

Anti-Bribery and Anti-Corruption Policy (the "Policy")

1. Scope of the Policy

This Policy applies to employees and all representatives (including consultants, agents, contractors, etc.), hereinafter collectively referred to as "Glasmark Personnel", who act in the name of or on behalf of Glasmark Sp. z o.o. in Krosno (hereinafter "Glasmark").

2. Purpose of the Policy

This Policy sets out the standards applicable to Glasmark Personnel in relation to gifts and hospitality in the course of performing their professional duties. Glasmark is committed to ensuring that the Company conducts its business in compliance with all applicable laws and regulations, including those relating to the prevention of bribery and corruption.

As, in certain circumstances, giving or receiving gifts or hospitality may give rise to concerns regarding a breach of ethical standards or even anti-corruption requirements, Glasmark generally discourages the giving and acceptance of gifts and hospitality. However, in some circumstances, modest gifts or hospitality may have a positive effect on business relationships and may therefore be accepted by the Company, provided that they do not breach the principles set out in this Policy.

Permitted modest gifts or hospitality that may be offered or accepted in connection with the Company's business include, for example, modest meals or low-cost entertainment. In case of any doubt, you should always consult your direct supervisor or the Company's Management Board.

3. Key Definitions

- "gift": means anything of value provided by Glasmark Personnel to a third party or received by Glasmark Personnel from a third party;

- "hospitality": means any offer of entertainment, travel, accommodation, a meal or attendance at an event made by a third party to Glasmark Personnel or by Glasmark Personnel to a third party;

4. Prohibited Conduct

You must never:

- 1) offer or accept gifts or hospitality that may:

- a) influence, or have the potential to influence, the outcome of a transaction or business-related decision, for example the award of a new contract, success in a tender, or the obtaining of favourable contractual terms;
 - b) create an obligation towards any person or company, thereby giving rise to even the appearance of influence being exerted or conduct being rewarded - if you believe that a person is giving a gift or offering hospitality in order to influence or reward specific conduct, you must not accept the offer;
 - c) be unlawful or result in a criminal offence being committed by either the giver or the recipient;
- 2) use personal funds for gifts or hospitality in order to circumvent the rules set out in this Policy, even if no reimbursement is sought from Glasmark;
 - 3) accept cash, cash equivalents or gifts from persons directly or indirectly involved in considering tenders, applications, contracts or decisions affecting Glasmark's business;
 - 4) give or accept gifts or hospitality in dealings with public officials or their relatives without the prior approval of the Glasmark Management Board.

5. Register

Glasmark maintains a register of gifts and hospitality (hereinafter the "Register"). The Register is maintained by the Glasmark Compliance Team appointed by the Company's Management Board.

Rules for maintaining the Register:

- 1) Gifts and hospitality with a value of less than PLN 200 do not need to be entered in the Register or approved, provided that they are not offered in the form of cash or cash equivalents (e.g. gift vouchers) and are not offered in connection with dealings with public officials or members of their families.
- 2) Submit the relevant details to the Register as soon as possible, but no later than one month after accepting or offering the gift or hospitality.
- 3) Provide as much information as possible regarding the gift or hospitality, including its value, date and contact details.
- 4) Identify the person approving the gift or hospitality and attach supporting evidence (where required). Please note that all information provided when recording a gift or hospitality in the Register is confidential and will be made available only to the Glasmark Compliance Team, as necessary, for audit and compliance purposes.

- 5) Please note that records of gifts and hospitality, whether given or received, will be retained by the Compliance Team for at least five years.

6. Gifts and Hospitality Practices

In each case involving a gift or hospitality, every person concerned (regardless of whether the gift or hospitality was accepted) must determine whether approval is required and ensure that the appropriate entry is made in the Register in accordance with this Policy.

The table in the Appendix referred to in Section 8 sets out the circumstances in which approval and/or registration is required. If you are unsure how to proceed in a particular situation, please contact the Compliance Team (m.dubiel@glasmark.pl and a.rygiel@glasmark.pl).

7. Compliance and Reporting

Any member of Glasmark Personnel who breaches this Policy and/or applicable laws or regulations may be subject to appropriate disciplinary action, up to and including dismissal.

APPENDIX NO. 1 to the Order of the President of the Management Board of Glasmark
Sp. z o.o. dated 13 August 2026

Rules on Gifts and Hospitality Offered by Glasmark Personnel or to Glasmark Personnel

Benefit	Value	Rules
Any gift in dealings with a government or public official or a member of their family	Any value	Prohibited without prior approval by the Glasmark Management Board and entry in the Register.
Cash	Any value	Prohibited (all offers must be entered in the Register as rejected).
Cash equivalents (e.g. gift vouchers)	< <u>PLN 400</u>	Glasmark Personnel must not make such offers. Acceptance by Glasmark Personnel requires approval by the Glasmark Management Board and entry in the Register.
	> PLN 400	Prohibited (all offers must be entered in the Register as rejected).
Gifts other than cash or cash equivalents (e.g. alcoholic beverages and other gifts)	< PLN 200	Not permitted to be offered or accepted. (No registration is required unless at least two gifts have been offered by the same entity within a 12-month period.)
	> PLN 200	Not permitted to be offered or accepted. Must be reported in the Register.

Invitation extended by Glasmark Personnel to a business event	Any value	Permitted subject to prior approval by the direct supervisor; no entry in the Register is required.
Acceptance of hospitality arising from attendance at events in connection with a position at Glasmark or professional status (e.g. attendance at receptions or industry events)	Any value	Permitted subject to prior approval by the direct supervisor; no entry in the Register is required.
Invitation extended by Glasmark Personnel to a social event in connection with a position at Glasmark or professional status (e.g. a sporting event or lunch)	< PLN 200	Permitted subject to prior approval by the direct supervisor; no entry in the Register is required.
	> PLN 200 but < PLN 1,200	Permitted subject to prior written approval by the direct supervisor and entry in the Register.

	> PLN 1,200	Permitted subject to prior written approval by the Company's Management Board and entry in the Register.
Acceptance by Glasmark Personnel of invitations to social events in connection with a position at Glasmark or professional status (e.g. sporting events or lunches)	< PLN 200	Permitted. (No registration or approval is required.)
	> PLN 200 but < PLN 1,200	Permitted subject to prior written approval by the direct supervisor and entry in the Register.
	> PLN 1,200	Permitted subject to prior written approval by the Company's Management Board and entry in the Register.