

BOSQAR INVEST

POLITIKA
o sprečavanju i
sankcionisanju mita i
korupcije

POLICY
on the prevention and
sanctioning bribery and
corruption

UVODNE ODREDBE

Član 1.

Ovom Politikom (dalje u tekstu: "**Politika**") uređuje se postupanje društva **BOSQAR d.d.** (dalje u tekstu: "**Društvo**") kao i njegovih zavisnih društava u cilju prepoznavanja i sprečavanja mogućih slučajeva davanja, odnosno primanja mita, te drugih oblika korupcije u cilju očuvanja integriteta i ugleda Društva.

Društvo u potpunosti osuđuje i smatra neprihvatljivim sva ponašanja koja imaju obeležja mita i korupcije. Društvo takođe zabranjuje svako ponašanje protivno Konvenciji Ujedinjenih naroda protiv korupcije od 25. septembra 2008. godine.

PODRUČJE PRIMENE

Član 2.

Članovi Uprave, Nadzornog odbora i njegovih odbora rukovodeće osobe, zaposleni, osobe angažovane na osnovu posebnog ugovora kao spoljni saradnici (konsultanti, studenti itd.) i druge osobe koje deluju u ime Društva, obavezni su da postupaju u skladu sa ovom Politikom

Postupanje osoba koje su obveznici ove Politike mora odražavati načela i standarde propisane ovom Politikom.

Ova Politika obavezuje i sva zavisna društva Društva u meri u kojoj su na njih primenjiva, pod uslovom da Uprave tih Društava svojom odlukom usvoje ovu Politiku.

INTRODUCTORY PROVISIONS

Article 1

This Policy (hereinafter: "the **Policy**") regulates the conduct of the company **BOSQAR d.d.** (hereinafter: "the **Company**") and its subsidiaries in order to identify and prevent possible cases of giving or receiving bribes and other forms of corruption in order to preserve the integrity and reputation of the Company.

The Company fully condemns and considers unacceptable all behaviours that bear the characteristics of bribery and corruption. The Company also fully condemns and considers unacceptable all behaviours that are contrary to the United Nations Convention Against Corruption.

SCOPE OF APPLICATION

Article 2

Members of the Management Board, the Supervisory Board and its boards, executives, employees, persons engaged on special contracts as external associates (consultants, students, etc.) and other persons acting on behalf of the Company are obliged to act in accordance with this Policy.

The conduct of persons subject to this Policy must reflect the principles and standards prescribed by this Policy.

This Policy also binds all subsidiaries of the Company to the extent that it is applicable to them on the condition that the Management Boards of those Companies adopt this Policy by their decisions.

POJMOVI

Član 3.

"**Mito**" ili "**podmićivanje**" znači direktno i indirektno davanje i nuđenje bilo kakve vrednosti i/ili druge koristi kako bi primaoca ili bilo koju drugu osobu navelo da obavi neku neprimerenu radnju ili delatnost odnosno da propusti da izvrši svoju obavezu. Pod mitom se takođe podrazumeva direktno i indirektno zahtevanje i primanje bilo kakve vrednosti i koristi od bilo koga zbog toga da se zauzvrat obavi kakva neprimerena radnja ili delatnost.

"**Korupcija**" u smislu krivičnih dela korupcije ne uključuju samo davanje/primanje mita i druge koruptivne radnje, već i pokušaje, nagovaranje na, pomaganje pri i podsticanje na činjenje takvih dela.

"**Vrednost**" ili "**korist**" odnosi se na svaki oblik pogodnosti, uključujući, ali ne ograničavajući se na:

- novac ili novčani ekvivalent, zajam, poklone, nagrade;
- ponude za zapošljavanje ili obećanje budućeg zapošljavanja (pojedinoj osobi ili njima bliskim osobama);
- povoljne uslove za proizvod i/ili uslugu i/ili popuste na proizvode ili usluge;
- plaćanje putovanja, smeštaja, hrane, troškova života ili troškova izleta ili boravka u odmaralištima;
- korišćenje vozila ili nekretnina;
- besplatne karte ili karte s popustom za razne događaje i privatne usluge;

DEFINITIONS

Article 3

"**Bribe**" or "**bribery**" means the direct and indirect giving and offering of any value and/or benefit to induce the recipient or any other person to perform an inappropriate act or activity or to refrain from fulfilling his/her duties. A bribe also means the direct and indirect claiming and receiving of any value and benefit from anyone to perform an inappropriate act or activity in return.

"**Corruption**" in the sense of criminal offenses of corruption includes not only giving/receiving bribes and other corrupt acts, but also attempting, persuading, aiding and abetting the commission of such acts.

"**Value**" or "**benefit**" refers to any form of benefit, including, but not limited to:

- money or cash equivalent, loan, gifts, rewards;
- offers for employment or promise of future employment (to an individual or persons close to them);
- favorable conditions for the product and/or service and/or discounts on products or services;
- payment for travel, accommodation, food, living expenses or expenses for excursions or stays at resorts;
- use of vehicles or real estate;
- free or discounted tickets for various events and private services; and

- političke ili dobrotvorne donacije.

- political or charitable donations.

NULTA STOPA TOLERANCIJE ZA MITO I KORUPCIJU

ZERO-TOLERANCE FOR BRIBERY AND CORRUPTION

Član 4.

Article 4

Društvo je uspostavilo, održava i trajno poboljšava sistem upravljanja za suzbijanje mita i korupcije, zahtevajući usklađenost sa primenjivim zakonima koji opisuju koruptivno ponašanje i uređuju njegovo sankcionisanje i zahtevima međunarodnih normi.

The Company has established, maintains and permanently improves the management system to combat bribery and corruption, requiring compliance with applicable laws describing corrupt behaviour and regulate its sanctioning as well as with the requirements of international norms.

Društvo primenjuje nultu stopu tolerancije za mito i korupciju i zabranjuje ih u svakom mogućem, direktnom ili indirektnom, obliku.

The Company has a zero-tolerance policy for bribes and corruption and prohibits them in any possible, direct or indirect, form.

Zabrana mita i korupcije se primenjuje kako prema državnim činovnicima, tako i prema drugim osobama u privatnom sektoru.

The ban on bribery and corruption applies to both state officials and other persons in the private sector.

Društvo se obavezuje da proveri svako postupanje protivno načelima utvrđenima ovom Politikom i sumnje na mogući slučaj davanja/primanja mita ili drugog oblika korupcije i, gde je to primereno, sprovede istragu i preduzme disciplinske mere uz sankcije predviđene važećim propisima.

The Company undertakes to check any conduct contrary to the principles set out in this Policy and any suspicion of a possible case of giving/receiving bribes or other forms of corruption and, where appropriate, to investigate and take disciplinary action with sanctions provided by applicable regulations.

PLAĆANJA RADI UBRZAVANJA POSTUPAKA

PAYMENTS WITH THE PURPOSE OF ACCELERATING PROCEDURES

Član 5.

Article 5

Plaćanja radi ubrzavanja postupaka predstavljaju neslužbena i neprimerena plaćanja manjih novčanih

Acceleration payments are unofficial and inappropriate payments of small sums of money to

iznosa nižim službenicima kako bi se osiguralo ili ubrzalo izvršavanje rutinskih ili nužnih radnji za koja izvršilac tog plaćanja radi ubrzavanja postupaka ima pravni osnov.

Plaćanje radi ubrzavanja postupaka je zabranjeno.

TRGOVINA UTICAJEM

Član 6.

Društvo zabranjuje svaki oblik trgovine uticajem.

Trgovinom uticajem smatra se svaka situacija kada neko iskorišćavanjem svoga službenog ili društvenog položaja ili utecaja posreduje da se obavi službena ili druga radnja koja se ne bi smela obaviti ili da se ne obavi službena ili druga radnja koja bi se morala obaviti. Podsticanje druge osobe u iste svrhe kao i obećanje i davanje mita za tu svrhu je takođe najstrože zabranjeno.

PRANJE NOVCA

Član 7.

Društvo zabranjuje svaki oblik pranja novca.

Pranjem novca smatra se svaka situacija kada neko imovinsku korist ostvarenu krivičnim delom uloži, preuzme, pretvori, prenese ili zameni u cilju prikrivanja ili lažnog prikazivanja njenog nezakonitog porekla ili pomaganja izvršiocu ili saučesniku krivičnog dela kojim je ostvarena imovinska korist da izbegne krivično gonjenje ili oduzimanje imovinske koristi ostvarene krivičnim delom.

lower officials to ensure or expedite the execution of routine or necessary actions which the executor of those payments has a legal basis to expedite.

Payment to expedite procedures is prohibited.

TRADING IN INFLUENCE

Article 6

The Company prohibits trading in influence in any possible, direct or indirect, form.

Trading in influence is any situation when someone, by taking advantage of their official or social position or influence, procures an official or other act that should not be performed or procures that an official or other act that should be performed is not performed. Inciting another person for the same purposes including making a promise and giving a bribe for this purpose is also strictly prohibited.

MONEY LAUNDERING

Article 7

The Company prohibits any form of money laundering.

Money laundering is any situation when someone invests, takes over, converts, transfers or exchanges the proceeds of crime in order to conceal or falsely present its illegal origin or when someone assists the perpetrator or participant of the criminal offence by which the proceeds were obtained to avoid criminal prosecution or confiscation of the proceeds of crime.

UTAJA I PRONEVERA

Član 8.

Društvo zabranjuje svaki oblik utaje i/ili pronevere.

Utajom se smatra svaka situacija kada neko bespravno prisvoji tuđu pokretnu stvar ili imovinsko pravo koji su mu povereni ili koje je našao ili slučajno do njih došao.

Proneverom se smatra svaka situacija kada neko bespravno prisvoji tuđu pokretnu stvar ili imovinsko pravo koji su mu povereni na radu.

EMBEZZLEMENT, EVASION

Article 8

The Company prohibits any form of fraudulent evasion and/or embezzlement.

Evasion is considered to be any situation when someone uses without approval someone else's movable property or property right that has been entrusted to them or that they have found or accidentally come across.

Embezzlement is considered to be any situation when someone uses without approval someone else's movable property or property right entrusted to him/her at work.

PRIKRIVANJE

Član 9.

Društvo zabranjuje svaki oblik prikrivanja.

Prikrivanjem se smatra svaka situacija kada neko stvar za koju zna ili je morao znati da ju je drugi pribavio krivičnim delom protiv imovine, bez obzira na to kupuje, prima u zalog ili na drugi način pribavlja, preprodaje ili skriva ili pomaže preprodati ili sakriti takvu stvar.

CONCEALMENT

Article 9

The Company forbids any form of concealment.

Concealment is any situation when someone knows, or should have known, that another person has obtained an item through a criminal offense against property, and this first person still buys, pledges or otherwise acquires, resells or hides, or helps to resell or hide this item.

POKLONI I GOSTOPRIMSTVO

Član 10.

Primanje i davanje simboličnih poklona, kao i gostoprimstvo poslovnih partnera kao znak zahvalnosti

GIFTS AND HOSPITALITY

Article 10

Receiving and giving symbolic gifts, as well as the hospitality of business partners as a sign of gratitude

i poštovanja u određenim okolnostima smatra se legitiman deo poslovanja.

and respect is considered a legitimate part of business in certain circumstances.

Prilikom primanja ili davanja poklona / gostoprinstva mora se postupati u skladu sa sledećim smernicama:

When receiving or giving a gift/hospitality, the following guidelines must be followed:

- poklon mora biti dopušten zakonom i pravilima organizacije primaoca;
- vrednost poklona mora biti razumna i prikladna položaju primaoca, okolnostima i prilikama, kako ne bi stvarala privid nepoštenja ili neprikladnosti te kako ne bi mogla biti pogrešno shvaćena od strane primaoca ili drugih osoba kao mito;
- poklon mora biti dat javno i transparentno (davanje poklona u tajnosti nije dopušteno);
- poklon mora biti dat u ime Društva, ne u ime člana Uprave ili zaposlenog lično;
- ne sme se poklanjati istom primaocu više od tri puta u razdoblju od dvanaest meseci kako se ne bi stvorio utisak neprikladnosti;
- pokloni u obliku gotovine ili ekvivalenta gotovine nisu dopušteni; i
- poklon ne sme imati bilo kakav učinak na odluke ili aktivnosti niti stvaranje obaveze kod primaoca.

- the gift must be permitted by law and the rules of the recipient's organization;
- the value of the gift must be reasonable and appropriate to the recipient's position, circumstances and occasion, so as not to create the appearance of dishonesty or inappropriateness and so that it cannot be misunderstood by the recipient or other persons as a bribe;
- the gift must be given publicly and transparently (giving gifts in secret is not allowed);
- the gift must be made on behalf of the Company, not on behalf of a member of the Board of Directors or on behalf of an employee personally;
- gifts should not be too frequent i.e. more than three times in any 12 months' period so as not to create the impression of inappropriateness;
- gifts in the form of cash or cash equivalents are not allowed, and
- the gift must have no effect on decisions or activities of the recipient and must not create any liability for the recipient.

Ako je vrednost poklona veća od nominalne vrijednosti od 65,00 evra, potrebno je prethodno pisano odobrenje Uprave Društva i/ili Odeljenja za usklađenost poslovanja.

If the value of the gift is higher than the nominal value of EUR 65.00 prior written approval of the Company's Management Board is required before receiving or giving the gift and/or Compliance department.

Svi pokloni u vrednosti višoj od 65 evra moraju biti evidentirani u Registru poklona koji vodi Odeljnje za usklađenost poslovanja, u suprotnom poklon se može smatrati mitom.

All gifts with a value of more than 65 EUR must be recorded in the Gift Register maintained by the management team for combating bribery and corruption, otherwise the gift may be considered a bribe.

Višestruki pokloni pojedinom javnom funkcioneru i/ili članovima porodice javnih funkcionera moraju se izbegavati.

Multiple gifts to an individual public official and/or family member of public officials must be avoided.

Najviša dopuštena vrednost poklona se zasebno određuje za svako zavisno društvo na osnovu Odluke uprave zavisnog Društva u skladu sa zakonskim propisima države u kojoj zavisno društvo posluje. Ako zakonskim propisima nije definisan taj iznos, primenjuje se ovde utvrđen iznos.

The maximum permissible value of a gift is determined separately for each subsidiary based on the decision of the subsidiary company's management in accordance with the legal regulations of the country in which the subsidiary operates. If this amount is not defined by law, the amount set out here applies.

DONACIJE POLITIČKIM STRANKAMA, DAVANJE U DOBROTVORNE SVRHE I SPONZORSTVA

DONATIONS TO POLITICAL PARTIES, GIVING TO CHARITY, AND SPONSORSHIPS

Član 11.

Article 11

Donacije političkim strankama, funkcionerima političkih stranaka i kandidatima Društvo sme davati samo u skladu s važećim pravom i zahtevima u pogledu javnosti. Iznos i trenutak davanja političkih donacija trebalo bi da budu pod nadzorom kako bi se osiguralo da se oni ne koriste u koruptivne svrhe.

Donations to political parties, political party officials and candidates may be made by the Company only in accordance with applicable law and public disclosure requirements. The amount and timing of political donations should be monitored to ensure that they are not used for corruptive purposes.

U skladu s poslovnim interesima i društvenom odgovornošću Društvo podržava sponzorstva i donacije. Usluge sponzorstva i donacija dogovaraju se i pružaju putem odeljenja za marketing i odnose s javnošću, a posebno u svrhe marketinga Društva.

In accordance with its business interests and social responsibility, the Company supports sponsorships and donations. Sponsorship and donation services are arranged and provided through the marketing and public relations department, especially for the Company's marketing purposes.

Svako sponzorstvo ili donacija mora biti transparentno dokumentovani putem odluke uprave Društva ili ugovora o davanju donacija ili sponzorstva.

Every sponsorship or donation must be transparently documented through a decision of the Company's management board, a donation agreement or a sponsorship agreement.

Dobrotvorni prilozi i sponzorstva ne smeju se koristiti u koruptivne svrhe i moraju biti transparentni i u skladu s važećim pravom.

Charitable contributions and sponsorships must not be used for corruptive purposes and must be transparent and in accordance with applicable law.

SUKOB INTERESA

CONFLICT OF INTERESTS

Član 12.

Article 12

Zabranjuje se zapošljavanje kao i drugi oblik korišćenja usluga pojedinaca koji su neposredno pre dotičnog angažmana, kao i u prethodnom periodu od 6 meseci, obavljali određenu javnu dužnost u sektoru u kojem posluje Društvo ili čiji angažman bi bio direktno vezan za njihovu prethodnu funkciju.

It is prohibited to employ as well as otherwise use the services of individuals who, immediately prior to the engagement in question, as well as in the previous period of 6 months, held a certain public office in the sector in which the Company operates or whose engagement would be directly related to their previous function.

FINANSIJE I KNJIGOVODSTVO

FINANCE AND BOOKKEEPING

Član 13.

Article 13

Svi finansijski poslovi Društva moraju biti propisno i objektivno evidentirani u odgovarajućim poslovnim knjigama i računovodstvenim evidencijama.

All financial transactions of the Company must be properly and objectively recorded in the appropriate business books and accounting records.

Godišnji finansijski izveštaji će biti revidirani od strane trećeg nepristrasnog revizora.

The annual financial statements will be audited by a third independent auditor.

Član 14.

Article 14

Ne smeju postojati "neslužbeni", odnosno tajni računi i ne mogu se izdavati isprave u kojima nisu objektivno i tačno evidentirane transakcije na koje se one odnose.

There must be no "unofficial" or secret accounts, and documents may not be issued in which the transactions to which they relate are not objectively and accurately

Član 15.

Ne smeju se knjižiti nepostojeći rashodi ili obaveze zasnovane na netačnoj identifikaciji njihovog predmeta ili transakcije bez stvarne i zakonite namene, a Društvo treba da osigura praćenje gotovinskih plaćanja ili plaćanja u naturi kako bi se izbeglo njihovo korišćenje u zamenu za mito i treba dopustiti samo gotovinska plaćanja malih iznosa iz blagajne ili u državama ili mestima u kojima bankarski sistem ne funkcioniše.

Član 16.

Društvo je potrebno da osigura da se nikakvi knjigovodstveni ili drugi relevantni dokumenti ne uništavaju namerno pre zakonom propisanog roka.

Članak 17.

Društvo je dužno da uspostavi nezavisne revizorske kontrole u svrhu razotkrivanja transakcija koje su u suprotnosti sa ovim Pravilima ili merodavnim računovodstvenim pravilima i koji, prema potrebi, predviđaju odgovarajuće korektivno delovanje.

Član 18.

Društvo je dužno da se pridržava svih odredbi nacionalnih poreskih propisa, uključujući one kojima se zabranjuje odbitak bilo kojeg oblika mita od oporezivog dohotka.

TRANSPARENTNOST

Član 19.

recorded.

Article 15

Non-existent expenses or liabilities based on incorrect identification of their subject or transaction without actual and lawful purpose should not be recorded, and the Company should ensure the monitoring of cash or in-kind payments to avoid their use in exchange for bribes and should only allow small cash payments from the treasury or in countries or places where the banking system is not functioning.

Article 16

The Company needs to ensure that no accounting or other relevant documents are intentionally destroyed before the statutory deadline.

Article 17

The Company is required to establish independent audit controls for the purpose of disclosing transactions that are contrary to these Rules or the relevant accounting rules and which, if necessary, provide for appropriate corrective action.

Article 18

The Company is required to comply with all provisions of national tax regulations, including those prohibiting the deduction of any form of bribe from taxable income.

TRANSPARENCY

Article 19

Društvo će uvek na transparentan način prikazivati svoja ovlašćena lica kao i deoničare, i to do nivoa stvarnih vlasnika, a sve kako je to predviđeno zakonima o sprečavanju pranja novca i finansiranja terorizma.

The Company will always present its authorized persons as well as shareholders in a transparent manner, up to the level of ultimate beneficial owners, all as provided for by the laws on the prevention of money laundering and terrorist financing.

AKVIZICIJE

ACQUISITIONS

Član 20.

Article 20

U postupku akvizicije može se pojaviti rizik da je ciljano društvo bilo ili je i dalje uključeno u dela mita i korupcije. Kako bi se smanjili takvi rizici mora se pristupiti sledećim merama:

In the process of acquisition, there may be a risk that the target has been or continues to be involved in acts of bribery and corruption. To reduce such risks, the following measures must be taken:

- dubinskoj analizi pre sklapanja transakcije kako bi se identifikovali svi potencijalni rizici od mita i korupcije
- implementaciji ove Politike i obuku zaposlenih nakon transakcije kako bi se minimizirala mogućnost pojave takvih rizika u budućnosti.

- pre-transaction due diligence to identify any potential risks of bribery and corruption
- implementing this Policy and training employees after the transaction to minimize the possibility of such risks occurring in the future.

Odluka o zaključenju transakcije donosi se nakon razmatranja rezultata dubinske analize.

The decision to close the transaction is made after considering the results of the due diligence.

PRIJAVA POVREDE ILI SUMNJE NA POSTUPANJE PROTIVNO POLITICI

REPORTING A VIOLATION OR SUSPICION OF ACTION AGAINST THIS POLICY

Član 21.

Article 21

U slučaju da bilo koja osoba, koja je u obavezi da primenjuje ovu Politiku, uoči zabrinjavajuće ponašanje ili ponašanje koje bi moglo predstavljati kršenje Politike, svoje sumnje je dužna da prijavi u skladu sa

In the event that any person who is obliged to apply this Policy notices worrying behaviour or behaviour that could constitute a violation of the Policy, they are obliged to report in accordance with the procedure for

postupkom prijavljivanja nepravilnosti, a koji postupak je definisan internim aktom Društva (vidi Pravilnik o postupku unutrašnjeg prijavljivanja nepravilnosti i imenovanju poverljive osobe ili drugi interni akt koji je usvojilo zavisno društvo, a kojim je definisan postupak prijave nepravilnosti).

U slučaju da bilo koja osoba, koja je u obavezi primene ove Politike, sumnja u ozbiljno kršenje Politike, odnosno da u kršenju sudeluje član Uprave ili Nadzornog odbora ili da takvo kršenje uključuje znatna finansijska sredstva ili navodna krivična dela, dužna je da svoje sumnje odmah prijavi u skladu sa postupkom prijavljivanja nepravilnosti, a koji postupak je definisan internim aktom Društva (vidi [Pravilnik o postupku unutrašnjeg prijavljivanja nepravilnosti i imenovanju poverljive osobe](#) ili drugi interni akt koji je usvojilo zavisno društvo, a kojim internim aktom je definisan postupak prijave nepravilnosti).

ZAVRŠNE ODREDBE

Član 22.

Svaki član Uprave, Nadzornog odbora i njegovih odbora, rukovodeće osobe, zaposleni Društva i osobe angažovane na osnovu posebnog ugovora kao spoljni saradnici (konsultanti, studenti itd) i druge osobe koje deluju za račun Društva, kao i sva zavisna Društva u meri u kojoj su na njih primenjiva i na koje se odnose odredbe ove Politike, u obavezi su da se upoznaju sa odredbama ove Politike i dužna su da se u obavljanju svojih poslova pridržavaju navedenih odredbi.

Društvo smatra mito i korupciju ozbiljnim pitanjima i

reporting irregularities, which is defined by the internal act of the Company (see the Ordinance on the procedure for internal reporting of irregularities and the appointment of a confidential person or another internal act adopted by the subsidiary which defines the procedure for reporting irregularities).

In the event that any person who is obliged to apply this Policy suspects a serious violation of the Policy, i.e. that a member of the Management Board or the Supervisory Board participates in the violation or that such a violation involves significant financial resources or alleged criminal offenses, they must immediately report in accordance with the procedure for reporting irregularities which is defined by the Company's internal act (see the [Ordinance on the procedure for internal reporting of irregularities and the appointment of a confidential person](#) or another internal act adopted by the subsidiary company which defines the procedure for reporting irregularities).

FINAL PROVISIONS

Article 22

Every member of the Management Board, Supervisory Board and its committees, employees of the Company and persons engaged on the basis of a special contract as external associates (consultants, students, etc.) and other persons acting on behalf of the Company, as well as all subsidiaries of the Company to the extent applicable to them to whom the provisions of this Policy apply are obliged to familiarize themselves with the provisions of this Policy and are obliged to comply with these provisions in performing their duties.

The Company considers bribery and corruption to be

primjenjivaće sankcije u slučaju nepoštovanja ove Politike. Za zaposle Društva nepridržavanje može dovesti do disciplinskih mera, do i uključujući prestanak radnog odnosa.

serious issues and will apply sanctions in case of non-compliance with this Policy. For employees of the Company, non-compliance may lead to disciplinary measures, up to and including termination of employment.

Za osobe angažovane na osnovu posebnog ugovora nepoštovanje ove Politike može dovesti do kazni, uključujući raskid ugovora. Dalje pravne radnje mogu se preduzeti u slučaju da su interesi Društva oštećeni usled nepridržavanja i nepoštovanja ove Politike od strane pojedinaca i/ili organizacija odnosno drugih deoničara.

For persons engaged under a special contract, failure to comply with this Policy may result in penalties, including termination of contract. Further legal actions may be taken in the event that the Company's interests are impaired due to non-compliance with this Policy by individuals and/or organizations or other shareholders.

Ova Politika objaviće se na internet stranicama Društva čime Društvo obezbeđuje da su svi relevantni deoničari upoznati s ovom Politikom.

This Policy will be published on the Company's website whereby the Company ensures that all relevant shareholders are familiar with this Policy.

Nijedan radnik neće biti degradiran, kažnjen niti će pretrpeti druge nepovoljne posljedice zbog toga što je odbio učestvovati u korupciji ili zbog toga što je prijavio sumnju ili stvarni slučaj, odnosno pokušaj davanja ili primanja mita.

No worker shall be demoted, punished or suffer any other adverse consequences for refusing to participate in corruption or for reporting a suspected or actual case, or an attempt to give or receive bribes.

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