

COMPETITION LAW COMPLIANCE POLICY

Version 1.0 — October 2026

1. Purpose of the document

ADAMS Sp. z o.o. (the "Company") conducts its business fairly, lawfully and on the basis of genuine market competition. This Policy sets out the basic principles that the Company and its employees observe in their relations with competitors, customers and suppliers in order to ensure full compliance with competition law.

Breaches of competition law — even unintentional ones — may lead to high financial penalties, invalidation of contracts concluded, personal liability of the persons involved and serious reputational damage. Knowing and observing the principles described in this document protects both the Company and its employees.

2. Legal basis

- Act of 16 February 2007 on Competition and Consumer Protection (consolidated text, Journal of Laws, as amended);
- Articles 101 and 102 of the Treaty on the Functioning of the European Union (prohibition of agreements restricting competition and prohibition of abuse of a dominant position);
- Implementing regulations and guidelines of the President of the Office of Competition and Consumer Protection (UOKiK) and of the European Commission.

3. Scope and addressees

The Policy applies to members of the Company's bodies and to employees and associates of the Company holding positions in which decisions are made or contacts are maintained with business partners or competitors in the areas of purchasing and supplier selection, sales and pricing, marketing, logistics, and employment and remuneration, as well as to persons representing the Company in industry organisations, at trade fairs and at other meetings attended by representatives of competitors (hereinafter jointly: "Persons covered by the Policy"). Other employees have access to the Policy in the e-pracownik employee portal and may report suspected breaches of it in the manner set out herein.

4. Prohibited practices

Competition law prohibits agreements and practices that restrict, distort or eliminate competition on the market. The most important prohibited practices include:

4.1 Price fixing and fixing of trading conditions

Any agreement or arrangement with competitors concerning prices, margins, discounts, payment terms or other trading conditions is prohibited — whether written or oral, formal or informal (e.g. on the sidelines of an industry meeting).

4.2 Market and customer sharing

Agreeing with competitors on the sharing of geographic markets, customer segments, sales territories or product ranges is prohibited.

4.3 Bid rigging

Agreeing with other bidders on the content of bids submitted in tender procedures is prohibited, including deciding who will submit the most favourable bid, withdrawing from a tender in exchange for a benefit, or submitting sham bids (so-called cover bidding).

4.4 Exchange of competitively sensitive information

Providing to and receiving from competitors information that could affect independent market decision-making is prohibited, in particular information concerning: current and planned prices, levels of margins and discounts, production costs, planned production or sales volumes, terms of offers made to specific customers, strategies towards individual customers or tenders, rates for transport, forwarding and warehousing services, and fuel surcharges. Such information constitutes confidential data within the meaning of the Cybersecurity Policy and is protected in accordance with the rules set out therein.

This rule applies regardless of the form of contact — it covers face-to-face meetings, e-mail correspondence, telephone calls, instant messaging, as well as informal conversations at industry trade fairs or association meetings. Business correspondence with business partners and competitors is conducted exclusively through official communication channels approved by the IT department, in accordance with the Cybersecurity Policy. Conducting conversations on commercial matters with representatives of competitors via private messaging apps, private e-mail accounts or disappearing messages is prohibited.

4.5 Relations with distributors and customers — resale prices

In its relations with distributors and customers, the Company does not impose fixed or minimum resale prices for goods. Recommending prices as a non-binding suggestion is permitted, provided that the distributor retains full freedom to set its own selling prices.

4.6 Abuse of market position

In its relations with business partners, the Company does not use practices that could constitute an abuse of a stronger negotiating position, such as imposing unjustified trading conditions or making the conclusion of a contract conditional on services unrelated to its subject matter.

4.7 Employment and remuneration

Agreeing with competitors — even informally — on terms of employment and remuneration is prohibited, in particular on pay levels, rates and additional benefits and on recruitment rules, as is concluding agreements not to hire or not to solicit each other's employees and associates (so-called no-poach agreements). Providing to and receiving from competitors non-public information on remuneration, rates and planned changes in this respect is also prohibited. Participation in salary surveys conducted by independent entities, in which the data are anonymised

and aggregated, requires prior consultation with the person supervising the application of the Policy.

5. Contacts with competitors — rules of caution

Participation in industry trade fairs, conferences, associations and other meetings attended by competitors is permitted and often commercially beneficial, provided that particular caution is exercised. During such meetings, the Company's employees:

1. do not initiate or take part in conversations about prices, costs, offer terms or market sharing;
2. if the conversation turns towards competitively sensitive information, clearly signal their objection and — if possible — leave the meeting, recording this fact;
3. avoid informal conversations “on the side” about prices or trading conditions with representatives of competitors;
4. if in doubt about the nature of a meeting or industry organisation, consult their supervisor before taking part.

Quick check — before you act, ask yourself:

- Does the conversation concern prices, costs, margins, offer terms or market plans of my company or a competitor?
- Would I feel uncomfortable if the content of this conversation were disclosed publicly or presented to a competition authority?
- Does the arrangement with a competitor limit my freedom to make market decisions independently?
- Should this information stay between us, because otherwise it will “harm the interests of both sides”? — if so, this is a warning sign.

6. Roles and responsibilities

- Management Board — takes decisions in doubtful or disputed cases; supervision over the application of the Policy is exercised by the member of the Management Board designated in the order introducing the Policy.
- Heads of organisational units — familiarise the Persons covered by the Policy who report to them with its content and continuously draw attention to risky situations in contacts with competitors.
- Persons covered by the Policy — apply the Policy in their daily work and report doubts or suspected breaches.
- Other employees — have access to the Policy in the e-pracownik employee portal and may report suspected breaches of it in the manner set out in Chapter 8.

7. Training

Persons covered by the Policy complete induction training on the principles of this Policy and refresher training at least once every 2 years.

8. Reporting breaches

Suspected breaches of this Policy and of the law within the scope covered by the Policy may be reported in accordance with the rules set out in the Regulations and Procedure for Reporting Breaches by Whistleblowers, through the following channels:

- e-mail: naruszenia@adamsbox.com.pl,
- telephone: 516-181-120,

- whistleblower boxes (drop boxes for written reports) at the Company's premises,
- in person with the Report Handling Coordinator,
- through an independent external entity – attorney-at-law (radca prawny) Mr Paweł Nowak, e-mail: nowak@atm.legal, tel. +48 61 102 42 62, office address: ul. Wolsztyńska 5, 60-361 Poznań.

The reporting channels may be used by the persons indicated in the Regulations and Procedure for Reporting Breaches by Whistleblowers, including persons from outside the Company. A report may be made anonymously in accordance with the rules set out in those Regulations. The Company ensures the confidentiality of the reporting person's identity and protection against retaliation. The reporting person may also make an external report to the Commissioner for Human Rights (Rzecznik Praw Obywatelskich) or the competent public authority, without first making an internal report.

9. Consequences of breaches

A breach of this Policy by an employee constitutes a breach of employee duties and may result in a disciplinary penalty on the terms set out in §31 of the Work Regulations and the Labour Code and, in the case of a serious breach of basic employee duties, termination of the employment contract without notice. When choosing the consequences, account is taken in particular of the type of breach, the degree of fault and the employee's previous attitude to work. A breach of this Policy by an associate or another person who is not an employee may result in the consequences provided for in the contract between that person and the Company, including its termination. Irrespective of the above, a breach may result in liability for damages and, in cases provided for by law, criminal liability.

A breach of competition law may also result in administrative liability of the Company, including financial penalties imposed by the President of UOKiK or the European Commission, as well as personal liability of managers, including financial penalties imposed by the President of UOKiK, and criminal liability of persons participating in bid rigging.

10. Inspections by the competition authority

In the event of an inspection or search conducted by the President of UOKiK or the European Commission, employees cooperate with the inspectors, inform the Management Board without delay, which notifies the Company's legal adviser, and do not delete, modify or conceal any documents, e-mails, files or data in IT systems. The IT department provides the inspectors with access to the systems to the extent required by law and, on the instruction of the Management Board, suspends the automatic deletion of data that may be covered by the inspection.

11. Final provisions

This Policy is reviewed at least once every 2 years and whenever there is a material change in competition law.

Matters not regulated by this Policy are governed by the applicable laws and the Company's other internal regulations.

The Policy enters into force on the date of entry into force of the Management Board order introducing the Policy.