



ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBE POLICY

The policy applies to all ERDEMIR ROMANIA employees and to third parties (interested parties) who represent or act on behalf of ERDEMIR ROMANIA, regardless of their identity: subcontractors, agents, intermediaries as well as business partners.

ERDEMIR ROMANIA employees carry out their activity in a normal and fair competitive environment, including by promoting correct and non-deceptive forms of advertising, in accordance with the legal competition provisions in force.

Any act of corruption, blackmail and embezzlement is prohibited.

In fact, any person who works on behalf of or for ERDEMIR ROMANIA will not give or accept bribes, will not engage in illegal activities that may stimulate business partners or public authorities.

Anti-fraud, anti-corruption and anti-bribery policy:

ERDEMIR ROMANIA does not request, does not accept and does not agree to receive, promise or offer bribes.

It is also forbidden:

- the concealment of bribes for commercial or charitable purposes;
- the intentional modification of data, financial accounting documents, making unjustified, unfounded payments;
- the theft of persons who come into direct contact with the assets of the organization;
- the forgery of contracts concluded by ERDEMIR ROMANIA with other companies;
- the forgery of decision-making documents;
- the money laundering;
- the conflict of interest;
- the secret agreements between staff and customer or suppliers of goods;
- the abuse of power;
- the unauthorized introduction, deletion or modification of computer data;
- the unjustified receipt of money, gifts and hospitality.

And / or other corruption or work infringement as described in the current Penal Code.

Ex: Types of acts defined as corruption offenses:

- Taking bribes (art. 289 of the Criminal Code) is the act of the employee who, directly or indirectly, claims or receives money or other benefits that are not due to him or accepts the promise of such benefits or does not reject it, in order to fulfill, not to perform or delay the performance of an act concerning his duties or to perform an act contrary to those duties.

- Bribery (art. 290 Penal Code) is the promise, offering or giving of money or other benefits to an employee, in the ways and purposes shown above, for the unlawful satisfaction of an interest.

ERDEMIR ROMANIA complies with all legal regulations in force, including those relating to the sustainable development of the socio-economic environment and social responsibility.

Violation of this measure by an employee of ERDEMIR ROMANIA constitutes a serious disciplinary violation and will be sanctioned according to the legislation in force.

Responsibility

ERDEMIR ROMANIA's management is responsible for the application of an internal managerial control system based on the Code of Ethics and Professional Conduct at GROUP level, which identifies, evaluates and prevents fraud risks as part of operational risk.

Staff at all levels have a duty to ensure the protection of assets, the rational and efficient use of resources, the promotion and protection of the company's reputation.

Final provisions:

ERDEMIR ROMANIA will post this policy both on the company's website and on the premises, which is available to all interested parties and brought to the attention of all employees.

In addition, we encourage all collaborators to report any request for undue benefits from an employee or a person with a management position within ERDEMIR ROMANIA with the aim of vitiating or altering a purchase / sale process.

Monitoring of such notifications is done on the email address: office@erdemir.ro