

Detailed Anti-Corruption Policy of Polska Wytwórnia Papierów Wartościowych S.A. (Polish Security Printing Works)

Polska Wytwórnia Papierów Wartościowych S.A. (Polish Security Printing Works, PWPW) is a provider of products and services ensuring the reliability of transactions and identification. The actions of the Management Board of Polska Wytwórnia Papierów Wartościowych S.A. are driven by market requirements and customer expectations, while caring for the rights and needs of employees and satisfactory relations with counterparties and other stakeholders.

Taking into consideration the need to fulfil legal and other requirements resulting from the business activity pursued and bearing in mind the objectives indicated in the corporate strategy, the Management Board of Polska Wytwórnia Papierów Wartościowych S.A. undertakes to conduct its business in a transparent, honest and ethical manner, while maintaining a "zero tolerance for corruption" attitude, in particular through:

1. full commitment to the implementation, maintenance and continuous improvement of the anti-corruption management system,
2. appointment of the anti-corruption compliance officer, with adequately assigned authority and guaranteed independence,
3. management of corruption risks through a detailed analysis of all processes in terms of threats and weaknesses as well as planning and implementing measures to reduce the likelihood of corruption and attempted corruption,
4. ensuring a professional approach and honesty and integrity in all business transactions and relations,
5. exercising due diligence in all dealings with business partners to ensure their transparency,
6. prohibiting the offering, promising, granting, accepting, demanding or seeking undue financial or non-financial advantage,
7. setting and achieving anti-corruption objectives and regular monitoring of the progress in their achievement,
8. creating an organisational culture conducive to anti-corruption activities.

The Management Board of Polska Wytwórnia Papierów Wartościowych S.A. undertakes to:

1. comply with anti-corruption legislation,
2. raise anti-corruption awareness on an ongoing basis, in particular through a system of regular training for employees, according to their role and the corruption risks to which they are exposed and changing circumstances,
3. explain to employees, business partners and other stakeholders the consequences of non-compliance with the applicable Integrated Management System of PWPW S.A. Policy and this specific policy, including making all stakeholders aware that corruption will not be accepted and the appropriate action will be taken against offenders violating the aforementioned policies, which may also involve reporting the matter to the relevant state authorities,
4. encourage employees to report suspected corruption, attempted corruption, corruption as well as other inappropriate behaviour,
5. protect against any form of retaliation and maintain the prohibition of any retaliation in the case of whistleblowers reporting in good faith corrupt activities and other cases of abuse.

In its actions, the Management Board of PWPW S.A. undertakes that it will strive to meet the requirements and continuously improve the anti-corruption activities management system.

Detailed Anti-Corruption Policy is available to all stakeholders at www.pwpw.pl and to all employees through the PWPW S.A. Intranet

On behalf of the Management Board of PWPW S.A.

Piotr Ciompa



President of the Management Board