

## **ANTI-BRIBERY and ANTI-CORRUPTION POLICY**

### **Policy Statement**

BOSMAL Automotive Research and Development Institute (hereinafter: BOSMAL) is committed to conducting business in an ethical and honest manner, and has zero-tolerance for bribery and corrupt activities. We are committed to acting in a modern, dynamic and friendly manner, and with openness and transparency in all our activities and business dealings.

This Anti-Corruption Policy should be read in conjunction with the applicable Polish and international law on corruption, which exist to set out a model line of conduct in the event of corruption encountered in professional life.

BOSMAL reserves the right to modify and update this Anti-Corruption Policy at any time and the modifications or changes are applicable within the internal organisational structure of BOSMAL from the time of their declaration and a written confirmation that the entity/person to whom they were submitted has read their content.

We are committed to implement the Anti-Corruption Policy and educate individuals working in BOSMAL to comply with our laws.

According to the adopted Policy, the following practices are prohibited at all times, in any manner whatsoever, irrespective of whether they are direct or indirect activities, both within BOSMAL and in relation to its stakeholders.

- **Bribery** – refers to the act of offering „item of value” or „personal gain” to a Customer of BOSMAL, or any public official in connection with performance of their duties to derive inappropriate advantage.
- **Solicitation and Extortion** – involves attempts to influence a public official, or persuade a public official to infringe the law, or the act of offering or promising „item of value” or „personal gain” to such a person in return for infringement
- **Venality** – the act of corruptly accepting or obtaining an item of value or advantage, or a promise of an item of value or advantage, from a Customer or Public Official, in connection with performance of duties.
- **Trading in Influence:**
  - **passive trading in influence** – corruptly offering or promising mediation in arranging a matter to another person in relation to the office or position in BOSMAL, or arousing or strengthening their belief about the existence of such influence.

- **active trading in influence** –offering or promising an item of value or advantage in exchange for mediation in arranging a matter in a state or local government institution, international or national organisation, or in a foreign organisational unit having public funds, by corruptly exerting improper influence over a decision, action or omission by a public official in connection with performance of duties.
- **Legalisation of revenues derived from corrupt practices** - conscientious use of illicit funds

We would like to ensure that a person who reports alleged abuse or refuses to engage in corruption or bribery will not face adverse consequences of his or her decision.

### § 1

1. This Policy applies to all employees, co-workers and managerial staff.
2. By applying the criteria of fair and impartial behaviour and treating all cooperating parties fairly, BOSMAL complies with and respects the principles of anti-corruption activities.

### § 2

Whenever reference is made in this Anti-Corruption Policy to:

1. **Corruption** - it shall be understood as offering, promising, giving, accepting, directly or indirectly, an undue advantage of any value, irrespective of place, as a reward or incentive for an individual to act or not to act in connection with that person's duties,
2. **Customer** – it means a natural person and an entity, regardless of its legal status, bound by an offer with BOSMAL or potentially interested in economic cooperation, whatever the form, with BOSMAL.
3. **Employer** – it shall mean BOSMAL.
4. **Employee** – it shall mean an employee of BOSMAL.
5. **Policy** – it shall mean the Anti-Bribery and Anti-Corruption Policy.

### § 3

The Anti-Corruption Policy applies to all employees, business partners, service providers and suppliers with whom the company works, regardless of their location.

The principles of anti-corruption operations are upheld by means of:

1. not offering or giving any financial or material advantage that would not otherwise be permitted in the course of normal, day-to-day operations / except in the case referred to in par. 4 (c),
2. not soliciting opportunities to offer any financial or material advantage or other unconventional behaviour that encourage potential customers,
3. not accepting any kind of financial, material or other intangible incentive that would not be allowed in the ordinary course of business,

4. not accepting any kind of financial, material or other intangible reward that would not otherwise be permitted in the course of normal, day-to-day operations,
5. refusing to accept any financial, material or other non-material reward in a way that leaves no illusions and does not lead to false expectations,
6. promoting fair and transparent conduct in all fields of business.

#### § 4

1. In view of the above, make sure that your action complies with the rules implemented by our organisation before accepting a gift or offering it to another person.
2. What is acceptable:
  - a. accepting or offering modest gifts with a value not exceeding PLN 200 as a rule, all gifts with a value exceeding the approximate value of PLN 200 shall be rendered to the BOSMAL's depository and their destination shall be determined by the Management Board of BOSMAL,
  - b. cash or money equivalents cannot be used in gifts (e.g., gift cards, vouchers, etc.),
  - c. accepting and offering small Christmas gifts that are part of the culture and customs of Poland.
3. All interactions with BOSMAL's partners and customers may only take place in the sense of business relationships. Communication can take place via e-mail and facsimile, company telephone numbers and direct meetings with the superior's knowledge and approval. In e-mail contacts, we use only business e-mails. Any conflict of interest that is likely to affect fairness and transparency must also be reported to the supervisor.
4. We expect third parties to apply the principles of our Policy with due diligence.

#### § 5

1. Preventing, detecting and reporting bribery as well as other forms of corruption is the responsibility of the Employer and the employee as well as of those authorities supervising the Employer.
2. All employees of the Employer shall avoid any actions that might violate the principle of fairness and transparency. If an employee who became aware of the suspected infringement or an infringement which is likely to occur in the future, should report it as soon as possible to his/her supervisor or directly to the Legal Compliance and Standard Management Team.
3. If you have been offered or given an advantage or a luxury gift from a business partner, report this immediately to your line manager or the Legal Compliance & Standard Management Team
4. Reports are treated confidentially and examined with due diligence. Suspected violations of the Policy or other legal regulations may be reported through the same channel used to report about any kind of unethical practices:  
[etyka@bosmal.com.pl](mailto:etyka@bosmal.com.pl) as well as directly to the Legal Compliance & Standard Management Team.
5. Via the Legal Compliance and Standard Management Team, the Management Board of the company routinely monitors and reviews compliance with this policy and procedures relevant to employer risk management. The findings obtained are recorded (documented)

and retained for risk analysis purposes by the Legal Compliance and Standard Management Team.

6. Any violation of this Policy shall result in disciplinary action, financial penalty, up to and including dismissal of the Employee who committed the breach and notification of law enforcement authorities.
7. Anyone who requests or obtains advantage, as well as anyone who gives, accepts, offers or grants anything of value, shall be treated equally in the case of corruption.