

## **Corporate Social Responsibility Policy** (As adopted on January 21, 2016)

*Policy owner:*      *Company Chief Operations Officer*

*Approver:*         *Chairman*

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This Corporate Social Responsibility Policy (the "CSR Policy") sets forth the policies of Azmont Investments Ltd. (the "Azmont") and its affiliated entities and projects initiated and financed by Azmont (collectively, the "Company") on the principles and minimum requirements for Corporate Social Responsibility.

This Policy is hereby adopted by the Executive Management of Azmont and applies to all Company directors, officers, employees and the Company's independent contractors. Each such person is required to execute an acknowledgment that they understand and will be abide by the Policy.

Any violation of this Policy should be brought to the attention of Azmont Chief Legal Officer or an Authorized Spokesperson and may constitute grounds for termination of employment.

### **1 Business Principles**

Azmont shall ensure integrity and diversity of its activities, contribute to welfare and economic development of Montenegro and other countries where operates itself or through its affiliated entities and projects initiated and financed by Azmont.

Azmont shall ensure responsible business practices across the organization, as set out in Governing documents and relevant Policies. Our commitment shall be based on our vision: We strive to be a company who professionally, efficiently and in sustainable way manages investments, and creates difference by introducing best business practices in Montenegro and the entire region.

### **2 Commitment to wider community**

Azmont is committed to being a responsible corporate citizen through the support for appropriate non-political and non-sectarian projects across a range of organizations and charities.

Through business-integrated corporate responsibility, Azmont shall drive a Social Program which local community will benefit from. Azmont is committed to:

- create training and education programs for the members of the local community;
- support the local children's education through investment in local schools and vocational trainings for later employment opportunities;
- support local families and their communities through increasing/developing the local economy;
- develop educational program in hospitality through set up of an International School that prepares students for a rewarding career in hospitality, tourism and hotel management.

Azmont will ensure to minimise impacts on the environment.

With a focus on education and enterprise, Azmont has developed target programmes for local communities, often involving commercial sponsorship and significant employee engagement through direct involvement or secondment.

### **3 Responsible corporate citizen**

As a responsible corporate citizen, Azmont aims to act in a socially responsible manner at all times. Azmont endeavours to comply with international and local regulations, and internal rules, exercise sound and fair corporate practices, and earn the trust of stakeholders such as customers, shareholders, employees, business partners, and society. Azmont will maintain constructive relationships with

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administrative bodies, remaining politically neutral and complying with laws, and will not engage in relationships with individuals or groups that threaten social order or safety.

Azmont will carry out corporate activities that take into account the cultures and practices of Montenegro, and proactively engage in activities that contribute to society as a good corporate citizen.

### **4 Human Rights**

Azmont shall respect internationally recognised human rights, including the UN Universal Declaration of Human Rights, and shall seek, in accordance with the UN Guiding Principles on Business and Human Rights, to avoid human rights abuses and complicity therein. Azmont will respect diversity and individual human rights and provide a healthy and safe working environment in which all persons receive fair treatment without discrimination. It will also oppose enforced labour and child labour and respect fundamental human rights as well as workers' rights.

### **5 Protection of the natural environment**

Azmont will proactively engage in environmental efforts and work to protect the natural environment, as these are common issues for all of mankind. Azmont is committed to minimize its environmental impact and will make all reasonable efforts to minimize use of resources including energy, water and raw materials.

### **6 Employees**

Azmont recognises that its employees are the Company's most vital resource and their importance in making the Company successful. Azmont is guided by the aim of delivering a competitive and fair employment environment and to providing the opportunity for employees to develop and advance, subject to personal performance and business objectives.

### **7 Socially responsible behaviour within the supply chain**

All material sustainability issues - including human rights, labour rights, anti-corruption policies and procedures and environmental practices – shall extend into the supply chain.

### **8 Transparent operating activities**

Azmont will communicate extensively with customers, shareholders, employees, business partners, and society and disclose business information in a timely and fair manner. It will also conduct reliable financial reporting through accurate accounting processes.

### **9 Implementation and Expenditure**

To implement the Company's CSR Programmes, Azmont will create CSR Plan and execute on it through Company personnel or through external engaged agencies or through designed programmes in partnership with relevant stakeholders.

CSR expenditure will include all expenditure, direct and indirect, incurred by the Company on CSR Programmes undertaken in accordance with the approved CSR Plan.

### **9 Stakeholder Dialogue**

Azmont shall seek meaningful dialogue with outside stakeholders, to share information and identify

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potential positive or negative impacts of its operations.

### 10 Questions

All questions relating to this Policy set forth herein should be referred to the Executive Director or Chief Operations Officer.

### 11 Disclaimer



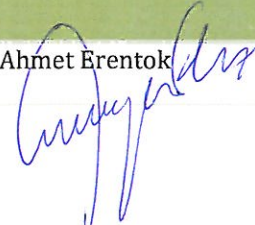
This document states internal procedure of the Company obligatory for all Company employees.

### 12 Reference documents

- Company Governing Documents
- Corporate Communications Policy and its reference documents
- Corporate Communications Procedure
- Corporate Social Responsibility Policy and its reference documents
- Social Media Procedure
- Event Management Process Manual

### 13 Change Log

Ver. No.	Revision category (new requirement, update, wording)	Placement (chapter/subchapter)	Description of main revisions	Date
1.0	Initial Version			21.01.2016.

Written	Controlled	Approved	Version	Pages
Adrijana Husic 	Stevan Milic 	Ahmet Erentok 	1.0.	3/3