



Policy on giving and accepting gifts in the KRUK Group



General provisions

The policy defines the rules for giving and accepting gifts in the company and applies to all employees, associates and members of statutory bodies.

The rules set out in the Policy do not apply to:

- a) business meetings (e.g. breakfasts, lunches, dinners) with customers, suppliers and business partners in order to build and maintain business relationships. In such case, each business meeting must be reported to the direct superior.
- b) invitations that employees receive from suppliers, business partners or give to business partners and suppliers for banquets and events related to the implementation of the employee's official tasks.

Rules on gifts' accepting and giving

When accepting and giving gifts is allowed

It is allowed for employees to accept and give gifts of the value specified in the Policy, provided it is related to the performance of official tasks. It is acceptable for an employee, associate or member of the company's statutory bodies to accept a gift of higher value, but they should obtain the consent of their superior before accepting the gift and inform the Compliance Section about accepting such a gift (or refusal to accept it).

An employee may accept the following types of gifts, including from business partners:

- low-value promotional gadgets – items intended to promote entities or goods, such as mugs, pens, pens, ball -pens, calendars, usually given to customers
- typical invitations that fall within the limits considered socially acceptable - invitations to sports or cultural events that are an element of good business relationships and serve to promote those relationships in which participation is sponsored by the person giving the invitation.
- occasional gifts given in exceptional situations, provided that the value of the gift remains within acceptable limits and there is no obligation to reciprocate.

When accepting or giving a gift, particular consideration should be given to the value of the gift compared to the value of gifts given as part of typical practices on a given market and country; whether there are any legal or regulatory restrictions; the total value of gifts received or given to a particular person or entity over the following 12 months. Employees, associates and members of the company's statutory bodies may participate in off-site conferences, training or seminars organized by business partners, suppliers and other entities cooperating with the company or whose participation costs are paid by these entities - if their topics are closely related to the scope of professional duties or functions held.

When accepting or giving the gift is prohibited

Employees, associates and members of the Company's statutory bodies may not give or accept gifts that violate the provisions of generally applicable law, contracts and settlements or reasonable customs applied on the market.

It is prohibited to accept or give gifts, regardless of their value, to state and local government officials in connection with their functions. This prohibition applies to employees of state offices, employees of local government administration (city, commune, district or voivodeship) and persons performing public functions.

In any case, it is prohibited to give or accept gifts during contract negotiations, contract renewal or in the period preceding this time.

It is forbidden to accept gifts:

- in the form of financial instruments
- cash or its equivalent, e.g. gift cards, vouchers
- in the form of discounts or promotions offered as a deviation from market conditions.
- on the basis of reciprocity;
- as part of an agreement under which the acceptance of a gift involves the performance of any actions by the recipient in return;
- regularly from the same source.

Any gifts that, due to their frequency or nature or circumstances, could be interpreted by an objective observer as given/received with the intention to influence, should be rejected and reported to the Compliance Section.

Compliance role

As part of the implementation of this Policy, the Compliance Section performs the following:

- a) introducing internal regulations regarding accepting and giving gifts;
- b) conducting analysis and issuing recommendations regarding the possibility of accepting and returning the gift, as well as monitoring their implementation;
- c) monitoring the application of the provisions of subjected Policy.
- d) keeping a register of gifts based on reports made by superiors, employees and associates.

Final provisions

The Compliance Section reviews the Policy annually, taking into account changes in the legal status, organizational changes and the validity of the described process. All activities performed based on the Policy are documented in written or electronic form, in a way that ensures the identification of the person performing the activity and the integrity of the information prepared.