



INTEGRITY COMPLIANCE PROGRAM

Corporate family: MG Mind Ltd, Mrkonjić putevi Ltd, Merkur Ltd. and all legal entities which are directly or indirectly controlled by the General Assemblies of MG Mind Ltd., Mrkonjić Putevi Ltd and Merkur Ltd and/or Mr. Mladen Milanović as the majority owner and other connected entities

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I INTRODUCTION

In line with our commitment to always perform our business unreservedly pursuant to all applicable laws, rules and regulations and highest standards of business integrity, the General Assemblies of MG Mind Ltd, Mrkonjić Putevi Ltd and Merkur Ltd, which are represented by the owner Mr. Mladen Milanović (100% owner of the listed companies) and other affiliated companies, has adopted Integrity Compliance Program - ICP. Our Integrity Compliance Program (ICP) is a key component of our commitment to adherence the highest standards of business responsibility and nurturing a culture of compliance that focuses on conducting business with integrity.

Conducting business with integrity is defined in our Code of Business Integrity and additional Integrity Compliance procedures and policies that are aligned with the best international practices, including the World Bank's Guidelines:

- Procedure on reporting, processing and managing irregularities
- Whistleblower protection policy
- Policy on integrity of human resource management
- Conflict of interest policy
- Policy on prohibited practices
- Policy on integrity of expense management – Gifts, hospitality and entertainment; donations and sponsorships; political contributions; travel expenses; keeping financial records and internal controls
- Third Party Code of conduct
- Integrity Third Party Due Diligence Procedure

Our Integrity Compliance Program is designed to provide effectively and transparently:

(1) prevention, detection and remediation of the violations of applicable laws, rules and regulations, as well as our Integrity Compliance policies and procedures,

(2) promotion and nurturing of the culture of the highest standards of integrity and professional conduct within our corporate family,

(3) the requirements that our suppliers, manufacturers, joint venture partners, subcontractors, intermediaries, distributors, agents, representatives and all other persons acting on behalf of our corporate family comply their operations with the highest standards of business integrity.

II TO WHOM THE PROGRAM IS REFERED TO

Corporate family - definition

Besides the companies MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd. corporate family consists of all legal entities which are directly or indirectly controlled by the Assemblies of MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd. and/or Mr. Mladen Milanović as a majority shareholder and other affiliated companies. (In the annex no. 1 is a list of all legal entities that are part of the corporate family and obliged to implement the ICP).

Application

Corporate family

Integrity Compliance Program and its integral parts the Code of Business Integrity and Integrity Compliance procedures and policies is mandatory for all employees regardless of individual characteristics of their contracts of employment, as well as to all authorized persons (such as directors), agents, representatives and all other persons acting on behalf of our corporate family.

Everybody has to act pursuant to these standards of conduct by which the risk of prohibited practices is minimized. Apart from the obligation to familiarize themselves with the rules and behave pursuant to the rules, they are all required to report any actions that are considered to be prohibited. Everybody has to implement and promote the highest standards of integrity of our corporate family in daily work.

Managers must set an example and be role model for others and ensure that employees under their supervision understand their obligations defined by the Code of business integrity, procedures and policies. Managers have an obligation, apart from emphasizing the importance of integrity, to create an environment in which employees are able to report their suspicions without discomfort.

When the employees are being evaluated, it is required to take into account compliance with the Code and other corporate integrity policies and take necessary measures to prevent his/her subordinates in violation of the Code, procedures, policies and laws.

Any prohibited behaviour that has elements of the crime, apart from the individual responsibility of the individual can also cause the penalties for legal persons, as well as claims of third parties.

Everybody is personally responsible for non-compliance and violations of laws, policies and procedures and any violation will be considered as a disciplinary matter and may result in disciplinary action including termination of employment.

Third parties

The term "third party" means any person with whom the corporate family operates. This includes suppliers, manufacturers, joint venture partners, subcontractors, intermediaries, distributors, agents, representatives and all other persons acting on behalf of our corporate family.

Apart from the function or the size of a third party, nature of the relationship, the sensitivity of the business relationship, the level of access to sensitive data or property are very important.

Corporate family highly values its relations with third parties referring to them honestly and fairly with respect. But to ensure that such behaviour (is) bidirectional, it is necessary that a third party shares the same values as the standards of our corporate family, and to respect the standards that is required by our Code of Conduct for third parties.

Due diligence is a process conducted by our corporate family in order to ensure that the risks of prohibited practices are identified through research of the background of a potential business partner (Third parties).

The main reason for the due diligence of third parties is to ensure that corporate family does not conduct business with the entities involved in the prohibited practice. The process of due diligence is defined in the Integrity Third Party Due Diligence procedure.

III OUR CORPORATE FAMILY VALUES

Members of our corporate family, regardless of their core business, share the same corporate values. Our values are part of our daily lives. Our values are the way we cooperate with our business partners, our communities and each other.

Integrity and liability as our guiding values ensure that every work that we do is a clean business, and our achievements are the result of our dedication and hard work.

Corporate family achieves their business results and success with fair business competition. It is forbidden to gain advantage over competitors by using illegal and unethical business practices.

IV PROHIBITED PRACTICES

Our corporate family established a zero tolerance for any occurrence of prohibited practices. Prohibited practices are defined as any violation of laws, rules and regulations as well as internal policies and procedures, focusing on prohibited practices which are precisely defined in our Policy on prohibited practices.

- Corruption

Corruption is the offering, giving, receiving or soliciting, directly or indirectly, of anything of value, including the influence or exchange of services, to influence improperly the actions of another party.

- Fraud

Fraud is any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation. Also fraudulent practices can be reflected in the business books and reports related to the business.

- Collusion

Collusion is an agreement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.

Collusive practices applies to any combination or contract-no matter how informal it may be (between the suppliers), in order to raise or change value or with the aim of devaluation of offer or reduction in scope of work in order to increase profits.

- Obstruction

Obstruction is deliberately destroying, falsifying, altering or concealing the evidence material to the investigation or making false statements to investigators in order to materially impede the process of establishing the facts by the competent authorities or other bodies; and/or threats, harassment, or intimidating any party to prevent disclosure of the facts relevant to the process of establishing the facts by the competent authorities or other bodies, or actions intended to physically disrupt the process of establishing the facts by the competent authorities or other bodies and/or refusal to cooperate during internal or external investigation.

- Coercion

Coercion is impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.

- Facilitation payment

Facilitation payment is the term used for the payment made in exchange for the service to which the company has a legal right to receive without making such payments. These are usually relatively small payments to government officials or people on functions to ensure or expedite a routine procedure.

- Abuses

Abuse is defined as intentionally exceeding the permissible limits or powers in order to acquire some benefit or harm to others including: abuse of working position, abuse of information, abuses of material and technical resources.

- Conflict of interest

Conflict of interests is a situation in which an individual who performs a specific function or activity comes in the chance that his/her decision or other action are in favor for him/her or to the people they are closely connected to, social groups and organizations, and to the detriment of the interests of the legal entity.

V Integrity Compliance Program Management Structure

General Assemblies of the companies MG Mind Ltd, Mrkonjić Putevi Ltd and Merkur Ltd formed bodies and acting personnel of the Integrity Compliance Program for the entire corporate family by its Decision on the management structure.

The decision prescribes the obligations and responsibilities of all bodies and other people involved, their relationships, reporting and decision-making.

The Decision establishes:

- Compliance Board
- Role of Chief Compliance Officer
- Role of Compliance officer

2.1 Compliance Board

Compliance Board is obliged to ensure that Integrity Compliance Program reaches its target objectives for the whole corporate family, being in coordination and monitoring all activities on the strategic level, providing advice, guidance and support in the implementation of the Program.

Compliance Board consists of three members appointed by the General Assemblies of MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd. Compliance Board members are:

- 1) two representatives of management of the MG corporate family.
- 2) One external entity that is not associated with entities covered by Integrity Compliance Program.

Chairman of the Compliance Board is the representative of the management from one member of the corporate family to which Integrity Compliance Program is referred to, and decisions are made by a simple majority. Decisions of the Compliance Board are binding on all legal entities within a corporate family.

Meetings of the Compliance Board are held quarterly, and if necessary more often, and at the Compliance Board's meetings, the Chief Compliance Officer participates as an associate member without the right to vote on decisions.

Compliance Board works along with the Chief Compliance Officer in all aspects of the implementation of the program and is responsible for:

- Cooperating with the Chief Compliance Officer in order to ensure effective implementation of Integrity Compliance Program,
- reviewing and approval of the program and other policies and procedures relating to or connected to the Program,
- encouraging and promoting behaviours that are consistent with the highest standards of integrity,
- approving the material and technical resources and personnel necessary for the implementation of the Program, and proposed by the Chief Compliance Officer,
- cooperating with the Chief Compliance Officer in order to promote and to influence the business partners and other entities with which they do business to adhere to standards, and to apply the standards of Integrity Compliance Program (ICP)
- monitoring and supervision of the implementation of the Program,
- reviewing reports from the Chief Compliance Officer and Directors of the members of the corporate family,
- adopting and approval of the annual work plan of the Chief Compliance Officer,
- reporting to the founder of the companies MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd. on all activities at least four times a year and if necessary more often.

2.2. Chief Compliance Officer

Chief Compliance Officer is appointed by the General Assemblies of the companies MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd as an independent and objective body for the development and implementation of Integrity Compliance Program (ICP) in all legal entities which are part of the corporate family. Chief Compliance Officer ensures that all listed entities are acting pursuant to the relevant external regulations, internal regulations and procedures, and that their behaviour is in line with the standards of integrity defined in the Integrity Compliance Program.

Position of the Chief Compliance Officer is considered to have special empowerments. He/she has the right to access all the documents that are relevant to the field of Integrity Compliance Program. He/she gives consent to all internal and external documents and business processes in the field of Integrity Compliance Program.

Directors in all legal entities that are part of the corporate family are obliged to provide all necessary support and unreservedly cooperate with the Chief Compliance Officer on the issues related to the field of Integrity Compliance Program.

Responsibilities and duties of the Chief Compliance Officer:

- Chief Compliance Officer is responsible for the design, operational coordination in the implementation of the Program and Monitoring the Program,
- Chief Compliance Officer coordinates and is responsible for the work of the each Compliance Officer appointed in the specific member of the corporate family,
- Ensures that program effectively prevents and detects violations of the relevant external regulations, internal policies and procedures and the Code of Business Integrity,
- Gives consent to all the members of the corporate family to participate in all processes of tendering in order to prevent collusive practices within the members of the corporate family, as well as preventing any other prohibited practices defined in the policies of the prohibited practices,
- Gives consent to the processes that are rated as high risk (gifts, donations, sponsorships, etc., which are defined in the policies and procedures of the Integrity Compliance Program)
- Proposes distribution of available funds which are intended to ensure operability and efficiency of the program,
- Periodically reviews the Program to align with the changes in the organization, relevant external regulations and internal rules and procedures,
- Ensures that the established internal controls are adequate for prevention and detection of violations of the relevant external regulations, internal policies and procedures and ethical standards by employees, suppliers, agents, business partners and others,
- Coordinates with other relevant departments of the company and manages possible legal and reputational risks,
- Carries out a systematic risk assessment, periodically and, if necessary, in the field of business integrity and proposes measures to reduce identified risks,
- Develops and where necessary, revises and proposes the changes to the Code of Business Integrity and other relevant Integrity Compliance procedures and policies (conflict of interest, gifts and animation, sponsorships, donations ...)
- receives reports relating to prohibited practices and any other irregularities,
- conducts independent and internal investigation and acts to the reported or observed suspected occurrence of prohibited practices and other irregularities. Independently, based on the results of the internal investigation, proposes corrective and disciplinary measures,
- monitors and documents all reported suspicions of irregularities,
- supervises the implementation of disciplinary and corrective measures arising from internal investigations or other activities envisaged in the Program,
- ensures, in cooperation with the legal department, that there are mechanisms in place to run disciplinary measures and punishments in cases of employee's misconduct, including cases where competent employees failed to prevent and detect irregularities or if they missed to report perceived irregularity,

- develops, coordinates and conducts education and training that focuses on the elements of the Program and seeks to ensure that all employees understand and comply in their work with relevant external regulations, internal policies and procedures and standards of integrity,
- creates, in cooperation with other departments, content of the policies, instructions, brochures and other materials aimed at raising awareness and educating employees, suppliers, business partners and other stakeholders about the program in order to ensure full compliance with external regulations and internal regulations and company procedures,
- implements the process of examining the background of potential business partners in order to assess and mitigate the risk of prohibited practices (due diligence) and makes a decision based on the information on whether to conclude a contract or not,
- ensures, in cooperation with the relevant departments in the company that the third parties with whom the corporate family has a business relationship understand and comply with the requirements of the Program,
- answers independently or in cooperation with the relevant departments the employees' questions and concerns about elements of the program and other issues in the domain of Integrity Compliance,
- reports to the Compliance Board on all activities at least quarterly, and if necessary more often,
- proposes an annual budget and plan activities to the Compliance Board.

2.3 Compliance officer

General Assemblies of the companies MG Mind Ltd, Mrkonjić Putevi Ltd. and Merkur Ltd pursuant to the needs of the legal entities referred to in the Integrity Compliance Program appoint the Compliance Officer. Compliance Officer is the internal body within the legal entity responsible for the implementation of Integrity Compliance Program in cooperation with the Chief Compliance Officer.

Compliance Officer reports to the Chief Compliance Officer about all the activities in the implementation of Integrity Compliance Program.

Responsibilities and duties of the Compliance Officer are:

- To ensure that the Program within the legal entity effectively prevents and detects violations of the relevant external regulations, internal policies and procedures and the Code of Business Integrity,
- To ensure that adequate internal controls are established within the legal entity in order to prevent and detect violations of the relevant external regulations, internal policies and procedures and ethical standards by employees, suppliers, agents and business partners,

- To give consent to the processes that are rated as high risk (gifts, donations, sponsorships, etc., as is defined in the policies and procedures of the ICP)
- To manage identified legal and reputational risks in coordination with other relevant departments of the legal entity,
- to carry out a systematic risk assessment periodically or when needed in the field of Integrity Compliance and to propose measures to reduce identified risks,
- to develop and if necessary revise and propose changes to the Code of Business Integrity and other relevant Integrity Compliance procedures and policies (conflict of interest, gifts and animation, sponsorships, donations ...),
- to conduct an internal investigation and to act to the reported or observed suspected occurrence of prohibited practices and other irregularities. Independently, based on the results of the internal investigation, to propose corrective and disciplinary measures,
- to ensure that there are mechanisms to initiate disciplinary measures and punishments in cases of employee misconduct in cooperation with the legal department within a legal entity, including cases where competent employees failed to prevent and detect irregularities or if they missed the report perceived irregularity,
- to develop, coordinate and conduct education and training that focuses on the elements of the Program and seek to ensure that all employees understand and comply in their work with relevant external regulations, internal policies and procedures and standards of integrity,
- to conduct the process of examining the background of potential business partners in order to assess and mitigate the risk of prohibited practices (due diligence),
- to ensure that the third parties with whom the corporate family conducts business understand and comply with the requirements of the Program in cooperation with the relevant departments in the company,
- to answer the employees' questions and concerns about elements of the program and other issues in the domain of Integrity Compliance independently or in cooperation with the relevant departments,
- to report to Chief Compliance Officer for all activities, monthly and if necessary more often,
- When performing his/her duties Compliance Officer is subordinate to Chief Compliance Officer, cooperate with Chief Compliance Officer, asking for an approval from the Chief Compliance Officer to conduct and carry out received orders.

2.4 Directors and managers at all levels

Directors and managers at all levels in all entities covered by Integrity Compliance Program are required to ensure compliance with all relevant laws, regulations and other mandatory requirements and strategic documents. Directors and managers must ensure necessary conditions in order to Integrity Compliance Program reaches its final goals.

Responsibilities and duties of the directors and managers at all levels are:

- to provide unconditional support to the implementation of the Integrity Compliance Program,
- to provide support, independence in work and smooth operation of the Compliance Officer and Chief Compliance Officer,
- to promote compliance and integrity in their daily business, both among employees as well as among customers, suppliers and business partners,
- to provide the necessary resources for the implementation of the program,
- to adopt and implement a disciplinary and corrective measures related to the violation of the program,
- to report quarterly to the Compliance Board.

VI INTEGRITY COMPLIANCE PROGRAM ACTIVITES

A) Risk management

Risk management is the process of identification and evaluation of systemic weaknesses of existing regulations, jobs, work processes and behaviour as a result of which our corporate family may be exposed to higher level of risk for the occurrence of prohibited practices. Using the analytical and systematic approach, and on the basis of self-assessment of employees of our corporate family, the possible negative consequences of the occurrence of prohibited practices are being evaluated and the likelihood that in the observed work processes will occur prohibited practices. For each identified possible risk, the measure for systemic and preventive actions will be adopted, in order to reduce or eliminate the possibility of the occurrence of prohibited practices. Apart from the process of identification and treatment of the risks, the risk management process will result in raising the awareness of all members of our corporate family of weak points and vulnerabilities in work processes in all business areas.

With this approach to the risk management, not only that we effectively detect and respond to the risk areas but also we act preventively to the causes of risk. Risk management is the basis for further development and revision of Integrity Compliance Program and related procedures. The risk assessment shall be carried out periodically at least once every two years, or more if necessary.

B) Policies and procedures

Code of business integrity

Our Code of Business Integrity is our statement of respecting the principles of integrity and professional conduct in our daily operations. The Code establishes the key principles of behaviour which we expect from the management, employees, contractors and agents who are part of our corporate family, and their obligation to follow and comply with the standards laid down in order to ensure compliance with applicable laws and policies of our corporate family. We emphasize that all our employees must certify that he or she has read and accepted the obligation to comply with all of our policies and procedures.

Apart from the Code of Business Integrity we developed a range of policies and procedures that ensure stability and consistent implementation of our Integrity Compliance program:

Policy on prohibited practices

Corruption, fraud, collusion, obstruction, coercion, facilitation payments, improper relationships with public officials, engagements of the third parties for the purpose of inducing or securing any improper advantage for the company are strictly prohibited practices and our corporate family will have no tolerance for violating this procedure.

Procedure on reporting, processing and managing irregularities

This procedure defines the process of reporting irregularities and this part of the procedure as well as the deadline for processing applications and the manner of informing the applicant of the results of the selection is published on the web site. Way of dealing with and managing of the reported irregularities (solving irregularities, the method of documenting, reporting and archiving) is clearly defined in the procedure.

Whistleblower protection policy

All employees are required to report noticed irregularities. Apart from the obligation, we find very important that employees feel free to point out the irregularity and to understand that it is desirable and admirable behaviour, which is why we adopted a policy of protection of the whistleblower which guarantees that anyone who in good faith makes the report will not be punished or be subjected to any kind of retaliation or adverse action.

Policy on integrity of human resources management

Special attention in terms of integrity and compliance is dedicated to our employees. Policy on integrity of human resources management defines the method of selection of candidates for certain working position, education and employee testing, employment of family members, employment of the public officials and/or related parties.

Conflict of interest policy

Our corporate family pursuant to the policy obliges all employees to report a conflict of interest or potential conflict of interest. Conflict of interests is a situation in which an individual who performs a specific function or activity comes in the chance that his/her decision or other action benefit to himself/herself or someone he/she is close to, social groups and organizations, to the detriment of the interests of the legal entity.

Policy on integrity of expense management

The purpose of this policy is to provide guidance to employees in the company on what are acceptable and unacceptable costs within the company, protecting the company from financial and reputational damage and possible legal disputes. Our procedure on costs contains clear provisions on gifts, hospitality and entertainment, donations and sponsorships, political contributions, travel orders, and keeping financial records and internal controls.

Third parties Code of conduct

By insisting on compliance with the Third Party Code of Conduct, we dedicate due attention when choosing subjects with whom the company cooperates and thus not only to ensure the full implementation of our Integrity Compliance Program Compliance but also to contribute to promotion of the ethics and compliance culture in the community in which we live and operate.

Third Party due diligence Procedure

The purpose of this procedure is to provide guidelines for the implementation of the process of examining the background of potential business partners before reaching a decision on entering into a business relationship, in order to assess and mitigate the risk of prohibited practices.

C) Training and communication

Our comprehensive system of education is developed not only for general training (for all members of the corporate family) on the Integrity Compliance Program, but also to meet the specific needs for different working positions in order to provide them with additional specific knowledge related to the adherence to the Integrity Compliance Program. When a new member joins our corporate family, he or she must, within 30 days, undergo the training about our Program, Code, policies and procedures that cover key areas of Integrity Compliance Program, including explanation on how to report a violation and where to get help and advice. Training course is conducted at least annually, through on-line training, workshops, and communications for all members of the corporate family. Trainings are conducted according to the annual training plan that covers our key procedures and specific training based on risk. All members of the corporate group must undergo an annual test after completion of training. The results of the test will be part of the personnel file and one of the basic criteria for evaluation of performance.

People in positions who are authorized to make decisions or individuals whose positions are particularly exposed to risks sign annually a declaration that they have considered Integrity

Compliance Program, that they comply with the program and that they have reported their findings on possible violations of the program by organizational staff or third parties to the Compliance Officer.

D) Counselling and confidential reporting

All the members of the corporate family have an obligation to promptly report any concerns regarding Integrity Compliance Program and/or the occurrence of prohibited practices, regardless of whether these events are registered by the organization personnel or by third parties.

Our Integrity Compliance Program allows all stakeholders (staff, organization, third parties, and customers, citizens) to express their concerns anonymously and/or non-anonymously.

To this purpose, our corporate family opened a channel for anonymous and non-anonymous reporting that enables two-way communication with applicants through which anonymous and non-anonymous applicants will receive the reply to their complaint or inquiry. Our channel for anonymous reporting is completely separate from the management functions in our corporate family and is available 24 hours a day, seven days a week.

All organizational personnel can express their concerns or complaints directly to the Chief Compliance Officer who is responsible for receiving and handling complaints.

We encourage, expect and undertake all organizational staff to report any illegal or behaviour without integrity.

Any type of retaliation against whistleblowers will not be tolerated, which is defined by our whistleblower protection policy.

E) Investigations

Chief Compliance Officer is authorized person for receiving and dealing with complaints and queries. In the process of establishing the facts, all data and information, including statements of employees and other persons, Chief Compliance Office must keep in a way that guarantees the confidentiality of the proceedings and the protection of privacy of any person. Unauthorized sharing or disposal of data from the report and/or investigations, and the unauthorized disclosure of the identity of the whistleblower and/or accused person and/or witnesses and/or any other person associated with irregularity, constitutes a serious breach of the working duties. The

process of reporting and investigation is defined by the Procedure on reporting processing and managing irregularities.

F) Corrective and preventive actions

Through the system of internal control, personnel training, promotion of the desired behaviour, our corporate family creates a culture of compliance and integrity that is preventative, and that reduces the risk of escalation and prohibited practice.

For every possible occurrence or identification of opportunities for the emergence of illicit behaviour we immediately act using the corrective measures to amend identified deviations which are the cause of the risk of illegal behaviour.

G) Disciplinary procedures

Everybody shall be personally responsible for non-compliance and violation of laws, policies and procedures and any violation will be considered to be disciplinary matter. All identified violations will result in disciplinary action and will impose sanctions which are proportional to the committed offense and may result in the termination of the contract and / or lawsuit.

H) Collective Actions

Corporate family welcomes and is interested in all positive activities in the field of Integrity Compliance and will actively work on the promotion and encouragement of other economic entities to develop programs that prevent illicit behaviour in the business community. Corporate Family will take part in associations that promote integrity in business.