



**ORGANIZATION CODE**

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**KAZAKHMYSS HOLDING LLC**

**Kazakhmys Group  
Anti-Corruption Code**

**K-DYUS-02-2019**

**(replaced K-DPK-09-2015)**

**Astana  
2019**

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**1 ELABORATED BY** Legal Services Department, Kazakhmys Corporation LLC

**2 APPROVED AND ENACTED** by the Order of the Chairman of the Board of Directors, Kazakhmys Holding LLC No. H/70-pr. dated April 10, 2019


**3 DATE OF ENACTMENT** April 10, 2019

**4 DATE OF FIRST INSPECTION** **2024**

**INSPECTION FREQUENCY** **5 years**  
 (based on amendments to the current legislation)

**5 ENACTED TO REPLACE** K-DPK-09-2015 Kazakhmys Holding LLC Anti-Corruption Code, enacted by Resolution of the Chairman of the Board of Directors No. 01-KN/21 dated September 30, 2015 with amendments made by Resolution of Chairman of the Board of Directors No. 01-KN/9 dated July 20, 2016.

This Code is an open document and can be freely disseminated by Kazakhmys Holding LLC among its business partners and any other interested parties.

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## 1 Areas of Application

The Kazakhmys Group Anti-Corruption Code (hereinafter referred to as the Code) is a set of general principles of professional business ethics and basic rules of conduct which should be followed in their daily activities by all employees of Kazakhmys Holding LLC (hereinafter referred to as the Holding), regardless of a position, both in external relationships with partners, counterparties and other interested parties, and in internal relationships when fulfilling their official duties.

The Code is elaborated in accordance with provisions of:

- Anti-Corruption Strategy of the Republic of Kazakhstan for 2015-2025, approved by the Decree of the President of the Republic of Kazakhstan No. 986 dated December 26, 2014
- the current Anti-Corruption Legislation of the Republic of Kazakhstan;
- The UK Bribery Act;
- internal local acts of the Holding.

This Code is elaborated to enhance reputation of the Company as an organization which complies with a policy of fair and ethical business conduct with a high level of corporate culture, including in the field of anti-corruption.

When implementing this Code, the Holding expects that each employee will contribute all their efforts, knowledge and experience to their activities, impartially and conscientiously serve the interests of the Holding. Make every effort for a highly professional work, apply optimal and economical ways to accomplish assigned tasks, take care of entrusted property, use it rationally and effectively.

This Code contains the key guidelines for decision-making, but does not describe all possible cases (situations) which each employee may face while fulfilling their job duties.

To implement the key provisions of this Code, if necessary, internal local acts of the Holding (regulations, standards, instructions, guidelines) will be elaborated and enacted in the prescribed manner.

This Code applies to all employees of legal entities, which assets are managed by Kazakhmys Holding LLC, who are obliged to strictly follow requirements stipulated in it.

## 2 Terms and Definitions

The following terms and definitions are applied in this Code:

**Charitable activities of business entities** are voluntary activities of business entities to provide citizens or legal entities with property, including cash, as well as fulfil works and provide services, provide other social support to individuals and legal entities which is not aimed at generating revenue or receiving in return remuneration, payment or fulfillment of obligations;

**Kazakhmys Group** is a group of legal entities which assets are managed by Kazakhmys Holding LLC.

**Business ethics** is a set of ethical principles and norms of business communication, which are followed by the Company, branches and structural units, as well as all employees, regardless of their position;

**Business partners (counterparties)** are individuals and legal entities bound to contractual obligations with the Company and cooperating when executing contractual relationships (clients, suppliers, contractors, subcontractors);

**Legal Services Department** is an authorized structural unit, Kazakhmys Corporation LLC, which ensures, in accordance with strategy and objectives, implementation, organization, functioning of an effective system of legal support for anti-corruption policies;

**Image of Company** is representation of the Company, formed in public or individual mind, highlighting value features of the Company and affecting its perception;

**Property of Company** are fixed assets, intangible assets, financial investments, production stocks, finished products, goods, other stocks, cash, other financial assets, any other property which, in accordance with the current legislation, is the property of the Company;

**Company** is Kazakhmys Holding LLC or another legal entity which assets are managed by Kazakhmys Holding LLC;

**Conflict of interest** is a situation when the personal interest of an employee, including indirectly through his close relatives and other related persons, affects objective fulfilment of his/her official duties, including duties stipulated in the current legislation and internal local acts, and when **the conflict** arises between the personal interest of an employee and the legitimate interests of the Company, which could lead to damages to the legitimate interests of the Company;

**Corruption** is proposal, guaranteeing or providing financial or other benefits to another person or creating such a situation in order to induce another person to knowingly fulfil an illegal execution of an official duty or action, or to reward a person for such activities;

- demand, consent to receive or reception of financial or other benefits, assuming that reception of such benefits will lead to knowingly illegal fulfilment of official duties or actions by the recipient of illegal benefits or another person, or is a reward for illegal fulfilment of official duties;

**Patronage activities of business entities** are voluntary activities of business entities in the field of art, science, culture, education, enlightenment, expressed in gratuitous transfer of property and money to other citizens or legal entities for maintenance, preservation and development of historical and cultural heritage of the state in accordance with the forms stipulated in the current legislation ;

**Employee** is an individual who is employed by an employer and works under an employment contract;

**Reputation of Company** is a prevailing opinion about advantages and disadvantages of the Company, based on information about its work, quality of work (services), conduct of officials and employees;

**Structural unit** is a functional unit of the Company (branch, enterprise, department, shop, site and others), which is not an independent legal entity, operating within the Company;

**Entities of corruption offenses** are individuals and legal entities who bribe officials and other persons authorized to fulfil public functions, or persons likened to them, as well as unlawfully providing them with property benefits and advantages;

**Formal procedures** are functions of government, authorized agencies and persons who are public officials, referred by the current legislation to powers of the state.


### **3 Basic Principles of Code**

#### 3.1 Basic principles of Code:

- a) honesty and patriotism;
- b) decency and conscientiousness;
- c) responsibility and trustworthy;
- d) business transparency and information openness;
- e) partnership and solidarity;
- f) fairness and democracy;
- g) high professionalism and intolerance to corruption;
- h) recognition and respect for rights of all interested parties and desire to cooperate with them based on compliance with the rule of law and norms of anti-corruption and business ethics;
- i) respect for a personality, regardless of background, social, official and financial status, gender, race, nationality, language, attitude to religion, political beliefs, place of residence, gender, national and cultural background or any other circumstances.

3.2 In order to prevent corruption risks, which are a direct threat to economy and reputation of the Company which aspires to comply with the highest business standards, employees of the Company undertake to:

- a) fulfil official and functional duties at a high professional level and strictly in accordance with the current legislation and local acts of the Company;
- b) work within rights and powers granted to each employee;
- c) regardless of a position and functions, exclude actions related to influence of any personal, property (financial) and other interests which prevent conscientious fulfilment of official duties;
- d) maintain neutrality, excluding possibility of influencing their professional activities, resolutions of cooperating parties, political parties, public and religious associations;
- e) strictly comply with norms of business ethics and basic rules of conduct.

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## **4 Objectives of Code**

Objectives of Code are as follows:

- 1) establish ethical norms and unified rules of conduct for employees of the Company to fulfil their professional duties according to quality standards;
- 2) establish the key principles of ethics and morality for corporate standards of conduct overseeing activities and behavior of the Company's employees, both in daily internal production activities and in external contacts and relationships;
- 3) form a sense of corporate and public duty in mind of each employee, intolerance to breaches of the Company's interests and public interests, intolerance to corruption, both by employees of the Company and other interested parties.

## **5 Tasks of Code**


Tasks of Code are as follows:

- 1) to establish required conditions aimed at achieving a balance of interests of the Company and its employees, authorized government agencies, business partners (counterparties) and other interested parties, the public;
- 2) contribute to fulfilment of the mission and achievement of strategic goals of the Company;
- 3) form corporate values and knowledge among employees of the Company, based on provisions of this Code, contributing to understanding, support and compliance with uniform principles of business ethics;
- 4) raising awareness of the Company's employees on the current anti-corruption legislation.

## **6 Areas of Code Application**

6.1 Norms of business ethics for employees of the Company, recommended for application in the following areas of external and internal relationships of the Company, employees and the Company, between employees of the Company:

- a) anti-corruption efforts;
- b) interaction with government agencies and public organizations;
- c) conflict of interest;
- d) interaction with business partners (counterparties);
- e) making payments to facilitate formalities (payments to expedite formalities);
- f) business gifts and entertainment (expenses);
- g) notification of breaches of the current legislation and ethical norms;
- h) HR management;
- i) interaction with political parties;
- j) charitable and patronage activities;
- k) lobbying activities.

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## **7 Norms of Code Recommended for Application**

### **7.1 Anti-corruption efforts**

Company employees are not entitled, directly or indirectly:

- a) grant, propose, promise, pay or authorize payment of cash or other property and non-property benefits and advantages to persons authorized to fulfil public functions and persons likened to them, in order to influence decisions made by such persons or receive from them illegal benefits and advantages;
- b) contrary to the current legislation, propose, promise, pay, authorize payment of money and other property and non-property benefits and advantages to commercial and non-commercial organizations and (or) their employees, as well as third parties in order to establish, retain business relationships, manage them or inducing relevant persons to breach their official duties in the interests of the Company;
- c) misuse agents and (or) other third parties to make illegal payments, provide other property and non-property benefits and advantages or conceal their purpose, to establish, retain business relationships or obtain illegal benefits or advantages;
- d) misuse their powers to demand, receive, provide or extort any benefits and advantages of a tangible, intangible, property and non-property nature in their own interests;
- e) create or conceal conflict of interest situations;
- f) conduct business in relation to business partners (counterparties) of the Company in any unfair way;
- g) give (accept) business gifts and express hospitality, excluding situations which meet rules of business ethics and the current legislation.

### **7.2 Relationships with government agencies and public organizations**


7.2.1 The Company's relationships with government agencies and public organizations are based on principles of responsibility, conscientiousness, professionalism, partnership, mutual trust, respect and inviolability of obligations.

7.2.2 The company aspires to develop public relations through an organization, as well as participation in socially significant events, programs, projects.

7.2.3 The company complies with the current legislation, acts of government agencies and local authorities, international ratified agreements and other documents related to its activities.

7.2.4 The Company proactively participates in lawmaking activities through monitoring current and initiating new regulations, through preparation of reviews, opinions and examination of draft laws and other regulations overseeing



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functioning, support and development of entrepreneurship in the areas of the Company's activities.

7.2.5 In order to comply with principles of business ethics and instill trust in the Company when interacting with government agencies and public organizations, employees are obliged to:

- a) comply with norms of the current legislation and principles of this Code;
- b) when interacting on behalf of the Company with representatives of government and local self-government agencies, represent solely the official position of the Company, approved in the prescribed manner;
- c) comply with the procedure established in the Company for participation of employees in public events (debates, interviews, press conferences, briefings);
- d) if it is impossible to independently assess correctness of own actions in relationships with government and local self-government agencies and (or) upon discovering facts of breaches of the procedure for interaction with government and local self-government agencies, contact your immediate manager and (or) relevant government liaison services.

7.2.6 Employees of the Company are not entitled to:

- a) interact on behalf of the Company with government agencies, if this is not part of their official duties and (or) they are not authorized to do so in the prescribed manner;
- b) try in any illegal way to influence resolutions of government agencies and (or) their representatives;
- c) directly or indirectly prevent collection of information, data, evidence or documentation by authorized officials of government and (or) other regulatory agencies;
- d) conceal, modify and eliminate documents, information and (or) accounts which are the subject of an investigation or request from government and/or other authorized agencies;
- e) misuse the property of the Company (e-mail, telephone, fax or others) for personal participation in political, social processes, entrepreneurial and other independent activities.

7.2.7 Employees of the Company, each, within the limits of their competence, are obliged to timely and adequately respond to all publications in the media and on television containing information about:

- a) breaches of business ethics;
- b) corruption offenses;
- c) other negative information about activities of subordinate employees and (or) the Company.

7.3 Conflict of interest

7.3.1 An employee of the Company is not entitled to:



a) have direct or indirect interest in any rival, supplier, buyer or other business partner (counterparty) of the Company, which actually or potentially conflicts with interests of the Company;

b) be employed by and have other relationships with third-party organizations, run third-party business or participate in it, if this actually or potentially has a negative impact on his/her ability to act professionally, objectively and impartially in the interests of the Company or has a negative impact on decisions, which must be made by him on behalf of, in the interests and not to the detriment of the Company;

c) have a personal, including indirectly through their close relatives and other relevant persons, financial interest in any transactions or contracts concluded by business partners (counterparties) with the Company;

d) make decisions or be one of the parties making decisions, which could lead to a conflict of interest;

e) misuse tangible, intangible assets, including confidential, insider information, commercial and any other legally protected secrets belonging to the Company, for personal interests not related to direct fulfilment of official duties, as well as in the interests of close relatives and other persons related to him/her;

f) damage interests of the Company, interfere with activities of persons involved in decision-making on issues affecting personal interests of an employee.

7.3.2 An employee of the Company and (or) his/her immediate senior manager must settle an existing or potential conflict of interest independently.

## **7.4 Relationships with business partners (counteragents)**

### **7.4.1 The company with business partners (counteragents)**

a) interacts on the principles of mutual benefit, fair competition, transparency and full responsibility for the obligations assumed in accordance with the terms of the concluded contracts (agreements);

b) complies with the terms of concluded contracts (agreements) and performs its obligations regarding them;

c) guarantees timely and full considering of all compellations, expectations and claims from them, and in the event of disagreements, and disputes, prefers negotiations and finding a compromise;

d) selects suppliers of goods, works and services in accordance with the current legislation, offering the best quality, lowest prices, terms of supply of goods, services and having a good reputation in the market;

e) adheres to fair and free competition and condemns all manifestations of unfair competition, which can not only negatively affect the reputation, but also may undermine the trust of the Company's business partners (counterparties), in this regard, expects the same of its business partners (counterparties);

f) does not allow in its activity the provision with unreasonable benefits and privileges business partners (counterparties) the use of which may negatively affect the reputation of the Company.

7.4.2 In order to comply with the provisions of this Anti- Corruption Code and preserve the impeccable reputation of the Company the employees of the *Company* *must adhere to the* following rules in relations with business partners (counterparties):

- a) to make all necessary efforts to ensure that the Company fulfills its obligations to business partners (counterparties) in good faith;
- b) to act principally in the interests of the Company;
- c) value the reputation of the Company, strictly observe the norms of the current legislation, internal local acts and norms of business ethics;
- d) inform their immediate manager and (or) the Legal Department if any of the employees of the Company has established the relations with partners that contradict the requirements of this Anti- Corruption Code.

### **7.5. Facilitation Payments (Facilitation Fees)**

7.5.1 The Company requires its employees to comply with the anti-corruption principles in terms of providing fees to speed up formal procedures, even if the amounts of such fees are nominal. If there are grounds for suspicion of the legality of the implementation of such a fee, it can be made only by permission of applicable law.

7.5.2 An employee of the Company who is extorted for payment for expediting formal procedures must explain that such a payment is not possible.

7.5.3 If the Company is required to pay for expediting formal procedures in circumstances where damage to the life, health of personnel or property of the Company is a real or potential threat, it is necessary to immediately notify his/her department head of this.


In such a situation, the Company will adhere to the general principle of inadmissibility of payment for accelerating formal procedures, however, the Company will consider all the circumstances, including the degree of danger to the persons or property, when deciding on measures to resolve or reduce the consequences of a potentially harmful situation.

### **7.6 Giving gifts and hospitality**

7.6.1 The Company considers it important to comply with the following principles by exchanging business gifts and carrying out hospitality (expenses):

a) do not establish the direct or indirect goal of influencing on representatives of the state, public organizations, private companies, politicians, or other officials on the adoption of decisions that affect the preservation or expansion of the Company's activities;

b) business gifts and hospitality expenses must be directly related to the legitimate objectives of the Company, for example, with the presentation or completion of business projects and contracts, or with national holidays, memorable dates.

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c) business gifts should not be by nature of cash or non-cash money, financial credit instruments, precious metals or should not be represented by any kinds or equivalents of cash and(or) articles of luxury.

7.6.2 The soliciting of gifts or hospitality by Company employees is strictly forbidden in any circumstances.

7.6.3 By receiving business gifts during one year with a total value of more than two monthly calculation indicators within the Republic of Kazakhstan, and / or more than \$ 100- outside the Republic of Kazakhstan (or the equivalent in the national currency of Kazakhstan), cash or their equivalents (bank check , money transfer, investment securities, negotiable documents), an employee of the Company, after forming a written agreement with his/her Department head/line manager, shall ensure their transfer to a charitable organization with the receipt of documents confirming the acceptance and transfer from the Head of such organization.

### **7.7 Speak Up Alert Reporting Service.**

7.7.1 If the employees of the Company and other interested parties have reason or concerns that employees of the Company have committed corruption violations, involving material damage, affecting the image and reputation of the Company, they are obliged to immediately use the Speak Up Service, where they can report wrongdoing via free-of-charge hot-line, with three options available:


1. Phone call 8-800-080-8089 (hot-line), organized in collaboration with Kazakh telecom JSC;
2. E-mail: [speakup@kazakhmys.kz](mailto:speakup@kazakhmys.kz)
3. Regular mail to the company's legal address: **12 Lenin Street, Karaganda, 100012**, to the name of Legal Department Director or marked with "Speak Up Reporting Service".

7.7.2 The hot-line and e-mail box are serviced without breaks and weekends by employees of the Legal Support Department for Anti-Corruption Policies, Legal Support Administration in Labor and Internal Administration, Legal Service Department of Kazakhmys Corporation LLC.

### **7.8 Personnel Management**

7.8.1 The main goal of the personnel management system in the Company is the rational formation, use and development of labor and creative potential to achieve organizational social and economic goals and meet the personal needs of employees.

7.8.2 Employees of the Company must perform their activities directly in the interests of the Company, in good faith and with full dedication, be an example of compliance with generally accepted standards of business ethics, as well as the standards established by this Anti-Corruption Code and other local acts of the Company.

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7.8.3 Employees, by their personal behavior and attitude to business, are obliged to:

- a) contribute to the creation of a stable and positive moral and psychological environment in the team;
- b) resist the actions impeding the effective functioning of the Company and the proper performance of official duties;
- c) prevent and suppress facts of violation of Anti-Corruption Code by other employees of the Company;
- d) give no cause to justified criticism by their actions and decisions, do not allow persecution for criticism, tolerate it and to use constructive criticism to eliminate shortcomings and improve their professional activities;
- e) respect the honor and dignity of a person and a citizen regardless of his origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence or any other circumstances;
- f) observe generally accepted moral and ethical standards, respectfully treat the state and other languages, traditions and customs of the people of Kazakhstan;
- g) be polite and correct.

7.8.4. Prohibition on:


- a) gross behavior; any forms of discrimination, unlawful preference; the selection and appointment of employees shall be performed taking into account their professional and personal qualities (labor productivity, qualifications, work experience in the specialty, etc.), an impartial and fair attitude should be ensured towards all employees;
- b) any types of protectionism, as well as privileges and benefits for certain employees, except on the basis of the wages and social measures adopted in the wage system, with the obligatory provision by the Company of equal opportunities for obtaining these privileges and benefits;
- c) participation in gambling of a monetary or other property nature with superior officials or inferiors or persons who are in any other dependence on work.

7.8.5 The Company provides a safe and welcoming environment of work for all the employees and ensures social and medical support in the frame of Collective Agreement (at its presence) and corresponding programs, acting within the Company; ensures equal possibilities in the search for personal fulfillment during the performance of work activity.

7.8.6 The Company complies with the dress- code requirements for the appearance of employees, business ethics of internal and external telephone conversations, taking into account the official position and social status of the subscriber (upon the availability of adopted and approved internal local acts of the Company).

7.8.7 The Company demonstrates respect for the privacy of employees by not allowing any interference in private life of employees.

## **7.9 Relationships with political parties.**

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7.9.1 The Company is not directly involved in the activity of any political parties and does not support any political campaigns, parties, candidates, and any affiliated organizations.

7.9.2 The participation of Company employees in any political activity, including the allocation of time and the contribution of funds, must be carried out exclusively at their own expense.

7.9.3 officials and other employees of the Company act as individuals, and do not represent the Company.

7.9.4 The decision of any employee of the Company to make/not to make his/her legal personal financial contribution to support any party or candidate, such contribution does not in any way affect his remuneration, retention of his position in the Company or opportunities for promotion.

### **7.10 Charity and patronage activity**

7.10.1 The purpose of the Company's charity and patronage activity is to provide various types of financial and other assistance to individuals and legal entities having the status of social institutions.

7.10.2 Charity and patronage activity can be carried out by the Company independently and (or) in partnership with civil society institutions and local executive bodies and is aimed at achieving positive changes in the social sphere.

7.10.3 No one has the right to restrict the freedom of choice of the subjects of rendering such assistance and the forms of its implementation by the Company under this Anti-Corruption Code.

7.10.4 No one has the right to force the Company to carry out charity and patronage activity.

7.10.5 Transfer of money and other material resources or the provision of assistance in any other below mentioned form is not considered to be the charity and patronage activity:

- a) to individuals or legal entities pursuing the goal of deriving revenue or receiving in return for remuneration, payment or fulfillment of obligations;
- b) to political parties and other social and political organizations;
- c) to trade union and religious organizations;
- d) on the terms of their own brand and trademark advertising or informing the origin of goods.

### **7.11. Lobbying**

7.11.1. Interests lobbying is part of a complex program of Anti-corruption enforcement, implemented by the Company as well as an integral component of modern business conducting and stipulates the relationship building with government bodies.

7.11.2. The Company places great store to doing business in accordance with generally recognized ethical standards and considers unacceptable any cases



of bribery and corruption in the lobbying process, both from the employees of the Company and its counterparties, and from government agencies.

7.11.3 The objectives of lobbying activities are:

1) promotion and protection of the Company's interests, performing within the framework of statutory activity, strictly in accordance with the current legislation of the Republic of Kazakhstan to achieve a balance of interests of the Company and the state;

2) improvement of the current legislation of the Republic of Kazakhstan affecting the interests of the Company that does not conflict with public and state interests.

7.11.4 The Company is guided by the following principles by lobbying interests:

a) the use of lawful opportunities to influence in defending the interests of the Company;

b) publicity of intentions;

c) maintaining a balance of interests of the State and the Company;

d) publicity, transparency, reliability within the implementation of lobbying activity.

7.11.5. Lobbying the interests of the Company shall be performed through the selection and application of legal and most rational forms and practices, such as:

a) participation in the discussion of draft laws considered by the Parliament of the Republic of Kazakhstan;

b) submission of proposals on draft laws considered by the Parliament of the Republic of Kazakhstan;

c) submission of conclusions on draft laws considered by the Parliament of the Republic of Kazakhstan;

d) compliance with the established procedure for considering draft laws;

e) obtaining information on draft laws, amendments and proposals to them pending by the Parliament of the Republic of Kazakhstan in the manner established by the legislation of the Republic of Kazakhstan;

f) participation in the work of committees, commissions, working groups of the Parliament of the Republic of Kazakhstan in the manner prescribed by the legislation of the Republic of Kazakhstan.


7.11.6 By lobbying interests, the Company is not entitled to:

a) lobby corporate interests to the detriment of the interests of society and the state;

b) lobby the interests of foreign citizens and / or legal entities;

c) to influence the decisions of governmental bodies.

7.11.7 The Company makes every effort to prevent corruption and other illegal actions, both on the part of state bodies and on the part of the Company's employees who interact with state bodies.

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## **8. Liability for violating the Anti-Corruption Code**

8.1 Securing compliance with the provisions of Anti-Corruption Code by the Company employees is their official duty.

8.2 Company employees, within the limits of their functions and within their competence, are obliged to:

- a) strictly comply with the requirements of the Code and ensure its strict compliance by subordinates;
- b) be guided by the provisions of this Code in any situation, including situations not regulated by internal local acts or involving a choice of behavior options; to act fairly and honestly assessing the affection of action to the activity and reputation of the Company;
- c) inform the business partners (counterparties) of the Company of the provisions of Anti-Corruption Code.

8.3 In the case of public allegations of corruption against the Company's employee, the employee should take measures on a traverse of the indictment, including in court.

8.4 Employees of the Company should contact their department head (or) the Legal Department in the following cases:

- a) unclear points in the provisions of the Code or the uncertainty of actions in a specific situation to get clarification;
- b) finding the facts of non-fulfillment and (or) violation of the requirements of the Code and taking disciplinary and other measures against violators with the involvement of personnel, control, legal and other services - for mandatory reporting of such violations;
- c) detection of corruption offenses and crimes committed by the employees and taking immediate measures - for mandatory reporting of all such cases.

8.5 Employees are held liable for the violation of the requirements of the Code in the manner prescribed by the current legislation and internal local acts of the Company

8.6 Department Head/ line managers are directly responsible for the commission of corruption offenses and crimes of their subordinates, up to lawful dismissal.





