

Eurogate Logistics Company's Management Board is aware of the responsibility for active non-participation in combating corruption and committed to creating a culture of honesty, transparency, openness and compliance with compliance rules, therefore decided to adopt the principles of an anti-corruption management system.

This Anti-Corruption Policy contributes in particular to:

Ensuring the transparency of the Company's activities towards clients and interested entities,

- Identifying threats, making risk assessments and taking actions to protect the Company's interests,
- Implementation of rules of conduct towards staff and subcontractors, increasing anti-corruption security,
- Shaping the awareness of people working on behalf of and for Eurogate Logistics Spółka z o.o. in the field of identifying and counteracting corrupt behavior.

As a Company, we have adopted solutions aimed at preventing, detecting, responding to corruption and achieving compliance with anti-corruption legislation, in particular, but not exclusively, with: the Act of October 28, 2002 on the liability of collective entities for acts prohibited under penalty (Journal of Laws 2002, No. 197, item 1661, as amended), the Act of June 6, 1997, Penal Code (Journal of Laws 1997, No. 88, item 553, as amended), Act of September 15, 2000, Commercial Companies Code (Journal of Laws of 2000, No. 94, item 1037, as amended), Act of September 11, 2019 Public Procurement Law (Journal of Laws 2019, item 2019, as amended), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, drawn up in Paris on December 17, 1997, the United Nations Convention against Corruption, adopted by the Assembly United Nations General Council of 31 October 2003, Council of Europe Resolution No. (97) 24 on twenty guiding principles in the fight against corruption (adopted by the Committee of Ministers on 6 November 1997 at its 101st session), U.S. Foreign Corrupt Practices Act, Foreign Extortion Prevention ACT (FEPA), U.K. Bribery Act and with the obligations applicable to the Company's operations.

Eurogate Logistics Spółka z o. o., in particular:

- does not offer or comply with demands to pay public officials or business partners any payment beyond the amount specified in the contract;
- does not use subcontractors or other interested parties to transfer money to public officials or persons employed by business partners or their relatives;
- ensures that employees' remuneration is appropriate and received only for work actually performed;
- prohibits demanding and accepting bribes by the Company's personnel and any entity working on behalf of the organization;
- in relation to relationships with business partners and with public authorities, staff must refrain from offering or accepting money, gifts, benefits, discounts, employment opportunities or any other benefits that may be interpreted as a bribe. Offering or accepting such undue advantages in order to obtain an order, influence a decision or expedite procedures is prohibited.

The Company's Management Board promotes awareness and the obligation to comply with the provisions of this Policy regarding combating corruption and fraud among staff and business partners by providing information about this Policy and implementing anti-corruption training programs.

The Policy obliges all staff of the Company to comply with the principles of ethics, honesty and conduct with applicable law in all activities undertaken, in particular in relations with contractors, carriers, suppliers, public institutions and all entities in relations with the Company. Persons working for Eurogate Logistics Spółka z o.o. are aware that in the event of violation of applicable provisions and internal anti-corruption regulations and applicable provisions and internal anti-corruption regulations, they may be subject to disciplinary and criminal liability.

At the same time, we oblige business partners who carry out activities for Eurogate Logistics Spółka z o.o. to comply with the provisions of this Policy and all applicable anti-corruption laws.

We make business decisions based on fair and objective criteria, which is why we oblige cooperating with us business partners with us to comply with the prohibition of offering bribes or gifts to external parties and staff of Eurogate Logistics Sp. z o.o. that could have an influence, or create the impression of influencing the decisions of external parties and/or the decisions of the Company's staff.

The Company's Management Board encourages staff, business partners, their representatives and other interested parties to report, in good faith or on the basis of a reasonable belief, attempted corruption, concerns about suspected corruption or actual corruption, or violation of or weak areas of our anti-corruption management system, without fear of retaliation. We accept applications, even anonymously, at <http://egcodeofconduct.eurogate.com/>.

At the same time, as the Management Board, we declare that no staff member will experience retaliation, discrimination or disciplinary action due to reports made in good faith or based on a reasonable belief of a violation or suspected violation of the provisions of the Company's anti-corruption policy.

The HR Manager is responsible for the implementation and coordination of activities related to the Anti-Corruption Policy. Independence in terms of preventing corruption is ensured. The Management Board have oversight for supervising the anti-corruption system. As a company, we commit to meeting the requirements of the anti-corruption management system and to its continuous improvement.

The current Anti-Corruption Policy is available to interested parties on the Company's website <https://eurogate.com/> and posted at the Company's headquarters and field offices.

Warsaw, 11 March 2024, Vice-President of the Management Board, Grzegorz Ocipka