

**Anti-Corruption Policy  
in force at Bidfood (Farutex Ltd.)**

**I. Introduction**

1. The rules described in the Anti-Corruption Policy apply to every Bidfood (Farutex Ltd.) Company
2. This Policy applies to all employees and collaborators of Bidfood (Farutex Ltd.).
3. Bidfood (Farutex Ltd.) is guided by the principle of absolute observance in the course of its business of the regulations in force, including the law and ethical standards designed to prevent any manifestation of corruption.
4. The company adopts a zero-tolerance policy for any corrupt behaviour.
5. In addition, Bidfood (Farutex Ltd.) supports and encourages its clients, business partners and suppliers to be ethical and honest in their actions, and to comply with applicable laws, including, in particular, the prevention of any manifestation of corruption.

**II. Policy objective**

1. The objective of the policy is to eliminate or reduce the risk of corruption at Bidfood (Farutex Ltd.) by creating an organisational culture based on the observance of ethical principles, and free from any abuse.
2. The subject matter of the company's anti-corruption policy is the implementation of rules of conduct, the definition of responsibilities and the procedure for reporting and resolving irregularities related to corruption risk.

**III. Definitions**

**Corruption** is the promising, requesting, offering, giving or accepting, directly or indirectly, of any undue pecuniary or personal benefit in violation of applicable law, internal regulations or an agreement concluded with the Company in exchange for an action or omission in relation to the performance of professional duties.

These activities relate in particular to bribery, kickbacks acceptance, paid protection, and economic corruption.

Among the most common corrupt activities, the following stand out in particular:

- bribery/kickbacks acceptance,
- paid protection/influence trafficking,
- economic corruption,
- favouritism, nepotism, cronyism

and other prohibited within the area of labour relations.

Prohibited activities that are corrupt in nature are defined by generally applicable laws, including in particular the provisions of the Criminal Code.

**IV. Policy rules**

1. The Bidfood (Farutex Ltd.) company expects high standards of conduct and integrity from all its employees and requires them to always act with integrity, reliability, and to protect the resources for which they are responsible.
2. The company also expects its suppliers, business partners and subcontractors to maintain the same high standards of conduct and integrity.
3. The Bidfood (Farutex Ltd.) company is committed to developing an anti-corruption culture by ensuring that all types of risk are being noticed and effectively managed. The employees involved in any inappropriate behaviour will be subject to disciplinary procedures set out by the company, and legal action will be taken if necessary.
4. In accordance with the Anti-Corruption Policy adopted, employees are required to comply with the following rules in both internal and external relations, whether undertaken directly or through others:
  - Employees are required to fully disclose all situations where their personal interests may conflict with those of the company,



- Any employee who succumbs or is likely to succumb to personal influences that may impede objective decision-making must seek advice from an appropriate senior manager.
  - Employees and their families are not allowed to accept, directly or indirectly, any money, gifts, or expressions of gratitude and hospitality that could directly influence or be perceived as influencing the decisions made by them on behalf of the company. The employees responsible for the purchase of materials, equipment and services must pay particular attention to ensure that the suppliers participating in tenders cannot be accused of being treated unequally by accepting gifts or other benefits.
  - The employees who were offered a gift as an incentive for special treatment must not accept it or return it together with a suitably polite letter explaining the company's policy.
  - Employees should not give any gifts or offer hospitality with the expectation that they and/or the company will benefit from this in any way, as this may constitute a bribe.
  - Accepting and/or offering small gifts and/or occasional hospitality, such as business lunches, dinners or invitations to events, is acceptable within reason, as long as it is a normal and appropriate expression of business courtesy and the recipient is not obliged to do anything. If a member of staff has any doubts about the appropriateness of giving or accepting a gift or invitation, they should consult their direct supervisor.
  - Contacts and/or gifts to or from state or local government officials may be a particularly sensitive issue. Employees must not offer or give, directly or indirectly, any pecuniary or other benefits to government or corporate officials for the purpose of obtaining or retaining a business advantage or securing any improper business advantage. Any employee who is asked by a government or corporate official to circumvent these rules must immediately report this to their immediate supervisor.
  - Employees should not make any contributions to individual politicians or political parties in order to gain political or commercial influence on behalf of the company.
5. It is forbidden to:
- receive or give any benefits in cash or cash equivalent (e.g. loans, shares, stocks, coupons, vouchers, prepaid cards and loyalty programmes).
  - receive or give any benefits to participants in tendering and purchasing procedures,
  - receive or give any benefits that may be perceived as unlawful and/or unethical.
6. Promotional programmes, discounts and prize competitions are subject to the rules contained in the Anti-Corruption Policy and generally applicable laws. The issuing of gift cards, coupons, vouchers, etc. to clients and business partners is only possible on the basis of the regulations for promotions and competitions run by the company.

#### V. **Whistleblowing**

1. All employees are obliged to protect the interests of the company and to report irregularities and other circumstances that may give rise to concerns, particularly in relation to corrupt activities.
2. Reports may be made via the dedicated e-mail address: [zgloszenia.sygnalescisci@farutex.pl](mailto:zgloszenia.sygnalescisci@farutex.pl) and as letters addressed to the Violations Team to the address 71-256 Szczecin, al. Wojska Polskiego 184c/5. The correspondence is subject to exclusion from the office circulation.
3. Investigations are only undertaken on the basis of reports containing sufficient information. Failure to provide sufficient information necessary for a fair explanation of a report may amount to discontinuing the investigation.
4. The company will not impose consequences in the form of termination of employment or service relationship on whistleblowing employees. No form of discrimination or harassment will be tolerated against individuals who in good faith raise concerns or suspicions about potential corruption.
5. Reports made in good faith are being treated confidentially and investigated with due diligence.



**VI. Policy introduction**

1. All employees are required to familiarise themselves with the contents of the Anti-Corruption Policy.
2. This policy is communicated to all employees through internal communication channels, and is also presented to all new employees during their onboarding.
3. Bidfood (Farutex Ltd.) conducts awareness-raising activities on the existing corruption risks by providing regular training courses to employees.
4. It is the duty of all employees and collaborators to avoid situations and actions that may lead to corruption. Failure by employees and collaborators to comply with the provisions of the Anti-Corruption Policy will be treated as a breach of employee duties and may result in both disciplinary liability and criminal liability under generally applicable laws.
5. This policy is subject to reviews on annual basis or if there are any changes to related government policy.

This policy enters into force on the date of signing.

03.03.2025

date

  
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signature  
Tarkowiak

  
Farutex Sp. z o.o.  
CZŁONEK ZARZĄDU  
Paweł Świąchawicz