

ANTI-CORRUPTION PROCEDURE

I. PURPOSE

The Anti-corruption Procedure in ALPHA TECHNOLOGY spółka z ograniczoną odpowiedzialnością (hereinafter referred to as the "ALPHA TECHNOLOGY") defines uniform rules for the enforcement of the Anti-Corruption Policy and the rules of conduct in the event of corruption behaviour (hereinafter referred to as the "Procedure").

II. DEFINITIONS

For the purposes of this Procedure, in order to detail the definitions contained in the Anti-corruption Policy, the following terms will have the following meanings:

MANAGEMENT BOARD

General Partner of ALPHA TECHNOLOGY,

EMPLOYEE

A person employed at ALPHA TECHNOLOGY, regardless of the position and function performed, as well as a person performing services on their behalf or on their behalf in any role, e.g. a sales representative, intermediary, agent, subcontractor.

MANAGER

Employee reporting directly to the management board holding the position of the head of the department or the position of an independent specialist.

CORRUPTION BEHAVIOUR

Corrupt behaviour includes all intentional acts or omissions, in particular:

- Promising, proposing, inducing, giving to persons holding managerial positions in an entity operating in the private and public sector any undue material or personal benefits, except for the usual holiday gifts and promotional materials - recognized as such by i.a. tax regulations, in order to take by a person an action, or refrain from acting in violation of the obligations imposed on him or her,
- Demanding or accepting any undue benefits for taking action or refraining from taking such action in breach of the ALPHA TECHNOLOGY employee's obligation.

III. RESPONSIBILITIES

1. ALPHA's TECHNOLOGY management board, plant directors and managers are responsible for the implementation and compliance with the Procedure.
2. The Anti-corruption Policy is available on the ALPHA TECHNOLOGY website.
3. All employees are obliged to read the Anti-Corruption Policy, Procedure and are obliged to comply with them.

IV. GENERAL RULES

1. Employees must not engage in corrupt behaviour under any circumstances.
2. Plant directors and managers are required to identify the risk of fraud and pay attention to any irregularities in the processes for which they are responsible, in particular in the areas of:
 - a) commercial activities,
 - b) investment,
 - c) purchasing,
 - d) acquiring and spending of public funds,
 - e) employment,
 - f) selection of service providers,
 - g) marketing, promotion and charity,
 - h) financial obligations under public law,
 - i) financial reporting,as well as prepare, and if necessary update a document containing risk analysis in the identified areas of conducted activity (hereinafter referred to as: the "Risk Analysis") in accordance with the sheet constituting the Annex to the Procedure. The Risk Analysis and their updates will be submitted to the Management Board for assessment.
3. Plant directors and managers are responsible for constant monitoring / controlling of the areas indicated in the Risk Analysis approved by the Management Board and for counteracting corruption behaviour in these areas.
4. Employees are obliged to report any suspected corruption or other economic abuses through the same communication channel that is used to inform about any kind of unethical proceedings: etyka@alpha.krakow.pl.
5. ALPHA TECHNOLOGY keeps registers of: Risk Analysis documents and reports of corruption behaviour. The Legal Department is responsible for keeping the records.

V. PRINCIPLES OF COMMUNICATION WITH ALPHA TECHNOLOGY CONTRACTORS AND ASSOCIATES

1. Any contacts with ALPHA's TECHNOLOGY contractors and associates for business purposes should be open, transparent and not provoking corrupt behaviour. They should be conducted through e-mail, fax and postal correspondence, business telephone numbers and direct meetings with compliance with the rules:
 - 1.1. in e-mail contacts should be used only business e-mails from the alpha.krakow.pl domain.
 - 1.2. all letters received and sent are to be registered in the register of incoming and outgoing correspondence in accordance with the rules in force in this regard at ALPHA TECHNOLOGY.
 - 1.3. all faxes are to be entered in the incoming and outgoing fax register.
2. Presentations of plants, products and solutions or technological ideas prepared in the form of slides, printed materials and other which are sent electronically may contain only substantive and marketing elements related to the presented solution.

3. In the case of a business trip, you should focus on its substantive purpose (implementation, participation in training, conferences, presentations, business talks). Participation in, for example, a dinner organized by the contractor is allowed.

VI. METHODS OF IMPLEMENTING ANTI-CORRUPTION POLICY

1. The Anticorruption Policy is implemented at ALPHA TECHNOLOGY through:
 - 1.1. Training newly hired employees on the principles of the Anti-Corruption Policy and Procedure.
 - 1.2. Periodic training to remind employees of the principles of the Anti-Corruption Policy and Procedure.
 - 1.3. Enabling reporting of suspected violations of the Anti-Corruption Policy or other legal provisions in the manner specified in the Code of Conduct.
 - 1.4. Ensure that employees, who report corruption behaviour in good faith and without malicious intent are protected from retaliation.
 - 1.5. Periodic audits of the Management Board aimed at control and supervision, verifying the effectiveness of the Anti-Corruption Policy based on the Risk Analysis.
 - 1.6. Notification of law enforcement agencies of any breaches of criminal law.
 - 1.7. Encourage entities cooperating with ALPHA TECHNOLOGY to implement their own anti-corruption practices.

VII. RULES OF CONDUCT IN CASE OF DETECTION OF CORRUPTION BEHAVIOUR

1. The Management Board, immediately after receiving the notification, in cooperation with the Legal Department, on the basis of the information received, verifies its truthfulness by checking the available evidence, verifying historical documents related to a given issue, obtaining information from third parties, etc.
2. The person who reports the breaches is guaranteed anonymity on the part of the persons verifying the information as well as on the part of the persons to whom the information about the abuse has been reported.
3. The person who made the report should be informed that:
 - is obliged not to contact the person whose behaviour is the basis for the report.
 - is obliged to maintain complete discretion and may not discuss matters, facts, suspicions or allegations with anyone.

VIII. ANTI-CORRUPTION OPERATING PROCEDURES

1. During proceedings concerning corrupt behaviour, every effort should be made to avoid taking actions on the basis of groundless accusations, avoid arousing suspicions in the persons who are being acted upon as to these actions, avoid statements that will have negative consequences for the company, employee or ALPHA TECHNOLOGY contractors.
2. Dealing with reported or identified cases of corruption or unlawful behaviour:
 - 2.1. The Management Board verifies the information received from the Legal Department, directly from the employee or obtained on its own, for example as a result of an audit.

- 2.2. In the event of a positive verification, the Management Board appoints a working Team to investigate the circumstances of the corruption behaviours.
- 2.3. The results of the work of the Team regarding the identified corruption behaviours are sent directly to the Management Board.
- 2.4. During the investigation of the circumstances of the events, the employee suspected of corrupt behaviour is allowed to present his position on the case.
- 2.5. On the basis of the working Team's request, further steps are taken in relation to the employee suspected of corruption.
- 2.6. Sanctioning decisions regarding the employee are made by the Management Board. In a situation where the event exposed ALPHA TECHNOLOGY to financial losses, the case may be brought to court. If it is determined that the investigated event is a crime, the Management Board will notify the law enforcement authorities of the incident.
- 2.7. Based on the findings of the working Team, the Management Board initiates remedial actions to prevent similar events in the future.
- 2.8. The implementation of the corrective action plan is coordinated by the Legal Department under the supervision of the Management Board.

IX. PROTECTION OF WORKERS

A person employed at ALPHA TECHNOLOGY may not be harassed or discriminated in any way in relation to legal activities in the field of disclosing corrupt behaviour.

ALPHA TECHNOLOGY gives the employee who is accused of corruption an opportunity to present his or her position.

X. FINAL PROVISIONS

This procedure is available at the secretariat of ALPHA TECHNOLOGY and at the secretariats of individual ALPHA TECHNOLOGY plants.

The Legal Department is responsible for administrative and organizational matters in the field of documenting and coordinating matters related to the activities of the Anti-Corruption Policy.

Attachment:

- Risk Analysis Sheet

Last modification: Cracow, on 08 January 2024