

## **COMPLIANCE MANAGEMENT POLICY OF UAB LITESKO**

### **I. GENERAL PROVISIONS**

- 1.1. Compliance is a process and a set of measures to ensure that UAB Litesko (the “**Company**”) complies with and implements the requirements of applicable international, European Union and Republic of Lithuania legislation, internal documents of the Company, Veolia Group’s legal procedures (including the Code of Ethics and Anti-Corruption Code of Conduct), other legally binding documents as well as best practices.
- 1.2. Compliance is of particular importance to the Company in its operations as:
  - 1.2.1. The Company is part of the international Veolia Group which operates in different geographic locations around the world in water management, waste management and energy sectors that are important to human beings and the planet;
  - 1.2.2. Any breach of compliance could result in reputational, financial, operational disruption and other adverse consequences not only to the Company, including its Employees, and not only in its area of operation but also to other companies in the Veolia Group or to the entire Veolia Group;
  - 1.2.3. The Company operates on the regulated energy market;
  - 1.2.4. Meeting compliance requirements is a prerequisite for the achievement of the Company’s objectives, for ensuring the Company’s and Veolia Group’s good reputation, successful operation and values and, therefore, the Company acts in accordance with applicable laws in its internal and external relations, applies high ethical standards in all its activities, respects the rights of employees and acts with integrity towards its customers, contractors, suppliers and other external partners.
- 1.3. All Employees, regardless of the position they hold, members of the Company’s management bodies or responsible persons delegated by the Veolia Group must comply with the general ethical rules, the Company’s anti-corruption rules and legal requirements. Under no circumstances is it acceptable to violate laws, behave in a way that is not in line with the values of the Company and the Veolia Group or with internal rules and procedures.
- 1.4. This Compliance Management Policy (the “**Compliance Policy**” or “**Policy**”) is of material importance for the implementation of the compliance system of the Company and the Veolia Group which is continuously monitored, assessed, developed and improved.
- 1.5. The rules laid down in the Policy are supplemented and detailed by Veolia's and/or Company’s internal procedures and legal procedures governing specific areas of operation or a particular process.
- 1.6. The Company implements the Compliance Policy to promote and enforce all principles and rules laid down in the Code of Ethics, Anti-Corruption Code and other internal and external legal acts and procedures, to prevent, detect and handle non-compliance.
- 1.7. All employees of the Company are liable to comply with the Compliance Policy.

## II. PURPOSE OF THE POLICY

- 2.1. The purpose of the Company's Compliance Policy is to establish and continuously maintain a consistent and effective compliance management system within the Company which is necessary to:
- 2.1.1. ensure that the Company's operations comply with the laws, internal documents and ethical principles;
  - 2.1.2. create, promote and develop a culture of compliance within the Company and to communicate internal and external laws, documents and applicable and required ethical principles (tone at the top);
  - 2.1.3. prevention of irregularities, information and training of employees;
  - 2.1.4. identification and management of risks to the Company's operations;
  - 2.1.5. remedying irregularities related to the Company's activities;
  - 2.1.6. planning and resourcing the Company's compliance activities;
  - 2.1.7. assessing the impact of implemented compliance activities;
  - 2.1.8. improving and ensuring the effectiveness of the compliance system and taking corrective measures.

## 3. DEFINITIONS

- 3.1. **Compliance (in lowercase or uppercase in the text of the Policy)** means the compliance of a company's activities with the provisions of generally applicable legislation, binding codes of conduct, internal regulations, ethical principles and good practices of the Company and Veolia Group.
- 3.2. **Compliance ambassadors** means employees of the Company appointed by an order of the General Manager of the Company on the recommendation of the Chief Compliance Officer to disseminate and promote the Compliance culture and play other roles provided for in this Policy.
- 3.3. **Compliance risk** means the risk of consequences of non-compliance with the laws, internal rules, ethical rules or other compliance standards required by the Group, including the risk of legal sanctions imposed on the Group and/or the Company, financial losses or loss of or damage to the reputation.
- 3.4. **Company** means UAB Litesko, including all its business units and branches.
- 3.5. **Data Protection Officer** means an employee appointed by the General Manager of the Company responsible for the protection of personal data as provided for in the Personal Data Protection Law of the Republic of Lithuania and the General Data Protection Regulation 2016/679 of the EU.
- 3.6. **Employees** means all persons employed by the Company, regardless of the type of their employment contract provided for in the Labour Code of the Republic of Lithuania (open-ended employment contract, fixed-term employment contract, temporary work employment contract, etc.) and full-time equivalent. In the context of this Policy, the definition also includes persons who undergo an internship or apprenticeship at the Company as well as persons who act on the basis of the powers granted by the Company.
- 3.7. **Ethical principles** means the principles and requirements derived from the Group's Code of Ethics, Anti-Corruption Code of Conduct and Anti-Corruption Policy.

- 3.8. **Irregularities** means any compliance events occurring in the course of the Company's business that violate the laws, Company's internal rules, codes of conduct or good practice required by the Company that are/were clearly communicated.
- 3.9. **Counterparty** means a supplier cooperating or having a commercial relationship with the Company, group of suppliers, partner or any other entity with which the Company has a contractual relationship other than the Company's employees working under an employment contract.
- 3.10. **Stakeholder** means any natural or legal person (communities, institutions, organisations, offices, etc.) who has an interest (directly or indirectly) in the Company's business or who may affect the Company or who is or may be affected by the Company's business.
- 3.11. **Veolia or Veolia Group or Group** means the Company's shareholder, Veolia Energie International SA, as well as Veolia Environnement SA, which set the key Compliance guidelines and/or procedures applicable to their subsidiaries.
- 3.12. **Chief Compliance Officer** means an employee of the Company designated to be responsible for Compliance. The performance of the Chief Compliance Officer's responsibilities may be delegated to an employee of the Company who holds another position within the Company, provided that this does not give rise to a conflict of interest and/or the effectiveness of the Compliance role is not compromised as a result of the duality of responsibilities. The Chief Compliance Officer may also be referred to in this Policy as the Compliance Officer or as an employee of the Company who plays the role of the (Chief) Compliance Officer.
- 3.13. **Veolia Group or Group Procedures** means the general Compliance procedures of the Veolia Group laying down the Group's Compliance guidelines required in certain areas which are either directly applicable within the Company or can be transposed in accordance with the regulatory framework of the Republic of Lithuania and internal procedures.
- 3.14. **Company's Internal Reporting Channel** means an internal reporting channel developed within the Company to report Compliance irregularities occurring within the Company. The operation and administration of this channel and the analysis of reports is governed by a separate internal procedure of the Company.
- 3.15. **Whispli** means the internal reporting channel of the Veolia Group which is administered by Veolia's Ethics Committee which analyses or delegates analysis of reports received through this channel.
- 3.16. **Zone** means the Central and Eastern Europe zone of the Veolia Group whose area of operation and functional management structure the Company is located.
- 3.17. For the sake of clarity, job titles and other terms as general references are used in the Policy in the masculine gender as defined in the grammar of the Lithuanian language but this in no way implies and/or promotes any discrimination and/or gender inequality within the Company.

#### 4. KEY COMPLIANCE MANAGEMENT AREAS AND PROCESSES

4.1. The Company recognises that compliance is critical to all of the Company's business processes and that any non-compliance or failure to manage risks in time has, or has the potential to have, adverse consequences for the Company. However, given the nature of the Company's business and Veolia's values, the following key areas are identified where compliance is critically important:

- 4.1.1. Anti-corruption;

- 4.1.2. Anti-money laundering and counter-terrorist financing;
  - 4.1.3. Duty of vigilance in business (sanctions, supplier/partner screening, etc.);
  - 4.1.4. Respect for human rights;
  - 4.1.5. Protection of the environment;
  - 4.1.6. Competition enforcement;
  - 4.1.7. Protection of personal data;
  - 4.1.8. Conflict of interest management.
- 4.2. The Company actively combats corruption by pursuing a “zero tolerance” strategy for any manifestations of corrupt behaviour in its relations with both internal and external stakeholders. In addition to being part of the Veolia Group, which operates in a number of countries on different continents and is generally subject to the requirements of SAPIN2, the FCPA and the UK Bribery Act respectively, special attention is paid to the prevention of corruption. For this reason, the Company has decided to put in place an “Anti-Corruption Management System” (ISO 37001).

## 5. COMPLIANCE MANAGEMENT PRINCIPLES

- 5.1. In order to effectively manage Compliance as well as to prevent, detect and respond promptly to resolve non-compliance, the Company is guided by the following key principles:
- 5.1.1. **Principle of Responsibility** which means that each Employee is responsible for ensuring compliance in the day-to-day business processes that he/she performs or supervises;
  - 5.1.2. **Principle of Education/Learning** which means that continuous training, education and various communication programmes for the Employees and the allocation of sufficient resources are critical in order to ensure and maintain the compliance culture and prevent compliance irregularities.
  - 5.1.3. **Principle of risk-based approach** which means that compliance management is organised to assess and address risks associated with activities or processes, including identifying, prioritising and managing risks to allocate resources and efforts more effectively according to the level and specific area of risk. For the sake of clarity, the resources allocated to ensure compliance in a given area must be adequate to manage the arising risks of non-compliance and must be directed to priority areas first;
  - 5.1.4. **Principle of integrity** which means that ensuring compliance and compliance management is an integral part of day-to-day operations based on the daily and continuous application and compliance with external and internal legislation, ethical and other requirements and values;
  - 5.1.5. **Principle of transparency** which means that all participants in the compliance management process are provided with the necessary information on compliance risks, non-compliance events and the reasons for non-compliance in accordance with their responsibilities;
  - 5.1.6. **Principle of good practices** which means that compliance management is organised taking into account the best examples of compliance from other entities, recommendations, insights, writings, etc. of compliance practitioners (officers, experts).

- 5.1.7. **Principle of documentation and traceability** which means that the implementation of compliance management is based on ensuring that actions are properly recorded and stored, thus enabling traceability and control of decisions taken and actions performed and improvement of processes.
- 5.1.8. **Principle of independence of compliance coordination or independence and objectivity of the compliance role** which means that the implementation of the compliance role is an activity that is autonomous and independent from other roles.
- 5.1.9. **Principle of sufficient resources for compliance management** which means that sufficient resources (both human and financial) must be allocated to ensure the proper implementation and enforcement of the compliance role.

## **6. COMPLIANCE MANAGEMENT STRUCTURE**

### **6.1. Board of the Company:**

- 6.1.1. Approves the Compliance Policy;
- 6.1.2. Oversees the implementation of the Compliance Policy;
- 6.1.3. Considers the information provided on compliance and its enforcement within the Company and, if necessary, decides on actions necessary to improve the effective functioning of the compliance system;
- 6.1.4. Enforces, promotes and disseminates the compliance culture of with special focus on anti-corruption.

### **6.2. General Manager of the Company:**

- 6.2.1. Ensures the implementation of the objectives and principles of the Policy;
- 6.2.2. Approves internal procedures and documents implementing the Policy;
- 6.2.3. Ensures that financial, human and other resources are allocated to the compliance role;
- 6.2.4. Ensures the timely provision of information to the Compliance Officer on compliance-related matters;
- 6.2.5. The General Manager of the Company oversees the activities of the Chief Compliance Officer (or an employee acting in this role) and ensures his independence from other organisational units of the Company.

### **6.3. Heads of business units of the Company:**

- 6.3.1. Ensure the implementation of the objectives and principles of the Policy in the structural units under their supervision;
- 6.3.2. Cooperate with the General Manager of the Company and the Chief Compliance Officer on compliance matters;
- 6.3.3. Contribute to the dissemination of the compliance culture within the Company and encourage the participation of Employees under their supervision in compliance training and contribution to compliance-related activities.

### **6.4. Chief Compliance Officer:**

- 6.4.1. Provides direct and ongoing oversight of implementation, operation and continuous improvement of the Policy, including the review and correction of the Policy itself or the internal regulations implementing the Policy as required;

- 6.4.2. Provides the General Manager of the Company with regular updates on the implementation of the Policy and key compliance developments,
- 6.4.3. Reports on the implementation of the Policy to the Board of the Company at intervals specified by the latter;
- 6.4.4. Promotes good compliance practices within the Company, organises the Company's compliance ambassadors and encourages them to get involved in the promotion of the compliance culture within the Company;
- 6.4.5. Individually and/or in cooperation with the heads of other structural units of the Company and/or employees designated by them organises or assists in organising regular compliance-related training for the Company's employees or their target groups, and prepares compliance reminders;
- 6.4.6. Advises the Company's employees on compliance enforcement requirements (both internal and external);
- 6.4.7. Initiates, prepares, advises in the preparation and provides methodological assistance and guidance to other Company employees on compliance-related matters;
- 6.4.8. Assists in the resolution and timely correction of non-compliance cases (irregularities);
- 6.4.9. Assesses or, depending on the area, assists and cooperates in the assessment of risks related to Compliance enforcement;
- 6.4.10. Provides annual and quarterly reports on the operation of the compliance system to the Chief Compliance Officer of the Zone as well as follows other orders of the Chief Compliance Officer of the Zone related to the compliance requirements applicable within the Group and/or the Zone;
- 6.4.11. Carries out the implementation of the internal audit tasks of the Zone and/or the Group and performs compliance audits required by the Zone and/or the Group in a timely manner;
- 6.4.12. Consults with the Chief Compliance Officer of the Zone and contributes to the implementation of compliance framework in the Zone;
- 6.4.13. In carrying out his duties under the Policy, reports directly to the General Manager of the Company and functionally to the Chief Compliance Officer of the Zone.
- 6.4.14. The Chief Compliance Officer must be impartial and objective in the performance of his duties.

#### **6.5. Employees:**

- 6.5.1. Ensure proper fulfilment of compliance requirements in day-to-day operations;
- 6.5.2. Attend training sessions provided for them, thoroughly analyse reminders and good compliance practices;
- 6.5.3. Inform their line manager or the Chief Compliance Officer of any cases of non-compliance or potential cases of non-compliance;
- 6.5.4. Within the scope of their job functions, cooperate with the Chief Compliance Officer and, upon his request, provide information and other assistance in the performance of compliance tasks and other roles;
- 6.5.5. Make proposals to the Chief Compliance Officer for the improvement of the Compliance processes.

## **6.6. Data Protection Officer:**

- 6.6.1. Develops or initiates personal data protection regulations within the Company that comply with the requirements of the Law on Legal Protection of Personal Data of the Republic of Lithuania (the “Law”) and the General Data Protection Regulation (the “Regulation”);
- 6.6.2. informs and advises the data controller and employees processing data on their obligations under the Regulation, the Law and other legislation governing the protection of personal data;
- 6.6.3. monitors compliance with the Regulation, the Law and other legislation governing the protection of personal data and the Company’s internal documents;
- 6.6.4. ensures awareness raising, training and related audits of employees involved in personal data processing operations;
- 6.6.5. advises on the data protection assessment and monitors that it is conducted in accordance with the applicable legal requirements;
- 6.6.6. cooperates with the data protection supervisory authority;
- 6.6.7. reviews Company’s contracts with data processors to ensure their compliance with the legislation governing the protection and processing of personal data;
- 6.6.8. advises the Company’s employees in determining the nature and purpose of personal data processing, legal basis, categories of personal data and categories of personal data subjects;
- 6.6.9. in the event of a personal data breach, assess the risk factors, degree of impact, damage and consequences of the breach and, on a case-by-case basis, makes proposals to the General Manager of the Company on the measures necessary to remedy the personal data breach and its consequences;
- 6.6.10. act as a contact person for the supervisory authority in relation to issues related to data processing;
- 6.6.11. assists in the implementation of the rights of data subjects as provided for in the Company’s internal documents;
- 6.6.12. notify the supervisory authority or the data subjects who may be at risk due to the loss of personal data of the risk of a personal data breach to the rights and freedoms of the data subjects within 72 hours from the moment when the Company becomes aware of the personal data breach;
- 6.6.13. ensures that records of personal data processing activities are maintained and updated;
- 6.6.14. Cooperates with the Chief Compliance Officer on the Group’s audits on personal data protection issues, reporting to the Group and/or the Zone and/or the Board of the Company and/or the General Manager of the Company, training and other compliance matters.

## **6.7. Compliance ambassadors:**

- 6.7.1. Promote and disseminate the Compliance culture within the Company;
- 6.7.2. Assist the Chief Compliance Officer in the implementation of various Compliance-related projects, activities, training, etc.

## **6.8. Veolia Group:**

- 6.8.1. establishes the guiding compliance principles, legal and other procedures for compliance;
- 6.8.2. organises the annual compliance audit (CAP Compliance) and its assessment,
- 6.8.3. organises compliance training for all or a specific group of Veolia employees,
- 6.8.4. organises and carries out other compliance-related activities and/or risk identification, information, communication or other campaigns;
- 6.8.5. receives and coordinates verification and investigation of alerts received via the Whispli channel;
- 6.8.6. organises, coordinates and delegates other compliance related campaigns and tasks applicable to all Veolia subsidiaries.

**6.9. Zone:**

- 6.9.1. For Veolia subsidiaries within the Zone, it defines the key strategic directions for compliance, provides methodological and functional support on compliance issues and shares best practices;
- 6.9.2. organises training for Zone's Compliance Officers and/or other Zone employees;
- 6.9.3. evaluates the reports submitted by the Chief Compliance Officer;
- 6.9.4. as needed, organises internal audits and other compliance-related activities and/or risk identification, information, communication or other campaigns.

**6.10. Other internal structures of the Company:**

- 6.10.1. There are certain other operating structures in the Company (for example, Sponsorship Committee) or commissions, committees or other structures may be formed for certain permanent or *ad hoc* functions related to the implementation of compliance procedures and processes, as well as certain Company employees may be delegated with certain functions related to the implementation of certain compliance tasks in the Company (for example, Ethics delegate) (such functions must be delegated in accordance with the applicable provisions of labor legislation).

## **7. COOPERATION WITH BUSINESS UNITS OF THE COMPANY**

7.1. The Chief Compliance Officer works closely with the relevant business units of the Company in order to fulfil the obligations laid down in clause 6.4. The Chief Compliance Officer cooperates in particular with the following departments or teams:

- 7.1.1. Legal: monitoring and evaluating applicable legislation, amendments thereto, new regulations that may affect the Company's and the Group's operations (legislative monitoring), preparing opinions or analyses on the compliance of the Company's operations with applicable law, internal rules or ethical principles, and analysing case law;
- 7.1.2. Commercial: anti-corruption, conflicts of interest and competition law infringements;
- 7.1.3. Financial Control and Accounting: matters of correctness and legality of expenditure and financial supervision measures applied or to be applied as well as anti-money laundering and counter-terrorist financing mechanisms;
- 7.1.4. Internal Control: verifying the correctness of application of the internal rules provided for in the Policy, reporting cases of abuse and supervision measures for the implementation of compliance processes applied or to be applied;
- 7.1.5. Procurement: transparency, avoidance of conflict of interest, monitoring of applicable international, EU and national sanctions, enforcement of competition law, evaluation of suppliers;



- 7.1.6. Human Resources: protection of human rights, non-discrimination, provision and organisation of training;
  - 7.1.7. Communication: internal and external communication;
  - 7.1.8. Data Protection Officer: personal data protection matters;
  - 7.1.9. Relevant employees of the Company's branches: addressing a compliance matter relevant for a specific branch or arising in a specific branch;
- 7.2. In a situation where the relevant department, team or role has not been created within a Group company in accordance with the provisions of this section of the Policy, the Chief Compliance Officer cooperates with the unit or employee whose professional duties correspond to the relevant area of responsibility.
- 7.3. The Chief Compliance Officer is entitled to ask questions, request and receive documents and explanations concerning the activities carried out by all the Company's business units as necessary for the performance of the compliance role.
- 7.4. The Chief Compliance Officer is entitled to involve the employees of the required area in the relevant activities related to the implementation of this Policy and Compliance (e.g. audit, risk assessment, investigation, etc.). He must inform in advance the line managers of the employees to be involved in the Compliance project.

## **8. IDENTIFICATION AND REPORTING OF COMPLIANCE RISKS**

- 8.1. It is the responsibility of every employee to seek to minimise the risk of non-compliance in the area in which they perform their duties. To this end, each employee must be familiar with the legislation applicable to the performance of his professional duties, the Company's internal documents and ethical principles that directly affect the performance of his professional duties.
- 8.2. It is the responsibility of each employee to identify the potential risks associated with his duties.
- 8.3. Each employee who becomes aware of certain potential risks which may arise and/or which are not, in his opinion, sufficiently minimised within the Company and/or new potential risks which may arise must inform his line manager and/or the Chief Compliance Officer.
- 8.4. Employees of the Company who become aware of potential compliance irregularities are encouraged to report them directly to their supervisor and to the Chief Compliance Officer or to use the designated communication (reporting) channels.
- 8.5. The Company's compliance risks are assessed, *mutatis mutandis*, in accordance with the Veolia Group's compliance and corruption risk assessment methodologies.

## **9. COMPLIANCE TRAINING**

- 9.1. The Chief Compliance Officer, in cooperation with other business units, develops an annual plan for training and education/awareness campaigns in the implementation of this Policy. However, specific professional or other specialised training (such as safety and health, cybersecurity, environmental protection, etc.) is planned and implemented by the relevant business units and/or specific Company employees involved in that area.
- 9.2. The Chief Compliance Officer informs the department responsible for personnel management of the development of the compliance training plan and discusses the scope of cooperation in its implementation.

9.3. Training is provided to all employees or to specific groups of employees. The frequency and scope of training is determined for an individual area and/or a group of employees.

9.4. Each training session and attendance must be documented where possible.

## **10. IMPLEMENTATION, MONITORING AND CONTROL OF THE POLICY**

- 10.1. Members of the Company's management bodies, General Manager of the Company and heads of branches, heads of business units of the Company and branches and other representatives of the Company's administration must, by their conduct, ensure and develop the standard of conduct provided for in the Policy and ensure that activities in the areas of their responsibility are carried out in accordance with the provisions of this Policy.
- 10.2. Heads of structural units of the Company are responsible for ensuring that this Policy and the internal documents implementing it are communicated to all subordinate employees, encourage and ensure that their subordinate employees take part in the relevant training organised by the Company and/or Group.
- 10.3. This Policy is implemented in conjunction with the Corruption Prevention Policy of the Company, Veolia Code of Ethics, Anti-Corruption Code of Conduct and the relevant Veolia legal procedures and/or other internal procedures of the Company implementing them. The Company aims to ensure that the principles of this Policy, Corruption Prevention Policy, Code of Ethics and the Anti-Corruption Code of Conduct are complied with by all its suppliers, contractors, subcontractors, consultants, intermediaries, beneficiaries, business partners and others.
- 10.4. If employees have questions regarding the provisions of this Policy or other implementing internal legal acts or their implementation, they are encouraged to contact the Compliance Officer of the Company, their line managers or the Company's legal experts.
- 10.5. Employees who become aware of violations of this Policy are encouraged to report such violations either directly to the Compliance Officer or through the communication channels established by the Company.
- 10.6. Employees of the Company who report potential violations must act in good faith and on reasonable belief that a violation of the Policy has occurred, i.e. if the employee believes in good faith that the information is correct under the circumstances of the situation.
- 10.7. The Company ensures that each report submitted through an internal channel of the Company (with the exception of those received via Whispli) is properly scrutinised and clarified, and the internal investigation process guarantees the anonymity or confidentiality of the informant and a fair and objective assessment of the case. In any event, each violation is assessed first and foremost on the assumption that the employee made the report in good faith.
- 10.8. Reports submitted via the Veolia Group Whispli reporting channel are handled in accordance with the methodologies and procedures of the Veolia Group and by the persons designated by the Group to investigate the report in question. As far as possible, the Company will endeavour to ensure that the principles laid down in clause 10.7 will also be applied to the examination and assessment of the reports received in this manner.
- 10.9. The Company may not retaliate against the Employee who has reported a violation in accordance with the rules laid down in the relevant internal regulations. Each Employee must report the fact of retaliation or suspected retaliation against him or another Employee.
- 10.10. Following the assessment of the report (even if the report is not considered to be a violation of this Policy after investigation), the Compliance Officer of the Company may take

appropriate corrective measures to reduce the likelihood of risks, improve the compliance management system at the Company, arrange for additional employee education, etc.

- 10.11. A violation of the rules set out in this Policy or other internal documents of Veolia may be a reason for legal or disciplinary action, including termination of the contract (employment or other) with the Company.
- 10.12. The imposition of disciplinary or legal penalties does not prevent the Company from pursuing claims for damages, including recourse claims, in respect of financial losses or reputational damage to the Company.

## **11. SCOPE, PUBLICATION**

- 11.1. The Policy applies to all structural units and Employees of the Company.
  - 11.2. The General Manager of the Company is responsible for ensuring compliance with the provisions of the Policy.
  - 11.3. This Policy, Corruption Prevention Policy, Code of Ethics and Anti-Corruption Code of Conduct are made publicly available. For the purpose of implementing the provisions of this Policy, other internal procedures, policies of the Company or their relevant parts may also be made publicly available.
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