

Counteracting abuse

Intent on creating a proper organizational culture that would be both open and transparent, and at the same time being responsible for monitoring and identifying any risks associated with the organization's functioning, Grupa LOTOS has decided to initiate steps aimed at designing and implementing solutions to help the organization achieve optimum level of resilience to abuse.

According to assumptions, a company resilient to abuse is an entity which, being aware of the actual and perceived risks of abuse associated with its operations, has put in place and ensures the implementation of solutions - best adjusted to the nature and scale of the risks involved - focused on counteracting, detecting and reacting to abuse.

As one component of such solutions, in 2011 the Company started to perform periodic assessments of the organization's resilience to abuse, which are a source of information on how well the Company is prepared to effectively manage the risk of abuse. As part of the assessments, the defined processes within Grupa LOTOS are graded, and choice is made of those in the case of which the risk of abuse is the highest from the point of view of the Company as a whole. In reliance on the results of this exercise, actions are planned in order to carry out in-depth reviews of selected processes (or selected process areas) with a view to identifying and potentially modifying measures designed to reduce the likelihood of abuse, both of external and internal nature.

Additionally, for a few years now, whenever there is suspicion of abuse, an investigation is carried out within the LOTOS Group the principal goal of which is to collect information necessary to correctly classify a given occurrence and determine the basis for taking appropriate action.

In 2011, no completed court proceedings initiated against the Company or its employees in connection with corruption practices were identified.

Training concerning anti-corruption policies and procedures is regularly provided within the organization. Such training is undertaken in line with the standards of work applicable at Grupa LOTOS, depending on current needs. The following anti-corruption training programmes were carried out in 2011:

- "Induction Programme",
- "Corruption Risks in Business Processes" – training provided by the Central Anti-Corruption Office.

Percentage of employees trained in 2011 in Grupa LOTOS' anti-corruption policies and procedures

| Type of position | Total number of employees | Number of employees who underwent training | Percentage of employees who completed training |
|----------------------|---------------------------|--|--|
| Management positions | 158 | 14 | 8.9 |
| Other positions | 1,171 | 87 | 7.4 |

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