

H&P GROUP

ANTI-CORRUPTION POLICY

November, 2010

We pursue good corporate governance and responsible business behavior. The decision-making in our Group is based on the premise that responsible behavior is not only a matter of legal compliance, but also a matter of our values.

This policy integrates anti-corruption commitment into our overall management system in order to strengthen our internal capacities for anti-corruption behavior.

It lays down our basic principles which guide our management and employees in order to demonstrate our clear commitment to conduct our business with integrity, transparency and accountability.

Key principles

General principles

- 1) We regularly perform assessments for risks related to corruption.
- 2) We have established internal mechanism for addressing concerns and seeking advice with regard to anti-corruption. Our employees and management can openly raise questions and bring concerns about any activity or situation that is unethical, illegal or unprofessional to the Ethical Committee which directly reports to the Group Management Board.
- 3) We make sure that all our managers and employees are adequately trained in order to do business with integrity.
- 4) As a part of internal control processes we keep clear and accurate records and books in order to secure transparency in payments and practice.
- 5) We make sure that these principles are reflected in all our contracts and agreements.
- 6) We make sure that our clients, business partners, competition, professional and business associations know our anti-corruption principles.
- 7) We regularly report on our anti-corruption practices and performance.

Principles for countering bribery

- 8) We never offer or accept bribe in order to gain unjust business advantage or influence business.
- 9) We generally do not make any political contributions, either in cash or in kind, to support any political cause. Nevertheless, we may consider to make political contributions in specific cases when we assess that they can support democratic processes in the countries in which the group operates based on clear criteria.
- 10) We make charitable contributions, either in cash or in kind, exclusively for the benefit of the society. We review and monitor them in order to make sure that they have been applied for intended purpose.
- 11) We do not make any payments to a private or a public person to secure or speed up a performance or required action.
- 12) We only give and receive appropriate gifts, hospitality and expenses. It means that we approve only of those gifts, hospitality or expenses made or given for the right reason (as an act of appreciation), with no return expectations or obligations placed on the recipient. Gifts, hospitality and expenses are given or accepted only if done openly and in a reasonable value.