

Anti-Corruption 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

- 1) Employees are strictly prohibited from receiving, 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, unfair advantages, and inappropriate benefits. 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.

- 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. No one should use their position to improperly influence stakeholders or request 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) **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 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.

Type	Limit	Remark
General business gifts	Max 2,000 CZK (€80)	Calendars Small souvenirs etc.
Anniversary/ holiday gifts	Max 3,000 CZK (€120)	Christmas, contract signing etc.
All cash or cash equivalents	Prohibited	Vouchers and coupons
Company hospitality	Under 1,500 CZK (€60)	Frequent provision is considered a risk of corruption
Event / Seminar	Max 5,000 CZK (€100)	

- The company has set limits in accordance with best practices and principles derived from the Criminal Code of the Czech Republic, the OECD Convention on Combating Bribery, and general EU recommendations on combating corruption. These internal limits help reduce risks and demonstrate the company's commitment to ethical conduct.
- Repeated small gifts that cumulatively exceed set thresholds may be considered violations. All gifts above CZK 1,000 must be reported internally. Prior approval is required for any gift exceeding CZK 2,000.

4) 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. Recordkeeping and Approval

All gifts and hospitality must be documented. Any item exceeding the set thresholds must be approved in advance by a supervisor or the compliance team.

6. Consequences of Violations

Breaches of this policy may lead to disciplinary action, termination, and possible legal or regulatory sanctions.

7. Reporting mechanism and whistleblower protection

PLAKOR Czech s.r.o. provides a secure and confidential channel for reporting suspected violations of laws, internal policies, or ethical standards. The company strictly prohibits any form of retaliation against whistleblowers and ensures that all reports are handled fairly, promptly, and in accordance with applicable regulations. Whistleblower protection is an essential part of our commitment to transparency and accountability.