



Approved  
By the decision of the Board of Directors  
of the joint-stock company  
"Moynak Hydroelectric  
Power Station named after U.D. Kantaev  
dated September 14, 2018.  
Protocol No. 05/18

## **INTEGRATED MANAGEMENT SYSTEM**

**Code of Conduct of the joint-stock company "Moynak Hydroelectric power  
Station named after U.D. Kantaev"**

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## **WHAT ARE OUR VALUES?**

### **Partnership**

- We work in partnership and trust the team
- We put the team's interests above personal ones
- We build long-term and trusting relationships with stakeholders

### **Respect**

- We take care of everything that surrounds us
- We act on the principles of trust and respect
- We observe the laws and honor traditions

### **Integrity**

- We fulfill our obligations
- We do what we say
- We are always fair and honest

### **Meritocracy**

- We choose worthy professionals
- We give everyone, regardless of their role, the opportunity to speak out
- We reward for achieving the result

### **Perfection**

- We work rationally and according to the highest quality standard, using advanced experience and technology
- We take responsibility by acting to create added value
- We are curious, constantly learning and developing Society

## **OUR PRINCIPLES**

### **Professionalism**

The high professionalism of the employees of the joint-stock company "Moynak Hydroelectric Power Station named after U.D. Kantaev" (hereinafter - the Company) is the key to its successful operation. Therefore, the Company strives to create all the necessary conditions for comfortable work and the realization of the potential of each employee, providing equal opportunities for personal and professional development. Each employee strives to increase the level of their professionalism using the opportunities provided by Society, as well as independently.

### **Compliance**

Following the rules allows us to remain a team of professionals united by common goals, culture of behavior and traditions, and also helps to maintain a proper level of mutual understanding both in Society itself and with business partners and clients.

### **Safety**

We provide the world with energy and strive to do it by safe methods.

Risk-based approach

We are aware of the importance of risk management as a key component of the corporate governance system and take the necessary measures aimed at timely identification and reduction of risks that may negatively affect the value and reputation of the Company.

### **Social responsibility**

We strive to conduct production activities protecting the environment and respecting the communities with which we interact. Our goals in the field of occupational safety, industrial and general safety, as well as environmental protection are the absence of accidents, harm to health and environmental damage.

### **Transparency**

We are open to meetings, discussions and dialogue, we strive to build long-term cooperation with stakeholders based on consideration of mutual interests, respect for rights and balance between the interests of Society and stakeholders.

## **Who is the Code of Conduct for?**

The provisions of the Code directly apply to all employees, officers and directors of the Company. Referring to "You", "us" or "all" in this Code means addressing all employees, officials and directors of the Company.

The Company, which is part of the Samruk-Energo JSC group of companies, is obliged to adopt a Code of Conduct commensurate with its risks. Business partners, suppliers and other third parties who work with the Company or represent the Company are recommended to adhere to the provisions of the Code.

## **WHY DO WE NEED A CODE OF CONDUCT?**

**Our goal is to become one of the most successful Companies in the world.**

Without maintaining and increasing confidence in our activities from all stakeholders, including the Sole Shareholder, employees and business partners, we will not be able to achieve our strategic goals.

This Code establishes values, basic principles and standards of conduct, guided by which we will be able to protect the interests of all interested parties. The Code of Conduct is aimed at developing our corporate culture and strengthening the reputation of our Society as an open and honest market participant. The Code does not cover the full range of risks that we may face. Therefore, the Code of Conduct does not eliminate the need to reason sensibly and be responsible for it.

## **HOW IS THE CODE OF CONDUCT ENFORCED?**

The standards and basic principles of conduct set forth in this Code are put by each employee of the Company at the forefront of their daily activities in the Company.

Below are the first basic steps:

- Read and comprehend the provisions of the Code of Conduct;  
Strictly adhere to the provisions of the Code in your words and actions;
- Express concern and inform about risks.

Each of us should evaluate our behavior based on the following practical guidance:

- Does my action comply with the Code?
- Is it ethical?

- Is it legal?
- If my behavior becomes known to the public, will my behavior be acceptable?

Commitment and compliance with ethical requirements is the responsibility of everyone who works in Society or represents its interests. Violation of this Code harms the reputation and work of our Company and may lead to disciplinary penalties or dismissal. It is important to note that non-compliance with certain sections of the Code may be a violation of anti-corruption legislation and entail personal administrative or criminal liability. Compliance with the Code is fully supported by the Board of Directors.

If you need recommendations or advice regarding the provisions of the Code, you can contact your direct supervisor.

If you become aware of violations of any provisions of the Code, internal control systems, you must immediately report them via the hotline in the ways that you will be informed about. Such communications can be made on a confidential and anonymous basis with a guarantee of protection from harassment.

## **SERVICE TO SOCIETY COMMITMENT TO OUR MISSION**

Our responsibility is to create value for shareholders, employees and society, as a high-tech guarantor of Kazakhstan's energy supply and a supplier to Eurasia, guided by the principles of environmental care and lean manufacturing. We are obliged to fulfill our tasks based on the principles of fair treatment of the sole shareholder, in order to ensure the growth of long-term value and sustainable development of the Company; transparency, efficiency and flexibility of the Company's activities; consistency, timeliness of decision-making in the best interests of the Company; responsibility, accountability and legality.

### **YOUR RESPONSIBILITIES:**

- Realize the special duty to serve our society and the state when carrying out activities on behalf of Society and to take due care, correctly realizing the mission of the Society;
- Realize that your responsibilities can have a direct impact on the quality and standard of life of society and the state;
- Perform your duties in accordance with the Company's mission and do not take measures that go beyond the goals for which your position in the Company has been delegated to you;
- Do not indicate that you officially represent the Society when solving your personal issues.

## **WHAT YOU NEED TO PAY ATTENTION TO:**

Signs of any obscene or inappropriate behavior that may attract negative public attention and/or harm the reputation of Society.

## **SUSTAINABLE DEVELOPMENT**

**The society cares about our future generation and pays special attention to the sustainable development of our country. We are for protecting ecosystems, improving air quality and preserving the sustainability of our resources.**

Our Company strives to minimize the negative impact of operating activities on the population and the environment, to prevent industrial accidents that damage the environment, and also supports the rational use and reproduction of natural resources. We are supporters of increasing energy efficiency, saving resources and using alternative energy sources.

We adhere to the principle of not harming people and protecting the environment while fulfilling and achieving our goals. Our Society evaluates the impact of activities on the environment.

We develop and follow the rules of safe work to ensure safety in the workplace and prevent injury.

The society promotes fair and healthy competition in everything it does. Strictly complies with all applicable antitrust rules in its activities.

The Company never participates in anti-competitive agreements. Company:

- does not participate in price collusion (does not coordinate prices, discounts or margins with competitors);
- does not participate in collusion during tenders, i.e. does not coordinate commercial proposals in order to ensure the victory of a particular participant;
- does not exchange confidential commercial information with competitors, including information about customers, fees, discounts, research and development.

## **YOUR RESPONSIBILITIES:**

Make sure that your decisions and actions do not have a negative impact on the economy, the environment and society;

Strive to take the necessary measures to minimize the negative impact on stakeholders in terms of economic, social and environmental aspects.

## **WHAT YOU NEED TO PAY ATTENTION TO:**

Signs of any obvious or potential violations of the provisions of laws and regulations on the environment.

### **Question:**

*Does the Society have another document on sustainable development?*

### **Answer:**

*Yes, a Guide to Sustainable Development, which you can find on our corporate website.*

## **ETHICAL BEHAVIOR**

### **Reputation is a key asset of Society based on trust.**

The Company strives to gain the trust of the state, business partners, investors and society.

Trust arises as a result of consistent adherence to high ethical standards.

We are all representatives of Society, and our actions can have an impact on the reputation of Society.

Each of us must be correct in our behavior in order to preserve the reputation of Society.

### **YOUR RESPONSIBILITIES:**

Follow the generally accepted moral and ethical standards of behavior, show respect for the state and other languages, traditions and customs of all countries, working in Kazakhstan and abroad;

Adhere to the general moral and ethical standards of behavior outside working hours, do not allow antisocial behavior that can harm the reputation of Society;

Refrain from public speaking about the activities of the Society if you are not given the proper authority.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

Unethical behavior of employees, which may lead to the loss of the Company's reputation.

### **Question:**

*I suspect that a colleague comes to work in a state of intoxication, and maybe even drinks alcohol in the office. What should I do?*

### **Answer:**

*You should immediately consult with your supervisor, who will take the necessary measures to solve the problem.*



## EXTERNAL COMMUNICATION

**Being an employee of the Society, if you behave unethically in public places, this will give rise to criticism of our Society from the society.**

You should always remember that you represent our Society even outside of Society.

Any unauthorized external communication on behalf of the Company affects the image of our Society.

Social media activity should only be used for personal purposes and should not be associated with the Company.

Any information disclosed on behalf of the Company must be accurate in all material aspects, complete, correct and comply with current legislation and internal rules.

### **YOUR RESPONSIBILITIES:**

- Never apply on behalf of the Society if you do not have the authority to do so;
  - Never use your official position for personal gain;
- Do not express your personal opinion about the work of the Society in the media.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Unofficial social media activity directly related to the Company.

#### **Question:**

*An employee of the Company made public comments about dissatisfaction with a consumer product or service. Can this be considered a violation of the Code?*

#### **Answer:**

*This is not a violation of the Code. The Company respects the privacy of employees who may have consumer complaints or express their opinions in private. It is important that such an opinion should not be perceived as a position of Society.*

## ATTITUDE TOWARDS YOUR EMPLOYEES EQUAL CONDITIONS OF EMPLOYMENT AND WORK

Our people are the most valuable asset, and the Company adheres to the policy of providing all its employees with the best prospects for work. Therefore, our Society provides equal opportunities to all who work in the Society to develop their professional abilities and improve skills. Therefore, the Company has created a fair procedure for recruitment and promotion, selecting professionals with diverse work experience and talents.

## **YOUR RESPONSIBILITIES:**

- Perform your duties professionally based on our corporate values and principles, adhering to the highest ethical standards;
- Make every decision about hiring, remuneration and promotion, taking into account merit, qualifications, performance and production necessity;  
Exclude any possibility of nepotism, subjectivity or prejudice.

## **WHAT YOU NEED TO PAY ATTENTION TO:**

- Signs of any obscene or inappropriate behavior in the workplace;
- Signs of any obvious violations or potential violations of labor law.

### **Question:**

*What situations, accepted as a violation of equal conditions in hiring and promotion, can I report?*

### **Answer:**

*Questions about why another employee has a higher salary are unacceptable. The salary amount is confidential information that is based on experience, qualifications, education and other factors. You can report discrimination in the hiring process, promotion, and termination. For example, you found out that a new employee reflected in his resume 5 years of work experience in the same Company. But are you sure that in fact, he or she didn't work(a) in this Company, which means deception on the part of the employee and such dishonest behavior is unacceptable.*

## **PROHIBITION OF DISCRIMINATION AND HARASSMENT**

The Company strives to create working conditions where all employees treat each other with respect. Therefore, our Society does not tolerate any form of discrimination, including discrimination on religious, racial, ethnic, gender, age and other grounds. Our Society prohibits any form of behavior that is offensive, aggressive or hostile or infringes on the rights of employees.

### **YOUR RESPONSIBILITIES:**

- Treat your colleagues respectfully and fairly;
- Do not intimidate or insult your colleagues;  
Do not make inappropriate comments about your colleagues.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Signs of any obscene or inappropriate behavior in the workplace;

- Signs of any violations or potential violations of labor legislation.

**Question:**

*I am a pregnant employee of the Company, and the immediate supervisor puts pressure on me and asks me to leave my job without any grounds in order to avoid additional compensation and find a replacement employee as soon as possible.*

**Answer:**

*As a pregnant employee, you have a special status and rights provided by the Labor Code. If your manager puts pressure on you without any reason, you should immediately report this situation to the Company's Ombudsman, who deals with labor issues, labor conflicts and other similar issues.*

## **INTERACTION WITH THE BUSINESS COMMUNITY**

The Company is constantly working to ensure that the implementation of shareholders' rights is highly effective.

The Company equally respects the rights of its shareholders, regardless of the number of shares they own, maintains an effective dialogue with them, strives to justify trust by fulfilling its stated development obligations.

By promptly publishing reliable information about its activities in a form accessible to shareholders, the Company guarantees compliance with the rights and interests of the shareholder. Information about a probable merger, acquisition or restructuring is disclosed in strict accordance with the Company's internal regulatory documents and current legislation with mandatory preliminary publication of the information subject to disclosure.

## **INVOLVEMENT OF THIRD PARTIES**

Our Company interacts with suppliers, consultants, business partners and other third parties based on the principles of openness, full adherence to the law, honesty and efficiency.

The Society declares its commitment to the ten principles of the UN Global Compact, supports the goals and initiatives of the UN in the field of sustainable development.

Accordingly, our company welcomes the following suppliers:

Suppliers who create and maintain an inclusive work environment where all types of discrimination are absent, and the contribution of each person is recognized;

Suppliers who comply with human rights, applicable state laws, the UN Universal Declaration, as well as the key principles of the International Labour Organization (ILO);

Manage the business in such a way as to ensure the safety and well-being of employees and the public;

Do not allow child labor, forced, illegal labor or any other form of compulsory labor;

Suppliers who comply with relevant environmental and social norms and standards;

Demonstrate commitment to the principles of sustainable development: they use environmentally friendly materials, pay special attention to energy and water consumption, greenhouse gas emissions, as well as when handling substances hazardous to the environment (materials, preparations and products), ensure that such substances are labeled, processed, transported, stored, disposed of safely;

Develop and implement environmental policy, carry out their business activities in accordance with the policy;

They take into account the origin of the purchased products, its composition, the stability of the production and transportation process. Whenever possible, it uses materials with confirmed certificates of ethical standards and standards of sustainable development and supply chain (for example, but not limited to ISO 14001, FSC, PEFC, EPD).

They strive to use resources more intelligently and responsibly integrate this approach into their supply chain, as well as into their business operations.

Our Company does not provide unreasonable advantages and privileges to business partners and maintains business relations with them on the basis of mutual benefit. We choose suppliers openly, giving preference to the most favorable price, quality of goods/services and good business reputation of the supplier on the basis of the Procurement Procedure by the joint Stock company "National Welfare Fund "Samruk-Kazyna" and legal entities, fifty or more percent of the voting shares (participation interests) of which directly or indirectly belong to JSC "Samruk-Kazyna" on the right of ownership or trust management approved by the Board of Directors of JSC "Samruk-Kazyna".

We expect all third parties to adhere to the provisions of this Code or similar compliance policies. In turn, third parties expect us to adhere to the provisions of this Code and they are given the opportunity to report any actual or potential violations of the Code through the Company's HOTLINE.

#### **YOUR RESPONSIBILITIES:**

- Choose suppliers based only on their qualifications, merits and competitiveness;
- Do not cooperate with third parties with a dubious business reputation;
- Make every effort to create a competitive environment;

- Make sure that our third parties are aware of the provisions of this Code;
  - Make sure that the accrued remuneration corresponds to the goods/services provided;
- Treat third parties respectfully and fairly.

#### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Third parties are involved or have been accused of unreliable business practices;
- Third parties insist on receiving a commission or remuneration before entering into a contract with us.

#### **Question:**

*I found out that the shareholder of a potential supplier participating in an open tender is a close relative of an employee of the Company. Should I report this?*

#### **Answer:**

*Yes, you need to inform your supervisor about this, as this may affect the choice of a supplier based on a selection criterion other than the criteria of qualification, merit and competitiveness*

### **CONFLICT OF INTEREST**

**The Society highly respects your privacy and treats with understanding and respect the right of everyone to engage in legitimate activities outside of Society. At the same time, we ask you to be careful and avoid the possibility of a conflict of interest.**

A conflict of interest arises when your personal interests or connections potentially influence or may influence your business decisions for Society.

Situations that can be perceived as a conflict of interest are very diverse, and it is impossible to list them all. However, some examples include situations where you have an equity interest in a private legal entity or hold a managerial position in this legal entity, and these circumstances serve as an obstacle in the performance of your official duties in the Company.

#### **YOUR RESPONSIBILITIES:**

- Avoid situations where your personal connections/circumstances affect your business decisions in Society;
- Disclose information about your actual, potential or identified conflicts of interest to your direct supervisor;
- Do not participate in decision-making if you have an actual, potential or identified conflict of interest;
- Do not participate in any work and business (commercial or non-commercial) outside the Society if it negatively affects your activities in the Society;

Seek advice and recommendations from your immediate supervisor if you have any doubts about whether your personal circumstances affect your job responsibilities in Society.

**WHAT YOU NEED TO PAY ATTENTION TO:**

- Do you or your colleagues have family members or other affiliated persons who work in the Company or in an organization that is a potential or actual partner or supplier of the Company;
- You or your colleagues have an equity interest in the organization, or you or your colleagues hold a management position in this organization, which is a potential or actual partner or supplier of the Company;
- You or your colleagues have a part-time job or other activity outside the Company that may require you or your colleagues to use the Company's resources, including confidential information.

**Question:**

*My close relative is a shareholder of the Company, which participates in an open tender. I am a member of the tender commission. Can this be considered a conflict of interest?*

**Answer:**

*Yes, this is a conflict of interest situation, you need to disclose such a situation and not participate in the decision-making process in this tender*

**SOCIAL PROJECTS AND SPONSORSHIP**

Striving to achieve leadership in all spheres of activity, the Company will always accompany the commercial development of its business with social activities. By constantly contributing to the creation of conditions for a prosperous society, the Society lays the foundations for its long-term success. This is a complex work, the main priorities of which have always been and remain assistance to children, talented youth and veterans of production, support and promotion of culture, art, education and environmental protection.

We strive to support programs aimed at the development of physical culture and sports, education, culture and other types of social sphere.

**Question:**

*I want to volunteer to participate in a local charity project. Is it allowed by the Code?*

**Answer:**

*In most cases, yes. Please make sure that such work will not affect your obligations in Society and does not contradict the Charity Policy, the Sponsorship Program of*

*Samruk-Kazyna JSC, as well as the Anti-Fraud and Corruption Policy of Samruk-Energo JSC. If you have doubts, you can always contact the structural unit for security issues.*

## **GIFTS AND SIGNS OF HOSPITALITY**

**The Company's policy allows for standard and acceptable signs of hospitality provided to or received from third parties.**

However, receiving and giving gifts, as well as providing signs of hospitality, may create an unreasonable expectation on the part of a third party or the impression that you give preference to a third party for reasons of personal gain, and not for reasonable commercial reasons.

Gifts and hospitality signs mean not only cash, but also everything that has value offered or received by employees, officials, when carrying out commercial activities in the Company.

The concept and interpretation of gifts and hospitality signs varies depending on different points of view, therefore, receiving gifts and hospitality signs should not have a potential impact on the decision-making process.

### **YOUR RESPONSIBILITIES:**

- Carefully evaluate the type, value and amount of a gift offered or received, or a sign of hospitality;
- Never offer, seek to receive or take money, cash equivalents, personal services or any other illegal or unacceptable gifts and hospitality;
- If the gifts you offer or receive may affect the decision-making process, never accept or give such gifts.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Any unacceptable gifts and signs of hospitality in cash or in monetary equivalent, offered or received during the purchase of goods, works and services, during employment or employment;
- Any gifts and gifts that may affect your decision and objectivity or the decision and objectivity of your colleagues.

### **Question:**

*Are there any restrictions on receiving gifts from business partners?*

### **Answer:**

*According to Articles 366, 367 of the Criminal Code of the Republic of Kazakhstan, a gift in excess of 2 MCI is considered a bribe and entails the application of criminal liability measures, and in other cases (if the value of the gift is less), in accordance with Articles 676 and 678 of the Code of Administrative*

*Offenses, illegal material remuneration provided to persons authorized to perform state functions, or persons equated to them, entails administrative responsibility. Thus, any employee should not receive values that can influence his decisions. Any gift can be considered as a bribe if it has an impact on the decision-making.*

## **TAKING CARE OF OUR SOCIETY ASSET PROTECTION**

**Every employee working in the Company is responsible for the proper management of the Company's assets. Proper asset management includes the control and maintenance of the Company's investments, reserves and property.**

Reputation is a highly valued asset of the Company. Each of us is the owner of this asset, and through proper behavior, can increase or decrease the value of this asset. Everyone should strive to strengthen the reputation of Society.

Each of us should implement the practice of proper attitude and high responsibility to achieve the growth of assets and the formation of their value. Improper use of assets has a direct impact on the Company's work; any case of fraud or embezzlement must be reported immediately.

Any use of the Company's assets for personal purposes is not allowed.

### **YOUR RESPONSIBILITIES:**

- Take care of the property of the Society as your personal;
  - Take responsibility for controlling the proper use of the Company's assets;
  - Provide appropriate authorization and accurate documentation for the use of assets;
  - Ensure only the proper use of assets in accordance with your responsibilities;
- Take a reasonable approach to the formation of representative expenses, realizing the need for funds from the Company's budget for more important needs

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Misappropriation or embezzlement of assets;
- Improper protection of assets from theft and damage;
- Any signs of fraud, damage or theft.

### **Question:**

*I know that our Company sells assets at a reduced price as part of the privatization program, and I believe that the price is below the market. Does this mean that we are not protecting our assets?*

### **Answer:**



*Privatization is one of the ways a Society manages its assets. The best price is formed through transparency and competition. The Company is guided by the policy and procedure of transparency and competition. Therefore, if you find out about any violation of the privatization procedure or any suspicions, inform your immediate supervisor.*

## **TRANSPARENCY OF FINANCIAL STATEMENTS**

**The Company provides accurate and complete financial and business information.**

**All financial data, records and reports must comply with International Financial Reporting Standards, national legislation and internal rules of the Company.**

**All transactions and accounts must be consistent and classified properly. Decisions should be based on complete and accurate data. The Society prohibits any distortion of facts. The Company adheres to the principle of not contributing, directly or indirectly, to money laundering or terrorist financing. The Company values transparency of payments in all transactions, competes fairly and avoids the use of intermediaries without a legitimate commercially reasonable reason.**

### **YOUR RESPONSIBILITIES:**

- Register transactions and contracts in good faith;  
Keep a complete, accurate and timely record of all business transactions;
- Do not use hidden records and illegal financial transactions.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Incorrect and incomplete reports with inflated financial forecasts and incorrect expense indicators;
- Signs of dishonest activity, for example, the use of de facto funds for other purposes not designated de jure;
- Incomplete and inaccurate expenses for business trips and other expenses;
- Inconsistency of production activities with financial results.

### **Question:**

*I was asked to record the data in the accounting system in a way that misleads the user of the information. If I have concerns about the inaccuracy of the report, what should I do?*

### **Answer:**

*It is important to always keep records of data accurately and correctly, observing the necessary order in the accounting system. First, you should ask your manager*

*and/or the head of the department to clearly explain the methodology used in accounting in order to fully understand how you should comply with the requirements for the formation and presentation of reports. If you still have concerns or questions, contact the Financial Controller or the Compliance Service.*

## **INFORMATION MANAGEMENT**

**We use information in our daily activities to make business decisions. The Company considers information as an asset, part of which is confidential. Confidential information includes our know-how and other competitive information, personal data and other information that should never be disclosed to third parties without permission.**

### **YOUR RESPONSIBILITIES:**

- Share confidential information outside of the Company strictly when necessary and only after receiving a professional recommendation;
  - Comply with all internal requirements and restrictions regarding the safety and disclosure of confidential information;
  - Take measures to protect confidential information if you find out about any of its leakage;
  - Sign a non-disclosure commitment to confidential information;
- Make sure that third parties have signed a confidential agreement before you disclose confidential information to them.

### **WHAT YOU NEED TO PAY ATTENTION TO:**

- Discussing confidential information with third parties in public places;
- The appearance of any confidential information in the media.

### **Question:**

*I received a request from a business partner to provide information on a joint project, but I'm not sure if I have the right to do so.*

### **Answer:**

*You must ensure that this information is not confidential information in accordance with the Disclosure Policy and Regulations. If you still have questions, please contact your direct supervisor.*