



IPM Avanea Eco Management a.s.

Zero Tolerance for Corruption Policy

INTRODUCTION

The Company IPM Avanea Eco Management a.s. (hereinafter referred to as the “Company” or “company IPM AEM”) has undertaken to respect the Zero Tolerance for Corruption Policy (hereinafter referred to as the “ZTC Policy”) as well as the Code of Ethics resulting from the Global Compact principles¹.

The Company IPM Avanea Eco Management a.s. belongs to the IPM Group Holdings Limited group of companies.

The Company IPM AEM requires from its employees, members of the steering committee and other external consultants to demonstrate honesty, transparency, and fairness while doing their professional duties. The same commitments are required from all other natural and legal persons with any legal or other relation to the company IPM AEM (hereinafter referred to as the “persons”), who are bound to such commitment by a contract or any other legal grounds.

The Company IPM AEM is involved in the fight against corruption in accordance with the PACP² initiative, applying the criteria of transparency recommended by the Transparency International in compliance with the tenth principal of the Global Compact initiative, which requires that “companies and corporations should work against all forms of corruption including blackmail and bribery”. This commitment is expressed in the following general principles:

- **IPM AEM rejects corruption in all its forms, both direct and indirect, and**
- **Company IPM AEM implements ZTC Policy in the fight against corruption.**

¹ Action plan promoted by the United Nations in July 2000 on the direct initiative of the Secretary General with the aim of involving the business world in a new form of partnership with the United Nations through adherence to ten universal principles in the areas of human rights, labour protection and environmental protection www.unglobalcompact.org.

² This refers to the adhesion of around 60 international companies operating in the energy, construction and mining industries to the Partnering against Corruption Initiative sponsored by the World Economic Forum.

I. ZTC Policy - Commitments

The Company IPM Avanea Eco Management a.s. adopts the following commitments for its activities, which are at the highest risk of corruption. This applies to the following areas: bribes, contributions to political parties, contributions to charity organisations and sponsorship, remunerations and benefits, gifts and presents.

I.1. Bribes

The Company IPM AEM forbids any form of corruption, particularly accepting and providing illegal payments in cash or any other form, in order to gain an advantage in relations with persons having who have any kind of relation with the Company. Such acceptance of unjustified benefits shall relate to their provision, directly or through an intermediary, for personal benefit or the benefit of any other person by soliciting or a keeping a promised bribe to act or refrain from acting in breach of his or her obligations resulting from employment, occupation, position or role.

In case of a promise, offer or solicitation of bribes, the employees, members of the steering committee and other external consultants of the company IPM AEM shall without undue delay inform the statutory body of IPM AEM through the communication channels reserved for these notifications.

Notifications may be sent via:

- e-mail, to the address: info@avaneaeco.com.

In all cases, the company IPM AEM guarantees that the identity of a person making such report shall be kept confidential pursuant to generally binding legal regulations and protection of the rights of the Company or persons specified in the report.

I.2 Contributions to Political Parties

The Company IPM AEM will ensure that everyone, who is authorised to do so on behalf of the Company, refrains from all forms of pressure, direct or indirect, on political actors, does not fund political parties, their representatives, or candidates, whether in the Slovak Republic or abroad, and does not sponsor any events whose aim is exclusively political propaganda.

I.3 Contributions to Charity Organisations and Sponsorship

The Company IPM AEM supports initiatives through sponsorship or specific agreements in the following areas: social, environmental, sport, cultural and educational activities. These are implemented through events with guaranteed quality that are of national importance or meet specific local or regional needs (in situations in which the Company supports initiatives in areas of its industrial interests), and are attended by citizens, institutions, and associations cooperating with the Company in their planning so as to guarantee the meaning and effectiveness.

When selecting proposals to support activities, the company IPM AEM pays particular attention to all possible conflicts of interest of a personal or corporate nature.

I.4 Remuneration and Benefits

The Company IPM AEM prohibits its employees, members of the Investment Committee or other external consultants from offering or accepting, directly or indirectly payments, various forms of remuneration or any benefits from any entity, with a purpose to accelerate performance or provide benefits to any unauthorised person.

In case of a promise, offer or request of any such benefits, the Company's employees or other persons with the opportunity to influence decisions of the Company IPM AEM shall inform the Statutory Body without undue delay through communication channels designated for that purpose.

1.5 Gifts

Any form of gift which is of higher value or exceeds, or can be construed as exceeding normal business practice or ethics, or which is in any way meant to obtain favourable treatment in the pursuit of any activity tied to Company IPM AEM is prohibited.

In particular, it is prohibited to provide any gifts to public officials in the Slovak Republic or abroad, auditors, members of the Board of Directors of the company IPM AEM, or their family members, who may affect the independence of judgement or lead to any type of advantage.

There is no exception to the application of this rule, even in such countries where it is a custom to give valuable gifts to business partners, regardless if it concerns the gifts promised, offered or received.

In all cases, IPM AEM will refrain from unlawful actions, business practices or the codes of ethics of the companies or entities with which IPM AEM has business and/or any other legal relations.

Promotional items donated by the company IPM AEM to its business partners are perceived as supporting of the company image of its trade name.

2. ZTC Policy – Implementation Framework

Respecting IPM AEM's commitments in the fight against corruption requires the participation of all stakeholders.

2.1 Organisation and Responsibility

The Statutory Body of the Company is responsible for the implementation of the approved ZTC Policy.

2.2 Relations with Third Parties

2.2.1 Affiliates and Partners

In the phase of acquiring or defining relationships with stakeholders or potential stakeholders, IPM AEM verifies the existence and ability to fulfil the conditions for compliance with ZTC Policy or the existence of similar and compatible conditions valid in these persons/parties.

The company IPM AEM will propose to stakeholders who do not have their own code of ethics or anti-corruption programmes or similar regulations governing these areas to adopt this ZTC Policy or alternatively, to create similar documents.

2.3 Communication

The ZTC Policy is available to all stakeholders on the Company's website www.avaneaeco.com.