

CORRUPTION PREVENTION MEASURES

This procedure determines the policy with regard to *preventing any form of bribery*. The procedure applies to all AXTONE Group employees. In the case of issues that are not covered by the procedure, the internal regulations applicable to the location of the Company should be applied.

The procedure determines basic actions in order to establish a framework for good business practices preventing bribery. Including:

- bribery prevention
- involvement in bribery prevention
- contribution to improvement of business standards/norms of integrity, transparency and responsibility.

Each person working with AXTONE Group on any basis is obligated to familiarize oneself with the information in this document and strictly adhere to it at any time while working or rendering services for AXTONE.

BRIBES

AXTONE Group forbids its Employees to offer, give or accept bribes in any form, including a kickback of any part of the contracted payment, or using other ways or channels to give unjustified/ undue benefits to clients, agents, contractors, suppliers or Employees of any party or to government officials.

AXTONE forbids its Employees to agree on or accept a bribe or kickback from clients, agents, contractors, suppliers or employees of any party or from government officials to the benefit of the Employee or his family, friends, partners or otherwise related persons. Each person working or cooperating with AXTONE is obligated to prevent corruption in any field of the Company's activity.

Failure to report a potential corruption situation to the Proxy / Member of the Board may be treated as infringement of employee (or associate) duties, as a result of which appropriate measures as stipulated by the law may be taken against the persons responsible.

CHARITY SUPPORT AND SPONSORSHIP

Make sure that charity support and sponsorship are not used as a ploy to commit bribery/ disguised bribery. It is necessary to reveal any charity support and sponsorship in public.

GIFTS, HOSPITALITY AND EXPENSES

AXTONE forbids its Employees to give or accept gifts, hospitality or expenses in any situation which may influence the outcome of business deals – unless they are justified/ reasonable and bona fide expenses. The Employees may accept gifts or presents of nominal value below 200 PLN no more than once a calendar year from one contrahent. Should the abovementioned value be exceeded, AXTONE obligates its Employees to report this to their Superior.

BUSINESS RELATIONSHIPS

AXTONE obligates its Employees to apply the procedure in its interaction with subsidiaries, joint-ventures, agents, contractors and other parties with whom it has business relationships. To this end, AXTONE Employees are obligated to sign EMPLOYEE STATEMENT to confirm that they have read AXTONE procedure with regard to corruption prevention and undertake to adhere to the instructions therein.

COMMUNICATION

Should AXTONE Employee have any doubt about corruption in a given situation, he/ she is obligated to inform the Proxy / Member of the Board in writing about such situation and altogether refrain from contact with the persons who may be involved in corruption practices.

The communicated information is confidential. Under no circumstances will the communication of the information influence the Employee's situation in the Company, even if it results in a loss of a contract, agreement etc. by the Company. The communicated information will be disclosed only to the bodies established to prosecute corruption offenses (among others, Central Anticorruption Bureau, Police and Public Prosecution Authorities) with a request to keep the Employee's personal information confidential.

INTERNAL CONTROLS AND AUDIT

AXTONE Group Accounts Department is obligated to keep accurate books and documentation that are subject to control and document all the financial transactions in a correct and reliable manner. AXTONE is obligated to undergo internal controls, Accounts and bookkeeping practices in particular, as well as regular audits in order to ensure effective bribery prevention.