

# ANTI-CORRUPTION POLICY



**EXTRAL**  
ALUMINIUM

# ANTI-CORRUPTION POLICY

The basic document regulating the area of counteracting corruption in EXTRAL is the anti-corruption policy. The purpose of introducing the Policy is to indicate the standards of conduct and uniform principles of operation in an honest and transparent manner, which generate value for all EXTRAL stakeholders.

The implementation and compliance with the Anti-Corruption Policy is a manifestation of EXTRAL due diligence in the scope of acting in accordance with applicable law, internal regulations and ethical principles.

The policy applies to all employees and associates, the management board and proxies. EXTRAL also requires the contractors to comply with the standards of behavior specified in the Policy.

The areas exposed to the risk of corruption or other abuses related to the activity include in particular:

- purchasing processes,
- conducting investment projects,
- expenses related to business travel or entertainment,
- representation and advertising expenses,
- giving gifts,
- expenses for marketing and consulting services,
- charity and sponsorship activities.

The aim of the Policy is to counteract corrupt practices and other abuses, which may include, for example:

- theft or misappropriation of the company's property in the form of know-how, cash, materials, products, tools, equipment,
- theft or misappropriation of contractors' property, including, in particular, theft of intellectual property, copyrights, technological designs and technical designs,
- deliberate falsification of EXTRAL documents or introducing false information and data into their content and keeping EXTRAL documentation in an unreliable or inconsistent with the facts,
- keeping accounting records inconsistent with the facts,
- using EXTRAL property for private purposes without consent or knowledge.

EXTRAL implements the goals indicated in the Policy by:

- exercising due diligence in order to maintain transparency and openness in contacts with external entities,
- complying with local laws regarding the combating of unfair competition, including not condoning activities aimed at cartel collusion and against the use of counterfeits.
- maintaining internal processes to ensure compliance with export restrictions and sanctions.
- taking adequate and proportionate actions in relation to the occurrence of suspicions or findings of corruption or fraud,
- having internal regulations on financial matters, including the accurate keeping of accounting records.

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- building awareness among employees and associates of the rules of conduct in accordance with internal regulations,
- training of employees and associates regarding the occurrence of corrupt activities and abuses in their daily work,
- complying with local laws regarding the combating of unfair competition, including not condoning activities aimed at cartel collusion and against the use of counterfeits,
- providing the opportunity for employees and associates as well as other persons acting on behalf of external entities to provide information on breaches of the Policy.

EXTRAL pays particular attention to the system of reporting, investigating and investigating corruption incidents and frauds, by ensuring:

- communication channels allowing for safe (including anonymous) reporting of violations,
- confidentiality of the notifier's data and the information provided,
- protection against any form of retaliation against reporting persons.

Employees are required to read the Policy and apply it strictly.