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Wrocław, 31.01.2025

Woodeco Group Anti-Corruption Policy

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I. Introduction

Ethical and responsible business conduct is the guiding principle underlying all Woodeco Group's ("Woodeco") operations. Woodeco complies with applicable regulations, including laws and ethical standards aimed at preventing all forms of corruption. Responsibility for achieving this goal rests with all Woodeco employees, associates, and representatives.

Woodeco maintains a zero-tolerance policy toward any corruption-related behavior.

This Policy applies to all Woodeco employees, associates, and representatives; every effort is made to inform all persons performing any services on behalf of or for Woodeco of its principles. These persons are obliged to ensure that their actions comply with local, national, and international law, as well as with regulations applicable to their business activities, considering the principles covered by this Anti-Corruption Policy and the anti-corruption regulations contained in the Woodeco Code of Ethics.

Woodeco expects adherence to ethical principles, integrity, and compliance with applicable laws, including, in particular, the prevention of all forms of corruption within its value chain. Our Business Partners must ensure compliance with the Supplier Code of Conduct, including with respect to their own employees, suppliers, and business partners.

II. Purpose of the Anti-Corruption Policy

The purpose of the Anti-Corruption Policy is to establish rules and standards of conduct at Woodeco aimed at preventing and responding to actions that may constitute corruption. For this purpose, Woodeco establishes a set of rules to be followed, defining a list of unacceptable behaviors that may constitute corruption.

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Woodeco's Anti-Corruption Policy specifies how to proceed in the event of a corruption risk or behavior exhibiting signs of corruption.

The Policy is supplemented by Woodeco's other internal regulations (Policy on Giving and Accepting Gifts and Making Donations, Policy on Preventing Conflicts of Interest), which contain detailed rules of conduct for Woodeco employees, associates, and representatives aimed at preventing corruption risks and responding to incidents of corruption.

Woodeco's Anti-Corruption Policy is also directed at all Woodeco stakeholders (i.e., customers, suppliers, subcontractors, and all business partners), setting standards of conduct in business relations with stakeholders.

The principles set forth in this Policy supplement domestic and international anti-corruption laws, and the obligation to comply with these provisions lies with every employee, contractor, and representative of Woodeco.

III. Definitions

Corruption is the act of promising, offering, giving, demanding, or accepting by any person, directly or indirectly, any undue financial, personal, or other benefit, for one's own benefit or that of any other person, or accepting an offer or promise of such benefits in exchange for an act or omission in the performance of public duties or in the course of business activities.

Among the most common corrupt practices, the following stand out in particular:

- bribery—including two forms: passive (solicitation, coercion, consent to receive a benefit, acceptance of a benefit) and active (offer, promise to provide, or provision of a benefit).
- the use of public funds and assets for private purposes or personal gain,
- paid protection/influence peddling – understood as invoking influence within an institution that manages public funds or inducing or reinforcing another person's belief in the existence of such influence, including offering (active paid protection) or seeking (passive paid protection) mediation in the resolution of a matter in exchange for a financial or personal benefit or a promise thereof.
- irregularities in procedures related to the procurement of contracts, the granting of concessions or permits, and decisions by courts and public administrative bodies,
- evasion of obligations arising from generally applicable laws, including, in particular, customs and tax obligations,
- knowing, unlawful use of public funds,
- favoritism, nepotism, cronyism, and other prohibited practices in employee relations.

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IV. Principles of the Anti-Corruption Policy

Transparency of Operations and Zero Tolerance for Corruption

All Woodeco employees, contractors, and representatives shall act in accordance with applicable law and Woodeco's Code of Ethics, applying a zero-tolerance policy toward corruption and bribery in all aspects of their business activities.

It is prohibited for Woodeco employees, associates, and representatives, in both internal and external relations, to engage in any of the following activities, regardless of whether they are undertaken directly or through others:

- bribery,
- coercion or inducement,
- paid protection,
- laundering proceeds from corrupt activities.

Woodeco employees, associates, and representatives may not offer, grant, promise, demand, or accept financial or personal benefits:

- that could be perceived as unlawful, unethical, or inappropriate,
- intended to influence the terms of a transaction,
- provided in cash or its equivalent (e.g., gift cards, vouchers).

Woodeco employees are subject to a "zero-gift" policy. Accepting any gifts, regardless of their nature or value, is prohibited. Woodeco employees are permitted to accept only gifts of symbolic material value and of a marketing nature. Gifts in the form of cash or cash equivalents are strictly prohibited.

All promotions and contests with prizes are conducted in accordance with this Policy and applicable laws.

Woodeco maintains its accounting records and financial policies in a transparent manner and in compliance with applicable laws. The use of (including the distribution) false documents and invoices, as well as the recording of improper, ambiguous, or misleading accounting entries, is prohibited. The use of any accounting procedures, techniques, or solutions intended to make or accept illegal payments is prohibited.

Compliance with Laws and International Conventions

Woodeco complies with both domestic and international anti-corruption regulations in its business operations, including the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the United Nations Convention against Corruption, and the European Council's Criminal Law Convention on Corruption. In countries where local anti-corruption regulations apply, such as the U.S. Foreign Corrupt Practices Act (FCPA) or the UK Bribery Act, Woodeco ensures compliance with and enforcement of such local regulations.

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V. Implementation of the Anti-Corruption Policy at Woodeco

Woodeco conducts activities aimed at raising Awareness of existing corruption risks by providing training for employees, contractors, and representatives.

Woodeco maintains a Whistleblowing System and has regulations in place for reporting violations and protecting whistleblowers. This enables the reporting of any violations, including cases of corruption and bribery. The system is available to employees as well as third parties.

A policy containing guidelines on preventing and managing conflicts of interest that may arise in connection with Woodeco's operations has been implemented.

Woodeco has established, maintains, and applies internal quality management procedures designed to ensure that operations are conducted in accordance with accepted national and international standards.

It is the responsibility of all Woodeco employees, associates, and representatives to avoid situations and actions that could lead to corruption. Non-compliance by employees, associates, and representatives with the provisions of the Anti-Corruption Policy and other related internal regulations of Woodeco will be treated as a breach of employment obligations and may result in both disciplinary liability and criminal liability under generally applicable law.

VI. Reporting Corruption Risks

Suspected violations of the Anti-Corruption Policy or other legal provisions should, as a rule, be reported first through official channels to your immediate supervisor.

In the event of a reasonable suspicion that using traditional communication channels may be inappropriate or ineffective, or would lead to the disclosure of the identity of a whistleblower who wishes to remain anonymous, a report may be submitted via:

- The Whistleblowing System available via the company's website or directly at <https://sygnaapp.pl/system-zgloszen-wewnetrznych/woodeco/>
- Email address (compliance@woodeco.eu), managed by the Legal and Compliance Department
- In-person meetings with the Compliance Manager or members of the Compliance Committee

The scope of whistleblower protection is broader than that provided by law. Whistleblowers are protected not only in the case of reports concerning violations of the law listed in the Whistleblower Protection Act, but also in the case of reports concerning violations of other generally applicable laws, internal regulations, and the principles of social coexistence. Any form of retaliation against whistleblowers is prohibited; the whistleblower's personal data is confidential; it is also possible to make an anonymous report.

All reports received will be treated with the utmost seriousness, reviewed, and thoroughly investigated.

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VII. Assessment of Corruption Risks and Monitoring of Compliance with the Anti-Corruption Policy

The management boards of Woodeco Group companies undertake to regularly assess compliance with the principles set forth in the Anti-Corruption Policy, including conducting ad hoc assessments of each reported incident. Based on the ongoing monitoring of compliance with the Policy's provisions, its content will be updated both when a need is identified and based on the conclusions drawn.

Woodeco will also regularly conduct a risk assessment of the occurrence of corrupt practices, covering all persons or entities to whom this Anti-Corruption Policy applies.