

ANTI-CORRUPTION POLICY

January 24, 2022

NAFTO Sp. z o.o.



ANTI-CORRUPTION POLICY

AT NAFTO SP. Z O.O.

Nafto sp. z o.o. subscribes to the principle of zero tolerance towards all forms of corruption. Corruption runs counter to our efforts to be a responsible company. Our ambition is to actively participate in business and to act in such a way as to build a consistent image of Nafto sp. z o.o. as a responsible and trustworthy company.

The zero-tolerance corruption policy applies to the entire Nafto sp. z o.o. company (hereinafter referred to as the "Company"), as well as the Business Partners (i.e., associates, contractors, clients).

Our management staff is aware of their impact on promoting desirable attitudes among employees and therefore takes a leading role in creating an organizational culture in which corruption will not stand a chance and shall be treated as unacceptable in any form. The natural result of the above beliefs was the preparation of the Anti-Corruption Policy (hereinafter referred to as the "Policy") and the implementation thereof.

Our intention is to promote and communicate the Policy among our Staff, taking into account training initiatives that enable proper understanding and use of its principles in daily work.

§ 1

THE PURPOSE OF INTRODUCING THE ANTI-CORRUPTION POLICY

The aim of introducing the Policy is to establish, both for our Company and for Business Partners, the obligation to apply the "zero tolerance for corruption" principle, as well as the application of measures ensuring compliance with applicable law. This Policy contains guidelines and procedures to identify and avoid the risk of fraud.

The policy is targeted at the Management Staff of the Company and Business Partners.

The policy must be understood and treated consistently with other regulations binding at the Company.

As part of our communication activities aimed at preventing all forms of corruption, we consider promoting and communicating the principles of the Policy towards our stakeholders, i.e., primarily customers and suppliers of Nafto sp. z o.o. It is also essential that the Policy does not constitute the sole and exclusive source of information or the basis for interpretation of business situations. It is therefore the responsibility of both the management and the employees to familiarize themselves with the legal provisions relating to corruption. In the case of employees being unsure about what to do in the event of a corruption threat or whether a situation may be classified as such, they must contact their supervisor or the Anti-Corruption Board Representative as described in this Policy.

§2

DEFINITION OF CORRUPTION

Corruption is a difficult concept to define because it is a multi-faceted and multi-threaded phenomenon. Nevertheless, the following should be considered as examples of corrupt behavior:

- a) an offer, promise or provision of a material benefit (active form) as well as solicitation, requirement, consent to receive a material benefit (passive form) in any form, of any value that may be considered a case of inducing to corruption because it is contrary to accepted rules of conduct, unethical or violates the law;
- b) abuse of an official position, power or influence in order to obtain unofficial and unjustified benefits for oneself or for others, where the “benefit” is considered to have not only a material nature but also non-material, i.e., among others: a donation, an employment contract, classified information, preferential treatment, gifts, awards, invitations;
- c) traffic of influence and legalizing the earnings from these practices.

§3

PRINCIPLES OF THE ANTI-CORRUPTION POLICY

We act honestly and fairly; we care for the openness and transparency of our activities. We strive to implement modern, dynamic, and friendly rules of conduct. With this attitude, we want to be perceived by our clients as a responsible company that can be trusted. We act in accordance with applicable law.

Nafto sp. z o.o. adopts a zero-tolerance corruption policy in all aspects of its business. We are dedicated to enforcing the Anti-Corruption Policy and to educating and training the Company’s employees in the field of compliance with the principles of the Policy.

In keeping with the adopted Policy, the corruption activities described above shall be prohibited always and in any form, regardless of whether these activities were to occur at the Company or in relations with its stakeholders. We assure that a person who reports a suspicion of corrupt behavior, abuse or refuses to participate in a corrupt practice will be covered by the confidentiality clause, and that under no circumstances will they be subject to negative consequences of their decision.

§4

ACCEPTABLE FORMS OF COOPERATION AND BEHAVIOR IN BUSINESS

We recognize that justified gifts and invitations (meals, parties, entertainment) can support the processes of concluding, maintaining and developing important business relationships. The intention of the Company is that its employees do not feel exposed to allegations of maintaining business relations by using behaviors inconsistent with the Policy and applicable standards and regulations in such situations. Giving or receiving gifts in a manner considered as improper may expose both our employees and the Company to allegations of violation of the corruption laws.

In this context, we introduce the following acceptable forms of cooperation and business behavior:

- a) before accepting a gift or offering it to someone, you should make sure that your actions are in accordance with the principles adopted at our company;
- b) before you offer someone a gift, it is worth to check the rules in this regard applicable at the company in which the given person is employed, if possible.

We allow:

- a) accepting or offering modest gifts, the value of which, as a rule, does not exceed PLN 200. Gifts may not include cash or cash equivalents (e.g., gift cards, vouchers, etc.);
- b) accepting and offering Christmas gifts, which are a part of the culture and customs prevailing in Poland;
- c) participation in business meetings/meals with business partners when they are aimed at maintaining business relationships;
- d) participation or organization of events with business partners that are a part of the culture or a corporate custom (e.g., business Christmas Eves, Safety Days).

§5

EMPLOYEE OBLIGATIONS RELATED TO CORRUPTION PREVENTION, REPORTING CORRUPTION CASES, SANCTIONS

The prevention, detection and reporting of any corruption cases is the responsibility of all employees and Business partners of Nafto sp. z o.o. All staff are required to avoid any actions that could lead to violation of this rule.

If an instance of corrupt behavior/violation has taken place or may occur in the future, it must be reported as soon as possible to the supervisor, the Anti-Corruption Board Representative or via the platform available at: www.sygnalet.pl/nafto

In the event of a report to the supervisor, he may forward the report directly to the Anti-Corruption Board Representative or by using the platform on the Company website.

A business partner who would like to report a case or suspected corruption should use the platform on the Company website.

The Anti-Corruption Board Representative who accepted the notification acts further in accordance with the procedure for reporting violations described in the Regulations on reporting violations of law at Nafto sp. Z o.o., p. 5, while informing the other members of the management board about the information obtained.

The procedure for examining corruption violations is the same as the procedure described in the above regulations, with the difference that, depending on the specificity of the report, the Anti-Corruption Board Representative has the right to join, supervise, receive information, discontinue proceedings, and transfer the case to law enforcement authorities at every stage of examining the report.

After considering the notification, the Employer's Team is obliged to submit a report on its activities to the Corruption Representative, who presents the conclusions to other members of the Management Board for further decisions.

The Company clearly defines the effects of corrupt behavior and non-compliance with the Policy – from an admonition, reprimand, up to disciplinary dismissal, financial penalty, and notification of law enforcement authorities. In the case of business partners, it may decide to terminate the cooperation. Any non-compliance with this procedure will be considered individually.

§6

TRANSPARENCY AND INSPECTION PROCEDURES

The Company is guided by the principle of full transparency in its activities and applies adequate control processes as described below:

- a) all contacts with the Company's Business partners should only take place in business relations. Contact should take place via e-mail correspondence, by means of a business phone, and direct meetings only with the knowledge and consent of the superior. We only use company e-mails in our e-mail contacts. Shared network drives are the preferred form of data storage;
- b) The company applies the "Multiple Eyes Principle" in relation to business contacts and approval of contracts, orders and invoices by minimizing meetings of individuals and implementing a system of multi-stage approval of contracts, orders, and other financial documents;
- c) in order to reduce the risk of unfair competition, the Company has established rules for obtaining and assigning orders in internal procedures;

- d) The Company Management Board and persons designated by it monitor and periodically verify the compliance with this Policy through ongoing monitoring, ad hoc controls, and scheduled internal audits in the highest risk areas.

§7

FINAL PROVISIONS

This Policy is an internal regulation disseminated on the principles adopted at the Company and additionally posted on the website, thanks to which it is available to all business partners of the Company. Each Company employee and Business partner is obliged to familiarize oneself with the Policy and comply with its content, which should be confirmed with a relevant statement. The model declaration for the Company's employees is attached as Appendix No. 2. For reasons of expediency, it is allowed to use other templates and prepare their translations in contacts with Business Partners.

Rafał Hojnor
[Signature]
PREZES Zarządu