



PRESSGLASS

GROUP



ANTI-CORRUPTION CODE



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GENERAL PROVISIONS

Article 1.

The Anti-Corruption Code for PRESS GLASS defines the procedure for dealing with corruption, bribery and conflict of interest situations, as well as counteracting and preventing similar events in the future.

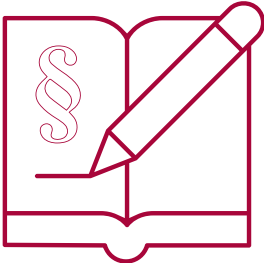
Article 2.

The terms used in the Anti-Corruption Code mean:

- Corruption** Abuse of job position for private gain. Corruption means promising, offering, giving, demanding, accepting by any person, directly or indirectly, any undue material, non-material or other benefit, or accepting an offer or promise of such benefits in exchange for action or omission to act in the performance of a function resulting from the job position held or in course of business activity.
- Bribe** Benefits, most often financial, given to a person or group of people to achieve a specific goal.
- Employer** PRESS GLASS Holding S.A. and PRESS GLASS Sp. z o.o.
- Conflict of interest** A situation in which the personal interests (financial, professional, family) of an employee or business partner conflict with the interests of the employer.

Employee A person in an employment relationship with an employer.

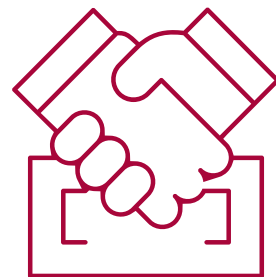
Ethics Committee A body appointed by the Employer as part of the implemented Code of Conduct to analyse reported violations and irregularities of the rules described in the Code, including those described in this document.



CORRUPTION AND BRIBERY

Article 3.

1. Corruption and bribery are behaviours that lead to business decisions being made in an unethical, biased manner, inconsistent with fair competition. They include issues such as making business promises in exchange for financial, material or other benefits that may be considered corruption or bribery.
2. PRESS GLASS prohibits all forms of corruption and bribery in contacts between employees and business partners and other employees. Actions or inducements to act resulting from the abuse of one's function or powers to obtain one's own benefits are not permitted.
3. It is also prohibited to make or accept corruption payments by any external entities acting on behalf of PRESS GLASS.



GIVING AND RECEIVING GIFTS

Article 4.

The Employer does not prohibit acts of mutual hospitality in the area of its activity, such as giving and accepting gifts, because these are actions commonly used in commercial relations. However, every employee of the company must be transparent and very careful when accepting and giving gifts or other benefits, and should adhere to the following rules:

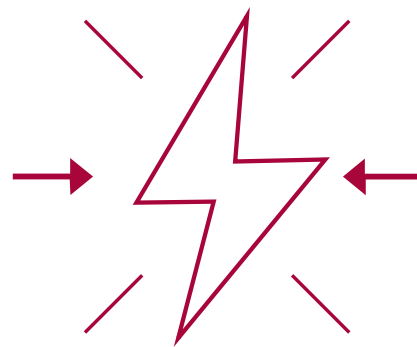
1. Offering or accepting benefits in the form of money is prohibited.
2. Gifts and other benefits are always given and accepted with the consent of the immediate or senior supervisor, in a transparent and open manner.
3. If you are in doubt as to whether a gift or other benefit is unlawful, you should always refrain from accepting or giving it.



CONFLICT OF INTEREST

Article 5.

1. All employees are obliged to identify potential conflicts of interest.
2. A conflict of interest occurs when an employee or employee's close ones have personal, financial or commercial interests that may influence, or appear to influence, the objectivity of decisions made in the performance of duties.
3. Employee transparency is essential to prevent and manage conflicts of interest, as well as to counteract the risk of their occurrence.
4. After becoming aware of an actual or potential conflict of interest, an employee should immediately inform its immediate or senior supervisor of this fact and refrain from any action until express consent is obtained, possibly subject to the fulfilment of certain conditions allowing for such action.

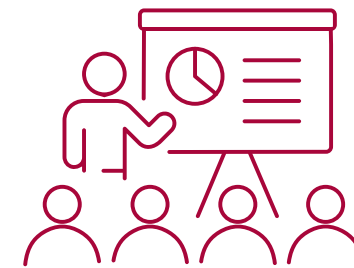


PREVENTING UNDESIRABLE CONDUCT

Article 6.

The Employer takes all actions permitted by law to counteract undesirable conduct described in this Code, in particular:

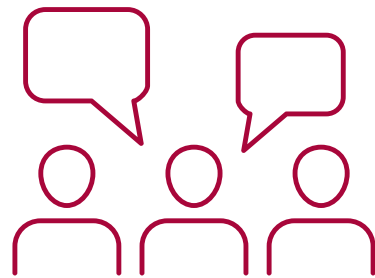
1. Promoting desired attitudes and conduct consistent with the principles, in particular through activities such as: the onboarding process, training, meetings, information campaigns (e-mails, posters, posts, intranet).
2. Promoting knowledge about undesirable conduct and methods of preventing their occurrence, through activities such as: training, meetings, information campaigns (e-mails, posters, posts), quizzes with questions.
3. Monitoring the application of the Anti-Corruption Code in practice, in particular through activities such as: satisfaction surveys, functioning of the Code of Conduct enabling the reporting of undesirable conduct.



REPORTING IRREGULARITIES AND UNDESIRABLE CONDUCT

Article 7.

1. Any employee observing, suspecting or dealing with undesirable conduct described herein, should immediately take action, i.e. contact directly the Ethics Committee operating in the company or send a message to the e-mail address: **compliance@pressglass.com**. The procedure for reporting violations and doubts is described in detail in the company's Code of Conduct.
2. Violations of the rules hereof may be reported by name or anonymously.
3. Violations of the rules may also be reported by our business partners via the website **www.pressglass.com**.
4. Failure to comply with the obligation to report violations, i.e. any delay or failure to report undesirable conduct may also constitute a violation of the law and the company's rules of conduct.
5. Employees should also pay attention to and inform without delay about circumstances that suggest actions of business partners that are contrary to the principles of this Code. After receiving such information, the Ethics Committee immediately takes steps to verify the indicated circumstances and make a decision regarding further cooperation with a given business partner.



6. The Employer will take appropriate measures against people who:
 - a. will act contrary to this Code,
 - b. will retaliate against employees who report violations of the principles described in this Code.
7. Personal data of the employee reporting violations and of other persons processed in connection with the explanatory proceedings initiated by the employer are protected in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons in relating to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation).



FINAL PROVISIONS

Article 8.

1. All company employees are obliged to read the Anti-Corruption Code and follow the rules contained therein.
2. PRESS GLASS expects all its business partners to comply with the principles described herein.
3. A template of the employee's declaration that it has read the content of the Anti-Corruption Code is attached as Appendix No. 1 hereto. Business partners can read the content of the document at: **www.pressglass.com**.

Article 9.

In matters not covered by the Anti-Corruption Code, the provisions of the Penal Code shall apply accordingly to proceedings of the commission.

Article 10.

The principles, rights and obligations contained herein apply throughout PRESS GLASS and may vary in individual countries where PRESS GLASS has its locations. Our employees and business partners should seek advice and support from their legal counsel to ensure compliance with applicable laws in individual countries.







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