

eurotorg

**Anti-corruption Policy  
of Eurotorg LLC**



# General Provisions

This Policy has been developed taking into account the provisions of the Code of Business Ethics of Eurotorg LLC, as well as the legislation of the Republic of Belarus, in particular the Law of the Republic of Belarus dated July 15, 2015, No. 305-Z "On Combating Corruption".

The Anti-Corruption Policy is the primary internal legal act of Eurotorg LLC (hereinafter referred to as "Eurotorg" or the "Company"), establishing the approach and principles used in combating abuses by employees and counterparties, as well as third parties, in cases where such actions affect the legitimate interests of the Company and / or cause it damage / result in lost profits.

Eurotorg strictly adheres to the normative legal acts of the Republic of Belarus, including anti-corruption legislation standards. When conducting internal investigations, the observance of the rights of the employees subject to such investigations is ensured.

This Policy determines:

- the goals and rules for combating corruption;
- the Company's general approach to prevention, detection, conducting internal investigations, and responding to corrupt practices.

All employees of Eurotorg must be guided by the norms and principles of this Policy within the framework of performing their job duties.

All internal documents, internal procedures, and management decisions must comply with this Policy.

# Glossary

**Counterparty** is natural or legal persons having contractual relations with the Company.

**Corruption** is the intentional use by an official of their official position and related opportunities, coupled with the unlawful receipt of property or other benefits in the form of services, patronage, promises of advantage for themselves or third parties, as well as the bribery of an official by providing them with property or other benefits in the form of services, patronage, promises of advantage for them or third parties, so that this official performs actions or refrains from performing them in the exercise of their official (labor) duties.

**Conflict of Interest** is a situation in which the personal interest (direct or indirect) of an employee, their spouse, close relatives, or in-laws affects or may affect the proper performance of their official duties when making a decision, participating in decision-making, or performing other actions at work.

**Lost Profits** are income not received which the Company could have received under normal conditions of activity if the employee(s) or third parties had not committed the abuse.

**Damage** is a decrease in the value / quantity of the Company's property resulting from a committed dishonest act.

**Reputational Damage** (harm to the Company's business reputation) is negative consequences of diminishing the business and public assessment of the Company, expressed in the loss of a positive attitude towards Eurotorg on the part of counterparties, customers, state bodies, and society as a whole.

**Hotline** is a communication channel for receiving reports from employees, counterparties, and third parties wishing to report corruption, fraud, and other unlawful acts: +375 17 289 00 00, +375 44 7888 880, or bezopasnost@eurotorg.by.

# Goals of the Anti-corruption Policy

The goals of this Policy are:

- prevention as a priority direction of anti-corruption activity, and striving to form a sustainable corporate environment in which corrupt actions by employees are unacceptable;
- minimization of corruption risks from employees and counterparties of the Company;
- increasing the legal and anti-corruption awareness of Eurotorg's employees, as well as forming a system for preventing and combating corruption;
- establishing uniform requirements for ethical behavior and interaction with suppliers, state bodies, and other stakeholders for Company employees, regardless of their position;
- establishing employee liability for non-compliance with the requirements of this Policy;
- protection of the legitimate interests of the Company and increasing the safety of its assets;
- maintaining a high level of and improving the Company's reputation in the eyes of investors, shareholders, employees, clients, suppliers, state bodies, and other partners; forming the image of Eurotorg as an honest organization intolerant of corruption;
- sustainable development of the Company;
- ensuring compliance with the legislation of the Republic of Belarus.

# Policy Rules

## **Inadmissibility of Corruption.**

Eurotorg establishes relations with its employees based on mutual respect and trust. The Company expects conscientious behavior from its employees in the course of performing their labor duties.

Employees are obliged to report situations that have become known to them representing a significant threat to the Company's property, cases of non-observance of the legitimate interests of Eurotorg in conducting financial and economic activities, including those related to violations of legal requirements and internal regulatory documents.

Any employee who becomes aware of such an action (or inaction) is obliged to report it to the Hotline.

The Company guarantees the absence of retaliatory measures against an employee who refused to participate in corrupt acts and reported them.

All cases of corruption and other unlawful acts are unacceptable for Company employees regardless of their position, functions performed, merits, or history of work in the Company.

The fact of failure to report to the Company (to the Hotline or by other available means) known information about committed or planned corrupt and other unlawful acts by other employees and / or counterparties entails the liability of the employee in accordance with internal legal acts and the legislation of the Republic of Belarus.

## **Inevitability of Punishment.**

Any identified case of corrupt and other unlawful actions is subject to an internal official investigation. Based on the results of the investigation, if the fact of violation is confirmed, the Company takes appropriate measures.

The Company undertakes all legal actions to protect its interests, ensure the safety of its property, and comply with the applicable legislation of the Republic of Belarus.

**Legality and Validity of Anti-Corruption Actions.**

Anti-corruption processes are aimed at achieving the legal goals defined by this Policy. Any unlawful discrimination against employees based on the selective application of anti-corruption procedures under similar circumstances, or manipulation of procedures, is unacceptable.

It is not permitted to use the results of internal official investigations for purposes other than those defined by legislation and established by this Policy, nor to abuse the legitimate interests of employees regarding whom internal investigations are being or have been conducted.

# Corruption Prevention Procedures

## **Corruption Prevention.**

The Company builds a system of internal procedures and control mechanisms that minimize the probability of corruption risks and conflicts of interest arising.

The Company analyzes and constantly improves internal acts for the presence of provisions that may entail corrupt actions by employees.

The Company forms a system for training employees in the field of conflict of interest management, combating corruption, and the provisions of this Policy.

## **Application of the "Due Diligence Principle".**

Before entering into business relations with a potential counterparty, the Company:

- carries out mandatory checks on the trustworthiness of suppliers and other counterparties, studying their business reputation, checking for the existence of unexecuted court rulings, executive endorsements of notaries, overdue debts on payments to the republican and / or local budgets, and the Social Security Fund (SSF);
- informs potential counterparties about the rejection of corruption and the requirements of this Policy, as well as ways to inform the Company's management about corruption.

In the event that facts of corrupt actions by counterparties and / or their employees become known, the Company has the right to terminate the contract with such counterparties.

Contracts concluded between the Company and counterparties contain anti-corruption conditions (clauses), as well as an obligation for the counterparty to comply with the requirements of anti-corruption legislation.

The Company and its employees are prohibited from engaging intermediaries, agents, or other third parties acting on behalf of the Company or in its interests to perform actions that violate the principles and requirements of this Policy.

Eurotorg conducts the following actions with its employees:

- when hiring employees for management positions, a reputation check is carried out, and possible conflicts of interest are taken into account;
- employees are prohibited from participating in corrupt actions, offering, giving, and receiving bribes, abusing authority, or carrying out unlawful actions to simplify administrative procedures;
- Company employees undertake to comply with the provisions of this Policy and the Code of Business Ethics, and are informed about the key principles, requirements, and liability for violations of anti-corruption provisions. Eurotorg strives to form an intolerance to corruption among employees, as well as an understanding of the need to prevent conflicts of interest.

### **Special Measures for Corruption Prevention.**

All gifts, hospitality expenses, and advertising and marketing events must meet the following criteria:

- be reasonable and not be carried out to exert unlawful influence on an official or other persons for the purpose of retaining business or obtaining commercial or other advantages for the Company, as well as for the purpose of inducing another person to improperly perform the official duties and functions assigned to them;
- not cast doubt on the image or business reputation of the Company or its employee;
- not take the form of cash or its equivalents (securities, cryptocurrency, etc.);
- comply with the internal legal acts of the Company, as well as the legislation of the Republic of Belarus.

The Company provides gratuitous (sponsorship) assistance on the principles of voluntary participation and the absence of interest in obtaining any advantages or the goal of causing unlawful actions by third parties contrary to their official obligations.

**Eurotorg implements** all necessary measures and programs permitted by the legislation of the Republic of Belarus to identify actions containing signs of corruption, including, but not limited to, the following:

- operation of an anonymous reporting Hotline;
- control and revision activities regarding financial and economic activities;
- internal and external audit.

**Internal Investigations.**

The Company carries out internal investigations in the presence of notifications about corrupt actions and violations of the provisions of this Policy. The decision to initiate internal investigations is made by an authorized official of the Company.

Official investigations are conducted in strict accordance with the legislation of the Republic of Belarus, do not violate the rights and legitimate interests of employees and third parties, and are not an alternative to inspections and measures conducted by state bodies.

The purpose of internal investigations is to establish the facts of the commission of corrupt actions. The rights of Eurotorg employees during internal investigations are determined by the internal legal acts of the Company and the legislation of the Republic of Belarus.

The Company does not allow investigations to be conducted against its employees in the absence of legal grounds for such investigations, striving to observe the rights of all employees regardless of their position, in accordance with internal legal acts and the legislation of the Republic of Belarus.

When analyzing information about facts of the commission of corrupt actions and other abuses, as well as the occurrence of a conflict of interest obtained during official investigations, both confirming and refuting data are taken into account.

Based on the results of internal official investigations, a conclusion is prepared containing recommendations for responding to the corrupt actions that took place.

**Response.**

The Company is guided by the necessity of full compensation for damage caused by unlawful actions, including the amount of lost profits and reputational damage, taking into account the requirements of the legislation of the Republic of Belarus.

Response measures may include actions aimed at bringing the employee to disciplinary, material, criminal, and administrative liability in accordance with the legislation of the Republic of Belarus.

# Conclusion

Eurotorg systematically reviews the goals, principles, and mechanisms for combating corruption.

In accordance with the requirements of the legislation of the Republic of Belarus, this Policy will be constantly reviewed and updated to maintain its relevance and significance for all stakeholders.