



“MILLENNIUM TEAM “applies a zero-tolerance approach to bribing and corruption and is determined to act professionally, honestly and with integrity during the realization of all business, as well as all other relations regarding its business.

All employees are committed to the continuous improvement of anti-bribery management system in accordance with the requirements of the ISO 37001 standard in the field of design and execution of work in the fields of civil engineering and construction. The policy applies to all employees of the company, including suppliers, subcontractors as well as all interested parties.

Considering the internal and external factors in which we operate (context), the purpose of existence (mission) and strategic direction (vision) our ABMS policy is based on the following:

- Zero tolerance to bribery and corruption, with mandatory compliance with all the current legal regulations in the field of bribery and corruption.

Bribery and corruption in all their forms related to the activities of the company are prohibited.

Bribery is the act of directly or indirectly giving, offering, promising and agreeing to give something of value, including any advantage to someone for the purpose of inducing that person or someone else to improperly perform their function, to act or make a decision.

Bribery is also an act of direct and indirect demanding, agreeing to receive or accepting anything of value, including any advantage, in order to induce the improper performance of a relevant function, act or a decision.

A bribe can be “anything of value” and can include money, loans, contributions or donations, gifts, business representation, travelling, job offers, refunds, rebates, free of charge products, other goods, services or anything that can be considered to have value.

A bribe can also take the form of a “reward” and is paid after the recipient has improperly performed his duty or obligation.

- “MILLENNIUM TEAM” is completely dedicated to prevention, detection, reporting and elimination of bribery and corruption.
- “MILLENNIUM TEAM „constantly encourages its employees to raise concerns about bribery and corruption at earliest possible stages, to report cases for which they think constitute bribery and corruption and/or that they think may become so in the future.
- „MILLENNIUM TEAM „encourages openness and will support anyone who in good faith expresses sincere concern about bribery and corruption, even if they are proven wrong.
- „MILLENNIUM TEAM „ensures that no one suffers harmful treatment such as dismissal from work, initiation of disciplinary measures, threats and other unfavourable treatments due to refusing to participate in bribery or corruption, or because they reported in good faith their suspicion that actual bribery has taken place, or they have recognized the possibility of a potential bribery.

All employees of the company are responsible for their own behaviour in an ethical and compliant manner, as well as for compliance with anti-bribery management system and current anti-bribery laws.

The anti-bribery and anti-corruption policy is communicated within the “MILLENNIUM TEAM “and is available to the relevant interested parties. AMBS policy is compatible with the IMS policy and the Social Responsibility Policy.

Belgrade, 01/11/2022

Director