

CUSTOMER VERIFICATION POLICY



AMICA GROUP

§ 1

[Definitions]

Whenever this policy refers to:

1. **ASA/Amica** – shall mean the parent company i.e. Amica S.A. with its registered office in Wronki (Poland).
2. **Declaration of Compliance** – shall mean a document confirming that the Customer complies with the Code of Business Conduct.
3. **Amica Group** – shall mean the parent company i.e. Amica S.A. with its registered office in Wronki and its subsidiaries, covered by and listed in the consolidated financial statements.
4. **Code of Business Conduct** – shall mean a document specifying the standards of conduct to be observed by Amica's business partners in matters related to compliance with laws and regulations regarding, inter alia, corruption and management corruption, social and working conditions, human rights and environmental issues.
5. **Customer** – shall mean a natural or legal person or an unincorporated organization purchasing goods, products and services from Amica Group Companies.
6. **Management Bodies** – shall mean bodies managing the Company pursuant to applicable regulations (Management Board, General Manager).
7. **Policy** – shall mean this Customer Policy document.
8. **Employee** – shall mean any natural person performing work at Amica Group, regardless of the type of employment contract concluded and the position held.
9. **Company** – shall mean a company of Amica Group.

§ 2

[Objective and applicability]

1. The Policy objective is that Amica Group Companies establish cooperation with Customers who have been subjected to detailed verification.
2. The Policy is to prevent events that may lead to reputation and financial losses of Amica Group. The events should be understood as deliberate actions on the part of the Customers that violate applicable law, and are – at the same time – independent of Amica Group's Employees, but can be detected thanks to the implementation of appropriate procedures and control mechanisms, and thus allow Amica Group Companies to be protected against legal liability or financial loss.
3. This Policy applies to all Amica Group Companies.
4. All activities resulting from the Policy conform to the principles set out in the Code of Ethics and the Code of Business Conduct as well as other policies and procedures that define in detail the values and rules of conduct adopted by Amica Group.

§ 3

[Implementation]

1. Each Amica Group Company is obliged to exercise due diligence in the verification of Customers and to comply with the provisions of this Policy.
2. Detailed methods of verification are regulated by separate procedures applicable in individual companies.

§ 4

[Liability]

Those obliged to comply with the principles set out in this policy include:

1. Management Bodies of Amica Group Companies, which are obliged to establish and properly implement procedures and instructions in the Companies in the scope covered by the Policy,
2. Employees who, as part of their professional competences and assigned scope of duties, are responsible for establishing cooperation and concluding contracts with the Customers.

§ 5

[Employees]

1. Employees are obliged to read the content of the Policy and act in accordance with the provisions contained therein when performing their duties, which also applies to the established procedures and instructions.
2. Employees, as part of their professional competences and assigned scope of duties, are required to familiarize the Customers with the provisions of the Code of Business Conduct on the terms set out in the Policy.

§ 6

[Verification of Customers]

1. In order to minimize the risk of cooperation with dishonest Customers, Amica Group introduces the list of recommended verification activities.
2. The entire process should be carried out with due diligence, in a manner transparent for the Customer.
3. The aforesaid activities include in particular:
 - a. Checking the Customer's registration data in the available databases, depending on the registered office of Amica Group Company, combined with archiving of registration documents for evidence purposes.
 - b. Checking the taxpayer's active status for the purpose of the tax on goods and services (e.g. VAT) combined with archiving for evidence purposes.
 - c. Application of appropriate security mechanisms to transactions with Customers and compliance with credit limits in accordance with Amica Group's applicable guidelines.

- d. In a situation where there is no framework contract signed with the Customer, it is advisable to archive the preliminary commercial agreements/arrangements underlying the cooperation.
- e. Obtaining a letter of authorization to represent the Customer or a declaration on the capacity in which the person acts in the dealings with the taxpayer, if the nature of the authorization is not evident from the commercial correspondence or publicly available registers.
- f. Checking the Customer's registered office and place of business as well as basic information about the Customer on the Internet.

Additionally, when the above activities are not sufficient to complete the verification process, it is advisable to perform a more detailed analysis by:

- g. Obtaining a certificate of credibility of the Customer from the competent tax authority.
- h. Using the business intelligence services.

§ 7

[Mode of Operation]

1. In the case of Customers with whom Amica Group Company cooperates under a framework contract or agreement, it is recommended to verify their legal and tax status at least once a year. In order to minimize the risk of cooperation with dishonest Customers, the list of recommended Customer verification activities has been introduced. The entire process should be carried out with due diligence, in a manner transparent for the Customer.
2. The aforesaid activities include in particular:
 - a. Annual verification of the company's registration data in the available databases, depending on the registered office of Amica Group Company, combined with archiving of registration documents for evidence purposes.
 - b. Annual verification of the taxpayer's active status for the purpose of the tax on goods and services (e.g. VAT) combined with archiving for evidence purposes.
 - c. According to the guidelines in force at Amica Group, application of appropriate security mechanisms to sales transactions in accordance with the rules adopted in a given company (e.g. trade credit, factoring, letter of credit). In the event of a potential risk, it is necessary to follow the applicable procedures,
 - d. In a situation where there is no framework contract signed with the Customer, it is advisable to archive the annual commercial agreements/arrangements underlying the cooperation.
 - e. Cyclical verification of the Customers' financial position.

§ 8

[Code of Business Conduct]

1. The Employees establishing cooperation with the Customer are obliged to notify the Customer about the provisions of the Code of Business Conduct, and recommend compliance therewith.

2. The Customer may be notified of the Code of Business Conduct in any form, the preferred form being written or electronic (e-mail) form.
3. The Employees are not obliged to collect declarations of compliance with the provisions of the Code of Business Conduct from Customers unless ASA's Management Board decides to oblige Customers to apply the Code of Business Conduct. In such a case, the Employees shall oblige the Customers to submit the Declaration of Compliance in writing or in electronic form, using the template attached as Annex 1 to the Policy.
4. In the event that the Customer refuses to apply the Code of Business Conduct, i.e. refuses to sign the Declaration of Conformity, Amica Group may refuse to cooperate with this entity, whereas it is necessary to first consider the interest of Amica Group in this regard.

§ 9

[Verification of Compliance with the Code of Business Conduct]

1. In the event that the Customer has submitted a Declaration of Compliance with the Code of Business Conduct, Amica Group verifies how the Customer complies with the Code of Business Conduct through relevant audits in the form of inspection visits or documentation audits, including online meetings or electronic correspondence exchange.
2. The basis for the audit is the Customer's Declaration of Compliance, in which the Customer has undertaken to apply the Code of Business Conduct.
3. The scope of the audit may cover issues specified in the Code of Business Conduct and include checking whether the submitted Declaration of Compliance corresponds to the actual application of the Code of Business Conduct by the Customer.
4. An audit shall be carried out by authorized employees of Amica Group, while respecting the security of the Customer's confidential information and the law on personal data.
5. The Customer shall be each time notified of the audit results and the recommendations laid down in the audit report.
6. Should the audit prove that the Customer grossly violates the provisions of the Code of Business Conduct, Amica Group may terminate its cooperation with this Customer or make further cooperation dependent on the Customer's implementation of Amica Group's recommendations.

§ 10

[Final Provisions]

1. Detailed methods of dealing in relations with Customers are defined in separate procedures in force at Amica Group.
2. The Customer must be notified of any material changes to the Code of Business Conduct.



Annex to the Customer Verification Policy – Declaration of Compliance

DECLARATION OF COMPLIANCE
with the Code of Business Conduct of Amica Group

We, the undersigned, duly authorized to represent the Customer of Amica Group, hereby confirm that:

1. We have received and acknowledged the Code of Business Conduct in force at Amica Group and the Customer Verification Policy of Amica Group, and we undertake, in addition to our usual obligations specified in the agreements for cooperation with Amica Group, to fully comply with the principles and requirements set out therein.
2. We will effectively familiarize our employees, associates and subcontractors with the Code of Business Conduct and oblige them to comply with its provisions.
3. In order to verify compliance with the provisions of the Code of Business Conduct, we hereby agree to be audited by Amica Group’s authorized representatives.

Company’s name:	
Company's address:	
Name, surname and position of the authorized signatory of the Declaration of Compliance:	
Name, surname and position of the authorized signatory of the Declaration of Compliance:	

Legible signatures of the authorized representatives
