



## Selena Group Anti-corruption Policy



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## **I. PURPOSE**

The purpose of this Policy is to eliminate any corrupt activities and to ensure that the highest ethical standards set out in this Policy are followed. The Policy applies to all employees, associates and business partners of the Selena Group.

## **II. INTRODUCTION**

Selena Group operates under the principle of zero tolerance for corruption. All companies belonging to the Selena Group are obliged to act in compliance with the applicable laws, internal regulations and accepted customs as long as they comply with the mandatory provisions of the law. Any corrupt practices have a negative impact on economic development, violate the principles of free trade and threaten the Selena Group's position achieved as a result of many years of trust from customers, business partners and the local community. This Policy applies to all contracts, transactions and agreements concluded, carried out and performed by the Selena Group in all countries where Selena Group operates. There are no factors which may affect exemption from the provisions of the Policy. It is an absolutely binding document and any violation of it constitutes a violation of the employee duties and of the basic principles of cooperation applied in practice

## **III. TYPES OF CORRUPTION RISKS**

Corruption is the requesting, offering, giving or accepting, directly or indirectly, a bribe or any other undue benefit or promise thereof which distorts the proper performance of any duty or conduct required of the person receiving the bribe, undue benefit or promise thereof. A "benefit" is considered not only a material benefit. Corrupt behaviour can be divided into:

1. Venality - soliciting, coercing, agreeing to receive a bribe
  - In connection with the performance of their duties for Selena Group companies, Selena's employees and associates are not allowed to accept any financial or personal benefit or promise thereof, including for conduct in breach of the law, or to make the performance of such duties conditional on receiving a financial or personal benefit.
  - Absolutely forbidden actions!
2. Bribery - offering, promising or giving a bribe
  - Employees and associates shall not give a financial or personal benefit to any person performing a public function in connection with their performance of that function. Employees and associates shall also not take actions aimed at inducing a person performing a public function to violate the law or to grant, or promise to grant, a financial or personal benefit to such person for violating the law.
  - Absolutely forbidden actions!
3. Manipulation of tenders / bids / contracts
  - Employees and associates shall not prevent or impede the tender process
  - Employees and associates shall not enter into any agreement with another person to the detriment of Selena Group
  - Absolutely forbidden actions!
4. Receiving / giving gifts (not applicable to promotional and marketing campaigns):
  - Receiving / giving gifts in the form of cash or cash equivalents is strictly prohibited

- Receiving / giving gifts up to a value of EUR 50 (expressed in local currency) is permissible if it is necessary to maintain good relations with the business partner
- Gifts with a value between EUR 50 and EUR 200 (expressed in local currency) may only be given / accepted with the approval of the supervisor
- Receiving / giving gifts with a value of more than EUR 200 (expressed in local currency) is only possible with the approval of the Compliance Unit.

#### **IV. AWARENESS AND TRAINING**

1. For the employees:
  - Newly hired employees are acquainted with the principles in force during the initial training, which fact they confirm with a signature
  - Information campaigns on applicable principles are organised once every six months
  - Training is organised by the Compliance Unit
2. For business partners:
  - The Anti-corruption Policy and its principles are available on Selena Group's websites
  - Key / Cyclical business partners are acquainted with the provisions of the Policy
  - The business partner's supervisor is responsible for providing the text of the Policy
3. The role of the Compliance Unit
  - Consultancy regarding anti-corruption activities
  - Organisation of promotional / information campaigns
  - Assessing behaviour / actions in terms of corruption

#### **V. OBLIGATIONS**

1. Each Selena Group employee and associate is obliged to know and understand the provisions of this Policy
2. Understand the characteristics and nature of corrupt behaviour
3. Comply with the provisions of the Policy and avoid corrupt activities / behaviour
4. Ensure that its business partners understand the standards of Selena Group

#### **VI. REPORTS**

1. in the event of identification or suspicion of occurrence of corrupt behaviours / activities, employees and business partners are obliged to report them
2. Reports must be made in accordance with the Group's reporting principles
3. In case of doubt, please contact the Compliance Unit, the Legal Department or the Management Board Office

#### **VII. FINAL PROVISIONS (LIABILITY)**

1. Violation of the obligations set forth in the Policy constitutes a breach of basic employee duties and may result in termination of the employment contract for cause without notice.
2. With regard to business partners, violation of the provisions of the Policy may result in termination of the civil law relationship without notice.
3. In the event of damage to a Selena Group Company, an employee / business partner may face criminal and civil liability in accordance with the applicable laws.