



Anti-Corruption Policy

KRUK Group



General

The KRUK Group has a zero tolerance policy towards corruption. All employees and associates, as well as members of the statutory bodies of individual companies, are required to avoid any action that could lead to a breach of this policy. The proper identification and management of incidents of corruption is part of the KRUK Group's organisational culture and is designed to ensure compliance with the law and ethical principles to counter corruption and to meet the highest standards of transparency and openness in business.

Policy objectives

The main objective of the policy is to define the rules for identifying, countering and mitigating the risk of corruption incidents, as well as the rules of conduct and reporting in the event of a corruption incident or suspicion thereof.

Potential sources of corruption events

The policy applies to situations where an employee, associate or member of a statutory body of the KRUK Group accepts or offers a financial or personal benefit in order to influence decisions or actions. Examples of corruption incidents include situations where a financial or personal benefit is promised, offered or given in exchange for: the selection of a bid as part of an ongoing procurement process; the offer of a job or employment; conduct that is inconsistent with the law or the Company's internal rules; failure to perform an obligation or unjustified withdrawal from part of an obligation.

Anti-corruption measures

The anti-corruption policy is an important element of the KRUK Group's compliance management policy. A number of measures have been taken to prevent incidents of corruption, including:

1. implementation of this policy and communication of its contents to employees, associates and members of the statutory bodies of individual KRUK Group companies;
2. implementation of an appropriate organisational structure, including the division of key functions and a remuneration system, to prevent the occurrence of corruption incidents;
3. definition of the duties and obligations of employees, associates and members of the statutory bodies of individual KRUK Group companies, including access to information that constitutes a trade secret, confidential information covered by professional secrecy or other information protected by law;
4. implementation of mechanisms for reporting and investigating cases of corruption. Implementing mechanisms for reporting and investigating cases of corruption and enforcing disciplinary measures against persons who violate the provisions of the Policy;
5. Implementing transparent procedures for reviewing and approving costs and expenses, as well as for cooperating with third parties, in order to exclude the possibility of creating mechanisms for granting material benefits using the Company's assets.

Escalation of Corruption Incidents

Every employee, co-worker, business partner, supplier and member of the statutory bodies of a given company is obliged to report information about existing and potential cases of corruption, both in the event of participation in such a situation and in the event of becoming aware of it.

You can report breach/abuse using the whistleblowing system form, which is available at: <https://whistlekruksa.vco.ey.com/>. Reports can be made anonymously and the information provided will remain confidential.

The role of Compliance in dealing with corruption events

The Management Board of KRUK S.A. designates the Compliance Section as the body responsible for performing the tasks under this Policy, i.e.:

1. implementing the Policy;
2. analysing incidents of corruption, making recommendations and monitoring their implementation;
3. monitoring the application of the provisions of the Policy;
4. conducting appropriate training;
5. keeping a register of incidents of corruption.

Final provisions

The Compliance Department reviews the policy annually, taking into account changes in legal status, organisational changes and the validity of the process described in the policy.