
Anti-bribery & Corruption Policy

Our commitment to delivering a more sustainable world

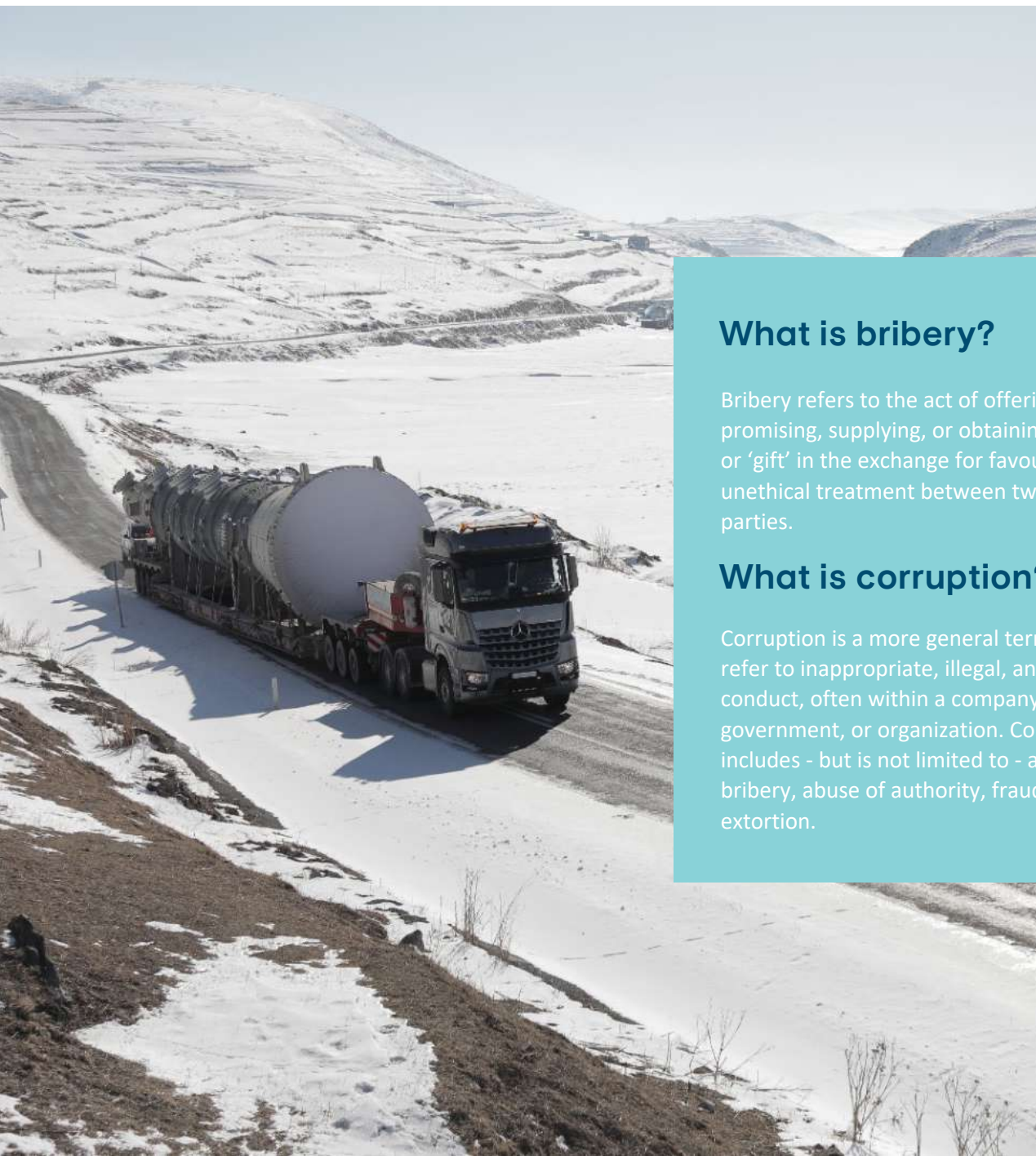
Our Commitment

Our pledge to the community

Our company enforces a zero-tolerance policy regarding matters of bribery and corruption. We denounce these actions within our own operations and hold any collaborators and third parties within our processes to the same standards.

To our clients, partners, and employees, we inform that all displays of bribery and corruption will not be permitted. Our company is committed to encouraging and upholding our ethical code, dedicated to growing alongside our values and moral principles.

Our Code of Conduct outlines the high standards under which we work. Beyond ensuring accountability to the guidelines it contains, it further allows us to foster a healthy culture within our community.



What is bribery?

Bribery refers to the act of offering, promising, supplying, or obtaining a payment or 'gift' in the exchange for favourable, unethical treatment between two or more parties.

What is corruption?

Corruption is a more general term used to refer to inappropriate, illegal, and unethical conduct, often within a company, government, or organization. Corruption includes - but is not limited to - acts of bribery, abuse of authority, fraud, and extortion.

Anti-bribery & corruption

“Eleven Danir 19” group of companies provide sustainable logistics solutions to all industries, around the world. Our values define how we develop our business, our employees, and our service we provide to the clients and partners.

As a community builder we take a large responsibility for work environment. We take advantage of our position in the industry to make every effort to fight against bribery and corruption on all stages of the project execution.

Firstly, we of course start with ourselves. The developed requirements and policies are applied to the entire group of companies and to each employee. Personal example and developed procedures help us work exclusively with those companies who support and comply with our developed procedures and share our vision on anti-bribery and corruption in the industry and stand in solidarity with our ethical vision.



We take responsibility

We take responsibility for the people involved in all the aspects of workflow and services we provide. From our employees to the employees of contractors by assisting and guiding them through developed policies, modern requirements, and workflow processes.



We educate

We always make sure that our employees and partners keep up with the modern requirements and updated policies. And we promptly instruct all involved parties on new changes, new features, and requirements. We share the knowledge gained and the materials developed with everyone we work with demanding full compliance from them.



We supervise

All our top managers and directors are additionally trained to have a possibility to observe the compliance of the requirements, policies and developed procedures. As experts on many related issues, they make sure that all norms and requirements are observed in company daily work.



We challenge

We have high demand on the quality of service we provide, and we expect the same to be done by our contractors, clients, and partners. We have a strong desire to grow and stay ahead of the market. We are not afraid of new goals - and always put them on the brink of the possible - to achieve the best results and stay at high level.



We are competent

We have the skills and competence to meet the needs of customers and society. We therefore set high standards, for both ourselves and for our suppliers, contractors, clients, and partners. Through the collaboration and exchange of experience we search for innovative solutions to meet the needs.

Anti-bribery & corruption policy

Eleven Danir 19 is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. Eleven Danir 19 has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Eleven Danir 19 will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate.

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located. The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, third-party refers to any individual or organization our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Bribery

A bribe is any financial or other type of advantage offered, promised or given from one person to another in order to gain commercial, contractual, regulatory or personal advantage. Bribes are not just monetary, they can be any type of gift, hospitality or inducement. A contract or transaction does not need to happen or be completed for bribery to have taken place. To comply with this policy:

- Do not offer promise or pay/provide bribes
- Do not accept, request or agree to bribes

Gifts, hospitality & entertainment

A This policy does not prohibit normal and appropriate gifts, entertainment and hospitality, both received and given, from and to third parties. Routine and inexpensive activities such as business breakfasts/lunches and small items of promotional material such as Eleven Danir 19 branded marketing items remain appropriate to what we do. However, any other type of gifts, hospitality or entertainment is subject to the following rules:

- they are appropriate to the circumstances and there is no risk that they could be perceived as improperly influencing the recipient
- they are for the purpose of establishing or maintaining good and ethical business relationships
- they improve the image or reputation of the Eleven Danir 19 Group and is arranged in good faith
- any gifts hospitality or entertainment is not offered promised or accepted to secure an advantage for the company or any of its employees, or to influence the impartiality of the recipient

Policy

Eleven Danir 19 has procedures for accepting or providing gifts, hospitality or entertainment. In general, this should be with the full and open knowledge of your manager and, where possible, in advance. The expenses system should be used to record any such spending or arrangements. If you answer yes to any of the following questions about any exchanges, you must discuss the issue with your manager:

Is it intended to influence a third party, gain or retain advantage?

- Is the gift/hospitality in your individual name rather than the Eleven Danir 19 Group name?
- Is any part of it cash or cash equivalent?
- Is any part of the transaction secretive?
- Is it in breach of any local law?

Report to your manager or HSE manager any suspected or actual bribery, or any concerns that other employees or associated persons may be linked with bribery. Eleven Danir 19 will investigate any allegations or suspected bribery, this includes use of the disciplinary processes and referral of information/investigations to relevant enforcing authorities.

Facilitation payments

These are typically small unofficial payments made to secure or expedite a routine government action by a government official. Eleven Danir 19 does not and will not accept or make facilitation payments of any kind. Our intermediaries or agents acting on our behalf must not breach this position.

Intermediaries, suppliers, agents and service providers

These are typically small unofficial payments made to secure or expedite a routine government action by a government official. Eleven Danir 19 does not and will not accept or make facilitation payments of any kind. Our intermediaries or agents acting on our behalf must not breach this position.

Conflicts of interest

This is a situation in which personal interest of an employee or representative conflicts with the interests of the business. It can be financial, professional, family or other interests. Please report any such conflicts, or perceived possible conflicts, to your manager so they can support you in managing the situation. Eleven Danir 19 also has in place requirements for employees to make declarations of interest in accordance with HR policies.

Responsibilities

Employees of Eleven Danir 19 must read, understand and comply with this policy. Employees follow procedures (including HR, procurement, and financial procedures) to minimise the risk of actual or perceived bribery or corruption by employees or third parties.

Eleven Danir 19 employees will notify their manager and HSE manager of any concerns regarding compliance with this policy. Those persons will be investigated in a manner that reflects Eleven Danir 19's zero tolerance position to bribery and corruption. No persons raising such concerns will be subject to unfavourable treatment or disciplinary action.

Expenses claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with expenses policies along with reasons for the expenses being incurred. Such expenses must not be concealed.

Policy

Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.

Last Update

28/09/2021, Development department, Valds Stunza, Development Director, vs@11d19.com



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