

INTEGRITY POLICY
ICS «BEMOL RETAIL» SRL

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1. INTRODUCTION

BEMOL (hereinafter "Company") tends to create a transparent, open and professional corporate culture where every employee knows which actions will be deemed appropriate and which will not be considered ethically acceptable.

The Company adheres to a clear policy according to its directors, department heads, employees and business partners are prohibited to commit any offenses in accordance with any applicable anti-corruption laws. Each director, department manager, employee or business partner of the Company is required to avoid any actions that may lead to the involvement of the Company or him/ her in any practice that hinders the provision of any such applicable laws.

When taking decisions on behalf of the Company, as well as in their individual activities at the workplace, Company employees should always choose an ethical course of action from a number of alternatives. Personal written responsibility, general courtesy and common sense cannot be replaced by any written code. Nevertheless, the Company follows the general recommendations that apply to all employees and emphasizes the importance of the Company policy, requiring it to comply with Law No. 82 of May 25, 2017 "On Integrity" and the anti-corruption legislation of the Republic of Moldova.

The anti-corruption legislation is a set of laws in force in the Republic of Moldova that regulate social, economic, civil relations, as well as other normative legal acts which provide procedures to prevent corruption, removal of corruption offenses and responsibility for them.

After starting work in the Company, all employees and officials are invited to sign confirmations that they have read and are familiarized with the Company's Integrity Policy, and they need to agree that they obey to the guidelines contained in it.

2. KEY PRINCIPLES AND REQUIREMENTS

The Company's Integrity Policy defines key principles and requirements aimed to prevent corruption and complying with applicable anti-corruption laws by its employees, independently of their position and other persons who may act on behalf or in the name of the Company:

2.1. Hindrance of discrimination

- In order to impartially and objectively serve the public interest within the Company, manifestation of discrimination are unacceptable.
- An employee of the Company must not allow preferencing in his/ her professional activities. Personal relationships at the workplace should not affect work in the interest of the Company, nor should they affect labour relation.

Each employee of the Company is required to prevent discrimination in his/her professional activities.

2.2. Compliance with the legal regime of gifts

Employees must not request, offer or receive, directly or indirectly, gifts (property, service, advantages, offers or any other benefits) meant for them personally or for their family members if the offer or provision is directly or indirectly related to accomplishment of their professional activity.

This interdiction is not applied in relation to gifts received in accordance with the rules of courtesy or within the protocol events.

The employees must be careful with such situations. If this creates the appearance of a business obligation, such behavior is unacceptable for the either party.

By maintaining independence, the Company and its employees avoid conflicts of real, clear interests.

If an employee is offered an unacceptable gift or whose value makes him/ her feel uncomfortable, he/ she should:

- reject or return the invitation or the gift;
- notify to his/ her immediate superiors;
- continue to carry out professional activities in an appropriate manner, especially the one in connection with which the gift was offered.

2.3. Hindrance, notification and elimination of undue influence

The professional activity of the employee should be free from any inappropriate influence.

The directors and heads of departments must not allow undue influence.

In the event of improper influence, the directors and managers will take the following measures:

- provide the possibility of notification in confidentiality of cases of undue influence;
- provide the necessary conditions for the employee to carry out legitimate activities and check the procedure for the exercise of powers in respect of which an improper influence was shown;
- prevent cases of undue influence through direct participation in their resolution.

Each employee must:

- directly resist undue influence;
- legally carry out activities in respect of which an improper influence has been shown;
- inform his/ her administration in case of impossibility to independently resist undue influence and causing consequential damage to his/ her professional activity.

2.4. Hindrance of corruption and protection of whistleblowers

In order to ensure the proper activity of the Company and to make sure that the human rights, image and reputation of the Company are not impaired, the heads of departments and employees must forbid and immediately notify about any attempts of engaging them in corruption.

The directors and managers of the Company will take all legal procedures to prevent corruption and ensure notification of such:

- provide the proper implementation of professional activities by employees in respect of whom attempts were made to engage them in corruption;
- ensure that administrative measures are taken to prevent other attempts to engage workers in corrupt practices similar to those reported.

In case of notifications of integrity, the head of the company will take the following procedures:

- provide protection to the integrity informant;
- carry out registration of notifications of integrity submitted by employees on confidentiality terms;
- provide consideration of integrity information.

When trying to engage them in corruption acts, Company employees should:

- directly reject attempts to engage them in corruption acts and, if possible, warn the other person about the illegality of this attempt;
- if possible, check the availability of witnesses, including from among colleagues;
- immediately inform the head of department about attempts to engage in corruption acts in the event that they constitute other types of violations than violations of a criminal or offense kind;
- carry out professional activities properly, especially in that part in connection with which an attempt was made to involve them in corruption acts;
- approach the notification of integrity conscientiously as they are responsible for the consequences, if it is proved that they included malicious information in the filed notification.

2.5. Incidents of intolerance and non-acceptance

The company takes an absolute intolerance approach to any direct or indirect form of corruption. Directors and managers will be examples of serving the public interests and preventing incidents of integrity in professional activity.

Company employees must:

- resist their involvement in incidents of integrity and notify of such attempts, including the offer of unacceptable gifts, the exercise of inappropriate influence and involvement in corruption;
- keep other employees non-involved in incidents of integrity.

2.6. Compliance with ethics and deontology rules

The Company's basic standards are designed to ensure fair and ethical conduct. However, the provision should not cover all relevant situations. In the event of a conflict between the law and the ethical policy of the Company, the employee must comply with the law.

a) Compliance with the law: The policy of the Company is to comply with all laws, norms and rules of state bodies and authorities applicable to the Company, or to conduct business of the Company.

Company directors, managers, employees and business partners are not required to know the details of all applicable laws, norms and rules. However, they should be familiar with the published policies and procedures of the Company and seek the advice of a manager if they have any questions about whether the legal requirement is relevant to a particular situation or what behaviour may be required to comply with any law, rule or regulation.

b) Honest and ethical conduct: In addition to complying with legal regulations, directors, managers, employees and business partners of the Company must comply with high standards of business and personal ethics in the performance of their duties. This requires the practice of honesty and integrity in every aspect of working with other employees of the Company, business community, customers, suppliers and government and regulatory bodies.

The directors, managers, employees and business partners of the Company should not use anyone for an unfair purpose by manipulating, hiding, misusing confidential information, misrepresenting information or any other dishonest actions or practices.

c) Non-discrimination: Company policy prohibits unlawful discrimination against employees, customers or suppliers based on race, colour, age, gender, religion, or national origin.

3. CONFLICT OF INTEREST

The Company, its administration and employees refrain from any actions that could cause a conflict of interest for any of their business partners and contractors. If a company employee has a conflict of interest, he/ she must inform directly

the management of the Company about this and provide full information about the type of the conflict to those responsible for investigating this situation.

4. INTERACTION WITH STATE OFFICERS

The company adheres to transparency in business relations with government agencies. The Company refrains from paying any expenses for public servants and their close relatives (or in their interests) in order to obtain commercial advantages in specific projects, including expenses of transportation, accommodation, food, entertainment or receiving any other benefit at the expenses of the Company.

5. ACCOUNTING CONTROL

According to the applicable laws, regulations and policies, the Company is required to hold accounting books and records that accurately reflect its operations and disposition of assets. All financial transactions must be accurate and with a sufficient level of detail reflected in the accounting of the Company, indicated in documents and available for verification.

6. AUDIT AND CONTROL

The Company regularly conducts an external audit of financial and economic activities, controls the completeness and accuracy of data reflection in accounting and compliance with the requirements of the legislation of the Republic of Moldova and internal documents regulating the processes of the Company, including the principles and requirements established by this Policy.

7. AMENDMENTS

In case of revealing poorly effective provision of this Policy or related anti-corruption procedure of the Company, or when amending the requirement of anti-corruption legislation, the general director and the responsible people organize the development and implementation of an action plan to review and amend this Policy and/ or anti-corruption measures.

8. RESPONSIBILITY FOR FAILURE TO IMPLEMENT THE ANTI-CORRUPTION POLICY

All employees of the Company, regardless of their position, are personally responsible for observing the principles and requirements of this Policy. Non-compliance with the principles and requirements of this Policy should be promptly disclosed in accordance with the requirements of applicable law.