

Policies and terms

We commit to act in compliance with guidelines whatever we do. **This obligation refers to all of us, to our clients and society.**

ANTI-CORRUPTION POLICY

Guidelines in professional ethics, aimed at preventing bribery and corruption.

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Policy preventing bribery and corruption

GUIDELINES IN PROFESSIONAL ETHICS, AIMED AT PREVENTING BRIBERY AND CORRUPTION

1. Introduction

1.1. This Policy is supposed to act as a guide in professional ethics. It complements the rules defined in the Code of Conduct so that it can be proved that all subjects act in a fair, transparent and professionally ethical way.

The aim of this policy is:

- a. assuring that Masterchem Logoplaste Sp. z o.o. (Limited Liability Company) acts fully in compliance with applicable laws and ethical norms, irrespective of the place where the company operates, and
- b. defining the scope of liability of both subcontractors and ourselves in terms of obeying and maintaining our principles on bribery and corruption, and
- c. providing subcontractors with information and directions in terms of recognising and solving problems related to bribery and corruption.

2. Scope

2.1. These Guidelines refer to all employees and representatives of the Masterchem Logoplaste Sp. z o.o. (LLC) and always when it is relevant, it also refers to the third parties providing services on behalf of the Masterchem Logoplaste Sp. z o.o. (LLC).

2.2 These Guidelines apply for the whole Masterchem Logoplaste Sp. z o.o. (LLC), irrespective of the country where it does or will operate. Rules involved in the Guidelines have to be observed in all countries, even if they are stricter than the local law. In countries where the law is stricter than the Guidelines, this law also has to be observed.

2.3. All people employed in the Masterchem Logoplaste Sp. z o.o. (LLC) have to demonstrate that they act in compliance with the highest ethical norms and both these Guideline and relevant legislation.

3. Policy

3.1. No individual in the Masterchem Logoplaste Sp. z o.o. (LLC) can be implicated in bribery of any kind.

3.2. “A bribe” means offering money, reward, favour or benefit to a person or a public officer, in order to influence this person’s acting or judgement.

In particular, no employee or other representative of the Masterchem Logoplaste Sp. z o.o. (LLC) will:

- a.** offer a bribe to any person;
- b.** receive bribes and/or
- c.** get involved in any form of indirect bribery by offering or receiving a bribe through the third party.

4. Compliance with the Guidelines and supervision

4.1. The person responsible for implementation and execution of these Guidelines is the President of the Management Board – Piotr Wasilewski. He has to counsel in the subject of payments, gifts and expenses, as well as authorise them in compliance with the Guidelines. Department Managers and Management Representative for Quality are obliged to monitor implementation of the Guidelines and control their observance.

5. Third parties

5.1 In this policy a third party means bodies, individuals or organisations providing services on behalf or for the benefit of the Masterchem Logoplaste Sp. z o.o. (LLC), and this term means present or potential clients, contractors, suppliers, distributors, contact persons in companies, representatives, advisors and government or public bodies, including their advisors, representatives and public officers, politicians and political parties. Masterchem Logoplaste Sp. z o.o. (LLC) has to comply with all applicable legal provisions. Moreover, they must be informed that these Guidelines exist, in order to promote stronger professional ethics.

5.2 It is prohibited to use the third parties for aims violating these Guidelines or legislation existing in a given location.

6. Gifts and entertainment

6.1 It is possible for the employee to receive or offer the gifts or forms of entertainment with strict regard to following norms and conditions:

- a.** It is a strict obligation of every Company employee to determine, before offering a gift or a form of entertainment, whether offering such gratification is not prohibited in a given company;
- b.** A Company employee has a right to accept justified meals or symbolic gifts only in appropriate social and business purposes, suitable in given circumstances, transparent and proper for business relations.
- c.** Small gestures expressing hospitality can be accepted only if they do not oblige a gifted person to anything and if they cannot be interpreted wrong, as well as if they can be reciprocated at the same level and if the employee’s superior has been notified of the situation.
- d.** It is never allowed to ask for gifts or favours. It is never allowed to accept money
- e.** While considering the gift or the form of entertainment (to offer or accept), the employee should decide if they are intended or if they can be reasonably interpreted as an award or encouragement to

do a favour or to treat a given person in a privileged way – if they are, they are not allowed, according to the Guidelines;

f. gifts should be offered in open and unconditional way, they can have modest or even symbolic value and they should comply with the Company's policy of expenses;

g. gifts and forms of entertainment should never be offered or accepted in order to win or keep the client, in exchange for an award or as encouragement;

h. it is important to be especially cautious while contacting with public officers. Many anti-corruption laws strictly forbid or limit a possibility of providing the public officers with gifts, hospitality and other worthy benefits, even if their value is low. Therefore, it is generally not advisable to offer anything of value to public officers or their relatives (spouses and other family members).

i. in exceptional situations, offering gifts or demonstrating hospitality to public officers, legal entities or an individual or an entity with the benefit for a given officer or an individual must be approved earlier by the President of the Management Board, as stated in the Register of Gifts and Showing Hospitality. If the sum of the hospitality offered to a public officer and all other hospitalities offered to the same officer during one calendar year exceeds USD 250, the proposal will not be approved unless there are exceptional circumstances. Approval or rejection of a proposal by the President of the Management Board must be recorded in the Register of Gifts and Showing Hospitality.

j. in case of receiving by an employee gifts or other gratifications from the Company's contractors or potential contractors, the employee is obliged to reveal this fact in the Register of Gifts and Showing Hospitality.

k. Requirements of this regulation are applicable for all kinds of hospitality offered on behalf of the company, no matter if the company is to reimburse its costs, as well as for all kinds of hospitality received by employees.

l. While working with advisors, lobbyists and other third parties who contact public officers, they should be contractually obliged to comply with the same standards as the Logoplaste company to the extent these parties act on behalf of the Logoplaste company.

m. Company's ledgers and records must reflect thoroughly and reliably all transactions, including those related to hospitality and charitable donations. It is prohibited to conceal or change anything.

7. Charitable donations

7.1 Charity and donations may potentially become an area of abuse related to bribes. If the President of the Management Board does not give his written approval earlier, the Masterchem Logoplaste Sp. z o.o. (LLC) cannot support charity organisations at the request of the clients and/or business partners, especially in local communities. Charitable donations in a form of cash, supporting charity event, publication or initiative related to fundraising, must be approved earlier by the President of the Management Board.

7.2 The Masterchem Logoplaste Sp. z o.o. (LLC) does not allow to offer gifts or make donations to political parties or associations and organisations of political character or forbidden by Polish law, including the Constitution, e.g. propagating fascism or nationalism.

8. Facilitation payments

8.1. According to the Guidelines, facilitation payments are not allowed. They are payments made to secure or expedite performance of a routine action by a public officer or a government agency (such as issuing a license or a permit, performing customs clearance).

8.2. In some circumstances the Masterchem Logoplaste Sp. z o.o. (LLC) must, according to the law, pay for the public officers services, i.e. customs clearance or inspections performed by bodies responsible for environmental protection. We expect such officers to fulfil their statutory and provided by the law duties and we assume that every payment has legal grounds. Everywhere it is possible, prior to making a payment and receiving a receipt, it is necessary to obtain proved confirmation that making a payment is obligatory. It is prohibited to make additional payments or hand gifts for the benefit of such officers.

8.3 The public officer's demand of a facilitation payment must be refused even if it might have negative business consequences. However, the employees may face situations of immediate danger to their health, personal or goods safety, or danger of their family member or a colleague. Paying the bribe due to avoid immediate danger is the only acceptable exception from the rules of this regulation. In case of such situation, it must be immediately reported to the President of the Management Board as soon as the danger disappears.

9. Relations with public officers

9.1. When employees or representatives contact government authorities, legislative bodies or supervisory authorities, their acts must be fair and compliant with local and international law. By contact we mean formal, informal or social contact, as well as all kinds of correspondence, including in person, via electronic media and in writing. This regulation defines requirements applicable while contacting such bodies:

- Acts must be transparent and polite;
- Conveyed information must be precise and reliable;
- It is prohibited to impede actions of authorised inspectors specialising in storing information, records or data.

10. Potential consequences of failure to comply with the Guidelines

10.1 The potential consequences of failure to comply with Guidelines may be the following:

10.1.1 For the Masterchem Logoplaste Sp. z o.o. (LLC):

- a. repayment of all obtained profits;
- b. termination of the contract;
- c. damage for the company image;
- d. provisional detention and/or fine and/or imprisonment in case of occurring and proving circumstances forbidden by the law and/or penal code;
- e. for the Masterchem employee, warning or reprimand or work contract termination with the termination notice or even without the termination notice.

10.1.2 For you:

- a. provisional detention and/or disciplinary action and/or fine;
- b. imprisonment in case of occurring and proving circumstances prohibited by the law and/or penal code;
- c. repayment of all obtained profits;
- d. contract termination;
- e. damage for the company image.

The Masterchem Logoplaste Sp. z o.o. (LLC) company will always support fully any person who refuses to pay the bribe, irrespective of inconvenience, loss of profits or additional expenses provoked by given situation for the Company. However, irrespective of circumstances, it is prohibited to take any steps which could endanger your personal safety or safety of another person.

11. Violation or potential violation of the Guidelines

11.1 All employees are encouraged to report their doubts about real or suspected cases of bribery or corruption at the earliest stage possible.

11.2 If any person thinks that these Guidelines are not complied with or is asked to act against the Guidelines, they must report their doubts to their immediate superior. If an immediate superior is not the right person, the doubts should be mentioned directly to the President of the Management Board.

11.3 Further way of reporting alerts or “alarm signals” which can mean bribery or corruption are described on the back of this policy.

12. Training and further directions

12.1 Chosen employees, i.e. Department Managers and Management Representative for Quality are obliged to participate in a training on this Policy and implementing provisions, complementary to information included in these Guidelines and afterwards, they will pass their knowledge on their subordinates. Every employee will be informed on this Policy and the place where the Policy is published. If you have not been chosen, but you would like to participate in a training, please contact your immediate superior. In case of any changes in this document, a suitable training will be organised. The Policy with any potential complimentary documents will be verified yearly during The Review of the Quality Management System.

13. Enquiries

13.1 In case of any questions related to the Guidelines, please contact the President of the Management Board.

14. Schedule: potential alerts or “alarm signals”

14.1 Below there is a list of potential alerts which may occur during your work in the Masterchem Logoplaste Sp. z o.o. (LLC), which can or should cast doubts in terms of anti-corruption legislation.

14.2 It must be highlighted, that this list is not exhaustive and its only task is to illustrate the problem

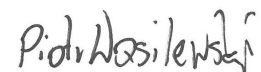
15. If, while working in the Masterchem Logoplaste Sp. z o.o. (LLC), you encounter any of the alarm signals, it must be immediately reported to the President of the Management Board:

you realise that the third party uses incorrect business practice or is accused of such practice;

- a. you learn that the third party is said to be the company which pays or demands bribes, or which has “special relations” with foreign public officers;
- b. the third party insists on obtaining a commission or a retainer before obliging themselves to sign the contract with us or before performing for us a function or a process related to public administration;
- c. the third party demands cash payment and/or refuses to sign a formal contract, handing the invoice or the receipt for the payment made;
- d. the third party insists on making a payment to the country or geographical region other than the third party’s head office or its place of operation;
- e. the third party demands an unexpected, additional retainer or commission for “expediting” the service;
- f. the third party demands generous gifts or entertainment before beginning or continuing contract negotiations or providing services;
- g. the third party demands payments for “turning a blind eye” to potential law violations;
- h. the third party demands employment or other benefits for their acquaintance or relative;
- i. you have obtained an invoice from the third party which looks different or has been changed;
- j. the third party insists on using the Side Letter or disagrees with the conditions agreed in writing;
- k. you notice that we have received an invoice for the commission or the retainer whose value seems higher than the value of the service it refers to;
- l. the third party demands or insists on using services of the representative, intermediary, advisor, distributor or supplier who we do not know or whose services we do not use or
- m. the third party offers you an incredibly generous gift or shows you hospitality in an exceptional way.

Approved by (date, signature)

Piotr Wasilewski, the President of the Management Board, 18-12-2020.



16. History of changes

| Version | Date of approval | Date of implementation | Details |
|---------|------------------|------------------------|---|
| 1.0 | 06.12.2017 | 09.12.2017 | - |
| 2.0 | 18.12.2020 | 18.12.2020 | Unification of requirements with the Logoplaste Group ethical documentation (changing the owner of the company) |