

# ANTI-CORRUPTION POLICY

Remontowa Shipbuilding S.A. promotes the highest ethical standards in its operations, such as Respect, Quality, Responsibility, Safety, Customer Satisfaction. We commit our employees, associates and management to strictly comply with internally adopted regulations and common law, including anti-corruption legislation.

Remontowa Shipbuilding S.A. is flexible, nonetheless with reference to abuse and incidents of a corrupt nature we show a zero tolerance attitude. **We do not accept and strongly oppose corruption and bribery.** Our employees, associates, executives and others on our behalf are by no means involved in corrupt activities.

## **APPLICABLE RULES**

Employees, associates and executive officers of Remontowa Shipbuilding S.A. or other persons acting for and on behalf of Remontowa Shipbuilding S.A.:

- will not promise, offer, give, demand, accept directly or indirectly any pecuniary, personal or other advantage or the promise of such an advantage in return for acting or refraining from acting, in order to obtain an improper advantage or to establish or maintain co-operation or to obtain more favourable conditions thereof;
- will not accept any monetary or non-monetary benefits that would not be entitled in the normal course of business, and will strictly refuse to accept such benefits;
- will promote an attitude of zero tolerance towards corrupt behaviour.

### **PUBLIC SECTOR INTERFACE**

It is unacceptable to give or offer any benefit (including gifts and expressions of hospitality and entertainment) to representatives of the public sector.

## **COOPERATION WITH COUNTERPARTIES**

Aware of the risk of becoming embroiled in a corruption scheme, we are particularly cautious when entering into business with counterparties, including but not limited to customers, intermediaries, co-operating companies or suppliers.

We work with reliable counterparties who enjoy a good repute and recognition in the market.

We give an official aspect to our arrangements with contractors on a case-by-case basis. We also update them on our anti-corruption policies, and we include provisions in our contracts to cooperate in accordance with the highest business standards.

We ensure transparency in our relationships with our counterparties by making non-cash settlements.

#### REPORTING IRREGULARITIES

If you become aware or suspect potential irregularities, you should report this to your line manager, the Ethics Officer or through anonymous channels:

- by an e-mail to: rzeczniketyki@remontowa-rsb.pl,
- posting a traditional letter to: Rzecznik Etyki (Ethics Officer), Remontowa Shipbuilding, ul. Swojska 8, 80-958 Gdańsk.
- dropping a letter in the dedicated mailbox set up on the ground floor of the Board's building.

We assure you that we will not pursue the identity of whistleblowers and prohibit any retaliation, acting in good faith and bearing in mind the guidelines of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of whistleblowers under European Union law.

PRESIDENT OF THE MANAGEMENT

BOARD BOARD

DEPUTY PRESIDENT OF THE

MANAGEMENT BOARD

Gdańsk, 10.07.2023

Dariusz JAGUSZEWSKI

Bartłomiej POMIERSKI

The Anti-Corruption Policy is an integral part of Remontowa Shipbuilding S.A.'s Anti-Corruption Procedure, containing the applicable rules in the area of anti-corruption and a number of guidelines to help identify and reduce the risk of corruption.

Remontowa Shipbuilding S.A.'s Ethics Officer is required to provide support in implementing the provisions of the Procedure, analysing and clarifying reported concerns, ensuring compliance of the Procedure with applicable law and verifying potential irregularities.