



# ANTI-CORRUPTION AND ANTI-FRAUD POLICY

Glass System Technologies S.A.

## ANTI-CORRUPTION AND ANTI-FRAUD POLICY

Integrity and transparency are the pillars on which we base our daily business activities. At Glass System Technologies S.A., there is no room for compromise when it comes to ethics – regardless of the scale of the transaction, position, or contract value.

Corruption, financial fraud, and dishonest practices are not only illegal but also fundamentally incompatible with our company's values. Even a single breach of these principles can lead to a loss of trust, serious legal consequences, and damage to the organization's reputation.

This document clearly outlines our stance on preventing corruption and fraud, the rules for giving and receiving gifts, and the boundaries that must not be crossed. Each of us is obliged not only to comply with these principles but also to respond to any attempts to circumvent them.

Transparency in internal and external relationships is not merely a formal issue – it is our conscious choice and commitment to each other, our partners, and the entire market..



## §1. General Principles

1. Glass System conducts its business in a transparent, honest, and lawful manner.  
The Company applies **a zero-tolerance policy toward corruption, financial fraud, and criminal activities**—regardless of the scale, intention, or position of the person involved.
2. This anti-corruption and anti-fraud policy applies to all employees, members of the management board, contractors, agents, intermediaries, sales representatives, and the Company's business partners.
3. The Company undertakes preventive, educational, and control measures to eliminate risks related to:
  - a) bribery, kickbacks, and "commissions";
  - b) fictitious invoices, double invoicing, inflating costs;
  - c) misuse of the Company's assets, theft, falsification of data;
  - d) manipulation in procurement, tender, or investment processes;
  - e) entering into contracts with related entities without proper transparency.

## §2. Prohibition of Bribery and Financial Benefits

1. It is prohibited to:
  - a) offer, give, promise, receive, or solicit any form of bribe;
  - b) make covert arrangements for cooperation in exchange for personal benefits;
  - c) use one's position to obtain unauthorized benefits;
  - d) conduct negotiations with the intent to condition official decisions on personal gratification.
2. These prohibitions also apply to actions carried out through third parties (agents, partners, representatives).
3. Breach of these rules constitutes a serious violation of employee duties and may result in criminal liability.

### **§3. Rules for Giving and Receiving Gifts**

1. Giving and receiving gifts is permissible only in situations that:
  - a) comply with local and international social and legal standards;
  - b) are occasional, courteous, symbolic, or promotional in nature (e.g., marketing materials);
  - c) do not exceed the value established by the Company, i.e., PLN 200 gross;
  - d) do not create a sense of obligation toward the donor;
  - e) are not offered during ongoing negotiations, tenders, or inspections.
2. The following are particularly unacceptable:
  - a) gifts in cash or cash equivalents (e.g., gift cards);
  - b) high-value gifts, hidden or given informally;
  - c) invitations to luxury events or trips that are not directly related to the Company's business.
3. Any doubts regarding the permissibility of a gift must be discussed with a supervisor or the accounting department..

### **§4. Fraud Prevention**

1. Glass System combats all forms of fraud, including:
  - a) inflating costs, travel expenses, commissions;
  - b) theft of company assets (equipment, data, materials);
  - c) falsification of accounting or operational records;
  - d) manipulation of performance reports or efficiency indicators.
2. The Company implements control mechanisms, including:
  - a) segregation of duties and multi-level supervision;
  - b) document and financial flow controls;
  - c) regular internal audits;
  - d) raising employee awareness of compliance and ethics.

## §5. Reporting Violations and Whistleblower Protection

1. Every employee has the right and obligation to report any suspicion of corruption, fraud, or attempts to circumvent procedures.
2. The Company ensures:
  - a) confidentiality of reports;
  - b) protection of whistleblower identity;
  - c) no retaliation of any kind against those acting in good faith;
  - d) independent and fair investigation of the matter.
3. Reports may be submitted to:
  - The immediate supervisor;
  - The Company's Management Board;
  - A dedicated reporting channel (e.g., email, whistleblower box, online system).

## §6. Accountability and Consequence

1. Violations of the rules set forth in this policy constitute a serious professional misconduct and may result in:
  - a) disciplinary proceedings;
  - b) termination of employment or cooperation;
  - c) civil and criminal liability.
2. The Company declares full cooperation with law enforcement authorities in the event of suspected corruption or criminal activities.

