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*The binding Polish original should be referred to in matters of interpretation.*

Wrocław, 31.05.2025

## **Woodeco Group Competition Law Compliance Policy**

1. Woodeco sp. z o.o. and its subsidiaries ("Woodeco Group") strictly adhere to legal requirements and the highest ethical standards in all their activities. This principle applies in particular to full compliance with competition and consumer protection laws ("competition law").
2. Competition law includes, among others, the regulations contained in the following legal acts:
  - a) the Act of February 16, 2007, on Competition and Consumer Protection,
  - b) the Treaty on the Functioning of the European Union (in particular Articles 101–106),
  - c) the Act of April 21, 2017, on claims for damages caused by a violation of competition law.
3. This policy applies to all companies of the Woodeco Group, as well as to all employees, members of governing bodies, and other persons acting on behalf of the Woodeco Group companies, including persons providing services under other contracts. Whenever this policy refers to employees of the Woodeco Group, this shall also be understood to include other persons referred to in this section.

### **I. Competition Law**

1. Competition law establishes a set of regulations designed to prevent anti-competitive practices, specifying in particular the types of conduct that are considered violations of the law.
2. It should be noted that competition law does not provide an exhaustive list of prohibited behaviors. Furthermore, even prohibited behaviors that did not actually result in a restriction of competition may be treated as prohibited and subject to severe penalties.
3. Competition law prohibits the conclusion of anticompetitive agreements, i.e., agreements whose object or effect is to eliminate, restrict, or otherwise infringe upon competition in the relevant market, consisting in particular of:
  - a) fixing, directly or indirectly, prices and other terms of purchase or sale of goods;
  - b) restricting or controlling production or sales, as well as technical progress or investment;
  - c) dividing markets for sales or purchases;
  - d) applying onerous or non-uniform contractual terms in similar agreements with third parties, thereby creating unequal conditions of competition for such parties;
  - e) making the conclusion of a contract contingent upon the other party's acceptance or performance of another obligation that has no material or customary connection to the subject matter of the contract;
  - f) limiting access to the market or excluding from the market undertakings not party to the agreement;

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- g) the coordination by undertakings participating in a tender, or by such undertakings and the undertaking organizing the tender, of the terms of the bids submitted, in particular the scope of work or the price.
4. Competition law prohibits an undertaking from abusing a dominant position in a given relevant market, which may be defined in various ways, both in terms of products and geography.
5. Competition law imposes strict restrictions on the exchange of information with competitors. In particular, it is prohibited to exchange with competitors information on prices or price components, including costs, as well as information on sales volumes, purchase volumes, production output, capacity utilization, development, and investments.
6. Competition law prohibits so-called concerted practices. The most important elements of a concerted practice are:
  - a. the existence of a form of coordination among undertakings that does not, however, lead to the conclusion of a formal agreement, but replaces the risk associated with the operation of an undisturbed competitive mechanism;
  - b. the existence of direct or indirect contacts aimed at adopting common conduct or exchanging information without the need for a plan to engage in such conduct;
  - c. establishing a causal link between the conduct of undertakings and market effects (which, however, may not necessarily arise);
  - d. reducing or eliminating uncertainty regarding competitors' market behavior.
7. A violation of competition law can have very severe financial consequences for both the business and the employee who commits the violation:
  - a) The maximum fine that may be imposed on a business by the Office of Competition and Consumer Protection (UOKiK) is 10% of the turnover achieved in the fiscal year preceding the year in which the decision was issued.
  - b) UOKiK may also impose a fine of up to PLN 2,000,000 on a person managing the business. It should be emphasized that the term "person managing the business" should not be understood to refer only to members of the company's management board, but also to lower-level managers.
  - c) Furthermore, a violation of competition law may result in severe liability for damages under civil law.

## II. Compliance with the Law

1. In the course of their business activities, all Woodeco Group companies and all Woodeco Group employees are strictly required to comply with competition laws and the provisions of this policy. A violation of these obligations by employees, given the potential severe negative consequences for the Woodeco Group, may be treated by Woodeco Group companies as a breach of fundamental employee duties.
2. In light of the above, it is of the utmost importance that, in the event of any doubt as to whether a given behavior is lawful, a Woodeco Group employee contacts the Compliance Department to obtain detailed information and guidance before taking any action.
3. If a potential violation of competition law is identified, and such violation is in any way related to the Woodeco Group's operations, every Woodeco Group employee is required to immediately report such a situation to the Compliance Department. Such a report may also be submitted via the Whistleblowing

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System available through the company's website or directly at <https://sygnaapp.pl/system-zgloszen-wewnetrznych/woodeco/>, or by email to [compliance@woodeco.eu](mailto:compliance@woodeco.eu), which is managed by the Legal and Compliance Department.

4. Woodeco Group employees are required to exercise the utmost care in the performance of their duties to prevent any potential violations of competition law.

### III. Meetings with Representatives of Competitors

1. "Competitors" shall be understood to mean businesses that supply or may supply, or purchase or may purchase, goods on the relevant market at the same time. Competitors are therefore entities with which the Woodeco Group competes in both the sales and purchasing markets.
2. Woodeco Group employees, in their professional capacity, are authorized to establish contact with representatives of competitors only in justified cases where there is a clear, legally permissible reason for such contact.
3. Woodeco Group employees are required to exercise particular caution when contacting representatives of competitors at trade fairs and other industry events. Such meetings are also subject to the restrictions set forth in this policy.
4. If, during a meeting with a competitor's representative, a Woodeco Group employee has doubts as to whether the course of the meeting violates competition laws, the employee should clearly emphasize that the Woodeco Group does not engage in any unlawful conduct. In such a case, the employee should immediately terminate the meeting.
5. This policy does not restrict the private contacts of Woodeco Group employees; however, it should be emphasized that even in the case of entirely private contacts with representatives of competitors, Woodeco Group employees are required to refrain from conduct prohibited by law or this policy, including refraining from the unauthorized exchange of information.
6. Woodeco Group employees are required to immediately report any contact with a representative of a Woodeco Group competitor to the Compliance Department. This reporting obligation applies to both meetings and other forms of contact, including telephone conversations and emails.
7. Reports of contact with a competitor's representative must be made using the form attached to this policy. The report must include the date of the meeting, the person or persons participating in the meeting, and the content of the conversation.

### IV. Compliance Training

1. The Woodeco Group organizes regular training sessions for its employees on compliance issues, which cover, in particular, competition law. Participation in these training sessions is mandatory for Woodeco Group employees.
2. In addition, the Compliance Department organizes compliance training covering competition law for new hires in the sales and procurement departments, as well as for new hires in managerial positions from other departments. Participation in these training sessions is mandatory.