

APPROVED

the protocol of the Supervisory Board
JSC «GORODEA SUGAR
REFINERY»

30.10.2025 No. 60

**Policy of the
Joint Stock Company «GORODEA SUGAR REFINERY»
in the field of combating bribery**

The anti-bribery policy of JSC «GORODEA SUGAR REFINERY» is an integral part of the Company's overall development strategy and is consistent with the anti-corruption legislation of the Republic of Belarus.

The purpose of the Policy

Prevention of bribery in the Company, the formation of a unified approach to fulfilling the Company's obligations to comply with anti-corruption legislation by management, employees and others, as well as the establishment of zero tolerance in Society for any manifestations of corruption.

Basic principles of the Policy

Intolerance to bribery in any form

The management of the Company considers unacceptable any manifestations of bribery in the course of production, investment and any other activities. Intolerance to bribery means a strict prohibition for any persons acting on behalf of the Company or in its interests, directly or indirectly, personally or through any kind of mediation, to participate in actions related to bribery, regardless of the conditions and fields of activity.

Unconditional compliance with the requirements of legislative acts

The requirements of the legislation and local legal acts must be unconditionally and strictly observed by all employees of the Company, regardless of their position, duration of work, status and other relationships with the Company.

The inevitability of punishment

The Company makes all possible reasonable and legitimate efforts to bring employees to justice promptly and inevitably for violations of the requirements of legislation in the field of bribery.

Ways of implementation

Exclusion of the facts of receiving bribes. Minimizing the risks of involving employees in corrupt activities.

Informing employees about compliance with the legislation and local legal acts of the Company on combating bribery.

Advising employees on compliance with anti-bribery requirements.

The formation of anti-corruption ethical values and a uniform understanding of the rejection of corruption in any form and manifestations.

Periodic assessment of corruption risks (risks of bribery) characteristic of the Company's activities in general and for certain areas in particular.

Taking measures to prevent the occurrence or possibility of a conflict of interest. Management of the anti-bribery management system based on an assessment of the risks of bribery, an analysis of the context of Society.

Continuous improvement of the anti-bribery management system as a protection against corruption and for the purpose of continuous improvement of its activities.

Bringing to justice persons who do not comply with the requirements of legislation, norms of local legal acts and documents of the anti-bribery management system.

Implementation of procedures that allow, through communication channels provided by the Company and guaranteeing confidentiality, to send messages and complaints related to violations of this Policy to the Company.

The Company does not apply or encourage any form of pressure, harassment, or influence (including in the form of disciplinary action) and prohibits its employees from using any form of pressure, harassment, or influence (including in the form of disciplinary action) against employees of the Company and other persons who have reported in good faith a violation of this Policy., assisted in conducting investigations, refused to participate in activities contrary to the principles or requirements of this Policy.

A personal example of leadership

The Company's management, regardless of its level, pays special attention to the need to strictly follow this Policy, perform official and (or) corporate duties in good faith and reasonably in accordance with applicable laws, best corporate governance practices and high professional and ethical standards. The Company's leadership, by its example, forms an internal corporate culture of rejection of all forms and manifestations of bribery and carries out general management of the internal organizational system for preventing and countering bribery and corruption.

As General Director, having proclaimed this Anti-Bribery Policy, I personally commit myself to adhere to its principles and expect the Company's employees and other stakeholders to understand and implement the Policy, and I commit myself to creating the conditions and allocating the necessary resources to improve the current anti-bribery management system continuously.

General Director
30.10.2025



G.M.Solovey