

APPROVED:

At the Board meeting of 28 March 2023

of Rīgas Dzemdību nams Ltd.

minutes No. 9



RĪGAS DZEMDĪBU NAMS Ltd.

ANTI-BRIBERY POLICY

In Riga, 2023

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1. Introduction

Bribery is a widespread phenomenon. It has significant social, moral, economic, and political consequences, it undermines sound administration and hinders development and fair competition. It erodes justice, jeopardizes human rights and is an obstacle to alleviating poverty. It also increases the cost of doing business, introduces uncertainties in commercial transactions, raises the cost of goods and services, and diminishes their quality (which can result in loss of human lives and property), erodes faith in institutions and hinders fair and effective market activity.

The ethical principles of Rīgas Dzemdību nams Ltd. (hereinafter – the Capital Company) are outlined in its Code of Ethics and are binding on all employees of the Capital Company. The Code of Ethics sets out the core principles of professional ethics within the Capital Company, which are independence and impartiality, professional expertise and due diligence, confidentiality, dedication, and professional conduct.

As part of its commitment to ethical business practices, the Capital Company has adopted a zero-tolerance approach regarding bribery and corruption in all of its areas of activity and operations.

2. The objective of the Anti-Bribery Policy

The objective of the Anti-Bribery Policy of the Capital Company (hereinafter – the Policy) is to define the principles and responsibilities of the Capital Company in the process of combatting bribery as the most prevalent form of corruption; to ensure effective, efficient and cost-conscious operation of Rīgas Dzemdību nams; and to enforce law-abiding conduct of its employees. Another objective of the Policy is to pre-emptively identify and prevent incidents that may adversely affect the fulfilment of the objectives of Rīgas Dzemdību nams; to avoid wrongful and unlawful behaviour; and to promote sound and ethical conduct within the Capital Company in accordance with the Anti-Bribery Management System (hereinafter – the ABMS). The system has been elaborated in conformity with the requirements of the LVS ISO 37001 standard entitled “Anti-Bribery Management Systems. Requirements with Guidance for Use”, and compliance with the stipulations included in this standard enables the Capital Company to achieve its strategic targets and safeguards its reputation from harm.

The Capital Company is committed to preventing and pre-emptively detecting fraudulent conduct, bribery, as well as corruptive practices of any other kind.

The core principles outlined in the Policy of the Capital Company are listed below:

- zero-tolerance approach to bribery;
- the highest standards of ethical conduct, honesty, and integrity;
- open and transparent business activity, which can be attained through:
 - adopting best practices and standards of corporate governance;
 - upholding high standards with regards to the reputation of the Capital Company;
- promotion of a culture of honesty and openness among the employees of the Capital Company; and
- provision of clear guidance about the types of conduct and activities that may give rise to violations of the ABMS.

3.Scope and applicability

The Policy applies to all employees of the Capital Company, including its Board, top management, advisers, students, interns, trainees, and resident doctors. The Policy is also binding on all parties who have entered into a contractual relation with the Company, on its remote workers, volunteers, contributors, or any other persons who are in any way linked to the Capital Company or its employees. In this Policy, all of the foregoing persons are jointly referred to as *employees*.

The term *business* is used in this Policy to designate any form of activity engaged in by the Capital Company, whether it be medical treatment, healthcare, training, commercial activity, publicity measures, or any other activity carried out by the employees of the Capital Company on its behalf. The term *third party* within the meaning of this Policy refers to any natural person or organization with whom the employee comes into contact while carrying out his or her professional duties, whether it be patients or their accompanying persons, current or potential customers, suppliers or distributors of goods, business partners or advisers, governmental or public bodies (including their advisers, representatives and officials), politicians or political parties.

4.Bribery and a bribe

The Capital Company has adopted a zero-tolerance approach with regards to bribery, whatever form it may take. We categorically oppose taking advantage of the power or opportunities arising from one's assigned job duties or conferred authority, including the use of the material or financial resources of the Capital Company to obtain any unauthorized personal gain for oneself, or to secure any benefits for other parties.

Bribery – directly or indirectly offering, promising, giving, accepting or requesting any undeserved benefit of any value, monetary or not, thus violating the applicable legislation, as an incentive or a reward for the action or inaction of any person in connection with the performance of his or her duties, wherever such bribery may take place.

Bribe is a payment, remuneration or advantage that is offered, promised or given to any person in exchange for any material, contractual or personal benefit.

A bribe can be money or its equivalent (for example, a gift card) or any other benefit of value, such as a gift, internal information, corporate hospitality or entertainment, offer of employment to a relative, payment or reimbursement of travel expenses, or a charitable donation. Bribery can occur directly or through a third party.

Bribing a public official is distinguished as a separate offence. The terms that appear in this Policy, when used in reference to public officials, shall be interpreted in the light of the law entitled “On Prevention of Conflict of Interest in Activities of Public Officials” (hereinafter – the Law), and the Cabinet Regulation No. 630, adopted on 17 October 2017, entitled “Regulations Regarding the Basic Requirements for an Internal Control System for the Prevention of Corruption and Conflict of Interest in an Institution of a Public Person”, as well as the Guidelines developed on the basis thereof.

A public official, when considered in connection with the Capital Company, is an employee or official of the Capital Company, recognized as a public official under the Law.

The overall policy of the Capital Company on the prevention of conflict of interest and corruption is outlined in the “Policy on the Prevention of Conflict of Interest and Corruption” of Rīgas Dzemdību nams Ltd., adopted on 13 May 2023.

5. Gifts and hospitality

The employees of the Capital Company perform their job duties for the agreed-upon remuneration, and the restrictions on accepting a gift are binding on all employees.

Neither employees, nor their immediate family members (spouse, mother, father, son, daughter, brother, sister, nor any other person linked to the employee by such kinship or legal relationships, nor friends) may provide, ask for, or accept cash or cash equivalents, entertainment, favours, gifts or anything other of substance from competitors, vendors, suppliers, customers or other parties entering or trying to enter into a business transaction with the Capital Company. Any form of relationship established between the employee and parties external to the Capital Company must be business-like, polite and impartial.

It is not permissible to engage in any conduct that may harm the reputation of the Company or create the impression that the gift interferes with the ability of the employee to carry out his or her duties or impairs his or her capacity to make fair and objective decisions. It is forbidden to

accept a gift that may impact the impartiality of the medical practitioner or any other employee by establishing an excessively familiar rapport with the patient. Furthermore, it is necessary to inform the patient or any other third party that the gift does not create any undue advantage.

The practice of offering symbolic and representative gifts or hospitality is acknowledged as a long-established and important part of conducting business.

This Policy does not forbid ordinary symbolic and representative gifts, hospitality, entertainment and promotional material, nor other similar business expenses, such as calendars, notebooks, or pens, whether offered by third parties or to them. However, the most important factors to consider when evaluating the appropriateness and/or value of a gift or hospitality are the facts of the matter and the circumstances under which the gift or the hospitality was offered.

To avoid committing the crime of bribery, the gift or hospitality must be:

- reasonable and justifiable under all circumstances;
- aimed at strengthening the image of the Capital Company, showcasing its services and values, and building business-like relationships between colleagues and corporations.

Offering or accepting gifts or hospitality is admissible under this Policy if all of the following requirements are met:

- the gift is not offered with the intention of influencing the third party, that is, securing or retaining business or business benefits;
- the gift is not exchanged, directly or indirectly, for any favours (benefits) or for other corrupt purposes;
- the gift cannot take the form of cash or cash equivalents (such as gift cards or vouchers);
- the gift or hospitality is of appropriate form and value for the occasion in which it is offered, and the act of offering is carried out at an appropriate time and does not violate good manners and customs;
- the gift is offered openly, not secretly, and in such a manner as to avoid showing unprofessional conduct;
- gifts of a symbolic nature (flowers, souvenirs, books, cakes, or promotional items) are not forbidden, as long as they are offered as part of hospitality or representative events, without an expectation of a reciprocal offering.

In case any gift is offered, even if it is of a symbolic or representative nature, one must carefully evaluate whether the gift may be perceived as an attempt at bribing and whether the Capital Company or the recipient of the gift may face ethical issues as a result of this offering. In case of any uncertainty, the gift must be declined. When accepting the gift, it is advisable to consider the potential reaction if the act of offering was made known to the public.

6.Unacceptable practices

It is unacceptable for any employee of the Capital Company (or anyone acting on behalf of this employee) to:

- accept, request, and, much less, extort any benefits from the patient;
- accept anything that exceeds the value or the nature of a symbolic or promotional gift;
- accept the offering of a gift of any value from any third party which is in the process of negotiating with the Capital Company or which submits a contract proposal to the Capital Company;
- give, promise to give or offer any form of payment, gift, hospitality or advantage in the hope of gaining or obtaining a business advantage, or to reward a business advantage that has already been bestowed;
- give, promise to give or offer any form of payment, gift or hospitality to a public official to facilitate or accelerate various processes, bypass waiting lines, and so on;
- accept any payment, advantage, gift, or hospitality from a third party if it is known or suspected to be offered in the hope of gaining an advantage in obtaining a service or expanding business;
- threaten or impose any unfavourable sanctions on another employee who has refused to commit the offence of bribery or who has raised concerns under this Policy
- engage in any conduct that may lead to a breach of this Policy.

7.Deliberate failure to report bribery

If the employee deliberately ignores or feigns not to notice any evidence of corruption or bribery at any operational unit or area of activity of the Capital Company, the employee may be held liable for inactivity. Even if such conduct may be deemed “passive”, i.e., even if the employee did not directly participate in bribery, nor directly benefit from the bribery, depending on the circumstances, they may still be held liable for the deliberate failure to report bribery, to the same extent as if they had deliberately participated in it.

8.Assessment of the risk of bribery

The Capital Company ensures that a bribery risk assessment is carried out periodically, by determining the bribery risk indicators that characterize its operation and the potentially vulnerable areas of its business activity, and regularly updating this risk profile.

The Capital Company does everything in its power to minimize the risk involved in conducting business with Third parties which may be involved in bribery or in other corrupt practices. To this end, the Capital Company must evaluate its business partners and their readiness to comply with the requirements of the Policy.

In its contracts, the Capital Company must include anti-bribery clauses, and it must promote honest business practices. When circumstances so require, the Capital Company must carry out due diligence on its intermediaries, partners, agents, joint venture representatives, and other parties, in order to prevent and/or identify any of the aforementioned offences, with the objective of reducing the bribery risk to a minimum.

The Capital Company may engage external auditors to conduct a bribery risk assessment and to examine the extent of risk that the existing business structures or processes may pose to the Company, and to identify the internal factors that might figure in the Company's risk profile:

- lack of training for workers, gaps in their skills or knowledge;
- remuneration policy that does not reflect each employee's contributions or the level of risk involved in their job;
- ambiguous policies and procedures regarding hospitality, advertising expenses, political and charity donations;
- a financial control system that is not clearly defined;
- anti-bribery policy that has not been clearly defined by the top management.

9. "Red flags" pointing to bribery

The Capital Company conducts periodical checks to identify any "red flags", i.e., indicators of potential bribery.

Particular attention in the public procurement process ought to be paid to:

- terms regarding provision of services or delivery of goods that are too restrictive or inconsistent with the specific nature of the company, and whether there is a reason to suspect that any specific selection criteria are tailored to the tenderer;
- situations of conflict of interest, namely, when an employee engaged in conducting the procurement is directly linked to the tenderer by kinship or legal relationships (i.e., if the employee works or has worked at the company of the tenderer);
- whether the employee (or anyone acting on their behalf) holds private meetings with the tenderer who is participating in the tender and who anticipates the award of a contract;
- whether experts are unjustifiably engaged in the elaboration of the procurement specification, and whether potential suppliers who anticipate the award of a contract are involved in the development of the tendering regulations;
- whether the tenderer has a questionable reputation regarding potential cases of bribery in the past;

- whether the technical specification is unreasonably complicated, and whether it incorporates terms that may result in uncertainties, conceal corrupt conduct, or hinder supervision;
- whether the employee negotiates terms of the contract that are unambiguously unfavourable to the Capital Company, and whether the standard procedure for concluding a contract is violated;
- whether substantial amendments or changes are made to the terms of the agreement after its conclusion, such as easing the requirements regarding the scope of the procurement or increasing the costs to favour the tenderer;
- whether a custom procurement procedure is favoured, even though an open procedure would be possible;
- whether two or more agreements with an identical subject-matter are drafted within a short time span and without an apparent reason, as a result of which the less competitive public procurement procedure is chosen;
- whether unjustified selection or award criteria are applied which favour a specific company or tender.

Particular attention in the provision of healthcare services shall be paid to cases where:

- the patients and customers lack information about their rights to access high-quality services without the need to offer additional material incentives to the staff;
- a clear and unambiguous difference is not established between publicly-funded and paid medical services;
- the recipients of the services do not have access to clear and unambiguous information about the procedure for receiving services and about the terms of the payment;
- the patients are invited to visit the medical professionals outside working hours or in a location that is not designed for patient visits;
- the patient is instructed to pay directly to the employee and a medical bill is not issued;
- the patient is encouraged to offer a cash payment during the appointment;
- the patient is informed that the waitlist to receive a medical service is long, while indicating that the wait time may be reduced if he or she arrives at a specified time and place;
- the patient is informed that the staff may be occupied or unable to provide healthcare of high quality unless an individual service agreement is concluded;
- no agreement is concluded about a paid service, with alternative payment options being suggested directly or indirectly;
- the employee demands personal benefits in exchange for providing services to the patient:
 - for allowing the patient to bypass waiting lines for medical services;
 - for prescribing certain medications;
 - for administering certain healthcare services (diagnostic tests, rehabilitation services, etc.)

10. Charity donations

The Capital Company contributes only to charitable causes that are lawful and ethical according to the existing legal framework and the corporate governance practices and principles of the Capital Company.

The donation (gift-giving) procedure of the Capital Company is outlined in Articles 10, 11 and 12 of the law “On Prevention of Squandering of the Financial Resources and Property of a Public Person” and in Articles 11 and 11.1 of the “Law on Assistance to Ukrainian Civilians”.

If any third party, guided by selfless and honourable motives, wishes to donate to the Capital Company, such donation must be offered openly and in accordance with the procedure established by the Capital Company. The public can freely access information about the donations received by the Capital Company.

11. Involvement in politics

The Capital Company does not invest financial or any other material resources in political parties, politicians, or related institutions.

The Company does not make financial contributions to political parties, officials of these parties or candidates for political office.

Any payment of corporate expenses or use of corporate resources as a form of direct or indirect payment to any person, company, political organization or public official, for any unlawful or unauthorized purposes, is strictly forbidden.

The employees of the Capital Company must not make any political contributions on behalf of the Capital Company, nor shall they use the resources of the Capital Company to endorse the political campaign of any political candidate or an elected official, or to influence the employees' vote in any elections, whether for a political party or a candidate.

12. Business relationships

The Capital Company anticipates that all third parties that conduct business with the Capital Company will address bribery and corruption issues in accordance with the principles set out in this Policy. The Capital Company further requires that all third parties collaborate and ensure compliance with the standards that we have detailed herein.

In order to uphold the highest standards of integrity in any kind of business relationship with a third party, it is paramount that:

- employees and partners conduct due diligence on third parties and review their integrity reports before initiating any business relationship with them;
- the relevant members of the personnel fully document the recruitment process, as well as the final confirmation of third-party selection (onboarding);
- the employees and partners implement a programme to communicate relevant information about this Policy to all third parties who conduct business with the Capital Company.

The employees and affiliated enterprises must ensure that:

- each third party is fully informed about the contents of this Policy, as it pertains to their sphere of activity, and has made an official written commitment to comply with it;
- the contractual agreement incorporates appropriate phrasing that allows for the termination of the business relationship if any of the third parties do not comply with this Policy.

If any doubts arise regarding the integrity of a third party, it is the responsibility of the employee to contact their manager or the Board, or else to submit a report as soon as possible, by following any of the procedures outlined in this Policy.

13. Our expectations of employees

The employees must ensure that they understand and adhere to this Policy.

All employees of the Capital Company are responsible for preventing, identifying and reporting bribery and other types of corruption. Furthermore, all employees must refrain from any conduct that may cause or give rise to suspicion about a violation of this Policy.

If the employee believes or suspects that they have observed conduct that conflicts with this Policy or violates it, or that the Policy may be infringed in the future, the employee must inform their manager or submit a report as soon as possible, by following any of the procedures outlined in this Policy.

It is forbidden to disclose information about an employee who has reported potentially suspicious conduct or transactions that could result in an undue benefit for a different employee or official.

Any employee who violates this Policy may face disciplinary measures. The employer has the right to terminate a business relationship with the employees if they violate this Policy.

In the cases outlined in the Criminal Law of the Republic of Latvia, bribery, bribetaking and misappropriation of a bribe all result in criminal liability.

14. Record-keeping

The employees must ensure that all expenses that are related to hospitality and gifts, as well as all expenses incurred by third parties, and, in particular, the reason for these expenses, are registered in the records in accordance with our Expense Policy.

All accounts, invoices, memoranda, and other documents and records that pertain to transactions with third parties, such as customers, suppliers, and business contacts, must be diligently and comprehensively recorded and maintained. “Off the books” record-keeping with the intent to facilitate or conceal undue payments is strictly forbidden, and this prohibition is enforced by implementing effective mechanisms of supervision and audit.

The employees must also comply with the provisions of other policies (available on the website of the Capital Company at <https://www.rdn.lv/en/>), which facilitate anti-bribery due diligence on suppliers, contractual partners, customers, and other third parties.

15. References to the relevant regulations

The Capital Company is bound by all national legislation and the internal regulatory framework in relation to bribery and corruption. The references to applicable regulations are based on internationally recognized norms that govern bribery in accordance with the principles of sound administration:

- ISO 37001: 2018 – “Anti-bribery management systems - Requirements with guidance for use”
- the Code of Ethics of Rīgas Dzemdību nams Ltd. - www.rdn.lv/parmums/politikas
- the “Policy on the Prevention of Conflict of Interests and Corruption Risk” of Rīgas Dzemdību nams Ltd. - www.rdn.lv/parmums/politikas
- “United Nations Convention against Corruption”, 2003
- Organisation for Economic Co-operation and Development, “Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and Related Instruments”, Paris, 2010
- “On the Civil Law Convention on Corruption by the Council of Europe”, LV law, published in “Latvijas Vēstnesis” on 9 March 2005
- “On Prevention of Conflict of Interest in Activities of Public Officials”, LV law, published in “Latvijas Vēstnesis” on 9 May 2002
- the Cabinet Regulation No. 630, adopted on 17 October 2017, entitled “Regulations Regarding the Basic Requirements for an Internal Control

System for the Prevention of Corruption and Conflict of Interest in an Institution of a Public Person”,

- the Criminal Law, LV law, published in “Latvijas Vēstnesis” on 11 May 2005
- “Law on Assistance to Ukrainian Civilians”, LV law, published in “Latvijas Vēstnesis” on 4 March 2022
- Labour Law, LV law, published in “Latvijas Vēstnesis” on 6 July 2001
- “On Prevention of Squandering of the Financial Resources and Property of a Public Person”, LV law, published in “Latvijas Vēstnesis” on 2 August 1995

16. How to raise concerns (whistle-blow)

Any person affected by this Policy is invited to raise concerns (whistle-blow) about any bribery issue or suspicion of corrupt practices as soon as possible. If the employee is not sure whether specific conduct is considered to be bribery or corruption, or if the employee has any other questions, we recommend consulting their immediate superior or a specialist in the field, or else submitting a report, by following any of the procedures for reporting outlined in this Policy. Timely reporting can pre-emptively prevent a violation and possible adverse consequences to the reputation and operation of the Capital Company.

17. Options for reporting

We invite you to immediately report any cases of bribery or suspicion about bribery, by stating the circumstances and the time of the violation of the Policy, the involved persons and other relevant information in as much detail as possible.

Ways to report a violation:

- by mail, to the address Miera iela 45, Riga, LV-1013;
- on-site, at the address Miera iela 45, Riga, at the Bureau of the Board, boardroom No. 127 – opening hours for visitors on workdays: 8 a.m. – 4 p.m.
- to the e-mail address rdn@rdn.lv
- on the webpage of the Capital Company: www.rdn.lv/lv/par-mums/pret-korupciju
- directly to the Corruption Prevention and Combating Bureau, 24-hour hotline: 80002070, website: <https://www.knab.gov.lv/lv/ka-zinot-knab>
- to the bribery reporting mailbox, at the address Miera iela 45, ground floor

The employees of the Capital Company have additional reporting options:

- by submitting a report on the internal reporting site of Rīgas Dzemdību nams:
 - https://dzintra.rdn.lv/lv/zinot/zinojums_par_kukulosanas_gadijumu/

- https://dzintra.rdn.lv/lv/zinot/zinojums_par_iespejamu_parkapu_mu_uznemuma_saskana_ar_trauksmes_celsanas_likumu
- by informing their immediate superior or the Board verbally or in writing (the report can also be submitted via e-mail)

18. Procedure for handling bribery incidents

If a third party offers or demands a bribe, if you suspect that bribery may occur in the future, or if you consider yourself a victim of unlawful conduct of any other kind, it is of paramount importance to notify the management or submit a report as soon as possible by following any of the procedures for reporting outlined in this Policy.

Please note that the Criminal Law of the Republic of Latvia relieves a person from liability if the benefit was demanded or extorted from the person or if the person voluntarily reports the corrupt practice after its occurrence and actively furthers the disclosure and investigation of this criminal offence.

19. Protection of whistleblowers and prevention of adverse consequences

The individuals who refuse to accept or offer a bribe, or those who raise concerns about a wrongdoing of another person that violates the Policy, are sometimes concerned about potential adverse consequences. The Capital Company promotes transparency and will support anyone who raises a genuine concern in good faith in accordance with this Policy, even if it is subsequently revealed that the person was mistaken.

The Capital Company undertakes to ensure that no employee or third party is affected by any sanctions or unfavourable treatment for refusing to take part in bribery or in corrupt practices or for reporting their suspicions about factual or potential future bribery or other corrupt conduct, as long as the reporting is done in good faith. If any employee considers that he or she has been subject to such unfavourable treatment, it must be immediately reported to their immediate superior or to the top management, or else a report must be submitted by following the procedures outlined in this Policy.

20. Training and communication

Policy training is an essential part of the onboarding process of all new employees. Likewise, all current employees of the Capital Company must undergo proper and regular training on the implementation of the Policy.

To promote comprehensive understanding of its anti-bribery culture, the Capital Company shall implement periodic training programmes which focus specifically on preventing bribery. The Capital Company shall regularly update these training programmes.

The Capital Company's zero-tolerance approach to bribery and corruption must be announced to all of its partners before initiating business or any other type of collaboration with these partners.

21. Audits

The Capital Company undertakes to conduct internal and external audits in accordance with the requirements of the ISO 37001 standard and a pre-defined plan, in order to:

- monitor the effectiveness of the anti-bribery policy and the implementation of the Company's objectives;
- ensure the compliance of the Policy and all other ABMS procedures with the applicable laws and regulations;
- appraise the accuracy and relevancy of the information included in the reports.

Unannounced audits are performed at the direction of the Board to investigate potential or identified violations of the ABMS regulation.

22. Responsibility for the implementation of the Policy

The Board of the Capital Company is responsible for ensuring the compliance of the corporate governance with the principles and values of the Policy.

The relevant specialists and the heads of the operational units shall, within the limits of their competence, have the primary day-to-day responsibility for the implementation of this Policy, and for the monitoring of its application and effectiveness. All levels of management shall be responsible for familiarizing the employees with this Policy and making sure that they understand it, as well as ensuring that they undergo proper and regular training on the principles of this Policy and the regulation contained herein.

23. Annulment and amendment of the Policy

The Capital Company undertakes to continuously revise and update its Policy and the ABMS procedures, as well as to evaluate the effectiveness of the Policy, its conformity to the business model of the Capital Company, and its day-to-day implementation.

In order to ensure effective application of the Policy, the Board of the Capital Company shall regularly monitor the implementation of the policies of the Capital Company. The Board shall review the Policy and propose to modify it accordingly as needed but not less frequently than once a year.

The employees shall be familiarized with the contents of the Policy in accordance with the procedure established by the Capital Company. The Policy is made available on the webpage of the Capital Company, at www.rdn.lv