

ANTICORRUPTION POLICY

1. TERMINOLOGY.

CHO – CELSA "Huta Ostrowiec" Sp. z o.o. with headquarters in Ostrowiec Świętokrzyski (27-400), Samsonowicza 2, entered into the National Court Register kept by the District Court in Kielce, 10th Commercial Department, under KRS number 0000123124;

Employees – all persons employed in CHO and providing services to CHO, regardless of the legal form and type of employment contract, as well as all other persons who perform activities on behalf and for CHO, including temporary trainees and apprenticeships in CHO;

Ethical values – principles included in the CHO Code of Ethics;

Corruption behavior (acts) – activities involving the abuse of official rights in order to obtain a material or personal advantage; offering, promise, giving, demand, accepting property or personal advantage in exchange for abuse of official rights, including managerial corruption;

Other violations – any violation of generally applicable laws, including in particular violations of the provisions on counteracting money laundering and financing of terrorism and acts constituting a crime, fiscal offense or tax fraud.

2. SUBJECT OF PROCEDURE.

The subject of the procedure is to determine the rules of conduct to ensure compliance of CHO's activities, its employees and other persons acting on behalf of and for CHO with applicable laws, internal regulations, ethical values and standards of conduct in CHO and the division of responsibility for its proper implementation.

The procedure regulates, in particular, the rules for counteracting the following crimes:

- active bribery (Article 229 of the Penal Code);
- paid active protection (Article 230a of the Criminal Code);
- active management bribery (Article 296a of the Criminal Code);
- disrupting (setting) a public tender (Article 305 of the Criminal Code);
- corruption and paid protection in sport (Article 46 (2) - (4) and Article 48 of the Sport Act of June 25, 2010);
- granting financial benefits in relation to the turnover of reimbursable products (Article 54 (4) and (5) of the Act of 12 May 2011 on reimbursement of medicines, foodstuffs for particular nutritional uses and medical devices).

3. SCOPE OF PROCEDURE.

The procedure applies to all CHO organizational units and applies to all employees.

4. PROCEEDINGS.

4.1. CHO Anticorruption policy

- 4.1.1 Employees performing their professional duties act fairly, in accordance with applicable law, codes of professional ethics, the CHO Code of Ethics and internal procedures and regulations.
- 4.1.2 CHO applies high ethical standards in all its activities, respects the rights of employees and the principles of honesty towards contractors and cooperating entities.
- 4.1.3 Anti-corruption rules and other violations contained in the Anti-Corruption Policy are aimed at improving and realizing such values as:
- honesty in relations with other employees and contractors and cooperating entities,
 - building trust in mutual relations with the environment and care for maintaining this trust,
 - transparency of all activities,
 - justice and decent treatment.
- 4.1.4 CHO implements the Anti-Corruption Policy in all aspects of its operations and takes measures to eliminate corruption-related phenomena.
- 4.1.5 Absolutely prohibited is:
- offering, promising or giving property or personal benefits of any value and in any form, in particular in the forms described in point 1 of the Procedure, subject to the provisions of the Procedures for offering and accepting gifts of CHO;
 - accepting or demanding such benefits;
 - mediating in offering (and giving) or demanding
 - (and accepting) such benefits, in violation of applicable law, in exchange for undertaking specific activities or in connection with the implementation of tasks;
 - creating mechanisms for financing the costs of providing property and personal benefits, including the use of CHO assets;
 - legalizing income from corruption activities;
 - making any decisions based on corrupt activities;
 - forcing or inducing to the above acts in all forms with respect to any persons, including employees
- 4.1.6 Employees are not allowed to participate in any activities bearing the traits of corruption or other violations, including, in particular, accepting or giving financial or personal benefits related to the performance of tasks on behalf of and for CHO.
- 4.1.7 It is the duty of CHO Employees to strictly avoid corrupt activities and other violations or behaviors that pose a risk of being considered corrupt or other violations.

4.2. Identification and reaction to corruption.

- 4.2.1. Employees of CHO's management staff (in particular, Divisional Directors) are required to identify the risks of Corruption Behavior and other violations that may occur in connection with the performance of their supervised tasks. In particular, the activities listed in section 4.1.5 are considered to be Corruption Behaviors.
- 4.2.2. For this purpose, they pay attention to and react to any situations that may give rise to Corruption Behaviors or other violations and inform subordinate Employees about it, communicating the lack of acceptance for these activities and indicating the right course of action.

4.3. Conflict of interests.

- 4.3.1. A conflict of interest is a situation in which an employee acting in his own favor, the benefit of another person or entity against whom he has obligations may act against the interests of CHO. A conflict of interest may also occur when the actions of the Employee in the personal, social, financial or political sphere harm or could harm in proper fulfillment of employee duties and undermine objectivity during the implementation of entrusted tasks and decisions.
- 4.3.2. Avoiding a conflict of interest is the responsibility of all employees. This obligation includes avoiding situations that justify suspicion of a conflict of interest or create an impression of its occurrence.
- 4.3.3. A conflict of interest may in particular take the form of business, financial, proprietary and personal relationships with an official, supplier, cooperating or competitive entities or another person whose decisions or behavior may affect CHO's business.
- 4.3.4. Employees are required to inform the immediate supervisor or the person managing the organizational unit or Director of the division about any, even possible, confusion of interests that could arise in connection with the performance of their duties. Reports about the possibility of a conflict of interest made in bad faith (i.e., knowing the misrepresentation of the information provided) are a violation of this Procedure, will be investigated in CHO and may be grounds for disciplinary action.

4.4. Relations with cooperating entities.

- 4.4.1. All types of CHO external cooperation are guided by the principles of integrity and transparency, and the basis for the relations created by CHO is to build mutual trust.
- 4.4.2. The Employee informs his superiors (direct supervisor, head of the organizational unit, department director or compliance director) about any contacts with cooperating entities unrelated to tasks performed for CHO, which may affect external relations or may constitute a conflict of interest.
- 4.4.3. Before cooperating with external entities, CHO may require that:
 - the persons representing the contractor have confirmed that they understand and have committed themselves that they will abide by the CHO Anti-Corruption Policy,
 - include in the contracts appropriate clauses regarding compliance with the anti-corruption standards introduced by CHO.

4.5. Relations with Employees.

- 4.5.1. CHO's relationship with employees is based on the principles of:
- mutual respect and trust,
 - cooperation in pursuit of commonly agreed and agreed goals,
 - fair and reliable assessment of the performance of duties,
 - efficiency of work performed.
- 4.5.2. CHO accepts, promotes and rewards Employees, taking into account the qualifications required for a given position and Employee's motivation to develop their qualifications and improve their skills.
- 4.5.3. Decisions regarding hiring, promoting and rewarding Employees can not be made in return for any personal or personal benefits or as a result of other behaviors prohibited by the Anticorruption Policy.