

Anti-corruption Policy of the Yabimo Company

The guiding objective of our anti-corruption policy is to continuously look for and analyse the possible corruption hazards at all management levels, that may occur in tasks implemented by us and to take immediate preventive measures reducing the risk of hazard occurrence.

Such defined anti-corruption policy is implemented by:

1. Performance of tasks, pursuant to the applicable law and the adopted national strategy for the anti-corruption strategy
2. Monitoring all processes implemented in company in terms of risks of corruption hazard occurrence and taking, in the case of high risk occurrence, the appropriate preventive measures.
3. Introduction of clear and explicit procedures reducing the probability of corruption hazard – known and available both for our customers and our cooperative a entities and employees.
4. Raising the employee's awareness and strengthening their bond with the company by increasing the organizations culture, improving the internal communication and motivational system, leadership, etc.
5. Continuous improvement of the employee's professional qualifications by realization of specialist trainings, including trainings in the field of corruption.
6. Implementation of the Code of Professional Conduct – Good Management Practise.
7. Controls and Sanctions -The company applies internal control procedures. Violations of the policy result in disciplinary actions, including possible termination of cooperation and reporting the matter to the relevant authorities.
8. Legal Compliance -The policy complies with applicable national and international laws, including:
 - United Nations Convention against Corruption,
 - FCPA (Foreign Corrupt Practices Act),
 - UK Bribery Act,
 - ISO 37001 standard.
9. Responsibility -The implementation and oversight of the policy are entrusted to the designated Compliance Manager. Every employee is obliged to comply with the policy.

President of the Board

Michał Olesiński