zero-tolerance principle for bribery and corruption, as well as measures to ensure compliance with applicable regulations. This Anti-corruption Policy contains guidelines that will help identify and avoid the risks of abuses.

The policy is addressed to employees, associates, contractors, all business partners and the managements Staff of ETP ELEKTRO SP. Z O.O. It should be understood and treated consistently with the company's work regulations.

As a part of our communication activities – aimed at preventing all forms of corruption – The Anti-corruption Policy should also reach all costumers and suppliers of ETP ELEKTRO SP. Z O.O. It is important to know that the Anti-corruption Policy is not the only source of information or interpretation of every business situation that can occur. Therefore, it is the responsibility of each of us to familiarize with the laws regarding corruption. In case of not knowing how to behave when facing a corruption threat, please contact your immediate superior.

### 2. What is bribery and corruption?

Bribery is:

- offer, promise or giving (active form);
- soliciting, demanding, agreeing to receive (passive form);

Both of the form refers to gaining any form, of any value, which can financially benefit you or may be considered a case of inciting bribery (active or passive) which is contrary to the accpeted rules, illegal, has signs of corruption or is unethical or violates the law.

Corruption is:

The abuse of office, power or influence to obtain unofficial and unjustified personal or other benefits.. It is also offering, giving or accepting in any form – regardless of the value – goods that can benefit you in any way. An "advantage" is considered to be not only a material benefit, but also an intangible one, such as: donation, employment contract, classified information, preferential treatment, gifts, awards, invitations. In the light of the Anti-corruption Policy, corruption is bribery, extortion or solicitation, trading in influence and legalizing the proceeds from these practices.

### **3. Principles of the Anti-corruption Policy**

#### **3.1. Transparency of the Corporate Governance**

We act fairly and honestly. We try to act in a modern, dynamic and friendly way, and we also care about the openness and transparency of our activities. Thanks to this attitude, we want our customers to perceive us as a responsible and trustworthy company. We act in accordance with applicable law.

ETP ELEKTRO SP. Z O.O. adopts a zero-tolerance policy for corruption in all aspects of its business.

We are involved in enforcing the Anti-corruption Policy and undertake to train people who work at ETP ELEKTRO SP. Z O.O. in compliance with our policies. In accordance with the adopted Policy, the following actions are always and in any form prohibited - regardless of whether they are direct or indirect actions - both in ETP ELEKTRO SP. Z O.O. as well as in relations with its suppliers and customers:

- bribery
- coercion or inducement
- influence trading
- legalizing income from corrupt activities.

We want to ensure that a person who reports suspected abuse or refuses to participate in bribery or corruption will not face negative consequences of their decision.

#### **3.2. Compliance with applicable law and international conventions**

In most countries, the act or attempted bribery is treated as a criminal offense punishable by significant penalties in the form of fines or imprisonment, applied to both companies and employees. Some of these provisions are international acts of universal scope aimed at combating bribery and corruption (e.g. OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, United Nations Convention Against Corruption). Individual countries are working on strengthening their anti-corruption legislation. In connection

with the above, ETP ELEKTRO SP. Z O.O. takes appropriate actions towards its employees, co-workers, suppliers and customers to inform them about duties and responsibilities.

#### **4. Corruption risk areas (corruption threats)**

Reasonable gifts and invitations (meals, events, entertainment) can support the process of establishing, maintaining and developing important business relationships. The intention of ETP ELEKTRO SP. Z O.O. in such situations, is that its employees should not feel exposed to accusations of maintaining business relations by using behavior that is inconsistent with applicable standards and regulations. Giving or receiving gifts in a way that is considered inappropriate may expose both our employees and the Company to accusations of violating corruption laws. Therefore, before accepting a gift or offering it to someone else, you should make sure that your actions comply with the principles adopted in our company.

We allow:

- accepting or offering modest gifts which value - as a rule - does not exceed the value of 100 PLN. Gifts cannot include cash or cash equivalents (e.g. gift cards, vouchers, etc.),
- accepting and offering small Christmas gifts, which are part of the culture and customs prevailing in Poland.

Below are examples of activities we consider unacceptable:

- giving, promising to give, offering or inducing a gratuity in the form of a payment, gift, trip, invitation or other benefit in order to achieve a specific business benefit or in gratitude for achieving a business benefit,
- giving, promising to give, offering a gratuity in the form of payment, gift, trip, invitation (meals, events, entertainment) or other advantage to a government official or intermediary to facilitate or expedite routine procedures
- promise of payment or acceptance of payment from third parties, if you suspect or sure that they expect certain business benefits in return
- accepting a gift, trip, invitation (meals, parties, entertainment) or other benefit, or promising to receive it from a third party.

All contacts with contractors, associates and clients of ETP ELEKTRO SP. Z O.O. can only take place in business relations. Contact should take place via e-mail, fax, business telephones and direct meetings with the knowledge and consent of the supervisor. In e-mail contacts, we only use company e-mails. ETP ELEKTRO SP. Z O.O. does not allow accepting and giving bribes (financial gratifications). We expect third parties to apply the principles of our Policy with due diligence.

#### **ETP ELEKTRO sp. z o.o.**

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## 5. Duties

### EMPLOYEES

It is our responsibility to prevent, detect and report cases of bribery and other forms of corruption, as well as the responsibility of those working under our supervision. All employees of ETP ELEKTRO SP. Z O.O. are obliged to avoid any actions that could lead to a violation of this principle. If you suspect that such a violation has occurred or may occur in the future, you should report this fact to your supervisor or CEO as soon as possible. An example of a case that you should report is when a customer or potential customer offers you something that could give them a business advantage or suggests that the gift or monetary benefit is a condition of the transaction. If you are offered or receive a gift of high value or luxury from a business partner, you should immediately report this fact to your immediate supervisor or CEO.

### SUPPLIERS AND CUSTOMERS

The Anti-corruption Policy of ETP ELEKTRO SP. Z O.O. obliges business partners, suppliers, customers to act honestly without intentions and activities related to corruption and to comply with the following principles:

- comply with the principles of this Anti-Corruption Policy,
- not offering or giving any financial or other advantage,
- cooperation with ETP ELEKTRO SP. Z O.O. in the field of eliminating corrupt behavior,
- ensuring that relations with public officials, private persons and other entrepreneurs are open and transparent so as to exclude the possibility of allegations and corruption threats,
- avoiding conflicts of interest that could lead to corruption risks.

## 6. Reporting abuse

Employees at ETP ELEKTRO SP. Z O.O. can report their concerns or seek advice using dedicated channels in the event of a suspected violation of the Anti-Corruption Policy or other legal provisions, without fear of reprisals, acts of discrimination or disciplinary proceedings. Reports are treated confidentially and investigated with due diligence. Suspected violation of the Anti-Corruption Policy of ETP ELEKTRO SP. Z O.O. or other legal regulations can be reported through the same channel that is used to inform about all kinds of unethical conduct:

**[etyka@etp-group.com](mailto:etyka@etp-group.com)**

as well as directly to the immediate supervisor or the CEO.

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## 7. Record keeping, transparency and control

ETP ELEKTRO SP. Z O.O. is guided by the principle of full transparency in its activities and applies adequate control processes. The company's management and its designees periodically monitor and review compliance with this policy.

## 8. Final Provisions

- Each employee of the company is obliged to read this document and strictly comply with its content.
- ETP ELEKTRO SP. Z O.O. clearly defines the effects of corrupt behavior and non-compliance with the Anti-Corruption Policy - from admonition, reprimand to disciplinary dismissal, financial penalty and notification of law enforcement authorities.
- Each case of non-compliance with this procedure will be considered on a case-by-case basis.