

ANTI-CORRUPTION POLICY

SAMBUD-2 K. STĘPAK I WSPÓLNICY SP. J.

dated 2 January 2018

General Provisions

§ 1

The aim of introducing this anti-corruption policy is to determine and implement the principles for combating corruption and bribery which shall be observed by the shareholders, workers, collaborators and business partners of Sambud-2 K. Stępak i Wspólnicy Sp. j. (hereinafter referred to as “the Company”).

§ 2

The provisions of this anti-corruption policy shall be binding upon every shareholder, worker (irrespective of the type of work they do or their position) as well as collaborator and business partner of the Company.

§ 3

Any reference hereinafter in this policy to:

1. **Corruption** – shall mean promising, offering, giving or accepting, in any form and irrespective of the value, any benefits with the aim of effecting or rewarding an illicit, unethical behaviour or a behaviour constituting a breach of employee duties or of the principles of good market practices. In any event, all behaviours which meet the criteria of a crime as determined in Art. 229, 230 and 230a of the Penal Code shall be deemed to be corruption.
2. **Bribery/Benefits** – shall be understood as both financial benefits such as money, gifts of value exceeding PLN 500 in a year received from or given to one client, in particular those other than promotional materials of small value, as well as other benefits of non-material nature – including any employment contract, execution of a contract, non-public information, preferential treatment, prizes, invitations with the intention of corrupting.

Principles of Anti-Corruption Policy

§ 4

1. The Company adopts the transparency principle and promotes compliance with both Polish and international anti-corruption standards.
2. The Company aims at the elimination of all and any signs of corruption.
3. The Company does not give or accept any bribes or benefits.
4. The Company forbids its business partners from offering bribes or benefits to its shareholders, workers or collaborators.
5. The Company forbids its shareholders, workers and collaborators from offering, promising or giving bribes or benefits to its business partners.

Duty to Prevent and Report Corruption

§ 5

1. All shareholders, workers and collaborators of the Company shall be obliged to avoid behaviours which could lead to any breach of this anti-corruption policy.
2. All shareholders, workers and collaborators of the Company shall be obliged to perform their duties in a manner which guarantees transparency of actions undertaken by the Company.
3. All shareholders, workers and collaborators of the Company shall be obliged to monitor their subordinate employees with the aim of eliminating any actions which could lead to any breach of this anti-corruption policy, including organizing workshops on workplace ethics on a yearly basis.

§ 6

Any shareholder, worker and collaborator of the Company who gets hold of any information about any corruptive behaviour in the Company, or who was being put up to giving or accepting a bribe or benefits shall be obliged to immediately report such an event to the remaining shareholders (in case of shareholders), the supervisor or a higher-level superior in case such an abuse concerns their immediate supervisor.

§ 7

Any Company's business partner who gets hold of any information about corrupt behaviour in the Company, or who was being put up to giving or accepting a bribe or benefits, shall be obliged to immediately report such an event to the Company by email to etyka@sambud2.com.pl

Liability

§ 8

1. In case it is revealed that a corrupt act was committed by:
 - A shareholder – they shall be obliged to give explanations before the remaining shareholders in the Company,
 - A worker or collaborator – they shall be obliged to give explanations before their supervisor or higher-level superiors,
 - A business partner - they shall be obliged to give explanations before a representative appointed by the Company.
2. In case corrupt actions committed by a shareholder, worker or a collaborator of the Company are revealed, the Company shall undertake steps aimed at preventing the consequences of the revealed corrupt actions.

§ 9

1. Any failure of any worker of the Company to comply with the provisions set forth in this anti-corruption policy shall be deemed breach of basic employee duties and may lead to imposing disciplinary sanctions on the said employee as well as to the termination of the employment contract with immediate effect by fault of the worker, pursuant to Art. 52 of the Labour Code.
2. Any failure of any collaborator or business partner of the Company to comply with the provisions set forth in this anti-corruption policy shall be deemed breach of good market practices and may lead to the termination of collaboration.
3. Any failure of any shareholder of the Company to comply with the provisions set forth in this anti-corruption policy shall be deemed an act prejudicing the interest of the Company and may lead to the remaining shareholders filing a case for revoking given shareholder's right to conduct the Company's affairs to court pursuant to Art. 47 of the Code of Commercial Companies or for the expulsion of the shareholder from the Company pursuant to Art. 63 § 2 of the Code of Commercial Companies.

§ 10

All and any behaviour which meets the criteria of a crime as determined in Art. 229, 230 and 230a of the Penal Code, the Company becomes aware of shall immediately be reported to law enforcement authorities.

Final Provisions

§ 11

1. The anti-corruption policy shall be effective for an indefinite period of time.
2. The Company may amend or supplement the anti-corruption policy at any time.
3. The anti-corruption policy shall become effective as of the date it is communicated to the workers and collaborators as well as business partners.
4. Every new worker shall be obliged to read the anti-corruption policy before commencing work.
5. The valid text of the anti-corruption policy is available at www.sambud2.com.pl and in the Company's seat.