

Anti-Corruption and Anti-Fraud Policy at ANWIL S.A

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ANWIL S.A., as a reliable business entity and partner that operates in a responsible and transparent manner, gaining a competitive advantage only through the quality, price and innovative nature of its products and services, declares and expects an attitude of zero tolerance towards any symptoms and cases of corruption and abuse, promoting activities based on ethical values and compliance with laws and market standards governing the prevention of corruption and abuse, in all markets where ANWIL S.A. is active.

The "Anti-Corruption and Anti-Fraud Policy at ANWIL S.A." has been established to ensure a fair and transparent model for the conduct of business by ANWIL S.A., guaranteeing trust, security of business transactions, free competition and value for all stakeholders of ANWIL S.A.

The Policy complements the provisions of the "ORLEN Group Code of Ethics," notably in the context of building awareness and defining rules of conduct to reduce the risk of corruption and fraud.

The requirements of this Policy apply to all employees of ANWIL S.A., regardless of the form of cooperation and type of position held.

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Prohibited conduct

- **passive bribery**, which means requesting or accepting a pecuniary or personal benefit or the promise thereof, as well as giving or promising a pecuniary or personal benefit in exchange for the abuse of powers granted or the non-fulfilment of duties, or which constitutes an act of unfair competition or an impermissible preferential act in favour of the purchaser or the receipt of goods, services or benefits, is prohibited,
- **active bribery**, which means giving of a pecuniary or personal benefit or the promise thereof to a person performing a public function, in connection with the performance of that function, is prohibited. It is also forbidden to undertake actions aimed at inducing a person holding a public function to violate the law or to give or promise to give such a person a financial or personal benefit for violating the law,
- **paid patronage in business activities** is prohibited, which means invoking influence and position at ANWIL S.A./ORLEN CG Companies, or inducing another person to believe or convince them of the existence of such influence and to undertake intermediation in the settlement of a matter in return for a financial or personal benefit or its promise,
- **paid patronage in the activity of public administration**, which means granting or promise of a material or personal benefit in exchange for intermediation in the settlement of a matter in a state or local government institution, an international or national organisation or in a foreign organisational unit disposing of public funds, consisting in the unlawful exertion of influence on a decision, action or failure to act by a person performing a public function in connection with the performance of that function, is prohibited,
- it is forbidden to **interfere** with a tender for the purpose of gaining a financial or personal advantage, or to frustrate or obstruct a tender or purchasing procedure, or to enter into an

agreement with another person, acting to the detriment of the owner of the property or the person or institution for whose benefit the tender or purchasing procedure is carried out. It is also forbidden, in connection with a tender or purchasing procedure, to disseminate information or conceal important circumstances which are of significance for the execution of a contract which is the subject of the tender or purchasing procedure or to enter into an agreement with another person, acting to the detriment of the owner of the property or the person or institution for whose benefit the tender or purchasing procedure is carried out,

- **sporting corruption**, which means requesting or accepting a pecuniary or personal benefit or the promise thereof, as well as giving or promising a pecuniary or personal benefit in return for dishonest conduct likely to affect the outcome or conduct of a sporting competition organised by a sports federation or an entity acting under contract with that federation, or an entity acting under its authority, is prohibited,
- it is forbidden to **maintain unreliable financial records**, meaning to cause damage to the property of ANWIL S.A. by not maintaining business records or maintaining them in an unreliable or untrue manner, in particular by destroying, deleting, concealing or falsifying documents relating to the business of ANWIL S.A.,
- it is prohibited to **act to the detriment of ANWIL S.A.'s resources**, which means in particular stealing, appropriating, destroying, damaging or any use of ANWIL S.A.'s resources contrary to legal provisions, internal regulations or the purpose of those resources,
- **cronyism and nepotism**, meaning the abuse of one's position or the mutual support of representatives of one group, e.g. due to kinship, intimacy or membership of the same political, religious, professional, ethnic organisation, etc., in order to achieve material or personal benefits, based on acquaintance and not on the basis of merit as defined by the regulations effective at ANWIL S.A., is prohibited,
- **making contributions to political party funds** is prohibited, meaning that ANWIL S.A. makes contributions to domestic or foreign political parties and movements or their supporters, regardless of their form,
- **pressure or influence** is prohibited, meaning that sponsorship, barter and donation activities by ANWIL S.A. must not take the form of pressure or influence on the beneficiary's decision-making process,
- **other conduct prohibited by generally applicable law** is prohibited, including, but not limited to, fraud, forgery of documents and misrepresentation.

if you have any doubts regarding the prohibited behaviours listed above, please contact the Anti-Corruption Coordinator at ANWIL S.A. immediately: anonim@anwil.pl or antykorupcja@anwil.pl