

Policy for accepting and giving gifts at Vitrintec Sp. z o.o.



Employees of Vitrintec Sp. z o.o. are bound by the Policy for accepting and giving gifts.

Key rules in this regard

It is permissible to accept or give gifts:

- that are commonly accepted in business relations, which are intended to promote or advertise the giving entity, including, in particular, promotional items with a one-off value not exceeding PLN 200 gross, presented on special occasions or at business meetings, which, due to their value and nature, do not oblige the recipient to offer anything in return;
- both the giver and the receiver of a gift are obliged to exercise due care in assessing whether the gift does not violate the applicable rules
 - in particular regarding the value and type, as well as the frequency of acceptance or presentation of gifts to the person in question, as well as the circumstances and motives associated with the gift.

When accepting or giving a gift, it is necessary to inform the immediate superior and, in the case of gifts with a value of more than PLN 200 gross, to obtain his/her approval.

It is forbidden to accept gifts:

- violating applicable laws or internal company regulations;
- contrary to good practices and ethical standards;
- that result or may result in an informal obligation to the contracting party according to the principle of 'favour for favour';
- adversely affecting the interest and image of the company and the group in which it operates;
- leading to a conflict of interest or any form of fraud;
- which affect or could be considered to affect decisions and the integrity or timing of assigned tasks and business decisions;
- which value or form may be considered as corrupt practice, for example:
 - cash, irrespective of the value and form of its transfer,
 - items of a collector's or investment nature, holidays or trips,
 - discounts on products and services, or the right to use an asset (unless this is in accordance with the terms of the contract between the parties).

It is forbidden to give gifts to public officials, persons performing public functions, officials of the state and local government administration (except at various occasional meetings where promotional gadgets are given)

In the case of gifts with a gross value of more than PLN 200, the giver and receiver of the gift are bound by the relevant tax regulations and obligations.



