

F.H. NOWALIJKA	COMPANY POLICY	Policy Version 2	Page 1
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Applicable from 24.01.2022		

1. GENERAL PROVISIONS

F.H. "Nowalijka" Piotr Wychowalek recognizes the policy of zero tolerance towards Corruption with reference to all symptoms of the activity of the enterprise. No acceptance covers all forms of Corruption. The document defines minimum standards and does not constitute the sole source of the information and interpretation of each situation connected with the occurrence of any forms of Corruption. The Anti-corruption Policy of F.H. "Nowalijka" Piotr Wychowalek should be treated as a whole with internal regulations applicable in the Company including Code of Ethics.

2. DEFINITIONS

Permitted benefits – gifts, invitations, presents, expression of hospitality granted or accepted by the Employee/Co-worker/Business Partner in accordance with the law and principles of the Anti-Corruption Policy – only with the occasional or promotional nature when they do not result in mutuality nor stating or omission of specified behavior.

Economic Crime – each prohibited act, which is committed by the participants of economic trade one of which at least being the professional entity and the socially harmful acts caused as a result thereof to a higher degree than minimum, illegal, threatened with the penalty

Document – Anti-Corruption policy in the F.H. "Nowalijka";

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Company - F.H. "Nowalijka" Piotr Wychowalek

Other Economic Abuse – the activities which do not constitute the Corruption Activities, however they are contradictory to the principle of fair competition or good merchant customs;

Business Partner/Client – each person or company for whom F.H. "Nowalijka" Piotr Wychowalek performs the service, sale or realization of the agreement;

Corruption – within the meaning of art. 1 it. 3 of the act of 9 June 2006 on Central Anti-Corruption Office (J. of L of 2021, it. 1671) the corruption means promising, proposing, handing in, demanding, accepting by any person, directly or indirectly, any undue property, personal or other benefits, for them or any person or accepting proposition or promise of such benefits in exchange for action or omission in performing public function or in the course of economic activity;

Benefit – Property or Personal Property;

Property benefit – any property appropriations satisfying a specific need, the value of which can be expressed in money, e.g.: the growth of the property, exemption from debt;

Personal benefit – all non-cash benefits, improving the situation of a given person, i.a.: promise of promotion, change of obligations, acceleration of performance of the activities;

Prohibited Benefits – Property or Personal benefit of any Type contrary to the provisions of law and provisions of the Anti-Corruption Policy and other internal regulations, which is handed in, proposed, promised or accepted by the Employee/Co-worker/Business Partner.

Non-conformities – infringing / potential infringement by the Employee / Co-worker/ Business Partner of the law provisions, accepted by the F.H. "Nowalijka" Piotr Wychowalek concerning standards of conduct, internal regulations, or the situation which is favorable to the above infringement.

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Explanation Procedure – the procedure conducted on the basis of the Anti-Corruptive Policy F.H. “Nowalijka” Piotr Wychowalek aiming at examining the correctness of reporting the Non-Conformity and other circumstances which may raise doubts, including in particular the suspicion of the occurrence of Corruption or Other Economic Abuse.

Employee – each person employed within employment in the Company, within the meaning of the provision of art. 22 § 1 of the Labor Code;

Policy – this Anti-Corruption Policy of F.H. “Nowalijka” Piotr Wychowalek;

Co-worker – each person cooperating with the Company on the basis of the civil-legal agreement.

3. THE PURPOSE OF THE POLICY

The purpose of the anti-corruption policy of F.H. “Nowalijka” Piotr Wychowalek is to minimize the risk for the Corruption to occur both in external and internal relations of the company. In addition, the document establishes unified principles concerning the conduct in case of stating the abuse, counteracting and preventing the economic abuse.

4. THE SCOPE AND USING THE POLICY

The Anti-Corruption Policy of the Company refers to all Corruption activities and Other Economic Abuse with the participation of the Employees, Suppliers, Business Partners, Clients and all entities remaining in economic relations with F.H. “Nowalijka” Piotr Wychowalek. The document should be complied with and respected by all the entities listed above. The areas of threats in corruption in the Company include, i.a.: commercial activity, connected with establishing cooperation, investment, marketing, charity, promotional and concluding agreements. The elements of the Anti-Corruption Policy include the activities in the scope of:

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- ✦ Preventing abuse including Corruption by means of establishing the Code of Ethics of the Company F.H. “Nowalijka” Piotr Wychowalek;
- ✦ Detecting and reporting abuse and not using and not complying with the Document;
- ✦ Reacting to the occurrence of abuse by means of reporting and conducting individual explanation procedure;
- ✦ Functioning on the basis of clear and transparent organizational structure which guarantees effective, legal activity;


5. BASIC PRINCIPLES OF THE POLICY

- 1) Any Corruption behavior and inciting or using third persons to such behavior is prohibited.
- 2) The contacts with the co-workers, business partners, clients of the Company may take place only in business contacts which should involve email correspondence, fax, company telephones or direct meetings with the knowledge and consent of the superior.
- 3) F.H. “Nowalijka” Piotr Wychowalek uses the principle of full transparency and reliability in the activities conducted, in addition in connection with using the control processes, does not allow for conducting out-of-accounting transactions, using forged documents, recording non-existing expenses.
- 4) The cooperation of the Company with the Business Partners takes place only on the basis of written agreements, orders and giving the goods or realizing the service is documented.
- 5) From the third persons the usage is required of the principles of the Anti-Corruption Policy of the Company is required, with due diligence

6. EXAMPLES OF ACTIVITIES

A. NOT PERMITTED:

- ✦ Handing in property benefits aiming at convincing the person for whom it is directed, to start the activity to the detriment of the Company or stopping it from the activities favorable for the Company.

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- ✦ The promise of payment or accepting it from the third persons in the event when there is a suspicion or certainty that they expect specific business benefits in exchange;
- ✦ Transferring or the promise of transferring, offering gratification in the form of payment, gift, trip, invitation or another benefit to the state official or agent in order to improve or accelerate the course of routine procedures.
- ✦ Accepting the gift, invitation, trip or another benefit or the promise to obtain them from the third persons.

B. PERMITTED:

- ✦ Handing in and accepting the expressions of hospitality, invitations (to the restaurant, sport event, etc.) is permitted in the situation when it is made in good faith, for the development of the business relations in the course of ordinary activity, whereas it does not infringe the law provisions, internal regulations of the Company or established business customs.
- ✦ The value of the Permitted Benefits handed in or accepted should be proportionate to the specific situation and correspond to the customs and accepted business relations.

7. REALIZATION OF THE ANTI-CORRUPTION POLICY IN THE COMPANY

Each Employee has the obligation to familiarize with the Anti-Corruption policy of the Company whereas confirms with the statement submitted in the HR department. In order to raise the awareness of the external entities, the principles of the anti-corruption policy are popularized and broadly communicated, with acknowledgment of the familiarization with the document. The Company supports the employees and co-workers in eliminating the unethical behavior, including those having the symptoms of bribery and corruption. In each case, noticing by the employees the infringement of the policy they are obliged to report such activities. The Company F.H. "Nowalijka" Piotr Wychowalek by means of

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counteracting the anti-bribery policy and encouraging other entities to implement the anti-corruption policy clearly defines its position in which it counteracts the economic abuse.

8. DETAILED PRINCIPLES FROR REPORTING THE NON-CONFORMITIES

- 1) Each employee of the Company F.H. "Nowalijka" Piotr Wychowalek has the obligation to report non-conformities and other circumstances which may raise doubts, including special suspicion of the Corruption to occur and Other Economic Abuse.
- 2) Non-conformities and other circumstances raising doubts may also report external entities, using available channels of report.
- 3) The reports referred to in point 1 and 2 may be submitted:
 - ✦ to persona superiors or the persons holding higher positions;
 - ✦ at the personal meeting with the Conformity Proxy organized within 7 days from learning about the possibility for the non-conformity to occur;
 - ✦ by means of etyka.info@nowalijka.pl;
 - ✦ the form of the letter prepared and sent with traditional mail to the address of the company" ul.Życzliwa 17, Piotrków Trybunalski 97-300, directed to Conformity Proxy;
 - ✦ placing a written report in paper form in the Company Report Box located in easily accessible place assuring the confidentiality;
 - ✦ reports may be made anonymously.
- 4) Each case of non-compliance and infringing the text of the Anti-corruption Policy of the Company will be considered by the Employer individually and may entail the consequences.
- 5) The superiors or the persons holding a higher position who will obtain the information on the occurrence of any form of corruption are obliged to inform the owner of the Company immediately.
- 6) On the basis of the information obtained, the tests of its correctness are conducted.
- 7) The explanatory activities are undertaken by the Employer exclusively on the basis of the reports, containing satisfactory information.

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- 8) In the situation of no reliable and sufficient information, necessary to explain the case properly, report may be left without consideration.
- 9) Each case of notification on the case referred to in point 1 is treated with confidentiality and will be considered with due diligence.
- 10) One may not draw consequences and liability towards the person who made the report in a good faith and it turned untrue.
- 11) The reports transferred in bad faith may expose the person submitting to the disciplinary and legal consequences.
- 12) The behavior with the repressive, discriminating, infringing personal goods towards persons: making the report, taking part in the explanatory procedure; to whom the refer refers are not tolerated. The occurrence of such activities may be the basis to start disciplinary activities.
- 13) In case of reporting the Economic Crime the Company Owner should use the services of the Law Office in order to reach the consultation on the grounds of law.

9. DISCIPLINARY MEANS

In case of the occurrence of the Corruption or Other Economic Abuse, except for the penal sanctions, results in the occurrence of:

- ✚ On the basis of the civil-legal agreements – gross infringement of the conditions of the agreement;
- ✚ On the basis of the employment contract – serious infringement of the employee obligations.

10. FINAL PROVISIONS OF THE POLICY

- 1) The provisions of the Document do not infringe the acts generally applicable.
- 2) The Anti-Corruption Policy of Company F.H. “Nowalijka” Piotr Wychowalek was published at www.nowalijka.pl.

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11. AFFILIATED DOCUMENTS

1) Attachments:

Attachment number 1 to PF-01 The specimen of reporting the information on the infringement and non-compliance with the Anti-Corruption Policy of Company F.H. "Nowalijka" Piotr Wychowalek

2) Documents:

None

3) Records:

None

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Attachment number 1 to the Anti-Corruption Policy of F.H. "Nowalijka" Piotr Wychowalek

Piotrków Trybunalski

.....
 (name and surname of the person reporting)

.....
 (tel., email or correspondence address)

REPORTING THE INFORMATION

Name and surname of the person, to whom the report refers (obligatory field)

.....

The organizational unit – to which the report refers

.....

Description of the event (obligatory field)


.....

The role of the above persons in the presented situation:

.....

Other, additional information:

.....

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Information clause for the persons covered with the corruption phenomenon.

F.H. "Nowalijka" Piotr Wychowalek as an entrepreneur taking care for the honesty in business contradicts corruption. Facing the ideas he believes he defined the principles of cooperation in employment and in relations with business partners and commercial partners taking care for the fulfillment of the highest standards of transparency and economic openness in particular business processes, he placed them in the Anti-corruption policy, obliged to comply with them by himself and his employees, business partners whereas he informed on its acceptance.

While realizing the assumptions of the anti-corruption policy, he assured different channels of reports, giving at the same time to the employees, business partners, a possibility to make the reports always when they experience such a phenomenon or witness it.

F.H. "Nowalijka" Piotr Wychowalek is the Administrator of personal data and contents acquired from claims, in accordance with art. 13, it. 1 and it. 2 and art. 14, it. 1 and it. 2 GDPR¹ hereby informs that:

1. making a claim You do it voluntarily and freely. If the decision on making a claim is voluntary, it is necessary to place your personal data and other information in a complaint as to grant a supported needed, specify a type of a phenomenon and take reasonable explanatory, remedial and preventive actions;
2. except ordinary data processed, there might be specialized category data what is subject to the content of a claim,
3. he acquired data in a direct and indirect way what means that data included in the claims of a person injured, witnesses and alleged offender may come from a direct owner of this data or another person;
4. taking into account a case interest and a sense of explanatory proceeding, does not provide to the presumed perpetrator whose data was indicated in the report of the source of origin of his data. In accordance with art. 14, par. 15, let. d) information on a person who made a claim is kept in secret by the Administrator subject to the obligation to keep a professional confidentiality at least until the end of an explanatory proceeding;
5. personal data protection means were kept in confidentiality and integrity;
6. processes data and information given in claims for the anti-mobbing policy realization on the basis of legally justified administrator's interest, what is fulfilling duties by an employer resulting from the labour code;
7. in case of any questions and doubts referring to the personal data processing, do not hesitate contact us: inspektor.rodos@nowalijka.pl;
8. if you state that personal data processing is illegal and there was a personal data processing breach or an unauthorized disclosure of information, you have the right to make a claim to the supervisory body: the President of the Personal Data Protection, ul. Stawki 2, 00-193 Warszawa, tel. 22 531 03 00.
9. you have the right to an access to your personal data, including getting a copy it, the right to demand to correct, remove it or restrict processing.
10. Your data and information from claims are kept for 3 years from the period of the explanatory proceeding completion;
11. Your data and information included in complaints will be the subject of an internal explanatory proceeding. Depending on the situation, it might be disclosed to legal advisors or public organizations, if arises from the law provisions;
12. Your data and information are not subject to profiling and no automated decision referring to you will be made.

¹ Regulation of the European Parliament and Council (UE) 2016/679 as of 27th April 2016 on natural person protection in reference to personal data and free flow of data and repeal of the directive 95/46/EC (general regulation on data protection)