

**POLICY FOR COUNTERING
ABUSES AND IRRGULARITIES**



AMICA GROUP

[Definitions]

§ 1

Wherever the Policy mentions the following:

1. **Supplier** – this should be understood as a natural or legal personal or organisational unit without legal personality which supplies products, goods or services to companies of the Amica Group. The above does not apply when the parties to contracts are solely companies of the Amica Group.
2. **Amica Group** – this should be understood as the parent company, i.e. Amica S.A. with its registered office in Wronki, along with its subsidiaries covered by a consolidated financial statement, mentioned in the consolidated financial report.
3. **Management Staff** – this should be understood as persons managing a given organisational unit and holding managerial positions in companies of the Amica Group.
4. **Conflict of interests** – this should be understood as a situation which has a detrimental effect on the impartial and unbiased execution of professional duties by Employees of the Amica Group. A conflict of interests happens when the private interest of an Employee of the Amica Group clashes or seems to clash with the interest of the Amica Group.
5. **Counterparty** – this should be understood as a natural or legal personal or organisational unit without legal personality which is a party to a contract or agreement concluded with any of the companies of the Amica Group. Customers and Suppliers of the Amica Group are also Counterparties. The above does not apply when the parties to contracts are solely companies of the Amica Group.
6. **Corruption** - this should be understood as the promise, suggestion or provision by any person, whether directly or indirectly, of any undue benefits to a person holding public office, either for that person or for any other person, in exchange for action or inaction in the execution of that office.
7. **Managerial Corruption** - this should be understood as receiving and giving material or personal benefits or promises of these for or by management staff of the Amica Group in exchange for abuse of the authorisations granted, or for failure by the receiving party to fulfil an obligation, which may result in damage being incurred by the Amica Group, in addition such actions may also include unfair competition against Counterparties.
8. **Abuse** - this should be understood as any action or inaction to the detriment of the Amica Group, in particular that involving corruption, managerial corruption, a conflict of interests or collusion to rig a tender. Improper use of the Amica Group's money and assets also constitutes an abuse, as does action inconsistent with the Code of Ethics which results in the person committing that action receiving unauthorised benefits, or in losses being incurred by the Amica Group, as well as actions by external entities which have contributed to material or image-related damage, or which may lead to such damage, and any other action or inaction inconsistent with the generally applicable legislation, including acts forbidden under punishment.

9. **Irregularities** - this should be understood as a violation by Employees of the Amica Group of the applicable rules of behaviour stipulated in internal policies and procedures.
10. **Customer** - this should be understood as a natural or legal personal or organisational unit without legal personality which purchases goods, products or services from companies of the Amica Group. The above does not apply when the parties to contracts are solely companies of the Amica Group.
11. **Policy** – the present document, i.e. the Policy for Countering Abuses and Irregularities in the Amica Group.
12. **Financial Authorisation Policy** - this should be understood as the internal rules for approving transactions carried out as part of business conducted by companies of the Amica Group.
13. **Employee of the Amica Group/Employee** - this should be understood as each natural person carrying out work in the Amica Group, irrespective of the type of contract signed or position held.
14. **IT System** – this should be understood as the system of collaborating devices, programmes, information processing procedures and software tools implemented in order to process data in the Amica Group.
15. **End User Support System or Helpdesk System** - this should be understood as the central communications system in relations between the User and the IT System Manager, used for purposes including servicing maintenance requests and when executing procedures covered by the regulations and procedures in force within this scope. The End User Support System forms part of the IT System.
16. **Collusion to rig a tender** – this should be understood as an agreement between entrepreneurs joining a tender for the supply of goods or services for companies of the Amica Group by those entrepreneurs and the company organising the tender, to set the conditions of the bids submitted, in particular the scope of work or the price. The parties to collusion to rig a tender may be Counterparties participating in the procedure to grant an order, or Counterparties and a company of the Amica Group.

[Aim and Material Scope]

§ 2

The policy for countering abuses and irregularities is intended to prevent incidents which may lead to financial or image-related damage to the Amica Group. Incidents should be understood as both deliberate actions by Employees of the Amica Group and external actions and factors independent of Employees of the Amica Group which, thanks to implementation of the appropriate control mechanisms and procedures can be minimised or blocked completely.

§ 3

All actions within the scope of the policy for countering abuses and irregularities comply with the principles stipulated in the Code of Ethics and in other policies and procedures which define in detail the

values and principles of behaviour as adopted by the Amica Group, and aimed at preventing the occurrence of abuses and irregularities.

§ 4

The catalogue of abuses and irregularities countered by the present Policy covers in particular:

1. Corruption
2. Managerial corruption
3. Collusion to rig tenders, such as the most beneficial offers always being submitted by the same companies
4. Unlawful disclosure and use of confidential information
5. Money laundering
6. Misappropriation of monetary and non-monetary assets of companies of the Amica Group
7. Deliberate provision of incorrect data in financial statements
8. Embezzlement
9. Fraud
10. Irregularities in management and accounting of financial transactions
11. Theft
12. Conclusion of any transactions with unverified entities
13. Exploiting the name, image and reputation of the Amica Group for purposes not connected with the business of any of the companies of the Amica Group in order to obtain personal benefits by Employees of the Amica Group or third parties.
14. Ignoring the obligation to report a situation which may constitute a threat to the informational security of the Amica Group - in particular suspicious messages, telephone calls or irregular activity of the system.

The above catalogue is open in nature.

[Implementation]

§ 5

1. The present Policy applies in all companies of the Amica Group.
2. The Management Body of a Company of the Amica Group is responsible for implementing the Policy at the Company.

[Liability]

§ 6

1. By a decision of the Management Board of Amica S.A., a team has been appointed which is responsible for countering abuses and irregularities in the Amica Group.
2. The team's tasks also include periodic monitoring of the business environment with regard to the occurrence of potential new incidents which may constitute a threat and at the same time result in abuses and irregularities.
3. The composition of the team appointed:
 - a. Director for Governance, Risk and Compliance at Amica S.A. – chair of the team
 - b. Director for Security at Amica S.A. – team member
 - c. IT Security Manager at InTeco Business Solution Sp. z o.o. – team member
 - d. Non-Production Purchases Manager at Amica S.A. – team member
 - e. Sales Support Manager at Amica Handel i Marketing Sp. z o.o. – team member

§ 7

The principles stipulated in the present Policy are binding for:

1. Members of the bodies of Amica Group companies.
2. Employees of the Amica Group.

[Duties]

§ 8

1. Employees of the Amica Group are obliged to familiarise themselves with the contents of the present Policy and to act in accordance with the provisions contained herein when executing their duties.
2. Employees of the Amica Group are obliged to immediately report the occurrence of any abuse or irregularity in accordance with the internally applied principles and competencies for considering a given type of report, which are defined in separate procedures.

§ 9

1. It is forbidden to undertake any action which constitutes an abuse or irregularity.
2. The Amica Group promotes the highest ethical standards in its activities.
3. The Amica Group is guided by the principles of honesty, takes care to ensure the full transparency of actions taken and properly documents actions carried out in connection with business conducted.
4. In the Amica Group, all possible organisational, staffing and technical measures are taken in order to prevent the creation of an environment conducive to cases of abuse and irregularities.
5. Internal checks, internal audits and external audits are conducted in order to identify threats, abuses and irregularities.
6. In the event that it is deemed necessary to introduce new actions due to changing regulations or for business requirements, the necessary initiatives are taken aimed at adapting internal rules

and procedures, which is consistent with the compliance policy adopted and in force at the Amica Group.

§ 10

1. The Amica Group does not accept any form of corruption.
2. Employees may not accept or give gifts or gratuities which could be intended to exert unlawful influence on the decisions of the person receiving them.
3. Employees make all professional decisions based on the good of the Amica Group.
4. Employees are obliged to exercise restraint in forming personal relations with Counterparties.
5. The process of verifying Customers is conducted with due diligence, in a transparent manner by carrying out the recommended verification actions intended to assess the credibility of the Customer.
6. The selection of a Supplier and offers submitted by Suppliers must proceed transparently, honestly and equally for all qualified Suppliers.
7. An Employee who is the owner of the area within which a purchase is made is obliged on each occasion to adhere to the principles and behaviour according to the accepted procedures for verifying a Supplier in terms of financial security.
8. An Employee who is the owner of the area within which a purchase is made is obliged on each occasion to adhere to the principles and behaviour according to the procedures for verifying Suppliers and establishing criteria for comparing and assessing offers, in order to prevent potential participation in tender rigging. The Ordering Party is also obliged to apply due diligence when choosing a supplier and the subject of an order, taking into account principally his credibility and the interests of the Amica Group.
9. Business travel may only be carried out for business purposes, at the instruction of a superior, and Employees are obliged to present for settlement only those expenses actually incurred in connection with the business travel.
10. Employees are obliged to treat all resources of the Amica Group with care, using them only for professional purposes and not violating the interests and security of the Amica Group.
11. There are rules in force at the Amica Group for approving financial transactions carried out as part of the business, based on principles including the four eyes principle, and defining the scope of competencies for a particular type and value of case, defined as the Financial Authorisation Policy.
12. Principles have been applied within the Amica Group concerning the use of financial security measures, as well as principles for exchanging and protecting information provided for the requirements of fulfilling obligations with regard to preventing money laundering and the financing of terrorism.
13. Employees are obliged to maintain the confidentiality of information which constitutes a company secret, and not to disclose it to third parties, in particular with regard to technical, technological, organisational, financial, legal or other information which may be of economic value.

14. Employees are obliged to verify whether the materials (such as fonts, images, music or video) and software they use have licences permitting their use for commercial purposes, if they have not been provided to the Employee by the Amica Group. Such verification must take place before the aforementioned materials or software are used for work purposes.
15. Employees are obliged to report in the Helpdesk System any events connected with IT systems or telephones which may constitute part of an attack by cybercriminals against the Amica Group. Every event which arouses an Employee's suspicion should be reported, particularly if it is connected with pressure of time or extortion. Before a report to the Helpdesk System is verified, Employees of the Amica Group cannot take any action in connection with the suspicious event.
16. Employees are obliged to report in the Helpdesk System the possession of excess authorisations in IT Systems, and authorisations and access to IT Systems should be removed from Employees who are finishing work in the Amica Group at the request of their direct superior, who is obliged to indicate the final date of the Employee's work.
17. It is forbidden for an Employee to attempt to bypass the safeguards of the IT System and to activate or install software which has not been approved in accordance with the Network User and IT Systems Regulations and the IT Policies.
18. Employees are forbidden from providing confidential information and information with significant economic value in an unencrypted form over the Internet - in particular by means of data sharing services (such as WeTransfer), excluding the IT Systems of the Amica Group.

§ 11

1. In order to minimise the occurrence of abuses and irregularities, training is carried out to increase the knowledge and awareness of Employees of the Amica Group.
2. The Amica Group is developing a culture of signalling abuses and irregularities thanks to the implementation of an appropriate system for reporting abuses and irregularities, ensuring confidentiality and full anonymity as well as protection against reprisals.
3. Every report is subjected to verification and analysis, on condition that the data contained in the report allow an explanatory procedure to be conducted.
4. In the event that the matter covered by a report is of a nature which indicates a breach of the applicable law, it is reported to the relevant authorities, and Employees of the Amica Group are obliged to collaborate with the appropriate authorities in order to clarify the matter.

[Final provisions]

§ 12

The Policy comes into effect on the day it is published.