

Anti-Corruption Policy

Corruption is understood as an action, action promises or failure to act in order to obtain undue advantage transferred, promised or alleged, both material and immaterial, directly or indirectly. The concept of corruption includes all participants, actual or potential exchange.

Assel's Anti-corruption Policy expects from its business partners, service providers, and employees to act fairly, without intentions and actions related to corruption and comply with the following rules:

- not to offer and not giving any financial, material or other benefits;
- Employees are not allowed to take a part in any type of behavior which can mean: conspiracy, request, demand or inquiry for financial or material benefit;
- None of the employees will not be punished by degradation, penalty or any other kind of negative consequences arising from the refusal to accept or pay bribes, even if such a refusal will result in loss of business opportunities for the Assel company;
- Suppliers cannot accept any kind of inquiry or request for financial or material benefits;
- Suppliers cannot offer financial or material benefits;
- In cases of corruption issue all sides includes: benefit taker, bribe giver and bribe taker are treated in the same way;
- If a Customer or Supplier or an employee suspects that request, attempt conduct having signs of corruption may occur, should immediately inform the owner of the company.

All employees in the company are responsible for implementation of anti-corruption policy in relations to their jobs and are obliged to take an initiative in eliminating the incidents of corruption.

This policy is communicating to employees, suppliers and subcontractors working with Assel.