

Anti-Fraud Policy

InPost Group

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1. WHAT VALUES DO WE HAVE AT INPOST?

At InPost Group, we act honestly and responsibly, with respect for ourselves and others. We believe that true success is only possible when we act in accordance with the law and ethics.

We adopt a zero-tolerance policy towards any abuse.

This principle applies to all of us - employees and co-workers regardless of their position, as well as business partners.

We aim to ensure that every person in our organisation is aware of the risks involved in breaching the law and our policies. This enables us to respond quickly and effectively to such risks. Therefore, all our employees and co-workers need to be able to recognise inappropriate behaviour. From this Policy you will learn how to spot them and how to act against them.

2. WHO IS AFFECTED BY THE RULES SET OUT IN THIS POLICY?

The Management Board of InPost S.A. is committed to acting in accordance with the highest ethical standards. It requires the same from management representatives at all levels of the organisation across all companies within the InPost Group, as well as other employees. Compliance with this Policy is a condition of any cooperation with InPost.

3. DO OUR RULES DERIVE FROM THE LAW?

Many countries introduce strict laws and regulations to combat dishonest business practices. In many countries, corruption and fraud are crimes with serious penalties.

International laws are designed to protect the public from the negative consequences of corruption: financial losses, poor quality of services, lack of trust in public institutions. Examples include:

- 1) 1997 OECD Convention on Combating Bribery of Foreign Public Officials,
- 2) 2004 UN Convention against Corruption.

Several countries have adopted laws that allow them to prosecute those guilty of corruption even if the crime took place outside their borders. This means that it is possible to be prosecuted for the same crime in different countries. You will find examples below:

- a) **Sapin II** law - this law supplements the provisions of the French Criminal Code on bribery and paid patronage and applies to large French companies such as Mondial Relay - and all its branches, related companies and entities under its control (even if they are not French entities).
- b) **UK Bribery Act (UKBA)** - applies to corrupt acts, both private and public, committed in or outside the UK **by persons connected with the UK and companies doing business in the UK**, regardless of where they are based. Accordingly, InPost Group companies are also subject to the UKBA.

c) **The Foreign Corrupt Practices Act (FCPA)** in the United States of America (USA). The FCPA is limited to corruption of foreign public officials. It applies to three categories of entities:

- companies that have securities registered in the US or are required to file periodic reports with the SEC, as well as their employees, officers, directors, shareholders or others acting on their behalf ("the issuer")
- any U.S. citizen, non-U.S. national or U.S. resident, as well as any company with its principal place of business in the U.S. or incorporated under the laws of the U.S., and its employees, officers, directors, shareholders or other persons acting on its behalf ("domestic shareholding")
- any natural or legal person who has committed a corrupt act within the US territory or who has used the US postal service or any other means or interstate instrumentality of commerce (such as US dollar, US bank, etc.) to do so ("territorial jurisdiction").

Note that the scope of the FCPA is so broad that InPost Group companies may fall under it, even if they are not listed or headquartered in the United States.

4. WHAT ACTIONS ARE NOT ACCEPTABLE?

Below, you'll find examples of behaviors that are not acceptable at InPost.

4.1 WHAT EXACTLY IS FRAUD?

Fraud is a deliberate and intentional act that may be committed by employees, associates, or third parties (such as business partners) to obtain undue benefits. It is dishonest or unethical behavior that has negative consequences for the company and its business operations. Examples include corruption, deception, falsifying documents, or misappropriation of company funds.

4.2. CORRUPTION - WHAT IS IT?

Corruption is the abuse of power or position to achieve one's own ends (private material or non-material benefits). It occurs, for example, when someone offers benefits to another person in the expectation that this person will repay him or her and take certain actions in his or her interest. This usually occurs in connection with an official position.

- **What do we mean by benefits?**

- this refers to undue advantage, i.e. that which is obtained in an unfair or unlawful manner, e.g. in the expectation of more favourable treatment from a business partner.

- **What might these benefits be?**

- this is not only money (cash, bank transfer, other types of bribes), but also benefits in kind, such as gifts, invitations to cultural or sporting events,

restaurant meals, payment of accommodation or travel expenses, sponsorships and even charitable donations.

Other examples of benefits include preferential treatment of business partners, e.g. in tendering or negotiations, sharing of confidential information that may provide an advantage over competitors, hiring – or promising to hire – outside the normal recruitment process.

The benefit may also apply to a **third party**, such as relatives or friends.

It is forbidden not only to give or receive such benefits, but also to offer or expect them already.

Corruption is committed both by those who offer such an undue advantage (**active corruption**) and those who accept or expect it (**passive corruption**). It does not matter whether the benefit is actually given. For example, soliciting a bribe can be punished in the same way as effectively giving it.

A corrupt activity can be **direct** (when someone personally approaches a person accepting a bribe) or **indirect** (when such a person is approached by third parties, intermediaries). All persons involved in a corrupt activity are responsible for it and can be punished.

4.3. TYPES OF CORRUPTION

4.3.1. Public corruption

By such corruption we mean corruption involving public officials.

A civil servant is a person who, for example:

- holds a position in national or local government;
- performs a public function;
- works in the public sector;
- is a member of the royal family;
- is employed by a state-owned or state-controlled company;
- is employed by a university or other body wholly or partly controlled by the state or local government (in some jurisdictions);
- is a representative of an international governmental organisation;
- is a candidate for public office or a person of prominence in a political party with decision-making powers.

Among public officials, there are so-called 'Politically Exposed Persons' - or **PEPs** for short. A PEP is an individual who holds a prominent position or has a close relationship with such a person - e.g. as a family member - or works closely with him or her. PEPs are particularly vulnerable to corrupt activities by virtue of their position.

4.3.2. Private corruption

If the corrupt activities involve persons in the private sector, we speak of private corruption.

Private corruption can happen, for example, during the selection process of a contractor or business partner in a private company, in a tender or recruitment process. It may involve the transfer of secret information to secure a competitive advantage.

4.3.3. Paid protection

Paid patronage is when someone offers or accepts money or other benefits to influence the decision of a public official.

In most countries, paid patronage is a form of corruption. However, in France it is a separate offence defined in the Criminal Code.

4.3.4. Extortion

Extortion involves demanding an undue advantage by means of violence, threat or coercion. One example of extortion is blackmail.

Extortion is a corruption offence in most countries.

4.3.5. Small gratuities

Small gratuities are small sums of money or other benefits given in a non-transparent manner (i.e. without receiving a confirmation e.g. in the form of a receipt) to a public official in order to obtain an expected decision or to speed up an administrative procedure.

4.3.6. Creative accounting

Creative accounting is the manipulation of accounting records. This includes, for example, illegal changes to financial statements to misrepresent a company's true financial condition, to hide profits or losses.

At InPost, we do not accept any form of corruption or fraud. We know that such actions damage our reputation and undermine trust in us among our employees and business partners. Therefore, we will draw severe business consequences against those guilty of such violations, including termination of cooperation.

4.3.7. Sanctions for corruption and paid patronage

In addition to official consequences, corrupt actions can have different effects in different countries, for example:

- serious criminal sanctions (imprisonment and fines) for both employees and business partners and InPost Group companies or members of their governing bodies;
- payment of compensation to the injured party;

- cancellation of concluded contracts or disqualification from participating in public tenders.

4.4. CONFLICT OF INTEREST

4.4.1 Conflict of interest – what is it?

We refer to a conflict of interest when someone's personal interests affect (or are likely to affect) their professional duties, which may lead to the abuse of their position for private purposes.

By personal interests we also mean the interests of closely related persons (e.g. a spouse, partner, other family member or a close but unrelated person). A conflict of interest may also arise from a professional relationship with a customer, supplier, business partner or competitor with whom the person has entered into a private relationship in the course of business cooperation.

Conflicts of interest are not in themselves unlawful, but they can give the impression of bias in decision-making and even lead to corruption. At InPost, we work hard to identify these situations early and make sure they don't result in any breaches.

A conflict of interest happens when your personal matters could influence your decisions at InPost, or when you might gain a personal benefit because of your role in the company.

4.4.2. How to handle conflict of interest?

It's important to know how to handle these situations. Here are **5 simple steps**:

Step 1 – Identify a potential conflict.

Think about whether your work or the decisions you make in your role could be connected to your personal interests, friendships, or relationships. Is there a risk that your actions at work could affect your private matters or the situation of someone close to you?

Step 2 – Be mindful of personal connections.

Think about your close ones – family, friends, acquaintances. Could any of them benefit in some way from the fact that you work at InPost, for example through decisions you make or information you have?

Step 3 – Assess the benefits for you and for InPost.

Compare your personal goals (e.g., financial or career-related) with InPost's interests. Make sure your private plans do not conflict with what is best for the company and that you are not using your position to gain personal benefits.

Step 4 – Consider how the situation looks from the outside.

Even if you personally do not gain any benefit from the situation, others may perceive it as a conflict. It's important to avoid situations that create even the appearance of wrongdoing to maintain trust and protect the company's reputation.

Step 5 – Always report a conflict.

If you identify a potential or actual conflict of interest, inform the appropriate people in the company immediately. Do this before making any decisions or taking any business actions. Disclosure is the best way to manage such situations and protect both yourself and InPost.

Example: You work in the purchasing department at InPost and your husband is employed in the sales department at one of the company's key contractors. You wonder whether your purchasing decisions may affect his salary or position in the contractor's company. You know that this could lead to a conflict of interest. You are concerned that other employees may have doubts about your impartiality in negotiations. To avoid potential problems, inform your supervisor of the situation and do not take part in decisions concerning this particular contractor. This will ensure transparency and fairness in the purchasing process.

Employees and associates of InPost are obliged to monitor their own actual or potential conflicts of interest and disclose them immediately to the Compliance Officer, for example by writing to compliance@inpost.pl or compliance@inpost.eu. The Compliance Officer maintains a register of reported conflicts of interest.

5. HOW TO AVOID RISKY BEHAVIOUR IN BUSINESS RELATIONSHIPS?

Below you will find the rules and guidelines you need to follow in your business relationships.

5.1. Relationships with third parties - what to watch out for?

Running a business requires networking with different people and building good relationships with them.

However, it is important to bear in mind that in some professional situations there may be a conflict of interest and the other party's intentions may not be honest. It is therefore important to be able to distinguish between a simple exchange of courtesies and corrupt behaviour.

Example: A partner who has a long-standing relationship with InPost sends small Christmas gifts, such as baskets of sweets, to InPost representatives every year as a nice gesture. This is acceptable when there are no negotiations going on. However, when InPost organises a tender and the company gives the same gift to an InPost employee, this could be considered an attempt to influence the decision, e.g. for the Partner to win the tender or get better terms.

Remember that you are not acting alone - if in doubt or in need of support, consult your manager, the HR Office or the Compliance Officer.

Relationships with agents and intermediaries

Intermediaries are individuals or companies that facilitate the business relationship between InPost and the customer or supplier. They can be, for example, PUDO point operators, couriers, carriers, external expansion specialists.

When starting to work with an intermediary, it is important to first check the reputation of the intermediary and the financial and technical capacity to provide the services. The contract with the intermediary must specify precisely the services required, the payment method and the reporting method. InPost should also be able to audit the intermediary's activities.

5.2. Public and private tenders

A call for tenders is a formal procedure that is organised by a buyer who wants to solicit offers from various suppliers of goods or services.

An invitation to tender can be public when the buyer organising the tender is a public entity and private when it operates in the private sector.

Like any process based on selection, tenders can become a field for abuse, e.g. expecting or giving bribes, disclosing confidential information, unfairly jacking up prices.

To avoid the risk of conflicts of interest in tendering, InPost employees and collaborators must follow contracting procedures, implement all controls, always disclose conflicts of interest and apply the four-eyes principle when negotiating with future suppliers.

The buyer must never be influenced in any way. Particular vigilance must be exercised in public tenders and in dealings with government officials.

5.3. Gifts

Giving small, occasional gifts is sometimes part of local custom. However, one must not expect anything in return. Nor is it permissible to demand gifts. As an exception, a small gift may be given or accepted, provided that:

- the gift is given as part of a standard business relationship and is in accordance with local laws and customs;
- the gift does not create a sense of obligation or an impression of inappropriateness;
- a gift is not given from a person with whom negotiations or other business discussions are in progress, e.g. about the pricing of services;
- the gift is given or received from a business contact and not from a third party. Family members or friends of InPost employees or the contractor may not be beneficiaries of such gifts;
- the value of the gift is appropriate given the position of the recipient, the circumstances and the occasion;
- a gift may not be given by or received from the same person frequently;
- the gift is not given or received in the form of cash or any other monetary instruments (e.g., vouchers or prepaid cards).

If an InPost staff member gives a gift, he or she must ensure that the related expenses are

accurately recorded in the company's records.

Promotional material of low value, such as mugs or calendars, may be given or accepted. All gifts of higher value should be approved by your immediate supervisor.

5.4. Meals, invitations and entertainment

In the business world, doing business over a meal is a common practice. To build a good business relationship with a client or supplier, you can offer or receive an invitation to entertainment events such as galas, conferences, seminars - combined with business meetings, which are often followed by plays, concerts or sports competitions.

These meals or events help build business relationships, but can sometimes be considered an undue advantage.

Therefore, such invitations may only be offered or accepted if they do not involve

- an invitation to a meal or event is only given or accepted as a form of courtesy in the context of a standard business relationship, and the form of entertainment is legal and socially acceptable;
- a meal or an invitation does not create a sense of obligation or an impression of impropriety, i.e. it is not perceived as an undue advantage;
- an invitation to a meal or event is given to or received from a person who is a business contact. Family members or friends of InPost employees or the person who is the business contact may never be the ultimate beneficiaries. If it is offered by InPost - a Staff representative is present at the event;
- the value of an invitation to a meal or event is appropriate given the position of the recipient, the circumstances and the occasion for which it is given;
- an invitation to a meal or event is not often given or received from the same person;
- Mutual invitations to meals or events between members of InPost Personnel from the same company are not permitted;
- in the event that more than one member of Staff attends a meal or event, the expenses shall be paid by the member of Staff with the most senior position;
- if the invitation is offered by a member of InPost's staff - the expenses incurred must be recorded fairly and accurately in the company's books and records, including information about the attendees at the meal or event.

All invitations to meals and events must be approved in advance by the manager. If in doubt, the Compliance Officer should be consulted, whose opinion can be relied upon.

5.5. Favouritism in recruitment

Favouritism is when an applicant for an employee or apprentice is hired because of personal relationships (e.g. family, friendship) with people who influence decisions in the company, instead of on the basis of their qualifications. This type of practice is inappropriate and can lead to corruption.

How do we avoid abuse?

Objective hiring criteria: We hire people whose qualifications match the requirements of

the position,

Formal procedure: All employment decisions are approved in accordance with established procedures.

Transparency: Job applicants who have a personal relationship with someone in the company are not automatically excluded from the recruitment process. They can be hired, but only after going through the standard recruitment process.

5.6. Political donations

InPost is involved in many initiatives for the communities in which it operates. However, we do not make, either directly or indirectly (e.g. through a third party), any political donations in cash or any other form.

5.7. Charitable donations, patronage and sponsorship

5.7.1. Donations and patronage: Corporate Social Responsibility ("CSR") is an important part of our sustainability strategy. We may act as a patron by providing financial, professional or equipment support to non-profit organisations in the public interest. However, we do not claim any economic or marketing benefits in return.

5.7.2. Sponsorship: as a sponsor, we financially or technically support social, cultural and sporting events. This can involve benefits in the form of promotion and reputation enhancement.

Before we engage in such activities, we make sure that:

- the purpose of the support is clearly defined and in line with our values, policies, CSR/ESG strategy or marketing strategy;
- we know the donation obligations in the country, e.g. the need to register as a non-profit organisation;
- payments are never made in cash;
- we will sign a donation agreement with the recipient and, if necessary, obtain written confirmation of the transfer. We will retain the documentation for future audits;
- support expenditure is fairly recorded in InPost's books;
- we have the opportunity to check that the support provided has been spent according to the agreed objective;
- any conflicts of interest, even potential ones, that relate to the support provided are disclosed and dealt with accordingly. We have to be particularly careful if a potential beneficiary of a patronage, donation or sponsorship has a connection to a government official or PEP or has a connection to InPost customers.

5.8. Lobbying

Lobbying is the action taken to influence public decisions and the content of legislation.

- Lobbying is generally legitimate. It can support the proper functioning of

government institutions if it involves sharing the expertise and perspectives of different groups in society with decision-makers. However, it cannot serve only the interests of the lobbyist, e.g. achieving undue advantage or obtaining secret information before competitors.

- Lobbying is different from illegal paid patronage, which involves offering benefits in exchange for certain decisions or claiming personal influence (e.g. friendship with a government official).
- Lobbying in many countries is regulated by law, e.g. in Poland, in France, in the UK. It often has to be registered in a public register.
- All lobbying activities of InPost must be transparent and fully comply with the relevant legislation.

5.9. Creative accounting and beautification of financial statements

The employees of InPost's Finance Division have an important task: they ensure that our books and documents did not conceal corruption or paid patronage. Hiding such activities is severely punished in many countries, as is corruption itself.

As a listed company, InPost has created Group Accounting Policies and a set of financial controls that we apply throughout the InPost Group. All accounting records must be well documented, audited and approved, and should accurately reflect actual transactions.

All accounting entries must be documented, verified and truthful. All payments must be approved and documented. Our financial statements must show the true financial state of InPost. We do not tolerate any manipulation or falsification of records that may conceal corruption or paid patronage.

6. HOW DO WE IDENTIFY AND DEAL WITH FRAUD RISKS?

6.1. Corporate Risk Management System

At InPost Group, we have established a Corporate Risk Management System (ERM). We have described its principles in InPost Group's Corporate Risk Management Policy and Methodology. This enables us to detect the risk of fraud and respond accordingly. ERM focuses on identifying, mitigating, and monitoring risks.

The Group Risk Manager appointed by the Management Board of InPost S.A. is responsible for this. The Anti-Fraud Policy is an important part of this system.

Where do we get information about risks?

1. From notifications made to the Compliance Officer - you can read more about this in the Whistleblower Policy,
2. From the results of internal audits and controls,
3. From reports made directly to the Group Risk Manager.

If you suspect fraud, pay attention to the **warning signs**:

- 1) ordering unusual payment methods (e.g. transfer to another entity or country);
- 2) granting broad, unwarranted access to banking systems;
- 3) lack of multi-stage payment approval schemes;
- 4) very high commissions;
- 5) avoiding the use of purchasing procedures when selecting a business partner;
- 6) situations where the chosen business partner does not have the required skills, resources, experience;
- 7) lack of a contract with a business partner or conclusion of a contract after the award date;
- 8) lack of objective reasons for choosing a business partner;
- 9) frequent or expensive gifts or invitations to the employee.

6.2. The “Three Lines of Defense” Model – How We Work Together to Keep the Company Safe

In every organization – just like in a team – everyone has a role in ensuring safety and smooth operations. The “Three Lines of Defense” model is how InPost manages risks and controls processes so everything runs correctly and securely. Think of it as three layers of protection that complement each other.

1. First Line of Defense: Daily Work and Responsibility for Risk

You and your colleagues in operational teams are the first line of defense. By performing your daily tasks, you also make sure risks are under control and everything follows the established rules. You are responsible for identifying and managing risks in your day-to-day work and for following procedures.

2. Second Line of Defense: Support, Oversight, and Expertise

The second line consists of departments and specialists who support the first line in managing risk and oversee whether procedures are effective and followed. These include teams responsible for risk management, compliance, financial control, and information security. They help create the right tools and policies.

3. Third Line of Defense: Independent Assessment and Audit

The third line is Internal Audit—an independent unit that checks whether the first and second lines of defense are working effectively and whether the company’s risk management system is appropriate. Internal auditors provide an objective assessment of how well the company handles risks and whether all processes comply with regulations and internal standards.

All three lines work together to ensure that InPost operates efficiently, safely, and in compliance with applicable standards.

7. REPORTING BREACHES AND SUSPECTED BREACHES UNDER THIS POLICY

If you become aware of an incident of corruption, fraud, or other breach of the law or our policies, use the group or local reporting channels. You can read more about this in the **Whistleblower Policy**.

If a report includes at least one allegation related to fraud, the individuals responsible for handling reports must notify the Ethics Team. The Ethics Team consists of the Compliance Officer, the Director of Internal Audit, and the InPost Group Risk Manager.

8. CONDUCTING INVESTIGATIONS INTO POTENTIAL BREACHES

If a report suggests that fraud may have happened at InPost, the Ethics Team will handle it. It may also involve other teams. The Ethics Team investigates the matter objectively. It maintains the confidentiality of the information collected.

If the clarification of a notification requires special expertise, it may also recommend to the Management Board the involvement of external experts within the framework of the so-called Forensic Services, i.e. legal assistance services for the detection of fraud.

The investigation carried out with the support of Forensic Services aims to, among other things:

- reduce InPost's losses related to the incident;
- collect and secure evidence for possible criminal or disciplinary proceedings;
- identify persons responsible for the incident;
- review the causes of the incident,
- review the measures taken to prevent such events in the future.

Experts from Forensic Services collect evidence, e.g. by talking to InPost employees and colleagues. They later compile a report and pass it on to the Ethics Team, and the Compliance Officer forwards it on to InPost's Management Board. The main findings also go to the InPost Group Risk Committee and the Audit Committee.

On the basis of the report, InPost's Management Board decides on the business and legal consequences for the person who has breached the law or policies.

9. FINAL PROVISIONS

This Policy is part of the InPost Group Compliance System. It is also an appendix to the InPost Group Code of Conduct.

The policy applies to the entire InPost Group. However, it may be the case that local rules in different Group companies are more detailed or demanding. In this case, these rules will be appendices to the Policy.

We regularly check that the Policy is up to date and compliant – we do this at least once every two years.

10. RELATED DOCUMENTS

1. Code of Conduct
2. Whistleblower Policy
3. Corporate Risk Management Policy at InPost Group
4. InPost Group's Corporate Risk Management Methodology.