

# Anti-Bribery and Corruption Policy

## 1. Purpose

1.1 The purpose of this policy is to:

- (a) set out IGK responsibilities, and the responsibilities of those working for//associated with us, in observing and upholding our position on bribery and corruption;
- and
- (b) provide information and guidance on how to recognize and deal with bribery and corruption issues.

In this policy the use of the terms "we", "our" and "us" refer to IGK.

## 2. To whom does this policy apply?

This policy applies to all individuals working at all levels, including directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, agents, channel partners or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

## 3. What it means for you

3.1 Bribery is a criminal offence.

3.2 The company could face an unlimited fine and be forbidden from tendering for public contracts.

3.3 You must never offer, promise or give a financial or other advantage to any person (including a foreign public official) with the intention of inducing or rewarding improper performance by them of their duties.

3.4 You must never directly or indirectly accept or agree to receive a financial or other advantage as a reward for the improper performance of your duties, independently who is the advantage recipient – you or another person.

3.5 Where your role requires this, you are permitted to give and receive hospitality after proper confirmation from management's side is received, but this should always be in a reasonable. Further guidance on this (along with gifts) is set out in this policy later on.

3.6 You must read this policy carefully and if you have any questions on it, please revert to the management of your division.

## 4. Our principles

4.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

4.2 It is our best practice objective that those we do business with take the same zero-tolerance approach to bribery and corruption.

4.3 We must comply with laws relevant to countering bribery and corruption in the jurisdictions in which we operate.

4.4 Bribery and corruption are criminal offences and if the Company is found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face serious damage to our reputation. We therefore take our legal responsibilities very seriously and expect all our employees to do the same.

4.5 In this policy "another person" means any individual or organization you come into contact with during your work for us, and includes actual and potential customers, suppliers, business contacts, agents, advisers, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## 5. What are bribery and corruption?

Corruption is the abuse of public or private office for personal gain.

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through "improper performance".

"Improper performance" happens when a person fails to act in good faith, impartially or in accordance with a position of trust.

## 6. Gifts and hospitality

6.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from another person.

6.2 The giving or receipt of gifts and hospitality is not prohibited, if the following requirements are met:

(a) You have disclosed it to the management of your division in advance (where it is possible to do so or as soon as possible afterwards);

(b) it is not made with the intention of influencing, inducing or rewarding another person in order to gain any advantage through improper performance, or in explicit or implicit exchange for favors or benefits;

(c) it complies with local law;

(d) it is given in our name, not in your name;

(e) it does not include cash or a cash equivalent (such as gift certificates or vouchers);

(f) it is appropriate in the circumstances;

(g) taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;

(h) it is given openly, not secretly; and

(i) gifts and / or hospitality should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of the management of your division.

6.3 Where it is an accepted part of your role (you should ask the management of your division if you are unsure about this) you can offer and accept a reasonable amount of moderate hospitality for the purposes of business development, having regard to paragraph 6.2 above.

## 7. What is not acceptable?

In addition to the above it is not acceptable for you (or someone on your behalf) to:

(a) give, promise to give, or offer, a payment, gift or hospitality with the intention of influencing, inducing or rewarding improper performance;

(b) give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure (where the payment is not a legitimate payment pursuant to local written law);

(c) accept payment from another person that you know or suspect is offered with the expectation that it will obtain a business advantage for them which will be obtained through improper performance by you or us;

(d) accept a gift or hospitality from another person if you know or suspect that it is offered or provided with the intention of influencing improper performance by us in return;

(e) threaten or retaliate against another Worker who has refused to commit a bribery offence or who has raised concerns under this policy; or

(f) engage in any activity that might lead to a breach of this policy.

## 8. Facilitation payments

8.1 We do not make, and will not accept facilitation payments of any kind.

8.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with the management of your division.

## 9. Donations

We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices.

## 10. Your responsibilities

10.1 You must ensure that you read, understand and comply with this policy at all times.

10.2 You must be open about gifts and hospitality given or received and you must disclose these to your manager in advance (where it is possible to do so, or as soon as possible afterwards).

10.3 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All Workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

10.4 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

10.5 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct.

10.6 We reserve our right to terminate our contractual relationship with other Workers if they breach this policy.

10.7 We aim to encourage openness and will support anyone who raises concerns in good faith under this policy, even if they turn out to be mistaken.

## 11. Monitoring and review

11.1 All Workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

11.2 Workers are invited to comment on this policy and suggest ways in which it might be improved.

11.3 We reserve the right to vary and/or amend the terms of this policy from time to time at its absolute discretion.

Document has been approved and signed by

Galina Serjant,

IGK AG

Member of the Board

