

# ANTI-CORRUPTION POLICY OF THE PGE CAPITAL GROUP



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## PREAMBLE

PGE CG operates in accordance with applicable laws and internal regulations. In its activities, it is guided by the adopted ethical standards, contained in particular in the *Code of Ethics of the PGE Capital Group*.

The *Anti-Corruption Policy of the PGE Capital Group* sets out the rules of and key responsibilities for counteracting corruption in the PGE Capital Group and constitutes a development of the relevant provisions of the *Code of Ethics of the PGE Capital Group*. This document sets out important elements of corporate governance concerning, among other things, the avoidance of conflicts of interest, fair and transparent business dealings, rules for accepting and giving business gifts as well as unacceptable sponsorship activities.

## 1. Introduction

- 1.1 The entities of the PGE Capital Group (hereinafter: "PGE CG"), within the framework of strengthening the efficient and effective organisation of the PGE CG, undertake to:
  - comply with anti-corruption legislation,
  - follow the "Recommended standards for a compliance management system with respect to counteracting corruption and a whistleblower protection system in companies listed on the markets organised by the Warsaw Stock Exchange",
  - meet and promote the highest standards of ethics and transparency in the conduct of business activities,
  - continuously improve the effectiveness of their anti-corruption activities.
- 1.2 This policy applies to all processes carried out in the PGE CG.
- 1.3 Each employee and anyone acting for and on behalf of the PGE CG is obliged to:
  - familiarise themselves with the policy and comply with the anti-corruption rules set out therein,
  - receive regular training on this policy and the internal regulations relating thereto.
- 1.4 The PGE CG management undertakes to:
  - implement the anti-corruption rules,
  - oversee the implementation of this policy and related documents,
  - play a key role in building, promoting and communicating an organisational culture in line with these rules.
- 1.5 The policy is a further specification of the provisions of the *Code of Ethics of the PGE Capital Group* and should be understood together with the *Code of Ethics of the PGE Capital Group* and the anti-corruption provisions of generally applicable law.

## 2. Anti-corruption rules

All employees and persons acting for and on behalf of the PGE CG are required to comply with the following rules:

- 2.1 ZERO TOLERANCE for bribes and other forms of corruption.
- 2.2 It is prohibited to accept, offer, request, directly or indirectly, any pecuniary or personal benefits or any promise thereof in connection with the performance of professional duties.
- 2.3 It is forbidden to invoke influence in the PGE CG or other organisations or public institutions in order to obtain undue advantage (paid patronage).
- 2.4 Conflicts of interest, understood as such a factual or formal state of affairs whereby private interests may impair objectivity and impartiality in the performance of assigned duties, must be avoided.
- 2.5 Enhanced precautions must be applied in areas particularly vulnerable to the risk of corruption.
- 2.6 The creation of corruption funds is prohibited.
- 2.7 The PGE CG cooperates with business partners who conduct their business activities in a fair manner, in compliance with generally applicable law and the provisions of the *Code of Conduct for Business Partners of PGE Capital Group Companies*.

- 2.8 The requirements contained in the *Code of Conduct for Business Partners of PGE Capital Group Companies* are clearly communicated to PGE CG business partners.
- 2.9 The PGE CG uses contractual clauses obliging business partners to comply with the requirements regarding, in particular, anti-corruption, as set out in the *Code of Conduct for Business Partners of PGE Capital Group Companies*.
- 2.10 In official dealings with business partners of the PGE CG, care is taken to ensure that these relationships are honest, transparent and formal in character.
- 2.11 Preferential actions towards business partners leading to a violation of the rules of fair competition are prohibited.
- 2.12 The giving and accepting of business gifts is only permitted in the context of building relationships with business partners, unless it is prohibited by generally applicable law and relevant internal regulations.
- 2.13 It is impermissible to:
- accept gifts when this could influence a business decision,
  - give or receive cash or cash equivalents as well as invitations of a luxury nature,
  - give gifts to people performing public functions, public officials, in situations that may create the impression of providing a corrupt financial gain,
  - do things or make facilitation payments aimed at “expediting matters”, understood as small, unofficial payments or benefits provided to expedite or ensure the performance of routine, legitimate official acts to which a person or institution is obliged by law.
- 2.14 ZERO GIFTS and reinforced precautions in areas particularly prone to corruption, including, in particular, purchasing, wholesale and retail, relations with business partners regarding contract performance.
- 2.15 Socially important causes are supported through sponsorship activities and donations by PGE CG companies only in accordance with internal regulations in this respect.
- 2.16 Sponsorship of political organisations directly or indirectly is prohibited.
- 2.17 Recruitment and promotion processes in the PGE CG are carried out on the basis of clearly defined, objective criteria, in accordance with internal regulations in this respect, taking into account the principle of ZERO TOLERANCE for corruption.

### 3. Reporting violations of anti-corruption rules

- 3.1 Information on suspected breaches of anti-corruption rules should be reported in accordance with the PGE CG procedure for handling reports of incidents of non-compliance or in accordance with the procedures implemented in individual PGE CG companies under the Whistleblowers Protection Act of 14 June 2024.
- 3.2 Detailed information on the possible ways of reporting such incidents is available at [www.gkpge.pl](http://www.gkpge.pl): REPORT AN IRREGULARITY.

### 4. Consequences of non-compliance with this policy

- 4.1 Violation of the rules set out in this policy by a person employed in the PGE CG may result in disciplinary consequences as provided for in the employer's work regulations and the Labour Code.
- 4.2 Violation of the rules of this policy by a person acting for and on behalf of the PGE CG will result in liability under general terms.
- 4.3 In the event of violations by business partners, the PGE CG reserves the right to take appropriate action, with the possibility of terminating cooperation with a business partner that has followed unacceptable practices.
- 4.4 In accordance with applicable law, any reasonable suspicion of violations that exhibit the hallmarks of corruption or other acts prohibited under generally applicable law will be reported to the law enforcement authorities.