

ANTI-CORRUPTION POLICY

For Metallcast, combating bribery, abuse of office, and embezzlement is an integral part of corporate culture. Any economic offenses harm the company's operations, its reputation, and contribute to the spread of corruption.

This policy, developed by the legal department of Metallcast, defines our goals and objectives in the fight against these phenomena.

It is a corporate document that applies to all employees of the company and all its industrial assets.

Scope of Application of the policy

The policy covers all cases or suspicions regarding:

- **Bribery:** The provision or receipt of unlawful benefits (money, services, advantages) for the performance or non-performance of certain actions, using official position.
- **Abuse of Office:** The use of position for personal or illegal purposes to the detriment of the company.
- **Embezzlement:** The appropriation of company property.

These rules apply to all who are involved in such actions, including:

- Company employees.
- Consultants.
- Suppliers of goods and services.
- Employees of contracting organizations that cooperate with Metallcast.

Consequences of violations:

Any detected cases will be thoroughly investigated. Depending on the circumstances, this may lead to:

- Lawsuits.
- Disciplinary responsibility (reprimand, dismissal, etc.).
- Criminal responsibility.

During investigations, the position, length of service, or personal relationships of the suspects with the company will not be taken into account.

Mandatory compliance:

The provisions of this policy are mandatory for all employees of Metallcast.

Department heads are required to ensure its implementation in their activities.

Definition of Concepts (according to the Criminal Code of Ukraine):

Bribery (Art. 368 of the Criminal Code of Ukraine):

Receiving a bribe: An official who receives a bribe (money, property, services) for performing or not performing actions in favor of the briber or third parties, using their official position.

Liability:

- **Basic case:** A fine from 1000 to 4000 non-taxable minimum income units, or arrest for up to 6 months, or imprisonment for up to 6 years with deprivation of the right to hold certain positions for up to 3 years.
- **Aggravating circumstances (large bribe amount, responsible position, group conspiracy, recidivism, extortion):** Imprisonment from 5 to 10 years with deprivation of the right to hold certain positions for up to 3 years and confiscation of property.
- **Especially large bribe (person in a certain official position, group conspiracy):** Imprisonment from 8 to 12 years with deprivation of the right to hold certain positions for up to 3 years and confiscation of property.

Abuse of official position:

Abuse of official position involves the use of an official's powers contrary to the interests of the service, with the aim of obtaining any unlawful benefit for themselves or other natural or legal persons. This may manifest in making decisions that harm the company, providing advantages to certain individuals, or using company resources for personal purposes.

Embezzlement (theft):

Embezzlement is the secret theft of someone else's property. In the context of Metalkast, this means appropriating any property belonging to the company without permission and with the intent to deprive the company of ownership rights to it.

This may relate to both tangible assets and intellectual property or financial resources.

General principles of combating corruption at Metallkast:

Metallkast strives to create an environment where honesty, transparency, and ethical behavior are the norm. We do not tolerate any manifestations of corruption, bribery, abuse of official position, or embezzlement.

Each employee is responsible for adhering to this policy and is required to report any suspicions of violations.

Mechanisms for reporting violations:

Metallkast provides confidential channels for reporting suspicions of wrongdoing. Employees can contact the legal department, the internal audit department, or directly reach out to management. The company guarantees protection against any forms of pressure or retaliation for individuals who report violations in good faith.

Training and Awareness:

Regular training and informational campaigns are conducted for all employees to raise their awareness of the provisions of this policy, the risks associated with corruption, and the procedures for reporting violations. This helps to foster a culture of zero tolerance for unethical practices.

Management Responsibility:

Managers at all levels bear personal responsibility for the implementation and adherence to this policy in their units. They are required to set an example of ethical behavior, create conditions for open discussion of integrity issues, and take actions to prevent and detect violations.

Prevention and Detection of Violations

The company implements a comprehensive set of measures to prevent and timely detect economic violations.

This includes:

- **Internal control systems:** development and implementation of effective internal control systems, which minimize the risks of fraud and embezzlement.
- **Audit:** regular conduct of internal and external audits to verify financial activities and operational processes.
- **Risk assessment:** continuous assessment of risks related to corruption and other economic offenses, to develop appropriate preventive measures.
- **Contractor verification:** thorough verification of all potential partners, suppliers, and contractors before establishing business relationships.

Relationships with third parties:

Metallkast expects all its partners, including consultants, suppliers, and contractors, to adhere to the highest standards of ethical behavior and legislation. The company will not tolerate any manifestations of bribery or corruption from third parties, and any violations may result in immediate termination of contractual relations and the taking of appropriate legal measures.

Relationships with third parties:

All employees Metallkast bear personal responsibility for complying with this policy. Violations of its provisions may have serious consequences, including disciplinary actions, up to dismissal, as well as liability under civil or criminal law in accordance with current legislation of Ukraine.

Confidentiality and Whistleblower Protection:

Metallkast guarantees the confidentiality of all reports of suspicions of violations. The company also commits to protecting against any forms of retaliation or pressure on individuals who good faith report wrongdoing. This creates a safe environment for whistleblowers, encouraging them to actively participate in the fight against corruption.

Continuous Improvement of Policy:

This policy is a living document and will be regularly reviewed and updated to ensure its relevance and effectiveness.

Metallkast strives to continuously improve its mechanisms to combat corruption, taking into account changes in legislation, new challenges, and best global practices.

Final Word:

The fight against bribery, abuse of official position, and embezzlement is a shared task for all of us. Adhering to this policy is not only a legal duty but also a moral imperative for every employee of Metallkast.

Together we can build a company based on honesty, transparency, and impeccable business reputation.