

ANTI-FRAUD POLICY

1. Rüger Polska Sp. z o.o. (hereinafter referred to as the "Company") operates in full compliance with applicable law. At the same time, the Company operates in accordance with the principles of ethics and business integrity.
2. Rüger Polska Sp. z o.o. does not tolerate any cases of fraud or activities that are inconsistent with applicable law, including activities that meet the criteria of a prohibited act under penalty of law. At the same time, the Company decisively acts to prevent such behaviour, among management authorities, employees, contractors of the Company as well as all other entities having relationship with the Company.
3. The purpose of the Anti-Fraud Policy is to define the rules of conduct in the event of the threat of committing a prohibited act, to promote a culture that discourages dishonest behaviour, as well as to prevent and effectively detect fraud.
4. The Anti-Fraud Policy, hereinafter referred to as the "Policy", is closely connected with the Code of Ethics of Rüger Polska Sp. z o.o. and is fully compliant with its provisions, as well as with all applicable legal regulations in this regard.
5. This Policy applies to all cases of fraud as well as situations in which there is a suspicion of the occurrence of fraud.
6. The Policy applies to all members of the Management Board, employees, persons employed on a basis other than an employment contract, subcontractors, contractors, suppliers and all other entities having relationship with Rüger Polska in relation to the Company's operations (hereinafter referred to as "persons associated with the Company").
7. Fraud, within the meaning of this Policy is, in particular, the deliberate use of an official position, the status of a client or a contractor in order to obtain an unauthorized benefit to the detriment of the organisation or its customers, in particular through non-compliance with applicable internal regulations or standards of conduct, done in order to obtain an unauthorized benefit, financial or other, the use or improper use of funds or assets belonging to the organization or its customer, misleading the organization or its customer, resulting in loss of the organization's or its customer's resources, assets, profits or reputation, deception, forgery, extortion, theft, manipulation as well as any other action or omission of action inconsistent with the provisions of generally applicable law, including acts prohibited under penalty of law.
8. All persons associated with the Company are absolutely obliged to comply with the law as well as all procedures and rules in force in the Company, and to act in accordance with the ethical norms and standards set out in the Code of Ethics, both in external and internal relations in the Company.

9. All persons associated with the Company are obliged to prevent any behaviour that is against the law, ethical principles or other rules in force in the Company. At the same time, they are obliged to react immediately and report any irregularities/fraud or suspicions regarding any irregularities/fraud.

10. The Company adopts the Compliance system. The main objective of the Compliance system introduced in the Company is to ensure the compliance of the Company's activities with applicable law and to eliminate or reduce the risk of any cases of fraud or violations by creating an organisation based on a culture of safety, observing the principles of ethics, respecting and caring for the good name of the Company, as well as continuous improvement of key processes.

11. It is unacceptable both to commit and to conceal fraudulent or illegal activities. Any person associated with the Company should report, in good faith, cases of violation of the law or the Code of Ethics, even if the situation does not directly concern them.

12. The Company has implemented a whistleblowing system regarding fraud and irregularities. Every person associated with the Company may report fraud by submitting a report to a dedicated e-mail address: compliance@ruger.eu, as well as reporting directly to the superior or member of the Management Board.

13. The Company complies with the rules of protecting persons reporting fraud/irregularities (hereinafter referred to as "Whistleblowers"). In particular, it exercises due diligence and takes appropriate measures to keep the identity of the Whistleblower confidential. At the same time, in the course of the investigation, the protection of identity and discretion towards all persons who make a report are ensured. Until the allegations are confirmed, the protection also covers the identity of the person who is the subject of the report.

14. If, during the investigation, it is found that fraud has been committed, including a breach of applicable law, appropriate actions are taken, including launching disciplinary procedures, as well as actions aimed at removing the effects of fraud and preventing the occurrence of similar cases in the future, as well as, if necessary, notifying the relevant authorities, including law enforcement agencies, and taking legal action against the perpetrator of fraud in order to redress the damage suffered by the Company, in accordance with applicable law.

15. This Policy has been implemented and is applied in practice by all persons associated with the Company.