

LAW COMPLIANCE POLICY**ENTC DAIRY SOLUTIONS SP. Z O.O.**

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Table of Contents

I. History of establishment.....	3
II. Definitions.....	3
III. Main postulates.....	4
IV. Respect for Human Rights.....	5
a) Forced Labor	5
b) Employment of children and minors	5
c) Freedom of association.....	5
d) Mobbing, persecution, and harassment	5
e) Employment contracts	5
f) Privacy	6
g) Working hours, benefits, and remuneration	6
h) Leave and sick leave	6
V. Counteracting mobbing, stalking and discrimination.....	6
a) Prohibition of mobbing, discrimination, stalking, and undesirable behavior	6
b) Rights and obligations of the Employer, Employees and management staff	7
VI. PROHIBITION OF CORRUPTION – anti-corruption policy	8
a) Purpose of the Anti-Corruption Policy.....	8
b) Objective and subjective scope	8
c) Scope of responsibility	8
d) Abuses	9
e) Rules of communication and conduct in relations with Clients and cooperating entities.....	9
f) Methods of implementing the anti-corruption policy by the Company	10
g) Abuse management.....	10
h) Rules for preventing abuse.....	10
VII. Principles of Ethics.....	11
VIII. Rules of conduct in the event of a law violation.	11
a) Procedure for reporting breaches of law	11
b) Register of reports of breaches of law	11
IX. Final Provisions.....	12

I. History of establishment**§ 1**

1. In order to increase the transparency of implemented policies and in connection with the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928), ENTC Dairy Solutions Sp. z o.o. (hereinafter referred to as: **Company, Employer**), introduces the Compliance Policy (hereinafter referred to as **Policy**), which will replace the existing policies:

- a. Human Rights Policy
- b. Anti-Mobbing, Discrimination and Stalking Policy
- c. Anti-Corruption Policy
- d. Ethics Policy

II. Definitions**§ 2**

1. It is assumed that if the Policy refers to:

- **Employer** - this should be understood to be ENTC Dairy Solutions Sp. z o.o.,
- **Employee** - this should be understood to be persons in employment agreement with the employer, tied to the company under civil law and B2B contracts.
- **Act** - this should be understood to be the Act of 14 June 2024 on the protection of whistleblowers - Journal of Laws of 2024.

§ 3

For the purposes of introducing the Policy, the Employer explains the following concepts:

1. **Discrimination** – unequal treatment of employees in terms of entering into and terminating an employment agreement, employment conditions, promotion, and access to training to improve professional qualifications, in particular on the basis of gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, denomination, or sexual orientation, as well as due to employment for a specified or indefinite period or full-time or part-time. Discrimination on the basis of gender also includes any undesirable conduct of a sexual nature or relating to the employee's gender, the purpose or effect of which is to violate the employee's dignity, in particular creating an intimidating, hostile, degrading, humiliating, and offensive atmosphere towards him; such conduct may consist of physical, verbal or non-verbal elements (sexual harassment);
2. **Committee** – an impartial body appointed on the basis of the procedure for reporting violations of the law contained in this Policy in order to settle reports of violations of the law.
3. **Mobbing** – actions or behaviors concerning an employee or directed against an employee, which consist of persistent and long-term harassment or intimidation of the employee which may cause them to have a lowered assessment of his professional usefulness; causing or aimed at humiliating or ridiculing the employee; isolating them or eliminating them from the team of co-workers;
4. **Stalking** – physical or virtual actions of approaching the employee (the harassed); intrusive communication with them against their will; formulating threats; making undesirable suggestions, declarations; also, frequent invading the employee's family and close ones; impersonating another employee in order to cause them property or personal damage.
5. **Procedure** – Appendix No. 1 to the Policy, K-04 Procedure for reporting violations of the law.
6. **HR representative** – a person holding the position of HR employee, who is competent to perform activities within the scope of labor law or any person who is authorized to receive complaints and notifications and any information on improper or undesirable behavior or phenomena in the workplace in accordance with their competences.
7. **Witness** – a person called for by the Committee for hearing.
8. **Abuse** - understood as actions defined as: corruption, conflict of interest and other actions in violation of the applicable Compliance Policy or bearing the characteristics of a crime, such as: theft, tender fraud, violence, violation of procedures, accounting irregularities, etc.

9. **Conflict of interest** - understood as a phenomenon occurring when private interest and official responsibility of a person or institution with the authority to make a specific decision collide.
10. **Corruption** - this should be understood as an act defined as:
- a) manifesting in promising, proposing or giving by any person, directly or indirectly, any undue benefits to an employee for themselves or for any other person, in exchange for action or failure to act on their official duties;
 - b) manifesting in the employee requesting or accepting, directly or indirectly, any undue benefits, for themselves or for any other person, or accepting a proposal or promise of such benefits, in exchange for acting or failing to act on their official duties;
 - c) committed in the course of business activity, covering the fulfilling obligations towards a public authority (institution), manifesting in promising, proposing or giving, directly or indirectly to a person managing an entity not included in the public finance sector or working in any capacity for such an entity, any undue benefits, for themselves or for any other person, in exchange for acting or failing to act, which violates their duties and constitutes a socially harmful reciprocity;
 - d) committed in the course of business activities involving the implementation of obligations towards a public authority (institution), consisting in demanding or accepting, directly or indirectly, any undue benefits by a person managing a unit that is not included in the public finance sector or working in any capacity for the benefit of such a unit, or accepting an offer or promise of such benefits for themselves or for any other person, in exchange for acting or refraining from acting, which violates their obligations and constitutes a socially detrimental reciprocity.

III. Main postulates

§ 4

1. The Company aims at maintaining the highest standards of ethics and respect for the law, in particular Employees' rights. The Employer is responsible for observing labor law regulations, rules of social norms and respect for the dignity and other personal rights of Employees. This means that we respect and, if necessary, protect the basic human rights of all our Employees. The purpose of the Policy is to provide guidelines for the company's management staff and to provide support to employees employed by ENTC Dairy Solutions Sp. z o.o. so that they can achieve these goals.
2. By issuing this Policy, the Employer aims to create a work environment based on such values as: mutual respect, trust, honesty, responsibility, and open communication. The Policy regulates the Employer's obligations in the area of counteracting violations of the law and any other undesirable behavior.
3. We are committed to respecting and promoting human rights, as well as to preventing and mitigating any adverse effects of our activities through a due diligence in our approach to human rights. We are committed to working with our employees, business partners, and relevant entities, striving for continuous improvement. We are convinced that this will bring mutual benefits to us and our business partners.
4. This Policy presents the rules applicable at ENTC Dairy Solutions Sp. z o.o. within the scope of: prohibition of discrimination and prohibition of forced labor. The Company as an employer does not employ minors and children, employs and remunerates employees in accordance with applicable law, respects the right of employees to association, and respects their privacy. We stand against mobbing, stalking, corruption, and discrimination, and we respect the rules of ethics that are in effect in the Company.

§ 5

The Employer familiarizes each new employee with the content of the Policy before they start work, and the employee confirms their knowledge of the Policy by signing an appropriate declaration, which is attached to their personal file.

LAW COMPLIANCE POLICY

ENTC DAIRY SOLUTIONS SP. Z O.O.

IV. Respect for Human Rights

a) Forced Labor

§ 6

Our goal is to ensure that all employees have freedom of moving about, and that no physical restraints, abuses, threats and such practices as withholding identity documents or valuable property items are used. We respect the right to work freely, to be aware of the terms of employment before starting work, and to receive regular payment of wages. Everyone has the right to choose their employment and to decent working conditions. Employees have the right to move about freely and leave the workplace after their shift is over. ENTC Dairy Solutions Sp. z o.o. does not tolerate any form of forced labor, including semi-slavery, slave labor, and labor related to human trafficking.

b) Employment of children and minors

§ 7

We recognize the human rights of children, such as the right to education, the right to play, and the right to have their basic needs met. We respect the minimum age for employment in accordance with national laws, and we also strive to respect children's rights in our business activities.

The employment of children is strictly prohibited under all circumstances. We will not employ anyone under the age of 18 to perform work that is dangerous or poses a threat to their health, safety, and morals.

c) Freedom of association

§ 8

The Company recognizes the fundamental right of all employees to form trade unions or elect their representatives to protect their affairs, respects the rights of employees to associate, organize, and conduct collective negotiations leading to achieving a balance of interests.

§ 9

The employer provides the opportunity to choose a staff representative from among employees - the selection rules have been worked out in *Procedure K.01. Human resources - Selection of a staff representative*.

d) Mobbing, persecution, and harassment

§ 10

1. ENTC Dairy Solutions Sp. z o.o. undertakes to protect employees from any act of abuse of a physical, verbal, sexual, and psychological nature, mobbing, humiliation and threats in the workplace, both by co-workers and superiors.

e) Employment contracts

§ 11

1. All employees of ENTC Dairy Solutions Sp. z o.o. must receive a written, understandable, and legally binding employment contract before being hired. The Company employs in accordance with commonly applicable law.
2. The Employer employs Employees full-time and on the basis of an employment contract.
3. An exception to the rule established in § 11 point 2 is a situation where the initiative to work part-time or based on other rules of cooperation comes from a person who is to provide work for the company, and such a form of cooperation does not constitute discrimination in employment.

4. The Company does not employ fictitious interns or trainees in order to benefit from paying lower wages and benefits.

f) Privacy**§ 12**

We respect and protect the privacy and security of the personal data of our employees, consumers, users, distributors, suppliers, and customers in accordance with the Data Protection Policy. We apply appropriate regulations and standards regarding the protection of personal data.

g) Working hours, benefits, and remuneration**§ 13**

1. ENTC Dairy Solutions Sp. z o. o. complies with all applicable laws and regulations concerning work and employment, including those concerning working hours, working conditions, and appropriate remuneration. Employees are not permitted to work regularly, including overtime, for more than an average of 48 hours per week. Overtime compensation must be paid in legal tender on a regular basis.
2. We encourage the development of employees' skills and qualifications; we support them through financing/co-financing courses and trainings in order to provide them with opportunities for career development.
3. The Employer has in place: Work Regulations and Remuneration Regulations, which are available to each employee. Employees familiarize themselves with the content of the regulations before starting work but may reacquaint with the content of the regulations at any time during working hours.

h) Leave and sick leave**§ 14**

ENTC Dairy Solutions Sp. z o.o. is obliged to enable all employees to exercise the right to sick leave and vacation leave, parental leave, intended for the care of newborn children of their own or adopted children, in accordance with state laws. Employees using this type of parental leave will not be in danger of being dismissed from work and will not be dismissed; they will also be allowed to return to their job position while maintaining unchanged rules of remuneration and benefits.

V. Counteracting mobbing, stalking and discrimination.**a) Prohibition of mobbing, discrimination, stalking, and undesirable behavior****§ 15**

1. The employer does not accept and tolerate mobbing, discrimination or stalking.
2. Any behavior bearing the characteristics of mobbing, stalking or discrimination and any other undesirable behavior aimed at mobbing, discrimination or stalking, and ones which could be considered mobbing, discrimination or stalking are prohibited. The Employer makes every effort to ensure that the work environment is free from such behaviors.
3. Management at every level of the organization bears special responsibility for ensuring that mobbing, discrimination or stalking do not occur.
4. Behaviors that are of the nature of accusing anyone of using mobbing, discrimination or stalking are prohibited. The Employer will apply appropriate professional consequences to persons engaging in such behavior.
5. The Employer may not apply any negative consequences to Employees who have submitted to mobbing, discrimination or stalking, and to Employees who have taken action to oppose such phenomena or have used the instruments of protection against mobbing, stalking or discrimination provided for in this Policy and in the law.

6. The Employer may not apply any negative consequences to Employees who, believing that they have become victims of mobbing, stalking or discrimination, have sought help not only from the Employer, but also from third parties, including ones in the fields of medicine and law.

§ 16

The use of mobbing, stalking or discrimination, as well as behaviors aimed at mobbing, stalking or discrimination constitute a serious violation of basic employee duties, justifying the termination of the employment contract with the Employee without notice.

b) Rights and obligations of the Employer, Employees and management staff**§ 17**

In order to implement this Policy, the Employer:

1. educates Employees on mobbing, stalking, and discrimination, and on the methods of preventing such phenomena;
2. develops the competences of the management staff, in particular in order to build effective teams free from conflicts and undesirable behaviors;
3. provides Employees with the opportunity to report undesirable behaviors and phenomena, including mobbing, stalking, and discrimination, and verifies each report objectively and promptly while ensuring confidentiality;
4. precisely defines the scope of duties and authorizations, and the rules of professional subordination;
5. defines clear and legible channels for the flow of information between the Employer and Employees;
6. imposes professional consequences on persons using mobbing, stalking or discrimination, and behaviors aimed at mobbing, stalking or discrimination, or ones which could be considered mobbing, stalking or discrimination.

§ 18

In order to implement this Policy, the management staff is obliged to:

1. respect the dignity and personal rights of subordinate Employees and build within the teams a culture based on mutual respect and dignity of Employees;
2. treat all Employees equally and make decisions, in particular regarding: employment, promotion, referral to training to improve qualifications, and remuneration, based on an objective assessment of work results, skills, and professional experience,
3. immediately forward reports submitted by Employees to the Human Resources Representative;
4. implement the Procedure in the subordinate area by familiarizing all subordinate Employees with its content and, if necessary, provide appropriate explanations and information on the rules of counteracting mobbing, stalking, and discrimination;
5. resolve conflicts within teams with respect for the dignity and personal rights of the parties to the conflict, the organizational culture of the Employer, and without damage to the organization of work;
6. respond immediately to any observed manifestations of undesirable behavior, in particular those that may be considered mobbing, stalking or discrimination, including informing the HR Representative about them;
7. build a culture of open communication among the staff, in particular by providing feedback, providing any necessary explanations and information in a calm, clear, understandable manner that does not provoke ambiguities or ambiguous conclusions.

§ 19

Employee Rights within the scope of activities related to mobbing, stalking, and discrimination:

1. Every employee who believes that they are the subject of mobbing, stalking or discrimination has the right to file a complaint,
2. Every employee who has noticed that other Employees are mobbed, stalked or discriminated has the right to file a report.

3. Employees have the right to inform the Employer of any other inappropriate or undesirable behaviors or phenomena in the workplace.

§ 20

In order to counteract mobbing, stalking, and discrimination, Employees are obliged in particular to:

1. respect the dignity and personal property of other employees, and build a team culture based on mutual respect and dignity of co-workers;
2. respect the beliefs, values, and rules that guide other employees;
3. observe the rules of social norms and the rules of good manners in interpersonal relations;
4. cooperate in creating a work environment free from mobbing, stalking, and discrimination;
5. prevent conflicts and strive to resolve them with respect for the dignity of the parties to the conflict;
6. respond to observed manifestations of mobbing, stalking, discrimination, and other inappropriate behaviors and phenomena, inform the superior or HR Representative about them, and cooperate in order to settle them.

VI. PROHIBITION OF CORRUPTION – anti-corruption policy**a) Purpose of the Anti-Corruption Policy****§ 21**

1. The purpose of this Policy is to establish uniform rules of conduct in relation to abuses committed to the detriment of the Company with losses to financial resources (defined as corruption or conflict of interest, both actual, apparent, and potential) aimed at preventing and counteracting them.
2. The purpose of the Policy is also to ensure transparency of the Company's activities towards its contractors and the bodies supervising Company's activities.

b) Objective and subjective scope**§ 22**

1. The Anti-Corruption Policy applies to all corruption activities, situations referred to as conflicts of interest and other abuses involving the Company's employees, as well as its contractors, experts, consultants, suppliers, and all entities in relations with the Company.
2. The Policy should be observed by all employees and entities cooperating with the Company, regardless of the form of employment, cooperation, function performed, position held, and existing relations with the Company.

c) Scope of responsibility**§ 23**

1. Managers of organizational units and persons holding independent positions must pay attention to any manifestations of irregularities in the processes which they are responsible for and to any potential abuses.
2. Identified risks of abuse will serve in the future as guidelines to help identify activities prohibited in the Company.
3. A person who determines the possibility of potential abuses is obliged to immediately inform their direct superior, or a higher-level superior of this fact if the abuse concerns their direct superior. Detailed rules for reporting incidents of a corruption nature and other abuses are regulated by Annex No. 1 to the *ENTC Dairy Solutions Sp z o.o. Law Compliance Policy. Personnel K-04 Procedure for reporting violations of the law.*

d) Abuses**§ 24**

For the purposes of this Policy, abuses also include any actions bearing the characteristics of a crime or misdemeanor (including a fiscal crime or misdemeanor), as well as other behaviors contrary to the ethical rules in force at ENTC Dairy Solutions Sp z o.o., including, among others:

- 1) Appropriation of the Company's property (materials, equipment, financial resources).
- 2) Deliberate provision of false data in financial reports, causing them to become unreliable and not corresponding to the actual, factual and legal status.
- 3) Deliberate input of false data into documents created in the Company.
- 4) Deliberate falsification of documents (including agreements, letters, resolutions, decisions, and minutes) or introduction of other changes therein not accepted by entities authorized to do so under the law and the Company's internal regulations.
- 5) Deliberate improper application of the applicable accounting rules, including, among others, forging or changing accounting entries and documentation confirming these entries.
- 6) Deliberately confirming untruth in the scope of substantive control of source documents (purchase receipts) causing financial consequences.
- 7) Deliberately distorting or omitting events or other important information in reports, causing damage to public funds at the Company's disposal.
- 8) Any other deliberate actions resulting in damage to the Company and public funds or violating the ethical rules applicable in the Company.

e) Rules of communication and conduct in relations with Clients and cooperating entities**§ 25**

1. All contacts with clients and entities cooperating with the Company may take place only for purposes related to the implementation of the obligations and tasks accepted by the Company. Contact should take place via e-mail, post, business phone calls and face-to-face meetings at the headquarters of the Company or cooperating entity. In e-mail contacts, only business e-mail addresses should be used.
2. All letters received and sent are stored in the documentation of the Finance Department;
3. In the case of business trips, the focus should be on the substantive purpose of the business trip (training, inspection, presentation).
4. An employee of the Company must not use their position to achieve personal benefits at the expense of a contractor, subordinate, or other cooperating entity. In the interests of dignity, an employee of the Company is particularly responsible for recognizing and eliminating any situations that may be interpreted as corruption, e.g.:
 - 1) accepting and giving bribes;
 - 2) accepting financial, intangible, and material benefits;
 - 3) accepting gifts and presents from clients, cooperating entities, or subordinate employees, with the exception of small gifts, customarily accepted in given circumstances (e.g. anniversary, birthday).
5. In the case when, against the will of the employee or without his conscious participation, an event referred to in point 4 occurs, the employee is obliged to report this fact to their superior, who forwards this fact for recording in the Register of Reports of Violations of Law.
6. In the event of an entry in the Register of Reports of Violations of Law concerning corruption and violations, the person responsible for maintaining the register in the column "subject of violation of law" will include:
 1. identification of the entity transferring the benefit (if it is possible to identify it);
 2. a brief description of the circumstances of transferring the benefit;
 3. description of the benefit and its estimated value;
 4. method of handling the benefit.

f) Methods of implementing the anti-corruption policy by the Company**§ 26**

The Company implements the Anti-Corruption Policy by:

- 1) Training employees and supporting cooperating entities in order to eliminate all abuses, in particular corruption, and preventing conflicts of interest.
- 2) Raising awareness of employees and cooperating entities in the scope of issues related to corruption, conflicts of interest, and other abuses.
- 3) Encouraging its employees and cooperating entities to report violations of adopted policies, and unethical behavior.
- 4) Notifying law enforcement authorities of any violations of criminal law.
- 5) Counteracting corruption activities and other abuses by encouraging cooperating entities to implement similar anti-corruption practices.

g) Abuse management**§ 27**

Potential sources of abuse in the Company's operations include:

1. Performing a decision-making function in matters of selecting service providers, especially services related to the implementation of new investments and other projects, e.g. selecting transport companies, companies performing repairs or implementing investments carried out by the company.
2. Performing the function of person in charge of ordering raw materials for production and other company purchases.
3. Abuse may in particular occur when the area with a high risk of abuse is the management of the Company's property.
4. Any identifiable abuses should be dealt with in a manner analogous to other diagnosed threats and included in the Corruption Risk Analysis.

h) Rules for preventing abuse**§ 28**

Each organizational unit of the Company and its employees should act independently of each other in the scope in which they perform the assigned tasks, in particular by:

1. Ensuring the organizational separation of departments;
2. Separate supervision of individual departments performing activities that involve the risk of a conflict of interest;
3. Avoiding ties between the amount of remuneration of the Company's employees and the number of cases handled.

In the Company, employees sign a declaration regarding the Employee's Obligation to Maintain Professional Secrecy and Confidentiality, in which, among other things:

1. The Employees undertake to maintain professional secrecy and not to disseminate, without the Employer's consent, in any form, all information available to them concerning the Employer, to which they will have access due to the performance of his official duties, and not intended for public dissemination, both during the term of the employment contract and after its expiration;
2. The Employee shall not disseminate any information whose dissemination could violate the good name or interests of ENTC Dairy Solutions Sp. z o.o. or its customers.
3. The Company introduces restrictions on access to information necessary to perform assigned tasks at individual workstations through a system of authorizations and granted access rights.
4. The Company employs employees appropriately qualified to perform their duties and provides, in particular employees from the Finance Department, training in current financial and accounting regulations and systematic training in the scope of, among others, the provision of investment services, conducting public procurement (including central procurement), management of property and intangible assets, financial and accounting services and prevention of related abuses.

5. In the event that the Company conducts or participates in a project that may cause particular exposure to corruption, the Director/Company's CEO may appoint a coordinator or several coordinators of anti-corruption activities.

c) Detailed rules for reporting incidents of a corruption nature and other abuses**§ 29**

In the event of an incident of a corruption nature and other abuses, reporting shall be carried out in accordance with Annex No. 1 to the *ENTC Dairy Solutions Sp z o.o. Law Compliance Policy Staff K-04 Procedure for reporting violations of the law to this Policy*, with the following additional rules:

1. The person making the report is obliged not to contact the person suspected of committing the abuse in order to establish any facts related to the reported abuse.
2. The person making the report should maintain discretion and not discuss the matter, facts, suspicions, or allegations with anyone, unless specifically requested to do so by the Management Board of the Company
3. During an investigation into alleged abuses (including corrupt activities or conflict of interest situations), every effort should be made to avoid taking action on the basis of erroneous or unfounded accusations, avoid raising suspicions in the persons in whose case the actions are being conducted, and avoid statements that will have negative consequences for the employee or customer.

VII. Principles of Ethics**§ 30**

As part of the applicable law enforcement policy, ENTC Dairy Solutions undertakes to act in accordance with the following principles of ethics:

1. apply transparent business practices based on respect for the community, environment, and employees
2. be guided by a policy of equal opportunities for women and men in the workplace,
3. counteract all forms of discrimination and respect for human rights (regardless of their ethnicity, nationality, gender, and religious and political beliefs),
4. be guided by the principle of apoliticality in its actions,
5. adhere to the rules of loyalty, impartiality, and honesty in internal and external relations,
6. compete fairly with competitors and not undermine their reputation,
7. build partnership relations with suppliers and customers,
8. prevent and oppose any corruption behavior in internal and external relations.
9. diligently fulfill obligations and duties towards bank offices and business environment institutions.

VIII. Rules of conduct in the event of a law violation.**a) Procedure for reporting breaches of law****§ 31**

Procedure for reporting to the employer issues related to a breach of law has been developed in the document: Procedure K.04. Procedure for Reporting a Breach of Law, which constitutes an annex to this policy.

b) Register of reports of breaches of law**§ 32**

1. The employer is obliged to maintain a register of reports of breaches of law, the register template is in Annex No. 2 - Register of reports of breaches of law
2. The employer authorizes an employee of the Finance Department and the Human Resources Department to maintain the register - the authorization template is in Annex No. 3.

LAW COMPLIANCE POLICY

ENTC DAIRY SOLUTIONS SP. Z O.O.

IX. Final Provisions

§ 33

1. The provisions of the Policy do not violate the provisions of generally applicable acts.
2. Issues related to the protection of the law are complex and have a wide scope, therefore the Policy identifies only key areas of priority importance. We want our efforts to focus on these areas, but we recognize that over time other issues related to the protection and respect of the law, especially human rights, may gain in importance. Therefore, we regularly review the priority areas and will update this Policy accordingly.
3. The Policy applies to all Employees. The Policy and the Procedure contained therein apply accordingly to persons employed on a basis other than an employment agreement, as defined in § 2.
4. Any doubts related to the application of this Policy, including the procedure for complaints and notifications, shall be resolved by a Representative of the Human Resources Department or a Member of the Management Board or a person authorized by them.
5. The Company systematically conducts and updates, if necessary, an analysis of corruption risk in positions particularly exposed to corruption, in particular employees in managerial positions and in independent positions.
6. Each case of non-compliance with the content of the Policy will be considered separately and may entail professional consequences.

§ 34

The Policy will be announced by the Employer in the manner customarily adopted in the workplace, i.e. by posting on the notice board in the office and employee canteens - its content will be available in places generally accessible to Employees in all organizational units of the Employer.

16.09.2024

Jacek Kozikowski

Member of the Management Board

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Employer's signature