

POLICY

ANTI-CORRUPTION

SIRO-Bielsko Sp. z o.o.

DOCUMENT APPROVING AUTHOR: PRESIDENT OF THE MANAGEMENT BOARD

PARTICIPANTS IN THE WRITING DOCUMENT:

PRESIDENT OF THE MANAGEMENT BOARD, JOINT PARTNERSHIP, COMMISSION FOR ETHICS
and EXTERNAL ADVISERS OF THE COMPANY

DOCUMENT RECIPIENTS:

ALL EMPLOYEES AND COLLABORATORIES SIRO-BIELSKO SP. Z o.o.

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TABLE OF CONTENTS

1. INTRODUCTION 3
2. WHAT IS CORRUPTION 4
 - FORMS OF CORRUPTION 4
 - EXAMPLES OF CORRUPTION 5
3. WHAT IS PROHIBITED? 6
4. AREAS OF CORRUPTION RISK 7
 - a. Conflicts of interest 7
 - b. Suppliers 7
 - c. Intermediaries 7
 - d. Hospitality and gifts 8
 - e. Facilitating payments 10
 - f. Payments for political purposes 10
 - g. Payments for charity, investments in local communities and sponsorship 10
 - h. Employment of relatives of public officials and foreign public officials 10
5. FURTHER TIPS 11
6. HOW TO REPORT A CORRUPTION EVENT WHERE YOU HAVE Suspected OF THIS CAN BE A CORRUPTIVE EVENT 11

1. INTRODUCTION.

SIRO-Bielsko Sp. z o.o. runs a business with a high level of integrity and believes in free and fair markets. We do not tolerate corruption in any form in the public or private sector in which we operate.

3

Corruption undermines the principles of honest business operations, distorts competitiveness, damages brands and exposes companies and individuals to risk.

Our code of conduct sets out the basic principles for preventing corruption. The purpose of this document is to more fully describe forms of corruption and to provide all employees with further guidance on proper and ethical conduct in implementing anti-corruption policies.

This document applies to all employees and associates of SIRO-Bielsko Sp. z o.o. with no exception.

The person responsible for implementing the principles described in the document and ensuring that these principles are observed is the President of the Management Board of SIRO-Bielsko.

Violation of these principles may be reported to the President of the Management Board or the ethics committee. Everyone who reports a violation will, to the extent permitted by law, be able to remain anonymous. No employee will bear any negative consequences for refusing to pay or accept bribes or engaging in corrupt practices, even if such refusal may result in loss of market or revenue.

Employees who violate the anti-corruption rules contained in this document may be subject to disciplinary action, up to and including dismissal, depending on the facts and circumstances.

2. WHAT IS CORRUPTION?

For the purposes of our internal policy, we define corruption as a promise, proposal or handing to anyone, directly or indirectly, an undue advantage for that person or other person or entity, in order to act or refrain from acting while performing his official duties, as well as demanding or accepting by that person, directly or indirectly, of such benefit.

4

Corruption involves many different behaviors, including bribery, fraud, embezzlement, conflicts of interest, and misuse of company assets. Corruption is often hidden, unobtrusive and can affect any group of people. What may appear to be natural business transactions and positive initiatives may in some circumstances be described as corruption not only on the basis of this policy, but also on national and international anti-corruption laws.

Employees should exercise caution and ensure that dishonest personal or business relationships do not underlie any activities related to business processes at SIRO-Bielsko. Employees must always remember that corruption can take many forms, it can include any type of remuneration, and may influence current or future decisions.

FORMS OF CORRUPTION:

BRIBERY (ACTIVE AND PASSIVE BRIBERY)

Bribery is the most common form of corruption. In criminal law there are two varieties: passive (i.e. those who receive) and active (i.e. those who propose). Anything can be a bribe. From cash to works of art.

TRADE IN EFFECTS

Impact trading occurs when a person who has actual or apparent influence on a public official's decision making exchanges that influence for an unjustified advantage. Impact trading can take the same forms as bribery. Sometimes, the distinction between trading influence and legitimate lobbying can be difficult. That is why lobbying is perceived in some countries as trade in influence, in other words, as a crime. Before you lobby for business interests, make sure in your company that the way you want to lobby in a country is legal.

EXAMPLES OF CORRUPTION:

PURCHASE OF MATERIALS

Corruption will be choosing a supplier who you know that in return for placing an order may reward you. You don't have to be sure that you will be rewarded. The very fact that you choose a supplier in this concept means that your action should be called corruption.

5

LOCAL COMMUNITY SUPPORT

Corruption will be the support of the local community with the thought that local decision-makers will support the company in making their decisions in exchange for this support. The support of the local community should always be completely selfless.

SPONSORSHIP

It will be corruption to sponsor an organization or person in a situation where, apart from strictly business benefits for both parties, the sponsor will expect any other benefits.

DONATIONS ON CHARITATIVE OR POLITICAL OBJECTIVES

Corruption will be the support of a charity or political organization with the thought that in return you will receive some benefit. You don't have to be sure that you will be rewarded. The very fact that you make a donation in this intention means that your action should be called corruption.

EMPLOYMENT

Corruption will be offering or accepting a person at SIRO-Bielsko (or an external business partner) with the thought that after starting work in a given position he will act in accordance with your needs and not in accordance with his duties.

CASH, CHECKS and other cash equivalents.

Corruption will be the acceptance or offer of any cash, check or other cash substitute for any action in favor or disadvantage of anyone.

GIFTS and GUEST

Corruption will be accepting or offering any kind of gift or hospitality that goes beyond the ordinary business arrangement or is above 500 zł.

LOANS

Corruption will be to grant or ask for a loan in exchange for specific business or private expectations

DISCOUNTS

Corruption will be offering or accepting discounts on private purchases in exchange for placing orders as part of official duties.

6

PROFESSIONAL BENEFITS

Corruption will be offering or accepting unfavorable business decisions in exchange for future professional benefits, e.g. high position in the future in one of the companies belonging to the supplier.

3. WHAT IS PROHIBITED?

SIRO-Bielsko prohibits bribery and corruption in all forms and in all business contacts and implementations. The use of the assets of SIRO-Bielsko or other assets for any illegal or improper purposes is strictly prohibited. These prohibitions apply to both giving and receiving any value, directly or indirectly (i.e. through an intermediary). At all times, to avoid even suggestions of unlawful or unethical behavior, employees of SIRO-Bielsko must be reasonable and make every effort to avoid situations that may lead to suspected or suspected corruption. Even the appearance that something may be associated with corruption or bribery can have a negative impact on the SIRO-Bielsko brand and undermine the confidence of the market and local community in the company.

WARNING!

No employee will bear any negative consequences for refusing to pay or accept bribes or engaging in corrupt practices, even if such refusal may result in loss of market or revenues.

4. AREAS OF CORRUPTION RISK.

The situations presented below show where corruption is most common.

a) Conflicts of interest.

7

Conflicts of interest are situations in which a person has conflicting interests, financial or other, and serving one interest may involve acting against the other. It is important that all employees avoid and withdraw from any situation in which relationships with another organization or person may affect their ability to make sound business decisions. Even the impression that the ability to make sound business decisions is at risk may harm the reputation of the employee and SIRO-Bielsko. Everyone representing SIRO-Bielsko must avoid conflicts between personal interests and business operations and disclose such situations. Any potential conflicts of interest should be reported to your superiors or directly to the President of the Management Board.

b) Provider.

Suppliers are subcontractors, material suppliers, service providers, consultants, brokers and agents with whom SIRO-Bielsko has a contractual relationship to provide goods and services. These third parties must be subject to appropriate risk-based verification, due diligence and monitoring.

Suppliers who want to cooperate with SIRO-Bielsko at a level greater than PLN 50,000 per year must sign the Supplier Code of Conduct.

Each company whose turnover with SIRO-Bielsko exceeds PLN 1,000,000 should be subject at least once every 3 years to an internal ethical audit procedure based on the Supplier Code of Conduct.

c) Agents.

Intermediaries / Agents or other external entities acting on behalf of SIRO-Bielsko, especially those cooperating with public officials or foreign public officials, require increased verification with due diligence. Each commission or fee paid to the intermediary must be rationally and appropriately linked to the scope and nature of the services actually rendered by the intermediary. Business arrangements must be transparent and the nature of the service very specific.

Intermediaries must sign a Supplier Code of Conduct regardless of annual turnover.

d) Hospitality and gifts.

To promote their business, companies show their clients and partners hospitality in the form of meals, travels or events.

8

A gift is something given voluntarily without expecting anything in return.

Misrepresenting your hospitality and giving gifts can create conflicts of interest or appearances of bribery.

OUR RULES:

We do not request, accept or offer any forms of hospitality or gifts that may influence or appear to influence our or our partners' business decisions.

- Forms of hospitality and gifts that are accepted and given must be appropriate and:
 - They must comply with local laws and customs.
 - They may not create obligations of the recipient towards the donor or appearances of such an obligation.
 - They must serve an actual business purpose.
 - They must not be immoral or violate the dignity of others.
 - Must be acceptable under the recipient's employer policy.
- Showing hospitality should be within moderate value.
- Gifts should have a symbolic value; for example pens, notebooks and other small value business gadgets. Remember that promotional items are gifts.
- You make the best possible assessment when deciding whether to offer or accept a form of hospitality or gift. If you feel something is wrong, you are probably right.
- You never offer or accept any gifts in the form of money or cash equivalent.
- You avoid offering or receiving any form of hospitality or gifts that may affect the objectivity of the host or yours when making business decisions.

- Also remember that overly frequent or routine gifts or hospitality may not be appropriate.
- You report any forms of hospitality given or received, or gifts that you value over 500 PLN.
- You have a responsibility to know and follow your clients' hospitality and gifts policy.
- You never ask customers, suppliers or other external business partners for any form of hospitality or gift.

OUR RULES FOR PARTICIPATION IN CONFERENCES AND EVENTS ORGANIZED BY EXTERNAL BUSINESS PARTNERS:

- Participation in a provider-sponsored conference should have clear business goals.
- Consider whether the issues discussed at the conference are useful for the operations of SIRO-Bielsko.
- The President of the Board must be notified and approve your participation in the event.
- Travel and accommodation costs must be paid by SIRO-Bielsko.
- Participation cannot cause a supplier to expect to be favored in business matters.
- Additional activities during the conference must be appropriate, within reason. If during the conference tickets for sports or artistic events are handed out at another time, it is an obvious conflict of interest.

e) Facilitating payments.

Payments facilitating these payments, often small, to government officials, aimed at accelerating or inducing lawful, non-discretionary bureaucratic processes to which the payer is legally entitled. **SIRO-Bielsko does not allow facilitating payments, directly or indirectly.**

10

f) Payments for political purposes.

Bribes can be masked as political contributions. These payments are prohibited in SIRO-Bielsko.

g) Payments for charity, investments in local communities and sponsorship.

Bribes can be masked as charitable donations, investments in local projects or sponsorship. To protect against this risk, charitable donations and sponsorship must be approved in writing by the President of the Board each time.

h) Employment of relatives of government officials and employees of suppliers or customers.

Relatives and close acquaintances of government officials and employees of suppliers or customers may never be treated as preferential or otherwise treated for that reason. If such a person is employed, the President of the Management Board and the Ethics Committee must be informed about it. The President of the Management Board and the ethics committee will conduct an analysis of whether there is any conflict of interest and whether a person should be prevented from participating in a specific job related to such a relationship or connection .

5. FURTHER TIPS.

If you have any questions related to the company's anti-corruption policy, please contact the office of the President of the Management Board.

11

6. HOW TO REPORT A CORRUPTION EVENT WHERE YOU HAVE SUSPECTED OF THIS CAN BE A CORRUPTIVE EVENT?

Corruption events or suspected of being corruption may be reported immediately to your supervisor or your supervisor. If you suspect that these people may be involved in corruption, report the matter to the President of the Management Board or to the Ethics Committee consisting of several employees of SIRO-Bielsko.

If you feel uncomfortable reporting such an event by name, you can report this information anonymously:

by phone (+48 33 818 34 82)

or via e-mail (komisjaetyki@siro.com.pl).

Reports can be confidential and anonymous. You don't have to introduce yourself!

We will promptly investigate any suspicions and problems reported and take appropriate action based on the results of our investigation.

The Ethics Committee, according to the ordinance of the President of the Management Board of December 2, 2019, consists of three people, each of whom is employed in a different department. The current list of people on the ethics committee is: Anna Adamowicz, Izabela Gutowska and Beata Kossowska.