This policy was last revised on 06.12.2024

# **Anti-Corruption, Anti-Money Laundering and Bribery Policy**

### 1. Purpose

PLAKOR Czech s.r.o. strives to establish transparent and ethical management in order to become a trusted partner of various stakeholders and enhance customer value. This Policy aims to prevent corruption and bribery, which are economic crimes that damage the tangible and intangible assets of Plakor Czech and deter fair fulfillment of duties by Plakor Czech employees; and to ensure that Plakor Czech employees actively put ethical and moral value standards into practice.

All employees and business partners of Plakor Czech must perform tasks related to Plakor Czech in compliance with all related laws and regulations, including the Criminal Code of the Czech Republic, the Act on Conflict of Interest, the Public Procurement Act, and all other local anti-corruption regulations applicable in the Czech Republic. In cases where this Policy conflicts with local regulations, such local regulations shall take precedence over this Policy. This Policy can be revised and used according to local regulations and industry-specific requirements.

## 2. Scope

This Policy shall apply to the following entities: (i) The manufacturing plant of Plakor Czech; (ii) Plakor Czech's business partners, including suppliers.

## 3. Implementation Guidelines

- 3-1. Bribery One should not receive, offer, or promise to offer any kinds of monetary, non-monetary, illegal, or unethical gains or bribery from/to stakeholders. Bribery refers to all forms of gains given or received to achieve monetary or non-monetary goals and includes money, services, entertainment, gifts, donations, support funds, preferential measures, and conveniences.
- If direct payment of prices by a Plakor Czech employee or business partner is inappropriate, the payment should not be made indirectly either. In particular, any signs of bribery attempts should not be overlooked, even if they serve the interests of Plakor Czech.
- 3-2. Improper Solicitation Improper solicitation between Plakor Czech employees and stakeholders or between Plakor Czech employees is prohibited. One should not make unreasonable requests to or get



paid from stakeholders using his/her superior or dominant position. There should be no good offices or requests to make stakeholders have unfair transactions with Plakor Czech or its partners.

In particular, one should avoid doing business under conditions that are favorable to a certain account or partner. One should clearly reject any requests to provide convenience in business. In the case of receiving improper solicitation, it should immediately be reported to his/her superior.

- 3-3. Gifts and Entertainment One should not receive any souvenirs and gifts that exceed the normal range of small gifts according to social norms. In the case of inevitably receiving souvenirs or gifts, they should be handled as per Plakor Czech's gift management policy. One should not publicly tell stakeholders related to work about his/her congratulatory or condolence events. The amount of congratulatory or condolence money should not exceed a conventional range.
- In the case of providing civil servants with meals, accommodation, and transportation allowances concerning signing a contract for, promoting, or marketing products or services, regulations within the Czech Republic, including the Act on Conflict of Interest, should be followed.
- 3-5. Facilitation Payments Plakor Czech continues its efforts to eradicate the practice of giving government employees the so-called "facilitation payments" directly or indirectly, either to speed up the normal process or to avoid administrative delays. Even in cases where government employees illegally demand facilitation payments, Plakor Czech employees should reject the request and immediately report it to his/her superior to eradicate the practice of giving such payments. However, if immediate discussions with one's superior or the local compliance manager are impossible due to exceptional situations, such as when life, health, or assets come under threat, one can pay facilitation payments and immediately share specific reasons and details with the superior.
- 4. Donations and Sponsorships Charity donations and sponsorships should be fairly provided in accordance with internal criteria and procedures. Donations and sponsorships for political purposes are prohibited.

### 5. Policy Management

Our company has established mechanisms for reporting concerns, which are accessible to employees and relevant stakeholders. We also have internal processes in place to monitor risks related to compliance and ethical conduct. In case of any violations, appropriate actions are taken in accordance with our internal regulations to ensure accountability and prevent recurrence.