



Anti-corruption policy

of Bank Ochrony Środowiska S.A.

Purpose of the Policy

1. The anti-corruption policy of Bank Ochrony Środowiska S.A. aims to uphold the Bank's commitment to the highest standards of integrity, honesty, and fairness in all internal and external activities.
2. The Bank maintains a zero tolerance policy towards corruption across all aspects of its operations.
3. The Bank is dedicated to fostering a positive image, reputation, and trust among its clients and trading partners by taking effective measures to eliminate any form of corruption.

Definitions

corruption means giving, offering, promising, approving, soliciting and accepting, directly or indirectly, any undue financial or personal gains in exchange for taking action or refraining from taking action relating to work for the Bank, i.e., bribes;

financial gain means a good that satisfies a specific need, whose value can be expressed in money; it may be any gain for oneself or another person or avoidance of a loss of property; a favourable contract may also represent a financial gain;

personal gain means a non-financial benefit that improves the situation of the person receiving that benefit;

related person means a person who meets at least one of the following criteria:

- 1) Is a member of a governing body of BOŚ;
- 2) Has been engaged by BOŚ under an employment or service contract or under a similar legally binding arrangement;
- 3) Is a sole trader acting as an agent for BOŚ;



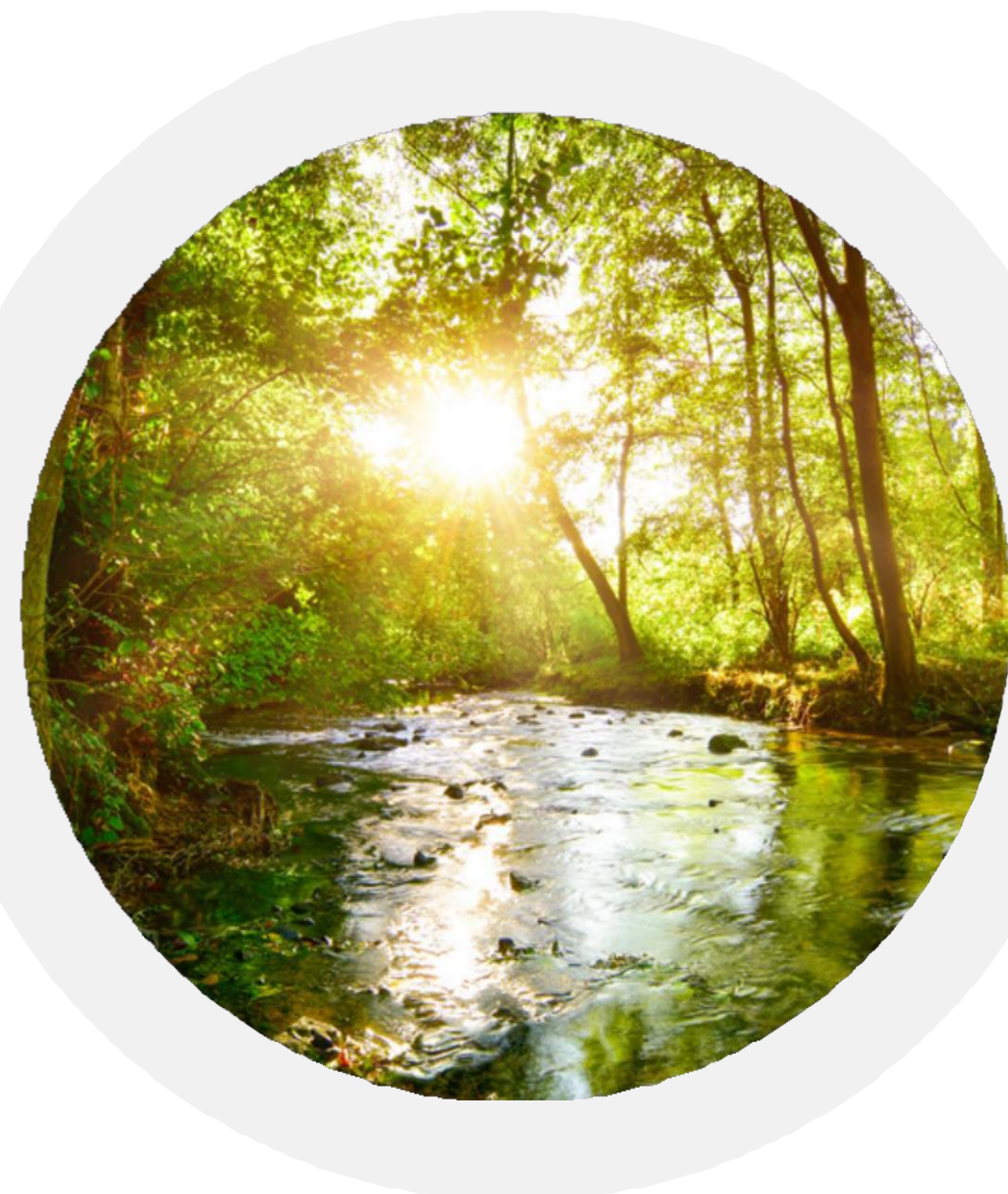
- 4) Is a person in charge of operations of:
- a) the Bank's agent where the Bank's agent is an unincorporated organisational unit;
 - b) an entity performing activities delegated in accordance with Art. 6a of the Banking Law of August 29th 1997, where that entity is an unincorporated organisational unit;
 - c) an entity performing activities delegated by the Bank in accordance with the agreement referred to in Art. 81a.1 of the Act on Trading in Financial Instruments of July 29th 2005, where the entity is an unincorporated organisational unit;
- 5) Is a member of a governing body of:
- a) the Bank's agent where the Bank's agent is a legal person;
 - b) an entity performing activities delegated in accordance with Art. 6a of the Banking Law of August 29th 1997, where that entity is a legal person;
- c) an entity performing activities delegated by the Bank in accordance with the agreement referred to in Art. 81a.1 of the Act on Trading in Financial Instruments of July 29th 2005, where the entity is a legal person;
- 6) Is a person involved in the performance of intermediation activities regarding the Bank's business or activities delegated by the Bank, who has been engaged under an employment or service contract or under a similar arrangement by the agent or the entity referred to in Sections 4 and 5;
- 7) Is a natural person performing agency activities, referred to in Art. 19 of the Act on Insurance Distribution of December 15th 2017;



gifts mean any benefit, whether financial or in kind, accepted or given, for which the recipient does not pay and the acceptance or giving of which by the Bank or a related person may give rise to a conflict of interest, in particular a conflict between the interests of clients; gifts are considered to include discounts and non-monetary benefits, such as invitations to events that are not directly related to professional duties, in Poland or abroad;

incentives mean cash benefits, including fees and commissions, or non-monetary benefits, the acceptance or provision of which by the Bank or a related person may give rise to a conflict of interests, in particular to a conflict between the interests of clients and those of the Bank, as set out in separate internal regulations and applicable laws;

violation means a potential or identified action which, in the opinion of the person reporting that action, is in conflict with internal regulations, the law or the Bank's ethical standards and is of a corrupt nature;



public person means – in accordance with Art. 115.19 of the Penal Code:

- 1) A public official;
- 2) A member of a local government;
- 3) A person employed in an organisational unit holding and managing public funds, unless such person performs exclusively service activities;
- 4) Any other person whose powers and responsibilities with regard to public business are defined or recognised by law or an international agreement binding on Poland.

Responsibilities

1. This Policy applies to all related persons.
2. Related persons are obliged to:
 - 1) Comply with internal regulations and anti-corruption laws;
 - 2) Observe the principles of ethics, integrity and conduct in accordance with the applicable internal regulations and the law in all they do, in particular in relations with clients, contractors, public institutions and social organisations;
 - 3) Prevent and report any identified incidents of corruption.

3. Related persons are prohibited from, whether indirectly or directly:

- 1) Accepting any financial or personal gains, or a promise thereof, and making the performance of an action conditional on receiving any financial or personal gains (venality);
- 2) Offering any financial or personal gains to any person, including a public person, in connection with the performance of their function, and taking steps to encourage a breach of the law, or giving, or promising to give, a financial or personal gain for breaching the law (bribery);
- 3) Undertaking to act as an intermediary in handing a matter in exchange for a financial or personal gain or a promise thereof, claiming influence and position at the Bank, or making another person believe in, or reassuring them of, the existence of such influence (passive trading in influence);
- 4) Providing or promising to provide a financial or personal gain in exchange for intermediation in handing a matter with a state or local government institution, international organisation or a national or

foreign organisational unit holding and managing public funds, consisting in exerting unlawful influence on a decision, action or refraining from an action by a public person in connection with the performance of their function (active trading in influence);

- 5) Soliciting or accepting any financial or personal gains, or a promise thereof, in exchange for the abuse of powers granted to them or for the non-performance of their obligation that may cause damage to the Bank's property, or constituting an act of unfair competition or an unacceptable preferential action in favour of the buyer or recipient of a good, service or benefit (executive bribery);
- 6) Preventing or obstructing a tender or entering into an agreement with another party, acting to the detriment of the owner of the property subject to the tender or the person or institution for whom the tender is conducted in order to achieve any financial or personal gains;



7) Disseminating, in relation to a tender, any information or keeping secret any important circumstances which are pertinent to the tender's outcome or to the entry into an agreement with another party, thus acting to the detriment of the owner of the property subject to the tender or the person or institution for whom the tender is conducted in order to achieve any financial or personal gains.

Gifts

Related persons may give and accept non-monetary gifts, whether directly or indirectly, as long as such gifts meet all of the following criteria:

- 1) The gift is accepted or given in connection with the performance of official duties;
- 2) The value of the gift does not exceed the amount specified in separate internal regulations on giving and accepting gifts;
- 3) The gift is a small corporate gift or customary token of courtesy in business relations, not extravagant or excessive (e.g., a delicatessen basket, flowers, candy, small leather and office goods, tickets, passes for participation in entertainment and recreational events, gift certificates, meals at restaurants or cafes);

- 4) The gift is of an advertising nature and is not offered with the intention of influencing the business relationship with the Bank;

with the proviso that detailed rules for accepting and giving gifts are defined in separate internal regulations.

Incentives

Related persons may accept and give, directly or indirectly, incentives:

- 1) Fees, commissions and non-monetary benefits received from a client or from a person acting on their behalf, or transferred to the client or a person acting on their behalf;
- 2) Fees or commissions necessary for the provision of a particular investment service;

with the proviso that detailed rules governing incentives are as defined in separate internal regulations and applicable laws.

Areas of the Bank's activity which are especially susceptible to corruption

1. To prevent the risk of corruption, the Bank identifies areas of activity that are particularly susceptible to this risk. Corruption risks are identified in particular in the area of:

- 1) Customer service in the processes relating to product sale and decisions on entry into transactions;
 - 2) Relationships of employees of Bank Group entities with business partners, including consulting firms, suppliers, intermediaries, subcontractors, cooperating entities, contractors and public officials;
 - 3) Supply of goods and services by external parties;
 - 4) Conducting procurement procedures;
 - 5) Executing property insurance contracts;
 - 6) Hiring and remunerating employees;
 - 7) Conducting sponsorship and charitable activities.
2. Related persons are required to exercise special diligence in carrying out tasks related to these areas of the Bank's activity which are particularly susceptible to corruption.

Reporting Violations

1. If a corruption offer is made to a related person, it is required that the person declines the offer and promptly, no later than the business day following the incident, report the matter to their immediate superior and the Compliance Department, or report it in accordance with the separate internal regulations on anonymous reporting of violations

of the law and the procedures and ethical standards applicable at the Bank. Violation reports to the Compliance Department are to be submitted via a dedicated electronic mailbox.

2. In the event that a related person other than the person who initially received the corruption offer becomes aware of such an incident, they must report it in accordance with the separate regulations mentioned in Section 1 no later than the business day following the day when they became aware of the offer.
3. Any other instances of identified Violations are to be reported in accordance with Sections 1 and 2.
4. In evaluating and considering violation reports referred to in Sections 1-3, the regulations referred to in Section 1 are to be applied accordingly.
5. Persons reporting a Violation are protected, and no retaliatory actions can be taken against them for making a report.
6. The Compliance Department maintains a register of Violations.
7. The Compliance Department evaluates and reports on anti-corruption activities to the Bank's Management Board, the Internal Audit Committee, and the Supervisory Board.

Quarterly compliance risk reports include information on reported cases of corruption, including details on how they are addressed. The personal data of the whistleblower and the individuals allegedly implicated in corruption are protected in accordance with privacy regulations.

Training

The Bank provides anti-corruption training that includes education on obligations/requirements related to the giving and receiving of gifts and incentives. Information on the completion of training courses is stored on the Bank's e-learning platform.

Responsibility

1. Responsibility for the implementation of the Policy lies with the Compliance Department.
2. Failure to comply with the Policy constitutes a breach of employee duties and may expose the employee to liability under Work Rules and criminal liability under the law.