





**LIMITED LIABILITY PARTNERSHIP
"KAZAKHSTAN AGENCY OF APPLIED ECOLOGY"**

APPROVED BY


Executive Director
KAPE LLC
A.M. Aiturbayev
"30" of January 2012



CODE

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CODE OF BUSINESS ETHICS	
Developed by: <u>Head of Contract-Legal Department</u> Approved by: <u>IMS and EMS Management Representative</u> <u>HSE MS Management Representative</u> <u>IMS Manager</u>	 <u> </u> K.U. Baizhumanova  <u> </u> D.B. Sakhariyeva  <u> </u> R.Y. Kaipov  <u> </u> V.S. Skudnyakova .

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MESSAGE OF MANAGEMENT

Dear colleagues,

The basis for successful activities of "Kazakhstan Agency of Applied Ecology" LLC (KAPE LLC) is corporate values and standards, which are urged to ensure trust and respect to business society, partners, customers, representatives of state authorities and everyone, on whom success of KAPE LLC and its prosperity depend.

Adherence to principles of corporate governance and transparency enables more active participation of KAPE LLC in implementation of different environmental programs.

For achievement of these goals KAPE LLC draws special attention to corporate culture, an important tool of which is this Code of Business ETHICS, as set objectives require all employees of KAPE LLC:

- to know the mission of KAPE LLC, principles of its achievement and adhere to them;*
- to adhere to norms of corporate culture of KAPE LLC, understand significance of corporate reputation;*
- understand significance of compliance of their actions to the mission of KAPE LLC and also adopted principles of corporate governance and business ethics.*

This Code shall be the guideline for all employees of KAPE LLC regardless of their position and shall be deemed necessary for an employee to carefully study the Code, strive for compliance with its requirements.

Adherence to the Code shall enable formation and development of positive corporate culture, lead to strengthening of reputation and authority of KAPE LLC, and serve as a pledge for successful development of KAPE LLC in the future.

Hereby we present the Code of Business Ethics of KAPE LLC, which establishes values and ethic principles, which our work is based on and determines common standards of conduct in KAPE LLC Corporate ethics shall be a key element, uniting employees into one uniform social organism. Clear understanding of ethical landmarks in the activities is necessary for well coordinated work in all subdivisions. Adherence to high ethic standards can preserve and strengthen trust in the team and in relations with external partners, society and state.

Observance of norms of the Code of Business Ethics shall be a serious step in strengthening the reputation of KAPE LLC today and ensure sustainable development in the future, help employees to achieve common goals. Success of KAPE LLC depends on each employee. For this reason clear adherence to the Code of Business Ethics shall be a high priority for employees of KAPE LLC.

Management of KAPE LLC

MISSION OF CODE

The Code of Business Conduct shall be a document, regulating ethic part of interaction between KAPE LLC and all concerned persons, ethic norms of corporate relations and also mechanisms of impact of ethic norms on daily activities of "KAPE" and its employees.

VISION OF CODE

The Code of Business Conduct is designed to enable enhancement of efficiency in mechanisms of corporate governance in KAPE LLC and successful interaction of the latter with concerned persons.

INTRODUCTION

1. This Code is developed in accordance with provisions of the current legislation of the Republic of Kazakhstan, the Charter and other internal documents of KAPE with account of recognized world standards of business conduct and corporate governance and establishes basic values and principles of business ethics, ethic norms of business mutual relations.
2. The purpose of this Code shall be:
 - 1) establishment of key values, principles, rules and norms of business ethics and conduct, guided by Officials and employees of KAPE in its activities both in strategic decision making processes and daily situations;
 - 2) development of uniform corporate culture, based on high ethic standards, maintenance of trust, mutual respect and decency in team.
 - 3) uniform understanding and performance of norms of business ethics, accepted in KAPE by all employees regardless of their position;
 - 4) boost and preservation of trust in KAPE on the part of business community, strengthening of reputation as an open and honest participant in the market;
 - 5) assistance to efficient interaction with concerned persons
3. The Code shall be applied together with other internal documents and shall reflect activities of KAPE officials and employees in terms of application of norms and principles of business ethics and business conduct.
4. The list of the above norms and principles shall not be exhaustive and can be clarified, amended, supplemented in case of particular conditions or circumstances
5. Provisions of the Code shall apply to officials and all employees of KAPE regardless of their positions;
6. The Code applies the following definitions and abbreviations:
 - 1) **KAPE** – “Kazakhstan Agency of Applied Ecology” LLC;
 - 2) **Business ethics** – a set of ethic principles and norms of business communication, guided by officials and employees of KAPE;
 - 3) **Official** – member of KAPE Board;
 - 4) **Concerned person** – individuals and legal entities, which enter legal relations with KAPE;
 - 5) **Code** – this Code of Business Ethics of “Kazakhstan Agency of Applied Ecology” LLC
 - 6) **Conflict of interests** - situation, where personal interest of an Official or an Employee of KAPE impacts or can impact on impartial performance of job duties;
 - 7) **Corporate culture** – KAPE specific values, principles, norms of conducts and relations
 - 8) **Corporate Secretary** – head of Legal Department, who is not a participant or a member of KAPE Board, who within his/her activities ensures a procedure on conduct of meeting and preparation of materials for meetings of KAPE Board and General Participants’ Meeting of KAPE, execution of relevant minutes and other internal acts of KAPE;
 - 9) **Employee** – an individual, who has employment relations with KAPE and directly performs works under an employment contract.
 - 10) **Corporate social responsibility** – performance of obligations accepted voluntarily, meeting mutual interests of KAPE and business;
7. KAPE shall accept and observe provisions of this Code in mutual relations with officials, employees, subsidiary and dependent organizations, state bodies, partners, customers and other concerned persons, both for strategic decision making processes and daily situations, faced by officials and employees of KAPE.

1. VALUES AND PRINCIPLES OF BUSINESS ETHICS

8. Basic corporate values, based on which KAPE activities are formed, shall be:

1) Competence and professionalism

First of all, results of KAPE activities shall be impartial with professional point of view. Officials, employees of KAPE shall have qualitative education, work experience, ability to make weighted and responsible decisions of KAPE. KAPE not only sets objectives, but also creates conditions for its employees, allowing to upgrade a level of professional knowledge and skills, realize their professional creative abilities, develop a potential and offer prospects for career advancement.

KAPE appreciates in their employees and their work:

- KAPE strategic goal oriented (Policy of KAPE)
- professionalism in their activities and aspiration to upgrade their professional level;
- initiative and activity when performing job duties;
- discipline and responsibility;
- mutual support between employees, assistance to young specialists of KAPE and respect to its veterans

2) Honesty and impartiality

Honesty and impartiality shall be “foundation” of KAPE activities, its business reputation. KAPE shall not admit any conflict between personal interests and professional activities. Deception, concealment and false declarations shall be incompatible with the status of an official, employee of KAPE.

3) Responsibility

Responsibility – a guarantee of quality of KAPE activities. KAPE shall be responsible for accepted obligations, established requirements of the legislation, contractual relations, customs of business intercourse and moral ethical principles. KAPE recognizes its social responsibility to the state and society.

4) Openness

KAPE strives for maximum openness and reliability of information about KAPE, services and its achievements, results of activities. KAPE intends honestly and timely to inform partners on state of affairs, increase transparency and availability of information on the basis of improvement of reporting and accounting quality in accordance with the legislation of the Republic of Kazakhstan. At the same time KAPE observes non-disclosure of information and data protected by the legislation of the Republic of Kazakhstan.

5) Respect of human personality

Employees and partners of KAPE shall have right for honest and fair attitude, regardless of race, language, political and religious convictions, sexual, national and cultural identity.

9. KAPE when performing its activities shall:

- 1) observe norms of the legislation of the Republic of Kazakhstan, execute decisions of state bodies, other documents, related to KAPE activities ;
- 2) ensure observance and respect of constitutional rights, honor and dignity of a person and a citizen regardless of origin, social, official and property capacity, sex, race, nationality, language, attitude to religion, convictions, place of residence or any other circumstances
- 3) be respectful towards state symbols - Emblem, Flag and Hymn;
- 4) observe common moral and ethic norms, be respectful towards state and other languages, customs of all people;
- 5) act fairly and in good faith, not accept bribes and similar vicious business practice and also practice of presenting and accepting gifts, except for those accepted in business practice (such gifts shall not be significant and shall not be presented/accepted frequently)

- 6) have fair attitude to officials and employees with respect and observance of ethic norms ;
- 7) strive to have all relations with concerned persons as mutually profitable;
- 8) show respect and treat with care environment.

10. Efficient organization of work is built on execution of mutual rights between KAPE and all concerned persons. Observance of mutual rights shall be a necessary condition for constructive work.

2. NORMS OF BUSINESS ETHICS

2.1. Ethics of mutual relations of Officials and Employees

11. Officials and Employees of KAPE shall be obliged to perform professional functions honestly and reasonably in the interest of KAPE, escaping a conflict of interests.
12. Officials of KAPE for achievement of KAPE strategic goals shall make business decisions with account of basic values and principles of Business ethics and assume responsibility, specified in the current legislation of the Republic of Kazakhstan for realization of objectives, set to them.
13. Officials, Employees of KAPE when performing job duties shall be guided by interests of KAPE, not personal relations or personal benefit.
14. Each Employee shall be obliged to honestly observe principles, specified in this Code, observe requirements of labor and collective contracts, code of labor conduct, job instructions and other internal normative documents of KAPE and also realize their personal responsibility for their violation and non-observance;
15. When recruiting new Employees KAPE shall be guided by the legislation of the Republic of Kazakhstan and requirements of internal acts of KAPE, prefer candidates with higher qualifications and industrial experience, and shall not admit any discrimination on any grounds. Selection and promotion of personnel shall be carried out exclusively on the basis of professional abilities, knowledge and skills according to internal acts of KAPE, excluding any evidence of discrimination on sexual, racial, political, religious and other similar motives;
16. KAPE shall encourage Employees, who strive for self-education and professional development and create equal and optimal conditions for raising Employees' qualifications of all levels in accordance with training programs and professional development of Employees;
17. Remuneration policy shall be based on acknowledgment of professional qualities and abilities of Employees, results of their work and achievement of key performance indicators and on offer of social package for motivation in accordance with internal documents of KAPE.
18. KAPE Safety and Health Policy shall specify assurance and constant improvement of healthy and safe working conditions for its Employees.
19. KAPE Officials and Employees with their attitude to work and behavior shall enable creation of sustainable and positive atmosphere in team.
20. KAPE shall not admit any privileges and benefits for separate Officials and Employees unless specified in the legislation of the Republic of Kazakhstan and/or internal documents of KAPE, but shall compulsorily provide everyone with equal possibilities.
21. KAPE Officials and Employees shall take every effort for highly professional work, treat with care property of KAPE, rationally and efficiently use it
22. KAPE shall be responsible for decisions, free from the Conflict of interests on any stage of this process from Official till any Employee, who makes a decision.
23. KAPE Officials and Employees shall behave themselves in a way not to admit a situation, where the Conflict of interests can arise, neither with respect to themselves (persons related to them), nor to others.
24. Officials and Employees shall timely provide each other with reliable information, without violation of confidentiality norms and with account of decisions of the Board and also internal documents of KAPE.
25. Decisions made by KAPE Officials shall be based on principles of transparency and adequacy.

26. Officials shall be obliged to inform immediately of any commercial or any interest (direct or indirect) in transactions, contracts, projects, related to KAPE, or in connection with issues in the order, specified in internal documents of KAPE;
27. Officials shall be obliged to inform immediately a direct manager or line management and refuse from participation in discussion and voting on issues, they are interested in.
28. Officials and Employees regardless of their status and position for performance of their functional duties shall not be entitled to accept:
 - remuneration in the form of money, services and other forms from an organization and individuals, where they do not perform relevant functions;
 - gifts or services from persons, who are dependent on them on work, except for symbolic signs of attention and symbolic souvenirs in accordance with common norms of politeness and hospitality or when conducting protocol and other official activities;
29. Officials and Employees shall be prohibited to disclose commercial, official and other secret protected by the legislation, except for cases, when a requirement on provision of this information is established by the legislation of the Republic of Kazakhstan and also to use information for personal purposes. It shall be regulated by internal normative documents of KAPE, job instructions and other documents of KAPE.
30. Officials and Employees shall observe rules, order and procedures, specified in internal documents of KAPE and related to safety and work with confidential information of KAPE.
31. Each Employee shall be obliged not to admit with respect to colleagues and partners discrimination on sexual, age-specific, racial, political, religious and other similar motives.
32. Any situation, leading to violation of rights of Employees, should be considered in accordance with norms of the legislation of the Republic of Kazakhstan and internal documents of KAPE.
33. KAPE Officials and Employees shall not admit public speaking, statements or interview on any topics on behalf of KAPE without direct instruction from KAPE management or provided direct authorities.
34. KAPE Officials, managers of structural subdivisions of all levels shall make management decisions, meeting requirements of the Code, besides shall strive through personal example to show adherence to provisions of the Code, draw time for consultations and mentoring, teambuilding, united with common mission, values and principles.

2.2. Ethics of Mutual Relations with State Bodies

35. KAPE shall implement mutual relations with state bodies in accordance with requirements of the legislation of the Republic of Kazakhstan, the Charter and internal documents of KAPE, and also in accordance with principles of corporate governance, on the basis of independence of parties. KAPE shall not admit illegal attempts to impact on decisions of state bodies for achievement of its goals.
36. KAPE shall take every effort in non- admission of corruption and other illegal actions, both on the part of state bodies and on the part of Officials and Employees of KAPE.

2.3. Ethics of Mutual Relations with Subsidiary and Dependent Organizations

37. KAPE shall implement mutual relations with subsidiary and dependent organizations of KAPE in accordance with requirements of the legislation, the Charter and internal documents of KAPE, charters of subsidiary and dependent organizations of KAPE and also provisions of the Code of corporate governance.

2.4. Ethics of Mutual Relations with Business Partners

38. KAPE shall interact with business partners on the principles of mutual profit, transparency and full responsibility for accepted obligations in accordance with terms of contracts.
39. KAPE shall observe terms of contracts/agreements with business partners and perform its obligations with respect to them.
40. KAPE shall guarantee timely and complete consideration of all addresses, wishes and claims of partners. In case of discrepancies and disputes, negotiations and quest for a compromise shall be preferred.
41. KAPE shall select suppliers of goods and services, which offer the lowest prices, the best quality, conditions for supply of goods, services and enjoy good reputation in accordance with the legislation of the Republic of Kazakhstan.
42. KAPE shall adhere to honest and free competition and criticize all evidences of unfair competition, which can not only negatively impact on the reputation, but also disturb trust of partners to KAPE. In this regard KAPE shall expect the same honest competition from its partners,
43. KAPE shall not admit in its activities provision of unfounded benefits and privileges to business partners.

2.5. Ethics of Mutual Relations with Society

44. KAPE shall recognize its social responsibility to society
45. KAPE shall consider itself as an integral element of social environment, where it operates and with which it strives to establish strong relations, based on the principles of respect, trust, honesty and fairness.
46. KAPE shall strive to create new working places and upgrade professional qualification of Employees.
47. KAPE shall strive to establish constructive relations with organizations (public, non-governmental and other) for the purpose of improvement of public relations, decrease of impact of its industrial activities on environment, health and safety for employees of KAPE.
48. KAPE shall be obliged to refuse from cooperation with legal entities and individuals with doubtful reputation.
49. Social responsibility shall be exercised within the legislation of the Republic of Kazakhstan, the Charter and internal documents of KAPE and also shall be governed by provisions of the Code of business ethics in KAPE.

2.6. Ethics of Mutual Relations with Mass Media

50. KAPE Information policy shall foresee creation of possibilities for free and easy access to information about KAPE. The corporate web-site of KAPE (<http://www.kape.kz>) in public regime contains information about KAPE, its activities, branches, contract data, etc.
51. Authorized responsible persons of KAPE shall be entitled to provide data, concerning KAPE activities.
52. KAPE employees, providing data to mass media shall assume personal responsibility for their reliability and absence of data, constituting commercial secret and also confidential data.
53. KAPE employees can provide mass media with information, concerning KAPE activities, on the instruction or with permission of KAPE Board and in coordination with supervising structural subdivision, which is responsible for cooperation with mass media.
54. Each Employee shall understand and always remember, that any opinion stated by him/her or distributed information is directly associated with KAPE, its image and impacts on its reputation in business society.

3. HEALTH AND ENVIRONMENT

55. KAPE shall recognize its responsibility to the society on preservation of favorable environment, rational use of natural resources.
56. KAPE shall observe requirements of the legislation of the Republic of Kazakhstan and also requirements of international standards in environment, health and safety.

4. RULES OF BUSINESS CONDUCT IN KAPE

4.1. Relations with colleagues

57. Relations between all Employees of KAPE shall be equal.
58. Relations in team impact on mood of employees and their wish to work, to a large extent determine results of KAPE activities. Creating and maintaining comfortable work environment, employees shall observe the following norms and rules of business etiquette:
 - be respectful towards each other;
 - during working time do not to deal with matters not related to performance of official duties
 - do not demonstrate bad mood to colleagues;
 - do not blackguard, do not to demonstrate abandonment and aggression;
 - always apologize for incorrect behavior;
 - help colleagues, share knowledge and work experience;
 - do not discuss personal or professional qualities of colleagues in their absence;
 - be polite and correct;
 - be attentive to the opinion of another person.

4.2. Relations between management and employees

59. Creation of constructive professional relations between management and subordinates is necessary for daily efficient work of KAPE and for its future development.
60. Managers are recommended to observe the following norms and rules of business etiquette:
 - show Employees though personal example good norms and rules of ethics and business etiquette
 - do not criticize employees in the presence of other employees, do it confidentially;
 - be able to acknowledge your own mistakes to subordinates and do not pursue them for their constructive critics in their address.
61. Employees are recommended to observe the following norms and rules of business etiquette:
 - immediately inform a direct manager of reasons of absence at a working place;
 - do not react in the presence of colleagues for incorrect behavior of a manager. If confident in your rightness, it is necessary to ask a personal meeting;
 - know by sight, name and patronymic of KAPE managers
62. In the presence of employment activities beyond KAPE, Employees shall:
 - notify a direct manager and Head of Legal Department of planned other payable employment activities in other organizations;
 - execute employment relations on combining jobs in accordance with the legislation of the Republic of Kazakhstan
 - carry out other payable employment activities in other organizations, which will not impact on performance of main job duties and cause damage to the image and interests of KAPE;
 - observe rules on preservation of commercial and other official information, specified in the legislation of the Republic of Kazakhstan and internal documents of KAPE.

4.3. Corporate Culture

4.3.1. Employee Appearance and Ethics of Negotiations

63. While carrying out their work duties, the employees are recommended to adhere to the rules of business style in the choice of their clothes, shoes and hairstyles, so as to maintain a respectable and professional image of the KAPE.
64. Employees need to follow the rules of negotiation culture, including telephone negotiations. Business negotiations should be conducted in a calm, polite tone.
65. Employees' ability to communicate on the phone with their colleagues and business partners help create a favourable impression on KAPE as a whole. Also, during telephone conversations it's important to mind the colleagues who might be working in the same room and needn't be distracted by loud conversations. Personal calls on mobile phones should be made outside the work room.
66. During meetings mobile phones must be switched off or set to silent mode. It's improper to raise the voice and interrupt the colleagues during meetings.

4.3.2. Corporate Celebrations

67. An important element in the formation of corporate culture is holding celebrations with the work team. The traditional corporate celebrations are: Birthday of KAPE, New Year, Nauryz, Constitution Day, Independence Day, Day of the Ecologist. Celebrations can take place both inside and outside KAPE. If celebrating at the company premises, all employees meet in the conference hall, the representatives of KAPE management make a formal speech with congratulations, noting the best employee and awarding them with honorary certificates and gifts. If celebrating outside KAPE, the team takes a trip to the country, where the company's structural units prepare musical numbers, comedy sketches, and national games. In some cases, at the initiative of the management, family members can also be invited.

4.3.3. Birthdays of the employees

68. Celebrating birthdays of KAPE employees is a tradition for the staff members. Every employee is officially congratulated (a greeting card, flowers, formal congratulations sent via KAPE internal mail). During the celebration of Birthdays of employees it's acceptable to have a small reception with a buffet (soft drinks, fruit, and cakes) outside the working hours (lunch break). HR Manager of the Contract-Legal Department sends birthday greetings on behalf of the KAPE staff through KAPE internal mail. Company gifts from KAPE are presented to the employees for anniversaries, as well as subject to personal preferences of team members (structural units).

5. CONFIDENTIALITY

69. Confidential information of KAPE shall be information referred to as such in accordance with the laws of the Republic of Kazakhstan and the internal documents of KAPE.
70. Any information of confidential nature in the possession of the Employees, including Officers, shall be kept confidential, unless the law of the Republic of Kazakhstan expressly provided otherwise.
71. Employees with access to confidential information of KAPE must not disclose it to other employees who do not have access to such information, and any third parties outside KAPE. Such restrictions shall also apply after the Employee's dismissal, for a period of time determined by internal documents of KAPE and the employment contract.
72. During the working day and at the end of it, when the Employee leaves his or her workplace, he/she has to make sure that on no documents containing confidential information are left on the desktop or in any other easily accessible place. All such documents shall be locked in cabinets or drawers, the workplace computer must be turned off or locked. During conversation with partners at the work desk of the Employee all confidential information, including information on the computer screen, should be visually inaccessible to the interlocutor.
73. Confidential information (in electronic, written or other format) should not be taken outside the KAPE premises without relevant instructions from KAPE management. If dismissed from work,

Employee must leave at KAPE all the documents belonging to KAPE, files, computer media, reports and records containing information about KAPE or information that is not designed for a wide range of people, as well as copies of all documents that contain such information.

6. CONFLICT OF INTERESTS

74. Officials, as well as Employees of KAPE must exercise their professional duties honestly and reasonably, with due care and diligence in the interests of KAPE, avoiding conflicts.
75. Identification of conflicts of interest and their adequate settlement is important for the protection of the interests of KAPE participants.
76. In order to avoid conflicts of interests, Officers and Employees of KAPE and/or their affiliated persons:
- should not use in their own interests or for personal gain the opportunities that are given to them by corporate resources of KAPE, its management, employees of KAPE, its officials and / or information acquired as a result of the performance of the official duties;
 - should not be directly involved in the review and the decision-making regarding any relationship between KAPE and him/herself, any of his/her affiliates;
 - must not engage in any activities that could potentially lead to a conflict of interest;
 - should make all possible efforts to ensure that the resulting conflicts are resolved in the framework of the current legislation of RK, with regard to the legitimate interests of the parties involved in the conflict;
 - should not accept any gifts or benefits associated with his or her activities at KAPE from any other third parties, as well as receive any income or benefits as a reward for performing functional duties, except for income received directly from KAPE. KAPE does not permit accepting any gift or benefits, with the exception of symbolic signs of attention and symbolic gifts in accordance with generally accepted standards of courtesy and hospitality, as well as the protocol and other formal events.
77. KAPE procedures for settlement of conflicts of interests are regulated by this Code and other internal documents of KAPE.

7. RESPONSIBILITY

78. Compliance with this Code is mandatory for all Officers and Employees of KAPE.
- All violations of ethical standards under with this Code shall be considered in accordance with the legislation of the Republic of Kazakhstan and the internal acts of KAPE.

8. PRACTICAL APPLICATION

79. This Code is an internal regulatory document of KAPE, mandatory for its Officers and all Employees, regardless of position.
80. KAPE encourages employees to openly discuss the Code and welcomes any constructive suggestions for its improvement.
81. For questions regarding the provisions of the Code and / or ethical issues arising in the course of work, as well as regarding violations of the provisions of the Code, corruption and other illegal activities Officers and Employees of KAPE, equally as its business partners and interested parties may contact:
- Chief of Contract-Legal Department by phone +7 (727) 2726450/ 2726470 / 2726469 (ext. 219) or by e-mail k.baizhuman@kape.kz, leaving the name or anonymously, requesting appropriate actions to be taken;
 - Division Supervisor or to the next higher level supervisor.

The rights of the appealing person shall not be infringed, regardless of the chosen method of appeal.

82. Should a case of violation of business ethics be discovered by an Officer or and Employee of

KAPE, the materials shall be sent to KAPE Contract-Legal Department, with a further submission to the General Meeting of participants of KAPE for review. The results of the review and decisions shall be communicated to the appellant person within three (3) working days from the date of the decision.

83. Employees of Contract-Legal Department guarantee confidentiality of the information on cases of violation of this Code.

9. CLARIFICATIONS AND FAMILIARIZATION WITH THE CODE

84. Unit responsible for the development of the Code provides:

- in respect of Employees – familiarization with the Code within 10 days from the date of its entry into force;
- in respect of new Employees – familiarization with the Code upon employment;
- in respect of Officials – familiarization with the Code upon election to the KAPE executive body (Directorate);
- in case of changes and additions to the Code – familiarization of Employees and Officers within 10 working days from the date of enactment.

Company Employees and Officials are obliged to become familiar with electronic version of this Code available in the KAPE internal portal. Technical Employees, who do not work with computers and do not have access to the Internet, are familiarized with the Code by their immediate supervisor against his/her signature put in Document Distribution Record Sheet. The Document Distribution Record Sheet in electronic format is then sent to the Contract-Legal Department. Information about any amendments / supplements to the Code shall be communicated to the Employees and Officials by electronic mail.

85. Contract-Legal Department shall be responsible for explaining and giving clarifications regarding the provisions of this Code.
86. The Code is a public document and is freely distributed by KAPE among the partners and any other interested parties.

10. CONCLUSION

87. KAPE monitors, conducts research, and carries out surveys of the state of corporate culture and the level of business ethics of KAPE Officials and Employees.
88. Adopting the Code shall be the responsibility of the Directorate of KAPE. In order to update and improve its provisions, the Directorate of KAPE shall revise every 2 years the provisions of this Code, explore the extent to which they are being implemented in practice, and, if necessary, revise the changes and / or additions.

