

§3

Exceptions and alterations to the Anticorruption Code

1. As Systemic-PAB's employees and its Polish associates are not subject to French law, the application of French criminal law is hereby excluded and, in its place, the relevant provisions of Polish criminal law are assigned to the illegal acts indicated by the Code:
 - CORRUPTION – the offences of active and passive corruption are sanctioned by the provisions of Articles: 228-230a of the Polish Criminal Code;
 - EXTORTION BY PUBLIC OFFICIALS – the offence is sanctioned by Article: 231 of the Polish Criminal Code;
 - UNLAWFUL TAKING OF INTEREST – the offence is sanctioned by the provisions of Articles 296 and 296a of the Polish Criminal Code;
 - INFLUENCE PEDDLING – the offences of active and passive influence peddling are sanctioned by the provisions of Articles 228 and 229 in conjunction with Article 231 of the Polish Criminal Code;
 - FAVOURITISM – the offence is sanctioned by Article 305 §2 of the Polish Criminal Code;
 - MISAPPROPRIATION OF PUBLIC FUNDS – the offence is sanctioned by the provisions of Articles 276 and 284 of the Polish Criminal Code.
2. As long as the offences indicated in the APAVE Anticorruption Code according to definitions are also illegal according to Polish law, employees and associates of Systemics-PAB are obliged to familiarize themselves with these definitions and avoid such behaviour.

§4

Reservations regarding the Disclosure Procedure - procedure for disclosure of breaches of the Code of Ethics and the Anticorruption Code and for the Protection of Whistleblowers

1. The Management Board of Systemics-PAB adopts the Disclosure Procedure in wording presented by APAVE Group but only temporarily.
2. Systemics-PAB reserves the right to adapt the Disclosure Procedure to meet the mandatory provisions of Polish law when these provisions become binding after implementation by Polish authorities Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of European Union law.
3. Action diagram and persons responsible on Systemics-PAB's side who will receive the alerts on the basis of the Disclosure Procedure and shall cooperate in the investigation in coordination with the Audit and Compliance Committee are to be adopted by a separate resolution.