



PIEROŃCZYK

**SUBCONTRACTING
PRECISION PRODUCTS**

KOLEJNICTWO · PRZEMYSŁ · MOTORYZACJA

Ślusarstwo Produkcyjne

inż. Andrzej Pierończyk

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ANTI-CORRUPTION POLICY

SUBCONTRACTING PRECISION PRODUCTS

Document	Anti-corruption policy
Version	1.0
Date introduced	2026-06-24
In force from	2026-07-01
Status	Internal document / for use within the organisation and in business relationships

CHAPTER I. GENERAL PROVISIONS

§ 1

This Anti-Corruption Policy sets out the principles for preventing corruption, conflicts of interest, abuse and other unethical practices in the operations of Ślusarstwo Produkcyjne inż. Andrzej Pierończyk.

§ 2

The purpose of the Policy is to ensure that the company's activities are conducted honestly, transparently, lawfully and with due organisational diligence. The Policy supports the protection of the company's reputation, the security of commercial relationships and the integrity of technical, quality and financial documentation.

§ 3

The company conducts production and subcontracting activities in the area of precision metal machining, welding, assembly, kitting, quality control and project execution for industrial customers. Given the nature of its relationships with customers, suppliers, subcontractors and business partners, high ethical standards are required.

CHAPTER II. SCOPE OF APPLICATION

§ 4

The provisions of the Policy are binding on the owner, persons directing work, employees, associates, persons acting under civil-law contracts and other persons performing activities on behalf of or for the company.

§ 5

The principles set out in the Policy shall also apply in relationships with customers, suppliers, subcontractors, intermediaries, advisers, institutions and other business partners, to the extent appropriate to each relationship.

§ 6

Each person subject to the Policy is required to act in the company's interest, with honesty, impartiality, reliability, confidentiality and responsibility for decisions made and information provided.

CHAPTER III. ZERO TOLERANCE FOR CORRUPTION

§ 7

The company applies a zero-tolerance policy towards all forms of corruption. It is prohibited to give, promise, offer, demand or accept material or personal benefits in exchange for a specific action, omission, decision, influence on supplier selection, quotation outcome, quality acceptance or any other business advantage.

§ 8

The following are considered inadmissible in particular: concealing actual costs, commissions or intermediaries; falsifying documents, technical documentation, quality records, quotations, settlements, reports, data and information provided to customers, suppliers or authorities; creating fictitious transactions, invoices or contracts; and conducting transactions for money-laundering or fraud purposes.

CHAPTER IV. CONFLICTS OF INTEREST

§ 9

Each person subject to the Policy shall avoid situations where their private interests conflict with the company's interests. If such a conflict arises or is suspected, it must be disclosed to the owner without delay.

A conflict of interest may arise in particular where a person subject to the Policy: maintains family, personal or financial relationships with a supplier, customer or competitor; participates in decisions concerning entities in which they have a personal interest; or makes use of company resources, information or relationships for private purposes.

CHAPTER V. GIFTS, HOSPITALITY AND BENEFITS

§ 10

Accepting or offering gifts, invitations and hospitality is permitted only to the extent that they are of a symbolic nature (e.g. small promotional items, occasional shared meals), consistent with social norms and business practice, transparent, and do not create a risk of undue influence on commercial decisions.

The following are prohibited regardless of their value: cash gifts, gift cards and financial instruments; gifts from entities seeking to obtain or retain an order from SPP; gifts for persons responsible for accepting deliveries, quality control or pricing; and benefits given with the intention of influencing a

business decision.

CHAPTER VI. REPORTING VIOLATIONS AND PROTECTION

§ 11

Each person subject to the Policy is obliged to report known or suspected violations of this Policy to the owner or, in the case of doubt or a conflict of interest, directly to a trusted person or externally in accordance with applicable law. Reports may be made verbally, in writing or electronically, and the person making the report must not suffer negative consequences for acting in good faith.

CHAPTER VII. FINAL PROVISIONS

§ 12

The Policy comes into force on 2026-07-01 and may be updated by decision of the owner. All persons subject to the Policy shall be familiarised with its content before taking up their duties and whenever significant changes are made. Confirmed violations may result in disciplinary action, termination of employment or cooperation, and — in the case of criminal conduct — referral to the relevant authorities.

Prepared by: Damian Pierończyk Date: 2026-07-01
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Approved: Andrzej Pierończyk Date: 2026-07-01
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