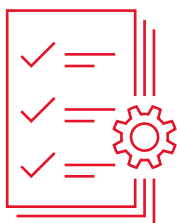


Compliance GK Amica

What is compliance?



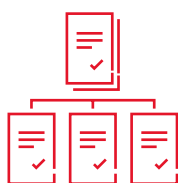
Compliance it means compatibility with the standards that an individual entity is obliged to adhere to

The way of conducting our business is crucial for us. We operate in a responsible, transparent and reliable manner. We abide by applicable laws, internal regulations as well as industry and market-related standards , and this is the reason why we have implemented a Compliance Policy in the Companies of the Amica Capital Group.

In the Amica Capital Group, the Compliance Policy implementation objective is the introduction and constant improvement of the Compliance Management System, which ensures compatibility in all business processes that take place in the Companies.

Compliance the Amica Capital Group

The Compliance Policy forms a set of universal rules of conduct, which are shared by the entire Amica Capital Group, and are aimed at reaching compatibility at all levels of its functioning.



The principles included in the Compliance Policy are detailed in internal documents applied by particular companies of the Amica Capital Group, adapted to local legal regulations and business obligations.

Compliance Management System

In response to the new challenges connected with the development of the Amica Capital Group and its environment, a Compliance Management System – based on the Compliance Policy and detailed internal procedures – has been enforced. **The introduced Compliance Management System’s aim is to regulate the operations of all companies from the Amica Capital Group in such a manner so as to satisfy the requirements for compliance at each level of management and operating activities.**

The task of the Compliance Management System is to identify sources of risk of non-compliance and to eliminate these in order to ensure that the activity of the Amica Capital Group is conducted in a manner compliant with domestic and international legislation, industry regulations, internal regulations and standards, and ethical principles.

Within the framework of the Compliance Management System in the Amica Capital Group, a Compliance Unit, i.e. an organizational unit designated in Amica S.A. (parent company), has been founded. It is responsible for the following:

- ensuring the proper functioning of the Compliance Management System in the Amica Capital Group,
- central detection of non-compliance risks and managing the risks,
- monitoring the compliance of business units’ activities through the evaluation of the effectiveness of such activities and recommending corrective actions.

Additionally, every our company is **obliged to appoint a Compliance Officer** who is responsible for compliance issues in this company, and who directly cooperates with the Compliance Unit.

We make every effort to ensure that the system functions properly, and that is why the individuals discharging their responsibilities in the Compliance Unit are subject to detailed verification in terms of their professional qualifications.

The Compliance Management System is subject to constant development in order to reflect the values, goals and strategy of the Amica Capital Group, and to minimise compliance risk in every business process.

Compliance culture

We are fully aware that the way we run our business also contributes to success and reputation.



Therefore, we have devised transparent rules of conduct and we support the organization in the conscious and lawful running of its business.

Every Employee of the Amica Capital Group is responsible for the compliance of actions taken, and matters of compliance should be taken into account **at every stage of work carried out**, particularly at the stage of planning new processes in order to assess whether they comply with domestic and international legislation, industry regulations, internal regulations and standards, and ethical principles, and establishing what risk a given process involves. **We place special emphasis on compliance in relations with our business partners or end customers.**

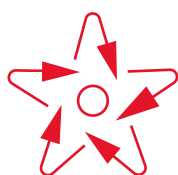
Thus, our each employee is trained on these principles, which in particular applies to the training of new employees. Our target is to develop and promote the compliance culture at all levels of activity in the Amica Capital Group.

Abuse Reporting System

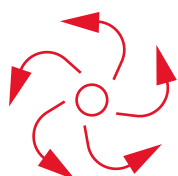
Compliance with applicable laws and internal regulations is of the highest priority in the Amica Capital Group. The identification of infringements or irregularities enables us to avoid financial damage of companies from the Amica Capital Group, or damage incurred among our business partners. It is only possible if the applicable laws, rules and standards are observed.

We endeavour that any misconduct is identified as soon as possible and immediately remedied. To reach this target, we have implemented internal regulations on reporting irregularities and protecting whistleblowers.

We utilize two channels for reporting irregularities:



a) internal – intended in particular for our employees; by reporting to entities designated in the Amica Capital Group, including the Ethics Committee, Compliance Officer or Data Protection Supervisor.



b) external – enables anonymous reporting of irregularities via an external internet platform. Reporting irregularities in this way can be conducted using the form available on the website:

report.whistleb.com/pl/amica

We attach special attention to the protection of the data of persons, who report irregularities both anonymously as well as those who transfer us with their data. **We have put into effect procedures to protect the whistleblowers; in particular regarding the prohibition of taking any action that could cause unjustified harm to these people through retaliatory measures.**