

ANTI-CORRUPTION POLICY OF MASTERPRESS S.A.



Introduction

Masterpress S.A. conducts business with a high level of integrity and believes in free and fair markets.

Fair management and respect for the law are fundamental pillars of the Company's value system. This Anti-Corruption Policy expands and strengthens respect for honesty and integrity in its operations, thus conveying the importance of corporate integrity to all directors, managers, employees, and associates of the organization.

Masterpress does not tolerate corruption in any form in the public or private sector where it operates. Corruption undermines the principles of fair business conduct, distorts competitiveness, harms brands, and exposes companies and individuals to risk.

Our Code of Ethics sets out fundamental principles for counteracting corruption. The purpose of this document is to fully describe the forms of corruption and provide all employees with further guidance on proper and ethical conduct in implementing anti-corruption policies.

This document applies to all Masterpress S.A. employees and associates without exception. Violations of these policies may be reported to the President of the Management Board or the designated reporting officer. Anyone reporting a violation will have the option to remain anonymous, to the extent permitted by law. No employee will suffer any negative consequences for refusing to pay or accept bribes or engaging in corrupt practices, even if such refusal may result in loss of business or revenue.

Employees who violate the anti-corruption policies contained in this document may be subject to disciplinary action, up to and including warning or dismissal, depending on the facts and circumstances.

What is corruption

According to the European Council definition, corruption means the abuse of entrusted power for private gain, involving the requesting, offering, or acceptance of bribes or undue advantages that distort professional duties.

For the purposes of this policy, corruption is defined as the promise, offer, or giving of an undue advantage to another person or entity, directly or indirectly, to induce them to act or refrain from acting in the performance of their official duties, as well as the demand or acceptance by that person, directly or indirectly, of such an advantage. Corruption encompasses a wide variety of behaviors, including bribery, fraud, embezzlement, conflicts of interest, and misuse of company assets. Corruption is often hidden, inconspicuous, and can involve any group of people. What may seem like normal business transactions and positive initiatives may, in certain circumstances, be defined as corruption not only under this policy but also under national and international anti-corruption laws. Employees should exercise caution to ensure that unfair personal or business relationships do not underlie any activities related to Masterpress SA's business processes. Employees must always remember that corruption can take many forms, can involve any type of compensation, and can influence current or future decisions.

Forms of Corruption

The most common form of corruption is bribery. In criminal law, there are two varieties of corruption: passive (i.e. those who receive) and active (those who offer). A bribe can be anything from cash to works of art, related to bribery. Another form is influence peddling, which occurs when a person who has real or perceived influence over a public official's decision-making and exchanges this influence for an unjustified advantage. Influence peddling can take the same forms as bribery. Sometimes, distinguishing between influence peddling and legitimate lobbying can be difficult. Therefore, lobbying is perceived in some countries as influence peddling, or more bluntly, as a crime.

Examples of Corruption

- Giving or accepting gifts and invitations of excessive financial value, going beyond normal customs and practices;
- Giving or accepting cash or cash equivalents (e.g. gift cards);
- Giving or accepting gifts and invitations intended as payment for an unjustified advantage or benefit;
- Giving or accepting gifts and invitations as a prerequisite for establishing or maintaining business relationships;
- Supporting the local community with the intention that local decision-makers will favor the Company in return for this support when making business decisions;
- Supporting a charitable or political organization with the intention that you will receive some benefit in return;
- Offering or accepting a job at Masterpress S.A. a person with the intention that after starting work in a given position they will act in accordance with the expectations of the offeror, instead of in accordance with their duties;
- Giving or asking for a loan in exchange for specific business or private expectations;
- Offering or accepting discounts on private purchases in exchange for placing orders as part of their official duties;
- Offering or accepting unfavorable business decisions in exchange for future professional benefits, e.g. a high-ranking position in the future in one of the supplier's companies.

Prohibited activities

Masterpress S.A. prohibits bribery and corruption in all forms and in all business dealings and relationships. The use of Masterpress property or other assets for any illegal or improper purpose is strictly prohibited. This prohibition applies to both giving and receiving anything of value, directly or indirectly (i.e., through an intermediary). At all times, to avoid even the suggestion of illegal or unethical behavior, Masterpress employees must exercise good judgment and make every effort to avoid situations that may lead to suspicion or the appearance of corruption. Even the appearance of corruption or bribery can negatively impact the Masterpress brand and undermine market and community trust in the Company.

No employee will suffer any negative consequences for refusing to pay or accept bribes or engaging in corrupt practices, even if such refusal may result in loss of profit or revenue.

Areas of risk of corruption

- Conflicts of interest are situations in which an individual has conflicting interests, financial or otherwise, and serving one interest may involve working against the other. It is important that all employees avoid and remove themselves from any situation in which a relationship with another organization or individual may affect their ability to make sound business decisions. Even the perception that their ability to make sound business decisions is at risk and could consequently damage the reputation of the employee and Masterpress S.A. All representatives of Masterpress S.A. must avoid conflicts between personal interests and

business operations and disclose such situations. Any potential conflicts of interest should be reported to your supervisor or directly to the President of the Management Board.

- **Suppliers** - Suppliers are subcontractors, material suppliers, service providers, consultants, intermediaries, and agents with whom Masterpress S.A. has a contractual relationship to provide goods and services. These third parties must be subject to appropriate, risk-based verification, due diligence, and monitoring. Suppliers wishing to work with Masterpress S.A. must sign the Supplier Code of Conduct.
- **Hospitality and Gifts** - To promote our business, we extend hospitality to our clients and partners through meals, travel, and events. Masterpress S.A.'s hospitality policies are described in Appendix 1 to this policy, "Principles for Giving and Receiving Gifts and Showing Hospitality."
- **Facilitation payments** are payments, often small, made to government officials to expedite or induce the performance of legitimate, non-discretionary bureaucratic processes to which the payer is legally entitled. Masterpress S.A. does not permit facilitation payments, directly or indirectly.
- **Political Contributions** – Bribes may be disguised as political contributions. These contributions are prohibited at Masterpress S.A.
- **Charitable contributions, community investments, and sponsorships** – bribes can be disguised as charitable contributions (donations), investments in local projects, or sponsorships. To protect against this risk, charitable contributions and sponsorships must always be approved by the CEO.
- **Hiring Relatives of Government Officials and Employees of Suppliers or Customers** – Relatives and close friends of government officials and employees of suppliers or customers must never receive preferential treatment or any other form of discrimination based on this relationship. If such a person is employed, the CEO must be informed. The CEO, together with a designated person, will analyze whether any conflict of interest exists and whether the individual should be barred from participating in specific work related to such a relationship or association.

Combating financial fraud

Fraud – any act or omission, including the provision of false information, that knowingly or recklessly misleads or attempts to mislead a party to obtain a financial or other advantage or to avoid an obligation.

Masterpress S.A. does not tolerate financial abuse in its activities and operations.

Masterpress has a duty to ensure that its funds are used for their intended purposes. Therefore, it will work to prevent and counteract cases of financial fraud, and if they occur, it will address them promptly.

Members of the management bodies and employees of Masterpress S.A. will maintain the highest level of integrity and efficiency in all activities.

Reporting corruption incidents or suspected corruption incidents

Corruption incidents, or suspected corruption incidents, should be reported immediately to your supervisor. If you suspect that individuals may be involved in corruption, you should report the matter to the President of the Management Board or the person designated to receive reports – the Deputy Financial Director, the Head of the Controlling and Finance Department. The supervisor to whom the report is addressed is obligated to inform the Deputy Financial Director, the Head of the Controlling and Finance Department, or the President of the Management Board within five business days of receiving the report. The Controlling and Finance Department will begin investigating the report as soon as possible, but no later than five business days after receiving it. All reports will be handled with due diligence with confidentiality guaranteed. Retaliatory actions against those reporting violations are not tolerated.

The anti-corruption policy was developed based on a risk assessment and is communicated to all employees of Masterpress S.A. The effectiveness of the implemented policy will be tested using anonymous surveys.

Rules for giving and receiving gifts and showing hospitality at Masterpress S.A.

Introduction

To promote its business, Masterpress S.A. shows hospitality to its clients and partners in the form of gifts, meals, travel or events.

A gift is something given voluntarily without expecting anything in return.

Inappropriate hospitality and gift giving may create a conflict of interest or the appearance of bribery.

Rules for giving and receiving gifts

- Hospitality and gifts received or given must be appropriate and consistent with local laws and customs, must serve a genuine business purpose, and must be permitted by the policies of the recipient's employer.
- Accepted and given forms of hospitality and gifts must not create an obligation on the part of the recipient towards the donor or the appearance of such an obligation, must not be of an immoral nature or violate the dignity of others.
- Showing hospitality should be kept within the limits of moderation.
- Gifts should have symbolic value. Gifts include promotional items.
- Use your best judgment when deciding whether to offer or accept hospitality or a gift.
- No cash or cash equivalents may be offered or accepted.
- Avoid offering or accepting any form of hospitality or a gift that could compromise your or the recipient's objectivity when making business decisions.
- Excessively frequent or routine gifts or hospitality may be inappropriate.
- Be familiar with and adhere to your vendor's hospitality and gifts policy.
- Do not solicit hospitality or gifts from vendors.

Rules for participation in conferences and events organized by external business partners

- Attending a vendor-sponsored conference should have clear business objectives.
- Before attending a conference, you should consider whether the issues discussed there are useful from the point of view of Masterpress S.A.'s activities.
- Participation must not cause the supplier to expect favoritism in business matters.
- Additional activities during the conference must be appropriate and reasonable. Giving out tickets to sporting or artistic events at other times during the conference constitutes a conflict of interest.