

ANTI-CORRUPTION POLICY

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INTRODUCTION

The Anti-Corruption Policy reflects best practices in preventing, detecting and responding to bribery and other corrupt behaviors that may have a negative impact on the economic interests of HASCO Group Companies.

The introduction of this Policy is an integral part of the compliance management system and constitutes an element of a transparent model for building and managing the activities of HASCO Group Companies.

The Policy defines the types of corrupt activities and indicates the principles of counteracting corruption with the aim of ensuring the security of operations and fair competition of the HASCO Group Companies and their Contractors.

In the HASCO Group, we strive to shape awareness among the Management Staff responsible for making business decisions, expand knowledge and strengthen effective communication both internally and in relations with our Contractors.

If one person doesn't play FAIR - we all lose!

I. STANDARDS OF OPERATION

"We comply with legal regulations and ethical standards and the principles of fair competition"

Operating in many industries, we understand perfectly well how valuable the principle of " *fair play* " is. For this reason, the provisions contained in the Anti-Corruption Policy apply to all Persons Employed in Companies from the HASCO Group.

Areas particularly exposed to the risk of corruption include the sale and purchase of products and services, which is why in our daily activities we ensure due diligence based on the following principles:

- selection of Contractors based on objective and transparent criteria;
- applying ethical principles in the customer acquisition process;
- maintaining the confidentiality of information obtained from the Contractor during negotiations, including maintaining trade secrets and business secrets;
- professional treatment of all Recipients, regardless of their nature and scale of activity;
- compliance with generally applicable legal provisions;
- compliance with compliance principles and policies that constitute the regulatory components of the compliance management system;
- avoiding relationships of gratitude.

II. FORMS OF CORRUPTION ACTIVITIES

We define corruption as follows:

CORRUPTION (pursuant to art. 1 sec. 3a of the Central Anticorruption Bureau Act) - promising, promoting, giving, demanding and accepting by any person, directly or indirectly, any undue financial, personal or other advantage for themselves or any other person, or accepting an offer or promise of such an advantage in exchange for acting or refraining from acting in the performance of a public function or in the course of business activity.

Corrupt activities include:



BRIBERY (pursuant to art. 229 of the Penal Code) - granting a material or personal benefit to a person performing a public function, in connection with the performance of that function. Inducing a person performing a public function to violate the provisions of the law or granting or promising to grant such a person a material or personal benefit for violating the provisions of the law.



MANAGERIAL BRIBERY (pursuant to Art. 296a of the Penal Code) - requesting or accepting a material or personal benefit, or a promise thereof, in exchange for the abuse of granted powers or failure to fulfil an obligation that may cause material damage or constitute an act of unfair competition or an inadmissible preferential act in favour of the purchaser or recipient of goods, services or benefits.



PAID ACTIVE AND PASSIVE PROTECTION (in accordance with Art. 230 and 230a of the Penal Code) providing or promising to provide a material or personal benefit by an Employed Person or undertaking intermediation in settling a matter in exchange for intermediation in settling a matter in a state institution, international or domestic self-government organization or in a foreign organizational unit with public funds, consisting in unlawfully exerting influence on a decision, action or omission by a person performing a public function, in connection with performing that function.



INFLUENCE TRADING - e.g. support in elections or financing a political party in exchange for gaining influence.



VANUANCE (pursuant to Art. 228 of the Penal Code) - accepting a material or personal benefit or a promise thereof, including for conduct that constitutes a violation of the law or making the performance of such an act dependent on receiving a material or personal benefit in connection with the performance of activities carried out for the benefit of HASCO Group Companies.



EVASION OF LAW - evasion of obligations resulting from the provisions of generally applicable law, including in particular customs and tax obligations, e.g. certifying an untruth in a document in order to obtain any material or personal benefits.



ILLEGAL MANAGEMENT OF PUBLIC FUNDS - deliberate, unlawful management of public funds, including nepotism, cronyism and other prohibited practices in the area of employee relations.



IRREGULAR PROCEEDINGS REGARDING PUBLIC PROCUREMENT - irregularities in proceedings concerning public procurement, obtaining contracts, obtaining concessions or permits and decisions of courts and public administration bodies.

III.ANTI-CORRUPTION RULES IN THE HASCO GROUP

Corruption crime poses a serious threat to economic development and the principles of free competition, leading to a significant increase in the costs of doing business.

Corruption and abuse are subject to criminal liability in accordance with Act of 6 June 1997 - Penal Code (Journal of Laws 1997 No. 88 item 553, as amended) and may lead to serious legal consequences for persons who commit such actions and may also have a negative impact on the interests and image of the company.

The most important principles of counteracting corruption in HASCO Group Companies include:

1. PROHIBITION OF ACCEPTANCE OF BENEFITS

It involves not accepting any material or personal benefits in connection with the performance of official duties and making the performance of these duties dependent on receiving such benefits.

2. PROHIBITION OF GIVING BENEFITS

It involves not providing any material or personal benefits in connection with the performance of official duties to persons performing public functions or taking actions aimed at persuading such persons to violate the law.

3. PROHIBITION OF REFERRING TO INFLUENCE OR POSITION

It involves not invoking any influence or function held in the HASCO Group Companies or inducing or confirming the belief in their existence in order to settle a matter in exchange for providing or promising any material or personal benefits.

4. PROHIBITION OF GIVING OR PROMISING TO GIVE A BENEFITS

It involves not providing or promising any material or personal benefits in exchange for mediation in settling a matter in state institutions.

5. PROHIBITION OF OBTAINING ADVANTAGES IN EXCHANGE FOR THREATENING OR OBSTRUCTING A PUBLIC TENDER

It involves hindering a public tender or failing to prevent it, acting to the detriment of the owner of property or the person or institution on whose behalf the tender is being held, in order to gain any material or personal benefits.

IV. REPORTING IRREGULARITIES

Persons employed in HASCO Group Companies are obliged to report a suspicion of a breach or violation of the Anti-Corruption Policy.

The area of corruption was also indicated in the catalogue of violations of the law - Art. 3 section 1 of the Act on the Protection of Whistleblowers (Journal of Laws 2024 item 928, as amended).

You can submit your application:



BY POST

PPF HASCO-LEK SA
Compliance Management Division / Compliance Department
ul. Zmigrodzka 242 E
51-131 Wrocław
with the note "Deliver directly to responsible person"



E-MAIL

For Companies with Regulations on Reporting Violations of Law:

PPF HASCO-LEK S.A. - sygnalista@hasco-lek.pl

PCF PROCEFAR SP. Z O.O. - sygnalista@procefar.pl

VRATISLAVIA MEDICA SP. Z O.O. - sygnalista@vratislavia-medica.pl

HASTON CITY HOTEL SP. Z O.O. - sygnalista@haston.pl

with the note "Corruption report"

For other HASCO Group Companies:

compliance@hasco-lek.pl with the note "Corruption report"



BY PHONE

tel. (+48) 71 352 95 22

CONTACT

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