

Nowy Styl

***Anti-
corruption
policy***



Nowy Styl Anti-corruption policy
was adopted by the Board of Nowy Styl sp. z o.o. on 2 February 2022

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Nowy Styl is committed to the principle of zero tolerance against all forms of corruption. We are a responsible and trustworthy company. Any corrupt activity is inconsistent with our values.

The zero tolerance principle for corruption applies to all employees, associates and business partners acting on our behalf. The Management of Nowy Styl is obliged to have a key role in creating an organisational culture in which corruption has no chance of taking place and any form of corruption is unacceptable.

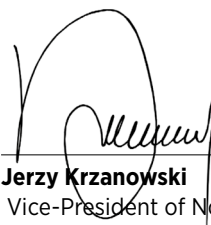
This *Anti-corruption policy* (hereinafter referred to also as the Policy) should be widely communicated and promoted among our employees/associates through training initiatives that enable proper understanding and use of its principles in our day-to-day work.

This Policy applies to Nowy Styl sp. z o.o. with registered office in Krosno (hereinafter referred to as Nowy Styl).

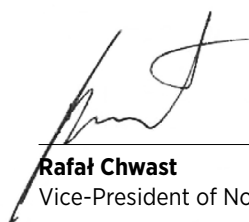
Kraków, 2.02.2022



Adam Krzanowski
President of Nowy Styl



Jerzy Krzanowski
Vice-President of Nowy Styl



Rafał Chwast
Vice-President of Nowy Styl



Roman Przybyński
Board Member of Nowy Styl

Purpose

The purpose of the Policy is to establish for us, our employees/ associates and business partners, a zero-tolerance obligation for all corrupt activities, as well as to take measures to ensure compliance with applicable laws. This Policy provides guidance to identify and avoid the risk of abuse.

The Policy is addressed to employees, associates, contractors, all business partners and the executives of Nowy Styl.

The *Anti-corruption policy* of Nowy Styl should be understood and treated consistently with the company's *Code of Ethics* and *Employee manual*.

As part of our communication efforts to prevent all forms of corruption, the *Anti-corruption policy* should also reach all stakeholders of Nowy Styl (including customers and suppliers).

It is important that the *Anti-corruption policy* is not the only source of information or interpretation of any business situation. It is therefore the responsibility of each of us to familiarise with the rules on corruption.

The Policy sets out the minimum standards for proceedings without replacing any national or international laws governing the abovementioned issues, including any liability of a civil, criminal, tax and criminal or administrative nature.

If you are not sure how to behave in the event of a corruption risk, please contact your supervisor and the **Compliance Officer**.

What is bribery and corruption?

Bribery is:

- An offer, a promise or handing in (active form);
- A solicitation, a request or a consent to receive a bribe (passive form) in any form and of any value that may be considered a case of incitement to bribery (active or passive), which is contrary to the accepted rules of conduct, illegal, corrupt, unethical or violates the law.

Corruption is an abuse of a job position, power or influence in order to obtain unofficial and unjustified personal gain or for others. It is also offering, giving or accepting any goods in any form, regardless of their value.

Not only a material advantage but also an intangible advantage is considered to be a bribe. It includes a donation, an employment contract, classified information, preferential treatment, gifts, awards and invitations.

In the light of the *Anti-corruption policy*, corruption is bribery, extortion, solicitation, trading in influence and the legalisation of the proceeds of these practices.

Anti-corruption policy Principles

Corporate Governance Transparency

We act fairly and honestly. We strive to act in a modern, dynamic and friendly way, and we also care about the openness and transparency of our actions. We want our customers to see us as a responsible company that can be trusted.

We comply with the applicable law.

Nowy Styl pursues a zero-tolerance policy against corruption in all aspects of its activities.

We are committed to enforcing the *Anti-corruption policy* and undertake to train people who work at Nowy Styl on the compliance with our rules.

According to the adopted Policy, the following activities, whether indirect or direct, are always prohibited in all forms, both at Nowy Styl and in relations with its stakeholders:

- Bribery;
- Forcing or inciting;
- Trade in influence; and
- Legalizing the proceeds of corruption activities

We would like to ensure that a person who reports a suspected abuse or refuses to participate in bribery or corruption will not face any negative consequences of his or her decision.

Compliance with applicable laws and international conventions

In most countries, an act of bribery or attempted bribery is treated as an offence punishable by significant criminal penalties in the form of financial penalties or imprisonment applied to both companies and employees. Some of these provisions are international acts of universal scope aimed at combating bribery and corruption (e.g. *OECD Convention against Bribery of Foreign Public Officials in International Trade Transactions*, *United Nations Convention against Corruption*).

As a global company with its subsidiaries in EMEA countries, we are subject to the local laws of the countries in which we operate and our subsidiaries have their registered offices.

Individual countries are working to strengthen their anti-corruption legislation. In view of the above, Nowy Styl takes appropriate actions against their employees, associates and stakeholders to inform them of their liability and responsibilities.

Areas of corruption risk (corruption threat)

Legitimate gifts and invitations (meals, events, entertainment) can support the process of concluding, maintaining and developing important business relationships.

The intention of Nowy Styl is that its employees do not feel exposed in such situations to allegations of maintaining business relationships by using conduct inconsistent with applicable standards and regulations. Giving or receiving gifts in a manner deemed inappropriate may expose both our employees and the Company to accusations of corruption law violations.

Therefore, before you accept a gift or before you offer a gift to someone, you should make sure that your action complies with the rules of our Company.

We admit:

- Receiving or offering modest gifts or flowers (e.g. birthday, nameday, promotion or jubilee) whose value, in principle, does not exceed the gross amount of PLN 200. Gifts must not include cash or cash equivalents (e.g. gift cards, vouchers, etc.);
- Receiving or offering small Christmas gifts, which are the elements of the Polish culture and customs.

We find it unacceptable to:

- Hand over, promise to hand over, offer or incite gratification in the form of payment, gift, trip, invitation or other benefit in order to achieve a certain business benefit or to thank for achieving a business benefit;
- Transfer, promise to transfer or offer gratification in the form of payment, gift, trip, invitation (meals, events, entertainment) or any other benefit to a government official or intermediary in order to streamline or speed up routine procedures;
- Promise to pay or accept payment from third parties when you suspect or are sure that they expect certain business benefits in return; or
- Accept a gift, trip, invitation (meals, events, entertainment) or other benefit or a promise to receive it from third parties.

All contacts with contractors, associates and customers of Nowy Styl can only take place as part of business relationships. A contact should take place by e-mail, fax, business telephone and by direct meetings with the knowledge and consent of the superior. We can only use company e-mails in e-mail contacts.

Nowy Styl does not allow the giving or the acceptance of bribes (financial gratification). We expect third parties to apply our Policy with due diligence.

Obligations

Employees/associates

Preventing, detecting and reporting cases of bribery as well as other forms of corruption is our responsibility as well as the responsibility of those who work under our supervision.

All employees/associates of Nowy Styl are obliged to avoid any activities which could lead to a breach of this principle. If you suspect that such a breach has occurred or may occur in the future, you should report this fact to your supervisor and the Compliance Officer as soon as possible.

An example of a case that you should report is when a customer or potential customer offers you something that could give them a business advantage or suggests that giving a gift or monetary benefit is a condition for entering into a transaction.

If you are offered or receive a high-value or luxury gift from a business partner, you should promptly report it to your direct supervisor and the Compliance Officer. The report should contain the date on which the gift was received/handed, a description of the item received/handed, the name of the institution or the name of the recipient, its estimated value and the circumstances of the event.

Contractors, suppliers and cooperating companies:

Pursuant to the *Anti-corruption policy* of Nowy Styl, business partners, suppliers and customers are obliged to act fairly without any intentions or activities related to corruption. In addition, they are obliged to:

- Comply with the principles of this *Anti-corruption policy*;
- Refrain from offering or giving any financial or other advantage;
- Cooperate with Nowy Styl in eliminating corrupt behaviours;
- Ensure that relations with public officials, individuals and other businesses are open and transparent in order to exclude the possibility of corruption allegations and threats; and
- Avoid conflicts of interest which could lead to the risk of corruption.

Reporting abuse

The employees/associates of Nowy Styl may use a dedicated channel and report their concerns or seek advice where there is a suspicion of violation of the *Anti-corruption policy* or other legal provisions without any fear of reprisals, acts of discrimination or disciplinary proceedings. Reports are treated confidentially and examined with due diligence.

Suspected violations of the *Anti-corruption policy* or other legal provisions may be reported by e-mail at: compliance@nowystyl.com.

All reports are transferred to the Compliance Officer; i.e. a person authorised in writing to handle them at Nowy Styl. Depending on the information held by the whistleblower, the report should contain:

- The date and time of the finding of the abuse;
- The date and time of the abuse;
- A description of the circumstances of the abuse, including the details of the person who contributed to the abuse;
- A description of the consequences of the abuse according to the information available.

If there is evidence of the abuse, the whistleblower should submit it together with the report.

Control and supervision of the implementation of *Anti-corruption policy*

It is the responsibility of the **Compliance Officer** appointed by the Company's Management Board to monitor the compliance with the Policy guidelines.

The Compliance Officer's responsibilities include, in particular:

- Ensuring compliance with the Policy at the Company;
- Analysing corruption risks;
- Ensuring compliance of the Policy with applicable laws, good business practices and accepted standards of business ethics;
- Clarifying doubts regarding the interpretation of the provisions of the Policy and their correct application, especially in cases of the violations thereof;
- Submitting ideas and proposals for anti-corruption mechanisms to the Company's Management Board;
- Submitting proposals for changes to the solutions provided for in the Policy to the Company's Management Board;
- Informing the Company's Management Board about the state of compliance with the Policy in the form of recurring reports submitted at least once every 12 months;
- Receiving and handling reports of suspected corrupt conduct;

- Verifying the compliance of reports submitted by employees/associates with facts and guidelines set out in the Policy;
- Initiating and conducting investigations of the matters reported in notifications;
- Taking steps to initiate disciplinary proceedings in the event of a flagrant violation by an employee/associate of the principles of this Policy; and
- Answering questions and requests from employees/associates regarding the Policy.

Record keeping, transparency and control policies

The above mentioned provisions oblige Nowy Styl to demonstrate compliance with the applicable laws and appropriate procedures to ensure the accuracy of the accounting records. Therefore, Nowy Styl is guided by the principle of full transparency in its activities and applies adequate control processes. The Company's Management Board and its designated persons periodically monitor and review the compliance with this risk management policy and procedures at Nowy Styl.

Liability

Each employee/associate of the Company is obliged to read this document and strictly comply with its provisions.

The failure to comply with the rules set out in the *Anti-corruption policy* is a violation of employee obligations and may result in disciplinary and criminal liability according to the applicable laws.

Each case of non-compliance with this Policy should be examined separately.

Final provisions

The Management Board of Nowy Styl sp. z o.o. reviews the effectiveness of anti-corruption activities at least once a year.

This Policy comes into force on 1 March 2022 and is updated on an ongoing basis.

