

GK PGE Anti-Corruption Policy



Effective from: 15/04/2021

I. INTRODUCTION

- 1.1 PGE Group companies (hereinafter GK PGE), within the framework of improving the effective and efficient organisation of GK PGE, are committed to:
 - compliance with anti-corruption regulations,
 - employment of the standards of Giełda Papierów Wartościowych w Warszawie S.A. (Warsaw Stock Exchange) as regards anti-corruption measures,
 - fulfilment and promotion of the highest standards of ethics and transparency of conducting business,
 - constant improvement of anti-corruption measures.
- 1.2 This policy shall be applicable to all and any anti-corruption measures.
- 1.3 Each GK PGE employee and everyone who acts on behalf and in the name of GK PGE shall:
 - familiarise oneself with the policy and comply with the anti-corruption rules set out therein,
 - undergo cyclical training as regards this policy and related in-house regulations.
- 1.4 The GK PGE management staff shall:
 - implement anticorruption rules,
 - oversee the implementation of this policy and related documents,
 - play the key role in building, promoting and communicating organisational culture compatible with the rules in question.
- 1.5 The policy constitutes a refinement of the provisions of the GK PGE Code of Conduct, and in particular, of the 'We do not tolerate corruption' rule and should be interpreted in a manner consistent with the GK PGE Code of Conduct and generally applicable law.

II. ANTI-CORRUPTION RULES

All GK PGE employees and anyone who acts on behalf and in the name of GK PGE shall comply with the following rules:

- 2.1 "Zero tolerance" for bribes and other forms of corruption.
- 2.2 The acceptance, offering, demanding, in a direct or indirect manner, of any material or personal advantages or promising such in connection with the discharge of professional responsibilities, is hereby prohibited.
- 2.3 Alluding to any influence in GK PGE or other organisations or public institutions with a view of soliciting an undue advantage (influence peddling) is hereby prohibited.
- 2.4 Any conflict of interest is to be avoided; understood as an effective or formal state, in which the objectivity and impartiality of discharging entrusted responsibilities, is disrupted.
- 2.5 Reinforced precautions are to be applied in areas with particular exposure to the risk of corruption.
- 2.6 The creation of corruption funds is hereby prohibited.
- 2.7 GK PGE cooperates with business partners who conduct business in an honest manner in compliance with the Code of Conduct for the Business Partners of GK PGE Companies.
- 2.8 The requirements set out in the Code of Conduct for the Business Partners of GK PGE Companies shall be communicated to the business partners of GK PGE in a clear manner.
- 2.9 GK PGE shall apply contractual clauses, which place business partners under the obligation of complying with the minimal ethical standards set out in the Code of Conduct for the Business Partners of GK PGE Companies.
- 2.10 GK PGE shall place emphasis on honesty and transparency in its business relations with business partners and on maintaining their formal nature.



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- 2.11 Any preferential measures with regard to business partners which lead to a breach of the rules of fair competition are hereby prohibited.
- 2.12 The giving and acceptance of business gifts shall only be allowed within the framework of building relations with business partners to the extent it is not prohibited by generally applicable laws or the relevant in-house regulations.
- 2.13 The following is inadmissible:
- acceptance of gifts in a situation where it may impact on a business decision,
 - giving or acceptance of cash or its equivalents, as well as of invitations of a luxurious nature,
 - giving of gifts to persons holding public office or civil servants in situations which may create the impression of the transfer of a material advantage of a corruptive nature.
- 2.14 "Zero gifts" and reinforced precautions in areas with particular exposure to the risk of corruption, in particular in the area of purchases, wholesale and retail trade, relations with business partners as regards contract performance.
- 2.15 Support of important public objectives by sponsoring activities and donations on part of GK PGE, shall take place only in compliance with in-house regulations governing this area.
- 2.16 The direct and indirect sponsoring of political organisations is hereby prohibited.
- 2.17 Recruitment and promotion in GK PGE shall be based on clearly defined objective criteria in accordance with in-house rules governing this area, with the exclusion of nepotism and cronyism.

III. REPORTING IRREGULARITIES

- 3.1 GK PGE has established the function of whistle-blower, i.e., a system of reporting irregularities.
- 3.2 Anyone can be a whistle-blower, in particular an employee, consultant, contractor, sub-contractor or supplier. The whistle-blower is a person who reports irregularities and information as to the suspicion or appearance of instances of non-compliance.
- 3.3 Reports may, in particular, concern acts of a criminal or corruptive nature or a conflict of interest.
- 3.4 Reports on fraud are to be submitted in good faith, bearing in mind the interests of GK PGE, the public interest and generally applicable law.
- 3.5 The reporting person may provide the information in an anonymous manner or may reveal his/her identity.
- 3.6 The reporting person shall enjoy protection.
- 3.7 Reports are to be forwarded to:
- the following e-mail address: uczciwybiznespge@gkpge.pl,
 - the following phone number: +48 22 340 12 02,
 - the following address: Director, Compliance Department, ul. Mysia 2, Warsaw, with the reference: 'FYO'.

IV. CONSEQUENCES OF NON-COMPLIANCE WITH THIS POLICY

- 4.1 A breach of the rules set out in this policy by an employee may result in disciplinary action provided under the employer's working rules and the Labour Code.
- 4.2 A breach of the rules set out in this policy by a person who acts on behalf and in the name of GK PGE shall result in liability under general rules.
- 4.3. In the event of breaches by business partners, GK PGE reserves to itself the right to take appropriate steps, and cooperation with a business partner who applies unacceptable practices may be subject to termination.
- 4.4. Breaches with the features of corruption or other offences shall be reported to law enforcement bodies in accordance with existing laws.

