

# Anti-Corruption Policy at Vitrintec Sp. z o.o.

2nd edition, Kielce, 2 September 2024.







Vitrintec Sp. z o.o. adheres to the principle of zero tolerance towards any form of corruption. The company is a responsible and trustworthy entity and therefore corrupt activities are not accepted in the value system we represent.

The principle of zero tolerance towards corruption applies to all employees, co-workers and business partners as well as to employees of other companies within the group or on our behalf. The management of Vitrintec Sp. z o.o. is obliged to define the principles of governance that do not accept any form of corruption.

This Anti-Corruption Policy (hereinafter: Policy) should be widely communicated and promoted to our company's employees/co-workers by means of training initiatives to enable proper understanding and use of its principles in daily work.

This Policy applies to Vitrintec Sp. z o.o. (hereinafter also referred to as Vitrintec).

Kielce, 27.08.2024 r.

A handwritten signature in black ink, reading "Dariusz Rybka".



# OUR VISION

Vitrintec Sp. z o.o. operates according to the highest ethical standards.

# OUR GOAL

We want to provide a fair and transparent business model at Vitrintec, guaranteeing trust, security, free competition and value for all the company's stakeholders.

# OUR COMMITMENTS

- As part of our daily responsibilities, we act in accordance with the values and standards of conduct set out in the detailed documents related to work ethics.
- We do not tolerate corrupt behaviour by abusing positions or functions for undue financial or personal gain.
- We actively build and verify awareness of ethical behaviour and corruption risks among our employees and contractors.
- Vitrintec executives are committed to creating a working environment based on respect for ethical standards and compliance with applicable regulations, as well as consistently improving their knowledge in this regard.
- We avoid conflicts of interest that may compromise our integrity and credibility.
- We comply with the internal regulations of Vitrintec Sp. z o.o. with regard to gifts and expenses.
- We responsibly and consciously identify and manage fraud and corruption risks.
- We report and explain any violations of anti-corruption laws and internal regulations and promptly take appropriate disciplinary and corrective action.
- We comply with the provisions of anti-corruption regulations at all locations where we conduct our business.







## **The Anti-Corruption Policy at Vitrintec Sp. z o.o. was introduced by an order of the CEO dated 25 February 2019 and updated on 02 September 2024**

- Corruption hinders economic development, interferes with free competition, increases the cost of conducting business, reduces the safety and quality of products and services, and can threaten the interests and damage the image of any entity involved.
- Corruption and related abuses result in criminal liability for individuals who engage in such practices and consequences for the company itself. Acceptance of corrupt practices hinders business operations, restricts the ability to promote services and products, may disqualify the company from obtaining public contracts, and can also result in high financial penalties.
- The Anti-Corruption Policy at Vitrintec reflects international best practice in preventing, detecting and responding to bribery, identifying corruption-related technological, financial and reputational risks, and other corrupt behaviour that may damage Vitrintec's economic interests.
- Effective prevention of corruption requires the implementation of systemic solutions, based on the analysis of information available within the organisation and obtained from external sources.
- Anti-corruption solutions protect against activities defined by law as corrupt and, in addition, counteract mismanagement, improperly managed conflicts of interest or conspiracy by counterparties involved in corruption practices.
- The implementation of the Anti-Corruption Policy at Vitrintec Sp. z o.o. increases security in relations with the counterparties and strengthens communication within the organisation.
- The Anti-Corruption Policy forms the official basis for the implementation of the Anti-corruption system at Vitrintec, which regulates relations between employees, entities and persons representing the company, contractors, suppliers, customers and representatives of public administration.



## ■ In particular, the Policy aims to:

- 1) prevent and detect incidents of a corrupt nature by implementing systemic solutions;
- 2) identify threats, assess risks and take measures to protect Vitrintec's business interests;
- 3) initiate control or audit activities in order to assess incidents and determine the responsibility of persons suspected of corruption, including Vitrintec employees and representatives who neglect to implement and apply anti-corruption standards;
- 4) implement rules of conduct for Vitrintec employees and representatives. enhancing anti-corruption security, including countering abuses that may be indicative of corruption;
- 5) raise the awareness of business decision-makers to identify and counteract corrupt behaviour.

- All employees and representatives of Vitrintec Sp. z o.o. should comply with the anti-corruption regulations introduced in all countries in which the company provides its services;

- The Policy requires all employees and representatives of Vitrintec Sp. z o.o. to observe the principles of ethics, integrity and conduct in compliance with applicable laws in all activities undertaken, in particular in business transactions with individuals, contractors, public institutions and social organisations.

## ■ Vitrintec employees and representatives are prohibited from:

### Corruption

Corruption is the abuse of a public position for private gain. Employees and representatives are prohibited from promising, offering, giving, demanding, accepting directly or indirectly, any undue, pecuniary, non-pecuniary or other advantage, or accepting the offer or promise of such an advantage in return for an act or failure to act, in the exercise of a public function, or in the course of business. An advantage is considered not only a benefit of a material nature, but also an intangible benefit, including a donation, an employment contract, classified information, preferential treatment, gifts, rewards, invitations.

According to the Anti-Corruption Policy, corruption is bribery, extortion or solicitation, influence trafficking and legalising the proceeds derived from these practices.

## Bribery

Bribery means giving a pecuniary or personal benefit to a person performing a public function in connection with the performance of that function. Employees and representatives shall not give either a pecuniary or personal benefit to any person performing a public function in connection with the performance of that function. Employees and representatives may also not take action to induce a person performing a public function to violate the law or give, or promise to give, a pecuniary or personal benefit to such person for violating the law.

## Influence trafficking

Influence trafficking occurs when a person who has real or apparent influence over the decision-making of a public official exchanges that influence for an undue advantage. The offence can take the same forms as bribery.

## Manipulation in tendering procedures

Employees and representatives may not, for the purpose of financial gain, prevent or obstruct a tender or enter into an agreement with another person acting to the disadvantage of the owner of the property, or the person or institution for whose account the tender is made.

Employees and representatives may not, in connection with a tender, disseminate information or withhold important circumstances which are of significance for the conclusion of the contract or enter into an agreement with another person to the disadvantage of the owner of the property, or the person or institution for whose account the tender is made.

- The Policy implements at Vitrintec the obligation to create the conditions for anonymous whistleblowing and to define the principles for accepting and giving gifts, in connection with the business activities of employees and representatives.



# Purpose of the Policy

The purpose of the Policy is to establish an obligation for all stakeholders, i.e. our employees/co-workers, business partners and all employees of subsidiaries, to have zero tolerance towards any corrupt activities, and to implement measures to ensure compliance with applicable laws.

This Policy provides guidance to identify and effectively avoid the risk of any fraud in this regard. The policy is addressed to employees, co-workers, contractors, all business partners and executives of Vitrintec Sp. z o.o.

The Anti-Corruption Policy of Vitrintec Sp. z o.o. should be treated by all persons acting for and on behalf of Vitrintec like the Code of Ethics and Business Conduct, the Work Regulations and other binding documents. In terms of relations with external stakeholders, it is an essential part of our communication efforts to prevent all forms of corruption. For this reason, the Anti-Corruption Policy should be reaching available to all Vitrintec stakeholders (customers, suppliers, subcontractors). The Anti-Corruption Policy should not be the only source of information or interpretation of all business situations. Each employee working in sensitive areas is obliged to be familiar with the anti-corruption regulations.

This Policy sets out minimum standards of conduct and does not replace national and international laws regulating such matters, including liability of any kind, such as civil, criminal, fiscal or administrative. If you are unsure of how to act in a corruption situation, you should contact your superior.

# Principles of the Anti-Corruption Policy

## Transparency in Corporate Governance

We act fairly and we are honest. We strive to be modern and friendly, but at the same time we are open and transparent about our activities. We want to ensure that our customers perceive us as a responsible and trustworthy company. We do not violate applicable laws, and we therefore adopt a zero-tolerance policy towards corruption and related offences in all aspects of our business. We are committed to enforcing the Anti-Corruption Policy, as well as educating those working within our organisation to comply with the policy and the law.

According to the adopted Policy, activities of corruption nature are always and in any form prohibited, whether indirect or direct, both within our structures and in relations with our stakeholders. Prohibited actions include:

- bribery;
- corruption;
- influence trafficking;
- manipulation in tendering procedures;
- legalising the proceeds of corrupt activities.

We ensure that any person who reports a suspected incident of fraud or refuses to engage in bribery or corruption will not face negative consequences.



## Corruption risk areas (corruption risks)

We are aware that certain gifts and invitations (meals, parties, entertainment) are legitimate, result from the specific nature of the industry in which we operate and that they can support the process of establishing, maintaining and developing important business relationships. It is Vitrintec's intention that in such situations, the company's employees should not feel any pressure due to the impression that they are sustaining business relationships by engaging in behaviour that is not in line with the applicable norms and regulations.

Giving or receiving gifts in a way that is considered inappropriate can expose both our employees and the company to accusations of violating anti-corruption regulations, so before you accept a gift, or before you offer it to someone, make sure that your action is in accordance with the rules adopted by our company.

## In the course of performing our professional duties, we are allowed to:

- accept or offer modest occasional gifts or flowers (e.g. on the occasion of a birthday, name day, promotion, anniversary), the value of which does not exceed the equivalent of PLN 200 gross.
- accept and offer small Christmas gifts, which are part of the culture and customs prevailing in Poland. These issues are regulated in detail in the document entitled Policy for accepting and giving gifts at Vitrintec Sp. z o.o.

## Examples of unacceptable practices include

- giving, promising to give, offering or soliciting a gratuity in the form of payment, a gift, a trip, an invitation or any other benefit for the purpose of obtaining a specific business advantage or as a reward for obtaining a business advantage,
- giving, promising to give, offering a gratuity in the form of payment, a gift, a travel, an invitation (meals, entertainment) or any other benefit to a government official or intermediary in order to improve or accelerate the course of a routine procedure
- promise or accept payment from a third party if you suspect or have reason to believe that the other party expects a specific business advantage in return,
- accept or promise to accept gifts, trips, invitations (meals, parties, entertainment) or other benefits from third parties.

## Obligations of contractors, suppliers, business partners of Vitrintec

The Anti-Corruption Policy at Vitrintec commits business partners, suppliers, customers and all parties working with the company to act with integrity without corrupt intentions or activities and to:

- comply with this Anti-Corruption Policy,
- not offer or give any financial or other advantage,
- cooperate with Vitrintec to eliminate corrupt behaviour,
- ensure that relationships with public officials, private individuals and other businesses are open and transparent so as to exclude the possibility of allegations and threats of corruption,
- avoid conflicts of interest that could result in a corruption.

## Reporting fraud

Vitrintec employees/co-workers can use the channel established to report their concerns or seek advice when there is a suspected violation of the Anti-Corruption Policy or other regulations. Employees should not fear reprisals, acts of discrimination or disciplinary action. Reports should be treated confidentially and investigated with due diligence.

Suspected violations of the Anti-Corruption Policy or other regulations may be reported via e-mail to: [trust@gmail.com](mailto:trust@gmail.com).

The report, depending on the information available to the reporting party, should include:

- the date and time the fraud occurred;
- the date and time the abuse occurred
- a description of the circumstances of the abuse, including details of the person involved;
- where available: a description of the effects/consequences of the abuse.

If the reporting party has any material that may provide evidence of the occurrence of the abuse, it shall forward it with the report.



# Record-keeping, transparency and control policies.

The regulations mentioned above oblige Vitrintec to demonstrate compliance with the applicable regulations and relevant procedures designed to ensure the integrity of the accounts and records. Therefore, Vitrintec follows the principle of full transparency in its operations and applies adequate control processes. The Management Board and its designees shall periodically monitor and review compliance with this Policy and risk management procedures at Vitrintec.

# Responsibility

Each and every employee/co-worker of the company is obliged to read this document and strictly adhere to its contents. Failure to comply with the principles set out in the Anti-Corruption Policy constitutes a breach of employee duties and may result in disciplinary and criminal liability under applicable laws and regulations. Each case of non-compliance with this Policy will be considered separately.

# Final provisions

The Management Board of Vitrintec Sp. z o.o. reviews the effectiveness of its anti-corruption measures at least once a year. This Policy is effective as of 2 September 2024, being a continuation of the Policy announced in 2019, and is updated on an ongoing basis.







The Anti-corruption policy of Vitrintec Sp. z o.o. was adopted  
by the Management Board of Vitrintec Sp. z o.o. in 2019  
and updated on 2 September 2024.

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