

## GLOBAL ANTI-CORRUPTION POLICY OF QEMETICA GROUP

### I. PURPOSE

1. At QEMETICA Group, we apply a zero-tolerance policy towards abuse and corruption, promoting ethical conduct and compliance with the law in all areas of activity wherever we conduct business. We care about the Group's reputation as a responsible and transparent partner whose competitive advantage is based solely on the quality, price, and innovation of the products, services, and solutions offered.
2. Prevention of abuse and corruption in the Group is based on compliance with the law, this Global Anti-Corruption Policy ("**Policy**"), and the Gift Procedure, which constitutes **Schedule No. 1 ("Gift Procedure")**.
3. Employees of QEMETICA Group (regardless of the type of contract, including collaborators) and stakeholders of the Group, including suppliers, subcontractors, and contractors, are required to comply with this Policy.
4. The Policy applies to all companies within QEMETICA Group and is binding for Employees.

### II. DEFINITIONS

**Compliance Officer** – the person serving as Compliance Officer in QEMETICA Group.

**QEMETICA and QEMETICA Group / Group** – QEMETICA S.A. and its subsidiaries (including foreign ones).

**Economic (Managerial) Corruption** – demanding, accepting, offering, or promising benefits in business relations in exchange for abuse of authority or neglect of duties.

**Official Corruption** – offering, promising, demanding, or accepting benefits by public officials or persons managing state entities.

**Cronyism** – favoring connected persons to gain benefits instead of using substantive criteria.

**Abuse** – intentional action or omission violating the law or QEMETICA Group standards, leading to personal gain or organizational loss.

**Nepotism** – abusing one's position to employ, favor, or promote family members.

**Paid Protection** – mediating in handling matters for a benefit, based on claiming influence in public institutions.

**Employees** – persons employed in the QEMETICA Group under an employment contract, persons performing work or services on similar terms but under a different legal basis (e.g. civil-law contracts, B2B contracts), and persons holding positions in the company's governing bodies on the basis of appointment.

### III. GENERAL PRINCIPLES

#### A. PROHIBITION OF CORRUPTION AND ABUSE

1. The Group prevents abuse and corruption by taking actions to prevent, detect, clarify, and report cases of Abuse, Official Corruption, Economic Corruption, Paid Protection, Cronyism, and Nepotism.
2. The giving or promising financial benefits or any material or personal advantages to state or local government officials (persons performing public functions) is prohibited. This prohibition also applies to state-affiliated entities (state-owned entities, SOEs).
3. The Group prohibits any facilitation payments. Facilitation payments, which are small fees intended to expedite routine administrative actions, are treated as a form of Corruption.
4. Any financial gratifications in relations with QEMETICA Group business partners, including clients or suppliers, are prohibited except in cases specified in the Gift Procedure.

#### B. ANTI-CORRUPTION CLAUSE

Any entity entering into a business relationship or any other form of cooperation with the QEMETICA Group is required to comply with this Policy by including an Anti-Corruption Clause in the contract or any other document, under which the counterparty undertakes to observe the QEMETICA Group

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Global Anti-Corruption Policy and to ensure its application by any third parties acting on its behalf. In the event of a breach or a justified suspicion of a breach of these rules, QEMETICA may, at its sole discretion, be entitled to terminate the agreement with immediate effect or to withdraw from it, without incurring any liability for damages.

## **C. DUE DILIGENCE OF CONTRACTORS**

QEMETICA Group conducts verification of contractors, including identification of their beneficial owners. Special caution is exercised towards contractors from countries considered to have a high level of corruption.

## **D. MERGER AND ACQUISITION TRANSACTIONS**

In merger and acquisition transactions, due diligence is conducted, including verification of compliance with anti-corruption and anti-abuse regulations.

## **E. ACCOUNTING AND DOCUMENTATION**

1. We comply with Group procedures regarding taxes and accounting, including settlement of business trips, payments, and other business expenses made using Group funds.
2. We comply with Group procedures regarding document circulation, contract drafting, and rules for granting powers of attorney and authorizations.
3. It is prohibited to create so-called corruption funds, i.e., bank accounts where funds from legal sources are accumulated, or other forms of spending funds for corruption purposes.

## **F. AUDIT**

We reserve the right to conduct, in agreement with QEMETICA Group contractors, audits regarding prevention of abuse and corruption.

## **IV. QEMETICA GROUP EMPLOYEES**

1. Employees comply with legal regulations, internal rules, and ethical standards for preventing abuse and corruption and apply best market practices in this area.
2. Employees demonstrate zero tolerance towards abuse and corrupt behavior and set a good example in their daily professional duties.
3. Employees comply with QEMETICA Group procedures regarding the use of entrusted property, assets, and resources of the Group.
4. The recruitment, evaluation, and promotion system for Employees is based on transparent, standardized criteria excluding Abuse.

## **V. POLICY APPLICATION. RESPONSIBILITY**

1. Employees are acquainted with the Policy during initial training and are obliged to comply with it.
2. Employees participate in regular Policy training with simultaneous knowledge verification.
3. Employees may submit questions regarding the Policy via email: [compliance@qemetica.com](mailto:compliance@qemetica.com).
4. Anyone can report a violation of the Policy to their supervisor or through available reporting channels in accordance with applicable regulations, including whistleblower protection.
5. We conduct risk assessments, regular audits, and internal controls within the Group in order to identify risks, optimize processes, and ensure compliance with the law and this Policy.
6. The Compliance Officer and the Management Board Proxy for QEMETICA Security are responsible for the content and application of the Policy and cooperate in analyzing the risk of non-compliance in QEMETICA Group's anti-abuse and anti-corruption processes.
7. Supervision over the implementation of the Policy is carried out by QEMETICA Group management.
8. Violations of the Policy may result in legal, financial, and reputational liability for the QEMETICA Group and may lead to termination of employment, disciplinary action, and liability for damages for individuals in breach of the Policy.
9. This Policy replaces the QEMETICA Group Abuse and Corruption Prevention Policy (version 1.4) as of the date of adoption by the QEMETICA Management Board.

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