

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 and image of HASCO Group Companies.

The introduction of this Policy is an integral element of the Compliance Management System and constitutes an element of the transparent model for building and managing the activities of the HASCO Group Companies.

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

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

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

I. OPERATING STANDARDS

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

Operating in a variety of industries, we understand the importance of *fair play* . Therefore, the provisions of the Anti-Corruption Policy apply to all employees of HASCO Group companies.

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

- selection of Business Partners based on objective and transparent criteria;
- applying ethical principles in the customer acquisition process;
- maintaining the confidentiality of information obtained from the Business Partner 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 laws;
- compliance with compliance rules and policies that constitute the regulatory components of the compliance management system;
- avoiding relationships of gratitude.

II. FORMS OF CORRUPTION

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 advantage in exchange for

acting or omitting to act in the performance of a public function or in the course of business activity.

Corrupt activities include:



BRIBERY (pursuant to Article 229 of the Penal Code) - providing a material or personal benefit to a person holding a public office in connection with the performance of that function. Inducing a person holding a public office to violate the law, or providing or promising to provide such a person with a material or personal benefit in exchange for violating the law.



MANAGERIAL BRIBERY (pursuant to Art. 296a of the Penal Code) - demanding or accepting a financial or personal benefit, or the promise thereof, in exchange for the abuse of granted powers or failure to fulfill an obligation that may cause financial 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 (pursuant to Art. 230 and 230a of the Penal Code) providing or promising to provide a financial 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 local 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 the performance of that function.



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



VANUANCE (pursuant to Article 228 of the Penal Code) - accepting a material or personal benefit or the promise thereof, including for conduct that constitutes a violation of the provisions of the law or making the

performance of such an act conditional 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 - evading obligations arising from the provisions of generally applicable law, including in particular customs and tax obligations, e.g. certifying false information in a document in order to obtain any financial or personal benefits.



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



IRREGULAR PROCUREMENT PROCEEDINGS - irregularities in public procurement procedures, acquiring Business Partners, obtaining concessions or permits, and decisions of courts and public administration bodies.

III. ANTI-CORRUPTION RULES

Crime of corruption 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 under the 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 anti-corruption principles 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 conditional 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 provisions of 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 BENEFITS

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

5. PROHIBITION OF ACHIEVING ADVANTAGES IN EXCHANGE FOR THWARTING OR OBSTRUCTING A PUBLIC TENDER

It involves obstructing 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 conducted, in order to gain any financial or personal benefits.

6. PROHIBITION OF CONCEALED ORIGIN OF ILLEGAL FINANCIAL FUNDS

It involves refraining from taking actions aimed at concealing the origin or destination of funds derived from illegal sources. It is prohibited to use business activities as a tool for introducing funds derived from crimes into circulation, in order to give them the appearance of legality.

IV. REPORTING IRREGULARITIES

Any situations of non-compliance and non-application of the provisions of this Policy should be reported to the Compliance Management Division of PPF HASCO-LEK SA – Compliance Department.

The application can be submitted:



BY LETTERS

PPF HASCO-LEK SA

Compliance Management Division / Compliance Department

Żmigrodzka Street 242 E

51-131 Wrocław

with the note "To your own hands" (put "Do rąk własnych" on the envelope)



E-MAIL

For Companies with Regulations on Reporting Violations of Law:

PPF HASCO-LEK SA - Sygnalista@hasco-lek.pl

PCF PROCEFAR SP. Z OO - Sygnalista@procefarm.pl

VRATISLAVIA MEDICA SP. Z OO - Sygnalista@vratislavia-medica.pl

HASTON CITY HOTEL SP. Z OO - Sygnalista@haston.pl

with the note "Corruption Report"

For other companies from the HASCO Group:

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



BY PHONE

phone (+48) 71 661 16 30

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