



*Annex No. 1 to Order No. 14/2026
of the President of the Management Board of
NAFTO S.A. dated 28.08.2026*

ANTI-CORRUPTION POLICY

Consolidated text of 28.08.2026

NAFTO S.A.





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INTRODUCTION

The purpose of the Anti-Corruption Policy at Nafto S.A. (hereinafter: the "Policy") is to establish a uniform course of conduct aimed at actively preventing and counteracting corruption, conflicts of interest and other misconduct that may occur in the operations of Nafto S.A. (hereinafter: the "Company").

The Policy is part of the compliance system operating within the Company and supplements the provisions of the Rules for Reporting Violations of Law at Nafto S.A. (hereinafter: the "Reporting Rules"), with respect to the receipt, verification and handling of reports of corruption-related events.

DEFINITIONS

1. Donation – means a gratuitous transfer of property made by the Company or to the Company, not directly related to a reciprocal performance by the other party.
2. Corruption-related incident – means an event in connection with which the occurrence of corruption is likely.
3. Conflict of interest – means a situation that occurs when the private interest of an employee/associate collides with his or her duties towards the Company, which may affect the impartiality of the decisions made by that person.
4. Corruption – means an act consisting in promising, offering, giving, demanding or accepting, by any person, directly or indirectly, any financial, personal or other benefit, for that person or for any other person, as well as accepting a proposal or promise of such a benefit, in exchange for acting or failing to act in the performance of any duty. For the purposes of the Policy, corruption includes in particular the acts described in Articles 228–230a of the Criminal Code (passive bribery, active bribery, paid protection, trading in influence) with respect to persons performing public functions and in contacts with public administration and regulatory authorities (e.g. the Energy Regulatory Office), as well as in Article 296a of the Criminal Code (managerial bribery) with respect to business transactions in the private sector
5. Benefit – means any performance (material and non-material) given and/or accepted by an employee / associate.
6. Financial benefit – means any good capable of satisfying a specific material need, the value of which can be expressed in money (i.e. it is financial in nature). It may consist not only of an increase in assets, but also of any favourable contracts, e.g. a loan granted on favourable terms or a discount on the purchase of certain goods.
7. Personal benefit – means a benefit that is not financial in nature, i.e. one that cannot be converted into money. It is a non-financial performance that improves the situation of the person who obtains it.



8. Misconduct – means an act or omission, including the provision of incorrect information, that misleads or attempts to mislead the Company or another entity in order to obtain a financial, personal or other benefit, or to avoid an obligation, in particular:
 - a) corruption,
 - b) theft of the Company's assets or funds entrusted to it,
 - c) misappropriation of the Company's property (materials, products, equipment),
 - d) knowingly failing to comply with the procedures in force at the Company,
 - e) knowingly providing false data in financial statements, causing them to become unreliable and not to reflect the actual factual and legal status,
 - f) knowingly entering false data into documents and IT systems,
 - g) falsifying documents (e.g. agreements, letters, decisions, resolutions, minutes) or making other changes to them not approved by the entities authorized to do so,
 - h) forging or altering accounting records and the documentation confirming such records,
 - i) knowingly misapplying accounting principles,
 - j) knowingly misrepresenting or omitting events, transactions or other material information in reports and statements prepared, causing damage to the Company,
 - k) disseminating false information,
 - l) any other intentional acts resulting in damage to the Company or violating the ethical principles in force at the Company. abuse of position or official authority in the granting, preparation or resolution of orders and tenders
 - m) violation of commercial information security rules, including the disclosure or use of confidential competing offers,
 - n) manipulation of data in measurement or billing systems.
9. Close person – a spouse, ascendant, descendant, sibling, relative by affinity in the same line or degree, a person in an adoptive relationship and his or her spouse, as well as a person remaining in a de facto cohabitation with the employee/associate.
10. Politically exposed person (PEP) – a person holding a prominent public position within the meaning of the anti-money laundering and counter-terrorist financing regulations, including a person performing functions in public administration or regulatory authorities, contact with whom requires increased anti-corruption diligence.
11. Facilitation payment – an undue financial or personal benefit, usually of low value, demanded or given in order to expedite or secure the performance of a routine official or business action to which the demanding or receiving party is in any event obliged. Facilitation payments are strictly prohibited at the Company.
12. Third party / Intermediary – an agent, adviser, consultant or other entity acting on behalf of or for the Company towards business partners, administrative authorities or other third parties, subject to the due diligence rules set out in § 7 of the Policy.

13. Anti-Corruption Policy or Policy – means this Anti-Corruption Policy of Nafto S.A.
14. Employer – means the employer within the meaning of Article 3 of the Act of 26 June 1974 – the Labour Code.
15. Employee – means an employee within the meaning of Article 2 of the Act of 26 June 1974 – the Labour Code.
16. Sponsorship – means the provision by the Company of financial resources, goods or services to a third party, including organizers of sporting, cultural, educational, social or business events (e.g. matches, tournaments, conferences, concerts), in exchange for the promotion of the Company's brand, products, services or image, in particular by displaying the Company's name, logo or other markings and providing information about its involvement as a sponsor.
17. Company – NAFTO S.A.
18. Whistleblower – means a person reporting a corruption-related event in accordance with the rules set out in the Rules for Reporting Violations of Law (hereinafter referred to as the Reporting Rules) and within the meaning of the Act of 14 June 2024 on the Protection of Whistleblowers.
19. Associate – means a person performing work or services for the Company on a basis other than an employment relationship, including under a civil law contract, a management contract or in the course of conducting business activity, as well as a business partner or a representative of a business partner acting on behalf of and for the Company.
20. Management Board – means the Management Board of Nafto S.A.
21. Team – means the Anti-Corruption Team established within the Company, which is the same as the Team reviewing internal reports in accordance with the Rules for Reporting Violations of Law.

Status of the Anti-Corruption Team:

- a) The Anti-Corruption Team is appointed and dismissed by the Management Board from among the Company's employees who have appropriate knowledge and experience in the areas of management, law or audit.
- b) The Team's responsibilities include, in particular: receiving the reports and declarations referred to in the Policy, maintaining the register of donations and sponsorship agreements, coordinating the corruption risk assessment and educational activities, as well as issuing opinions on interpretative doubts related to the application of the Policy.
- c) The Team is guaranteed independence, including a direct reporting line to the Management Board, and, in matters concerning members of the Management Board, to the Supervisory Board, bypassing the persons who may be the subject of the report.
- d) The Team cooperates with the Sustainable Development and Management Systems Office in organizing the training referred to in § 6 of the Policy, and in undertaking activities aimed at shaping the Company's organizational culture conducive to preventing corruption and violations of ethical principles.



§ 1

GENERAL PROVISIONS

1. With a view to counteracting events that may bear the hallmarks of corruption, conflict of interest or other misconduct, an Anti-Corruption Policy is hereby introduced at Nafto S.A., the purpose of which is to prevent the occurrence of such events.
2. The Anti-Corruption Policy forms part of the Company's system for counteracting corruption, conflicts of interest and other misconduct, which may occur in all areas of operations and at all levels of management, involving members of the Management Board, the Supervisory Board, senior management, employees and associates, as well as business partners and other entities maintaining relations with the Company.
3. The Anti-Corruption Policy is tailored to the specific nature of the Company's operations, the complexity of its organizational structure, the scope of delegated powers and authorizations, and the objectives and tasks pursued.

§ 2

SCOPE OF THE ANTI-CORRUPTION POLICY

1. The Anti-Corruption Policy covers the Company's operations, together with all of its organizational units, job positions and functioning teams, and applies to all corrupt acts, conflict-of-interest situations and other misconduct involving employees, associates, business partners, stakeholders and other entities maintaining relations with the Company.
2. The Anti-Corruption Policy must be complied with by all employees, associates and persons and entities cooperating with the Company, regardless of the form of employment or cooperation, the function performed or the relationships in place.

§ 3

PURPOSE OF THE ANTI-CORRUPTION POLICY

The purpose of the Policy is:

1. to establish a uniform course of conduct aimed at actively preventing and counteracting misconduct committed to the detriment of the Company (defined as corruption or conflict of interest), including detriment to the Company's assets. For the avoidance of interpretative doubt, the term "misconduct"



used in this point should be understood in accordance with the broad definition contained in point 8 of the Definitions, under which corruption constitutes one of the manifestations of misconduct,

2. to ensure the transparency of the Company's activities towards its shareholders, business partners, stakeholders and the authorities supervising its operations.

§ 4

SCOPE OF RESPONSIBILITY

1. The Management Board is responsible for the implementation of and compliance with this Policy at the Company.
2. All employees and associates of the Company are required to familiarize themselves with the content of the Policy and to comply with its provisions in the course of performing their duties.
3. All employees and associates of the Company must pay attention to any irregularities relating to the processes and/or tasks for which they are responsible, as well as to any potential misconduct.
4. The rules for reporting corruption-related incidents and other misconduct are set out in § 9 of the Policy.
5. Employees and associates of the Company are obliged to:
 - a) comply with the principles of honesty, transparency of actions and reliability, as well as prevent conflicts of interest, counteract corruption-related phenomena and build trust in the Company,
 - b) comply with the ethical principles in force at the Company,
 - c) apply the principles of legalism, the rule of law and disinterestedness in the performance of their professional duties,
 - d) comply with the restrictions on taking up additional employment or competitive activity arising from the agreements concluded with the Company and applicable laws. These restrictions arise in particular from the provisions of Articles 101¹–101⁴ of the Labour Code concerning non-competition agreements,
 - e) ensure transparency in performing the tasks entrusted to them, taking into account the restrictions arising from specific regulations and trade secrets,
 - f) comply with the absolute prohibition on using their position to obtain personal benefits at the expense of a subordinate, superior, business partner, stakeholder or cooperating entity. Every employee/associate of the Company is obliged to identify and eliminate any situations that could be interpreted as corrupt,
 - g) respond to any events and situations that may bear the hallmarks of corruption, conflict of interest or other misconduct, of which they become aware,
 - h) immediately report situations of conflict of interest in accordance with the rules set out in § 5 of the Policy,

- i) immediately report any attempt to induce corruption, including an attempt by a third party to offer a financial or personal benefit, regardless of the general obligation to respond to events referred to in item (g) above.

§ 5

CONFLICT OF INTEREST

1. An employee/associate of the Company is obliged to avoid situations in which his or her private interest is or could be in conflict with the interest of the Company, or could affect the impartiality of the decisions made by that person.
2. Situations that may give rise to a conflict of interest include, in particular:
 - a) the employee/associate or a person close to him or her holding shares, stock or other property rights in an entity that is a business partner or a competitor of the Company,
 - b) the employee/associate being in a family, personal or social relationship with a person representing a business partner or a competitor of the Company, which may affect the decisions made,
 - c) taking up additional employment or competitive activity towards the Company without the Employer's consent,
 - d) participating in making decisions concerning an entity with which the employee /associate has personal or financial ties.
3. An employee/associate who becomes aware of the occurrence or possible occurrence of a conflict of interest is obliged to immediately inform his or her supervisor or the Team of this fact, by submitting a written statement describing the circumstances of the matter. The report referred to in the preceding sentence should be made immediately, no later than within 7 business days of becoming aware of the conflict of interest. If the conflict of interest concerns a member of the Management Board, the report is submitted to the Supervisory Board, bypassing the Management Board.
4. Until the situation referred to in para. 3 is clarified, the employee/associate should refrain from participating in making decisions to which the conflict of interest relates.
5. Upon receiving information about a conflict of interest, the supervisor or the Team decides how to eliminate it, including by excluding the employee/associate from participation in the matter in question or taking other preventive measures.
6. Statements and decisions concerning conflicts of interest are recorded and archived by the Team in accordance with rules analogous to those applied to the reports referred to in § 9 and § 10 of the Policy and in the Rules for Reporting Violations of Law. The retention period for the statements and decisions referred to in this paragraph, as well as the rules for processing the personal data

contained therein, are set out in the Company's internal regulations on the protection of personal data, consistent with Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).

§ 6

SHAPING THE ORGANIZATIONAL CULTURE

1. In order to shape the organizational culture, foster proper employee conduct and build awareness of the risks associated with corruption and conflicts of interest, educational activities are carried out at the Company.
2. Educational activities include:
 - a) training,
 - b) information campaigns,
 - c) professional self-development,
 - d) the promotion of proper conduct by senior management.
3. The Company organizes mandatory training on preventing corruption and conflicts of interest for all of the Company's employees.
4. Managers holding positions particularly exposed to corruption risk, including persons responsible for procurement, negotiations with business partners, management of the Company's property and external representation of the Company, undergo periodic training on preventing corruption, conflicts of interest and other misconduct not less frequently than once every 3 years.
5. The Sustainable Development and Management Systems Office is responsible for organizing training in this area, while the Team coordinates this process.
6. Independently of the training, the Team carries out information campaigns at the Company aimed at raising the awareness of employees and associates and reinforcing their knowledge of issues related to corruption, conflicts of interest and other misconduct, as well as the ethical principles in force.
7. In justified cases, additional training on preventing corruption and other misconduct may be organized for selected groups of recipients, as the need arises.
8. The Management Board, as well as the heads of individual organizational units, promote proper conduct and the consistent implementation of a policy of zero tolerance for unethical conduct bearing the hallmarks of misconduct.

§ 7

GIFT POLICY AND HANDLING OF BENEFITS

1. In connection with the performance of professional duties, an employee/associate may not accept benefits, except for the circumstances referred to in paras. 4 and 5.
2. The acceptance or giving by an employee/associate of the Company of a financial or personal benefit, or a promise thereof, for himself/herself or another person, in connection with the function performed, is a criminal offence and is subject to criminal liability – except where the acceptance or giving took place on behalf of and for the Company.
3. Depending on the circumstances of the act and the status of the perpetrator, the acceptance or giving of a financial or personal benefit, or a promise thereof, in connection with the function performed, may constitute the offence set out in Articles 228–230a of the Criminal Code (persons performing public functions) or in Article 296a of the Criminal Code (managerial bribery in the private sector), and may result in the criminal liability of the natural person, as well as the liability of the Company under the Act of 28 October 2002 on the Liability of Collective Entities for Acts Prohibited under Penalty.
4. An employee/associate of the Company, in performing professional duties related to representing the Company at domestic or foreign meetings, when this is customarily justified or results from the rules of business protocol, is authorized to accept or give a benefit on behalf of and for the Company, provided that:
 - a) the meeting is official in natureand
 - b) the gift is symbolic in nature and value (i.e. does not exceed the limit referred to in § 7 para. 5 of the Policy – PLN 500 gross)and
 - c) the gift is voluntary and is not forced by either partyand
 - d) the gift is occasional in nature.
5. Employees/associates of the Company are permitted to accept and/or give:
 - a) training and conference materials,
 - b) promotional or informational-promotional materials and items,
 - c) educational materials,
 - d) office materials of minor value, necessary for the performance of professional activities, given to all participants in connection with attending or conducting an event such as training, a congress, a workshop, a conference, etc.

The condition for accepting the above-mentioned materials is the same as in the case of para. 4.



6. The one-off value of a benefit referred to in paras. 4 and 5 may not exceed PLN 500 gross (or the equivalent of that amount in a foreign currency, converted at the average NBP (National Bank of Poland) exchange rate on the date of receipt or giving of the benefit). A benefit exceeding this limit must be reported in accordance with § 9 and unconditionally returned to the donor or, if return is not possible, transferred to a charitable cause or to the Company, with the Team's consent. The return or transfer of a benefit exceeding the limit shall take place immediately, no later than within 14 days of becoming aware that the limit has been exceeded, and the person making the return or transfer shall provide the Team with written confirmation of this action. The total value of benefits accepted or given in a given calendar year in relation to the same person or entity should not result in a situation in which those benefits, considered jointly, could raise doubts as to the impartiality or independence of the employee/associate. In such a case, the employee/associate shall report this fact to the Team. The total value of benefits accepted or given in relation to the same person or entity in a given calendar year may not exceed PLN 1,500 gross. Exceeding this value must be immediately reported to the Team in accordance with the procedure described in § 9.
7. Each time, an employee/associate must assess the acceptance of the customary benefits referred to in paras. 4 and 5 for compliance with the ethical principles in force at the Company.
8. If doubts arise as to whether the principles of impartiality, disinterestedness, openness and transparency of the giver's conduct have been observed, the employee/associate of the Company shall refuse to accept the benefit.
9. An absolute prohibition is hereby established on employees/associates of the Company accepting or giving benefits in the form of cash or a cash equivalent.
10. Any decision by the Company to make or accept a donation or to conclude a sponsorship agreement requires the prior written consent of the Management Board.
11. Donations and sponsorship agreements may only be made in an open and documented manner, with full transparency as to the purpose, recipient and value of the performance, and may not be used as a hidden form of benefit for persons making decisions on behalf of the other party, nor as a means of obtaining an undue benefit for the Company.
12. It is prohibited to make donations or conclude sponsorship agreements in favour of political parties, electoral committees or persons performing public functions, in connection with the function performed by them.
13. The register of donations and sponsorship agreements is maintained by the Anti-Corruption Team, and it is reviewed not less frequently than once a year as part of the corruption risk assessment referred to in § 12 of the Policy.
14. Before establishing cooperation with a business partner, agent, adviser or intermediary acting on behalf of or for the Company, in particular in foreign contracts, the Company may, as a result of a business risk assessment, decide to carry out a due diligence analysis covering, in particular, reputational verification,



ownership structure, connections with politically exposed persons (PEPs) and the history of any sanctions or criminal proceedings.

15. All business partners with whom the Company intends to cooperate are required to familiarize themselves with and accept this Policy as part of the supplier qualification process.

§ 8

PERMISSIBLE FORMS OF COOPERATION AND BUSINESS CONDUCT

1. The Company is aware that reasonable gifts and invitations (meals, events, entertainment) can support the establishment, maintenance and development of important business relationships. It is the Company's intention that employees and associates should not be exposed to allegations of violating the Policy or applicable standards and regulations in connection with maintaining legitimate business relationships.
2. Giving or accepting gifts in a manner considered improper may expose both the employee/associate and the Company to allegations of violating anti-corruption laws.
3. In view of the above, the following rules on permissible forms of cooperation and business conduct are hereby introduced:
 - a) before accepting a gift or offering one to another person, the employee/associate should make sure that his or her action is consistent with the rules adopted at the Company,
 - b) before offering a gift, the employee/associate should, to the extent possible, find out what rules in this respect apply at the entity where the person in question is employed.
4. The following are permitted:
 - a) accepting or offering modest gifts whose value, as a rule, does not exceed PLN 500, provided that in no case may the limit referred to in § 7 para. 6 of the Policy be exceeded. Gifts may not include cash or its equivalents (e.g. gift cards, vouchers),
 - b) accepting and offering holiday gifts, which form part of the culture and customs prevailing in Poland,
 - c) participating in business meetings or meals with business partners, where these are intended to maintain business relationships,
 - d) participating in or organizing events involving business partners that form part of the corporate culture or custom (e.g. Christmas Eve gatherings, safety days).
5. The Company follows the principle of full transparency in its activities and applies adequate control mechanisms with respect to all contacts with the Company's business partners.

6. Contacts with business partners should take place solely within the framework of business relationships, in particular by means of electronic correspondence or a business telephone, whereas direct meetings may take place only with the knowledge and consent of the supervisor.
7. In electronic correspondence with business partners, employees/associates shall use only the Company's business e-mail. The preferred method of storing documentation related to business relationships is the Company's shared network drives. The prohibition on conducting business correspondence with partners via private messaging applications (e.g. WhatsApp, Messenger) and private e-mail applies on an equal footing with the obligation to use business e-mail. It is prohibited to delete business correspondence related to relationships with business partners, in order to ensure the possibility of its subsequent verification and audit.

§ 9

RULES FOR REPORTING EVENTS

1. Every employee/associate of the Company is obliged to report the occurrence of an event that may bear the hallmarks of corruption, conflict of interest or other misconduct.
2. The report referred to in para. 1 shall be made in the following manner:
 - a) in writing:
 - electronically, through the platform made available on the Employer's website: www.sygnet.pl/nafto which ensures the security of the report, including its confidentiality,
 - on the form constituting Annex No. 5 to the Reporting Rules, submitted in person or by email to the Person Receiving Reports indicated in the employer's order
 - or
 - b) verbally (in person or by telephone) to the Person Receiving Reports, at the telephone number indicated in the employer's order.

The final choice of reporting method rests with the reporting person.

3. The report should be made immediately after identifying the event or obtaining information about its occurrence.
4. The group of persons entitled to make a report includes – in addition to employees and associates – also the persons listed in Article 4 of the Act of 14 June 2024 on the Protection of Whistleblowers, including former employees, job applicants, shareholders, volunteers, trainees, and persons performing work under the supervision of a contractor or subcontractor. Reports may also be made anonymously, to the extent and on the terms set out in the Reporting Rules.

5. The provisions of the Reporting Rules shall apply accordingly to the reports referred to in this paragraph, with respect to their receipt, handling, the maintenance of confidentiality, and the protection of the reporting person against retaliatory action.

§ 10

HANDLING OF REPORTS

1. Reports concerning corruption-related events, conflicts of interest and other misconduct are forwarded to the Team reviewing internal reports, established in accordance with the rules set out in the Reporting Rules.
2. The process of the initial verification of reports should be objective and based on facts and any evidence presented. Every effort should be made to avoid taking action on the basis of unfounded or groundless accusations, and to avoid arousing suspicion against persons who are the subject of verification activities.
3. If an event is classified as a corrupt act or other misconduct prosecuted by operation of law, the Management Board shall immediately notify the competent law enforcement authorities of the event (e.g. the Police, the Central Anti-Corruption Bureau (CBA), the Public Prosecutor's Office).
4. After the report has been forwarded to the law enforcement authorities, the Management Board shall designate the persons and/or organizational units obliged to take remedial action aimed at assessing and remedying any damage caused by the corrupt act and preventing similar events in the future.
5. If an accepted report is not confirmed by the facts and/or is not classified as misconduct, no further clarification steps shall be taken.
6. The reporting person shall be informed of the actions taken and their results, in accordance with the rules set out in the Reporting Rules.
7. Feedback on the actions taken and their results is provided to the reporting person no later than within 3 months of confirmation of receipt of the report, or, in the absence of such confirmation, from the expiry of 7 days from the making of the report, in accordance with the Reporting Rules and the Act of 14 June 2024 on the Protection of Whistleblowers. This period may be extended if the nature or degree of complexity of the case requires more time for its thorough clarification, of which the reporting person shall be informed.
8. If the report concerns:
 - a) a member or members of the Management Board,
 - b) an act or omission of the Management Board as a corporate bodyor

- c) an act or omission of the Company at the strategic level, for which the Management Board bears responsibility,

then the person receiving the report or the Team reviewing internal reports shall forward the report immediately, no later than within 3 business days of its receipt, to the Chairperson of the Supervisory Board or a person authorized by the Supervisory Board to receive such reports, in accordance with § 7 of the Reporting Rules. The Supervisory Board then assumes the role of the Team reviewing internal reports with respect to handling the report, including confirming its receipt, conducting an initial assessment, designating a person or team to conduct the explanatory proceedings while maintaining independence from the Management Board, and supervising further follow-up action. Members of the Management Board and other persons concerned by the report do not participate in handling the matter and do not have access to its documentation, except in situations necessary for providing explanations or performing the Company's legal obligations.

§ 11

MANAGEMENT OF CORRUPTION RISK

1. In order to identify possible threats related to the occurrence of misconduct and corruption-related events and/or events bearing the hallmarks of a conflict of interest, corruption risk management is carried out at the Company.
2. Corruption risk management is part of the corporate risk management system implemented at the Company, and is supplemented by a corruption risk assessment for individual positions/areas of the Company's operations, together with the established corruption-prevention measures.
3. The corruption risk assessment referred to above should be carried out on a cyclical basis (not less frequently than every 3 years), and, in the event of the sudden occurrence of significant irregularities, on an ad hoc basis, in order to respond on an ongoing basis and update the preventive mechanisms in place.

§ 12

MONITORING OF CORRUPTION-RELATED THREATS

1. In order to verify the preventive measures in place and to detect corruption-related threats at the earliest possible stage, ongoing monitoring of corruption-related threats is carried out at the Company.
2. The monitoring of corruption-related threats is carried out by means of:
 - a) ongoing supervision of emerging potential irregularities,



- a) checking all information on any irregularities or misconduct and responding appropriately if confirmed,
- b) implementing the recommendations of the competent supervisory and control authorities,
- c) applying the “two pairs of eyes” principle, so that every action of one employee/associate is verified by a supervisor or another authorized person, especially when performing tasks in areas particularly exposed to the occurrence of corruption-related and/or conflict-of-interest phenomena,
- d) conducting planned and, as needed, ad hoc control and audit activities at the Company by the organizational units responsible for control and internal audit matters,
- e) periodically reviewing reports of legal violations relating to corruption, as well as the register of donations and sponsorship agreements referred to in § 7 of the Policy.

§ 13

FINAL PROVISIONS

1. The Employer is obliged to familiarize the Company's employees with the Policy and to require them to comply with it. The employee/associate confirms in writing that he or she has read and will comply with the provisions of the Policy by submitting an appropriate declaration.
2. The template of the employee's declaration constitutes Annex No. 1 to the Policy.
3. The declaration referred to in para. 1 shall be included in the employee's personnel file.
4. Each case of non-compliance with the principles of the Policy will be considered separately and may entail employment-related consequences, including the consequences provided for in the agreement between the Company and the associate. Employment-related consequences shall be applied in compliance with the principle of proportionality and the right of defence. A person making a report in good faith shall not suffer negative consequences as a result, even if the allegations are not confirmed. Knowingly making a report containing false information, or knowingly misleading others in the course of explanatory proceedings, may constitute grounds for disciplinary, civil or criminal liability, in accordance with applicable law.
5. The Anti-Corruption Policy is available on the Company's internal website, in the policies tab, and is also available for inspection at the Company's registered office.
6. With respect to reporting and handling corruption-related events, in matters not regulated by this Policy, the provisions of the Reporting Rules shall apply accordingly.
7. The Policy shall be reviewed whenever there is a material change in the applicable law or in the Company's organizational structure, and the Team shall be responsible for this.
8. The Policy enters into force on the date of signing.



Annex No. 1 Declaration of Acknowledgment of the Anti-Corruption Policy

**DECLARATION
OF ACKNOWLEDGMENT OF THE ANTI-CORRUPTION POLICY**

I, the undersigned
(first and last name)

employed in the position of/providing services*

.....at Nafto S.A.

hereby declare that I have read
the Anti-Corruption Policy in force at Nafto S.A. and undertake to comply with it.

....., date

.....
(signature of the person making the declaration)