

ЈКП Београдски метро и воз	
Београд	
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број прилога:	



PUC „Belgrade metro and train“ Belgrade

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

April 2025

1. Purpose

This Anti-Bribery and Anti-Corruption Policy (in further text: the Policy) sets out the requirements and standards of behavior required across the PUC „Belgrade metro and train“ Belgrade (in further text: BMV) related to bribery and corruption.

This Policy provides a framework, but cannot describe every situation, law or policy that may apply. Where the Policy sets higher standards of behavior than local laws, rules, customs or norms, the higher standards are applied. Employees need to exercise good judgement, justify each action, and try to prevent any potential breach of the Policy and applicable laws, rules, or standards.

BMV has a zero-tolerance approach to any attempts to offer, pay, authorize, solicit or accept bribes, any corrupt practices or other improper advantages. Any allegations of such behavior must be reported, reviewed and, as appropriate, investigated and acted upon.

2. Scope

This Policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, or any other person associated with BMV (collectively referred to as **employees** in this Policy).

In this Policy, **third party** means any individual or organisation employees come into contact with during the course of work for BMV, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents and advisers.

All employees and third parties shall comply with this Policy. Failure to comply may be grounds for disciplinary action up to and including termination or in respect of third parties termination of contract.

3. Terms and Definitions

For this policy's purposes, the following terms and definition apply.

- 3.1. **Bribery** - The act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting anything of value, whether directly or indirectly, to induce or influence an action or decision, which interferes with the BMV's value, policies, and procedure, and/or the applicable laws, rules, or regulation.
- 3.2. **Corruption** – is a dishonest or illegal act performed to gain anything of value by abusing power or authority.
- 3.3. **Anything of Value** – refers to cash, gifts to family members, debt write-off, loans, personal favors, rebates, kickbacks, insider information,

entertainment, business or employment opportunities, among other items. Items of value that are given in compliance with the requirements of this Policy and the applicable Anti-Corruption Laws, and which are not given with the intent to secure any undue or improper advantage, will not be considered as bribes.

- 3.4. **Facilitation Payment** - bribes or unofficial payments given to or by BMV's employee intended to speed up routine transactions to which the payer is already entitled.
- 3.5. **Kickback** - arise when the third parties or business partners pay part of their fees to BMV employees who give them a contract or some other business advantage.
- 3.6. **Gifts and Entertainment** - refers to any form of a gift, entertainment, hospitality, reward, benefit, or other incentives received or offered.
- 3.7. **Conflict of Interest** - Conflict of interest means every activity and situation that would constitute an actual or apparent conflict between personal interests and the interests of the BMV. Conflicts of interest may arise when an employee places his or her interests before the interests of the BMV and where such personal interests unduly influence that employee's business judgments, decisions, or actions.
- 3.8. **Detrimental treatment** - Any dismissal, disciplinary action, treats, or unfavorable treatment due to the concern the individual raised.
- 3.9. **Management** – is made up of senior-level executives who direct and control the Sectors inside BMV at the highest level.
- 3.10. **BMV's personnel and/or employees** – refers to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, or any other person associated with BMV.
- 3.11. **Third party** – refers to any individual or organization employees come into contact with during the course of work for BMV, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents and advisers.
- 3.12. **External party** – refers to any individual or organisation which is not included in the definition of „BMV's personnel and/or employees“ and/or „Third party“, but comes to knowledge about breach of the Policy.

4. Application

BMV does not tolerate bribery or corruption of any kind, whether for a public official or a private individual.

BMV, its personnel and third parties must never offer, provide or authorise bribes of any kind, including facilitation payments, either directly or indirectly to a public official or a private individual.

BMV, its personnel and third parties must never request bribes of any kind, directly or indirectly. A bribe may be monetary or non-monetary, tangible or intangible. A bribe may take the form of, or be facilitated through:

- payments of money either direct or through a third party
- gifts or entertainment
- discounts, loans and/or financing given on non-commercial terms
- rebates or kickbacks in relation to services provided
- overpayments to business partners
- use of assets at a discount or free of charge
- employment or internships, or
- information or assistance.

These are not exhaustive examples, and management and BMV's personnel and third parties must escalate any other situations in which potential bribery or corruption may be suspected.

BMV, its personnel and third parties will not engage in corrupt practices which can range from the offering, giving, receiving or soliciting, directly or indirectly, of anything of value to influence improperly the actions of another party

5. Your responsibilities

You must ensure that you read, understand and comply with this Policy.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for BMV or with BMV. All BMV's employees and third parties must avoid any activity that might lead to, or suggest, a breach of this Policy.

All BMV's employees, third party and external parties are encouraged to raise concerns in good faith about bribery and corruption concerning the BMV.

Employee must inform his/her line manager whenever faced with the situation below:

1. Uncertain about whether a certain action or behavior can be considered bribery and corruption.
2. Found any weakness in the BMV's anti-bribery and corruption Policy and its implementation.
3. Suspect that there is an instance of bribery and corruption activities concerning the BMV or violation to this Policy.
4. Offered or asked for a bribe by anyone.
5. Being subject to unjust treatment as a result of concern raised and refusal to accept or offer a bribe.

BMV applies no retaliation policy of report raises in good faith. The BMV ensures that no one suffers any detrimental treatment as a result of refusing to accept or offer a

bribe or other corrupt activities or because they reported a concern relating to the potential act of bribery or corruption.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

Third party and external parties are encouraged to raise concerns through mechanisms stated in Section 6 of the Policy.

6. How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these should be raised with your line manager **OR** by submitting a complaint by e-mail address grml1@bgmetro.rs, **OR** by submitting a complaint through the established state mechanism: https://www.acas.rs/lat/report_corruption .

7. What to do if you are a victim of bribery or corruption

It is important that you tell the line manager or submit the complaint by any methods stated in this Policy as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

8. Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform BMV immediately.

9. Training and communication

This Policy will be communicated to all employees and business associates or third parties from the outset of business relations, and as appropriate thereafter.

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In compliance with the Law on the Prevention of Corruption, all public authorities, including BMV as defined by legal provisions, are mandated to conduct training on preventing corruption and strengthening integrity, titled 'Ethics and Integrity.' They must also report on the implementation of these measures to the Agency for the Prevention of Corruption. Awareness and training program to third parties is to be provided as deemed necessary.

10. Who is responsible for the policy?

The Director and Management Team have overall responsibility for ensuring this Policy complies with BMV legal and ethical obligations, and that all those under BMV control comply with it.

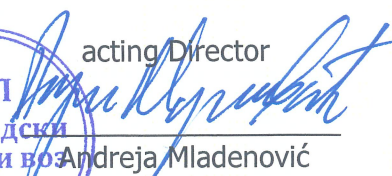
Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

11. Monitoring and review

BMV will monitor the effectiveness and review the implementation of this Policy every two years, or earlier if circumstances warrant it, considering its suitability, adequacy and effectiveness based on received complaints. Any improvements identified will be made as soon as possible.

All employees are responsible for the success of this Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

This policy does not form part of any employee's contract of employment, and it may be amended at any time.

acting Director

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