



The Senior Management Team of „Aurubis Bulgaria“ AD and its subsidiaries commits themselves to this Anti-bribery policy, aiming to achieve the company's Anti-bribery vision for Zero tolerance to bribery, corruption, and fraud.

For effective implementation and maintaining of the Anti-bribery system, and to ensure continuous improvement, we set out the following principles and commit to:

- » Work together to achieve highly efficient production in a fraud and bribe-free business environment;
- » Pursue our strategy to proactively acknowledge, prevent, detect and deter bribery and fraud;
- » Comply with the national and international anti-bribery laws, applicable to the activities of „Aurubis Bulgaria“ AD and its subsidiaries;
- » Promote and support anti-bribery and anti-corruption principles in business dealings and interactions with business partners and government agencies;
- » Provide channels for reporting of suspected and actual fraud or bribery cases;
- » Ensure that no one will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or based on reasonable belief of violation or suspected violation of the company's counter-fraud and anti-bribery policy, procedures and working instructions;
- » Ensure resources for investigation of all reported signals, regardless of the reporting channel. Ensure fair investigation process and punishment of offenders;
- » Ensure independent function responsible for anti-bribery and anti-corruption compliance in the organization;
- » Maximize prevention and proactively detect bribery, corruption, and fraud through implementation of a risk-based system, designed to cover all departments.

For the achievement of the objectives „Aurubis Bulgaria“ AD commits to implement, maintain and continuously improve an Anti-Bribery Management System in compliance with the requirements of ISO 37001.

The Senior Management Team of „Aurubis Bulgaria“ AD requires all employees of the company and its subsidiaries, as well as business partners to behave responsibly and in compliance with the regulatory framework and the internal regulations aiming to minimize the financial and reputation impact from bribery and fraud.

Employees who do not comply with the current Policy Statement and the relevant internal documents shall be subjected to disciplinary actions in accordance with provisions of the Labour Code and the Internal Rules and Regulation of Aurubis Bulgaria, and if warranted, legal action based on the applicable laws.

Business partners or third parties, who do not comply with the anti-bribery regulatory requirements shall be subject to termination of the business relations with „Aurubis Bulgaria“ AD and if warranted, legal action based on the applicable laws.

The Anti-bribery policy shall be communicated within the organization and to all interested parties through:

- » Company website;
- » Internal company electronic network;
- » Information boards;
- » Trainings.

Rakan Rahbani
/Executive Director/

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Anti-bribery Policy