Antitrust Policy of Arlen S.A.

1. Introduction

Arlen S.A. operates on the basis of the highest standards of business ethics and full compliance with the applicable law, including the provisions of antitrust and competition law ("Competition Law"). The aim of this Policy is to ensure fair competition on the market, for the benefit of consumers, contractors and society.

Unfair competition weakens the economy, threatens the level playing field of businesses and deprives people of access to fairly priced prices and services. Arlen S.A. adopts the principle of **zero tolerance** towards any practices restricting competition.

This Antitrust Policy is part of the ESG management system and is linked to other internal documents, in particular: **the Code of Ethics**, **the Anti-Corruption Policy, the Conflict of Interest Policy**.

The Policy applies to all employees, members of management bodies, suppliers, subcontractors and business partners of Arlen S.A. Everyone is obliged to comply with its rules and to avoid actions that may cause the risk of corruption.

2. Definitions

Competition – the process by which companies compete for customers by offering more favorable trading conditions.

Anti-competitive (cartel) agreements – any arrangements between entrepreneurs the object or effect of which is to restrict competition, including price fixing, market sharing, tender collusion.

Abuse of dominant position – using a market advantage in a way that is harmful to competitors, contractors or consumers (e.g. predatory prices, discrimination against contractors).

Acts of unfair competition – actions contrary to the law or good morals that threaten the interests of another entrepreneur or consumer, such as: misleading advertising, unfair comparisons, violation of trade secrets, imitation of packaging.

Contractors – all entities cooperating or seeking cooperation with the Company (customers, suppliers, subcontractors, business partners).

3. Rules applied in the areas of risk of competition law infringements

3.1. Setting prices, discounts and terms of sale

Any agreements with competitors regarding prices, discounts, payment terms, margins or commercial policy are prohibited. All pricing decisions must be made independently and autonomously by the Company, based on its own cost, market and business strategy analysis. Any arrangements in this regard, even in the form of informal discussions, may constitute an infringement of competition law and result in serious legal consequences.

3.2. Division of the market and customers

It is prohibited to make any arrangements that restrict the freedom of choice of customers, geographical areas or distribution channels. Competition for customers is the foundation of the free market and is subject to special legal protection. Only official and transparent distribution agreements that are not intended to eliminate other entities from the market are acceptable.

3.3. Participation in tenders and public procurement

It is prohibited to make so-called bid collusion, i.e. any arrangements concerning the results of tender procedures, the submission of sham ("façade") bids or the determination of the winner between the participants. All bidding procedures must be conducted in a fair, reliable manner and in accordance with the regulations of public procurement law. Any irregularities in this regard pose a serious risk of violation of the law and may result in severe financial and criminal sanctions.

3.4. Contacts with competitors

Relations with competitors can only concern neutral and lawful areas, such as consultation on technical standards, safety or joint action in the field of industry regulations. It is prohibited to discuss pricing, trading strategies, customer lists, discount policies, sales plans or other information that could affect the decision-making process and limit fair competition. Any contact with competitors should be conducted in a careful, transparent and documentable manner.

Collecting information about competitors from legally available sources to evaluate the merits of their products, services, and marketing methods is permitted under applicable law. Practices such as industrial espionage, theft or hiding of identity in order to obtain confidential information from a competitor are prohibited. Employees may not make offensive statements about the nature, financial situation and potential legal problems of competing companies in order to obtain business benefits.

3.5. Advertising and marketing communication

You may not use advertising or marketing materials that could mislead customers, misrepresent competitors' products, or compare them in an unfair way. All marketing activities must be reliable, based on facts and in accordance with the principles of market ethics. Particular attention should be paid to comparative content, which must not discredit competition, but should serve to provide objective and verifiable information.

3.6. Protection of trade secrets

Employees are obliged to keep confidential all information constituting a business secret, both of the Company and its business partners. It is not allowed to obtain confidential information about competitors illegally, e.g. through wiretapping, hacking into IT systems or soliciting third parties to disclose professional secrets. A breach of these principles is not only a violation of policy, but also an act of unfair competition, subject to legal liability.

3.7. Abuse of market position

The Company does not use any market advantage to eliminate competitors in an unlawful manner. In particular, practices such as dumping prices, imposing unfair conditions on contractors or discriminating against trading partners are prohibited. Any action related to the establishment of the terms and conditions of cooperation should be carried out on the basis of the principle of equal treatment and transparency. Abuse of market position may be treated as a serious violation of competition law and exposes the Company to high sanctions.

3.8. Contractors and business partners

Relations with contractors must be based on the principles of fair competition, equal treatment and transparency. The Company requires its business partners to comply with competition law and does not cooperate with entities applying anti-competitive practices. Any agreements concluded with contractors should clearly define the terms of cooperation, and their purpose must not be to restrict the freedom of business activity of other market participants.

4. Consequences of violations

Violation of the Antitrust Policy poses a serious threat to both the Company and its employees. It can lead to disciplinary, civil and criminal liability, as well as the imposition of high financial penalties – up to 10% of the company's annual turnover.

Managers are also responsible, as they are required to effectively supervise compliance with the rules by subordinate teams. Failure to properly control or respond to irregularities is treated as a serious misconduct.

To minimize risk, the Company conducts regular training in competition law and provides a transparent compliance management system. The Legal Department monitors changes in regulations and updates the Policy as needed. Every employee and every person performing a managerial function is obliged to comply with the principles of fair competition and to take measures to prevent infringements.

5. Reporting violations

This Policy is a specification of the guidelines contained in **the Code of Ethics of Arlen S.A.**, therefore reporting potential violations is carried out according to the same principles. In addition, detailed rules for reporting violations are described in **the Whistleblowing Policy**.

Applications can be submitted:

a) to a supervisor or a higher-level supervisor (in the case of reports made by employees or associates of ARLEN S.A.),

b) directly to the **Ethics Ombudsman** (in any case) at: etyka@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw,

c) In matters requiring legal interpretation, support is provided by **the Legal Department of Arlen S.A.** at prawny@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw.

6. Final provisions

This Policy enters into force on 1 October 2025 and is effective until it is repealed or replaced by a new document.

The Policy is subject to annual review and updating by the relevant organizational units of Arlen S.A., taking into account regulatory and organizational changes and best market practices.

The Management Board of Arlen S.A. together with the Company's subordinate organizational units, it is responsible for supervising the implementation and effectiveness of the application of the provisions of this Policy.

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Arlen S.A., Adama Branickiego 17, 02-972 Warsaw, Company entered into the register of entrepreneurs at the District Court for the Capital City of Warsaw, XIII Commercial Division of the National Court Register, KRS No. 0000125086, NIP 526-10-39-877,
REGON 011346610, share capital: PLN 2,213,300 (paid in full)