

## CODE OF CONDUCT

**Respect for fundamental human rights, social justice and human dignity, and respect for the equal rights of men and women, serve as overarching values to which ESTRALIN adheres.**

### 1. Scope of Application

The Code of Conduct contains principles used in ESTRALIN and its subsidiaries. The Code of Conduct addresses the issues in the areas of human rights, labour, environment and anti-corruption. This Code of Conduct is communicated to all employees and counterparties.

### 2. Continuous Improvement

ESTRALIN works on continually improving its performance to maintain its leading position on the market.

### 3. Management, Monitoring and Evaluation

ESTRALIN has established clear goals toward meeting the standards set forth in this Code of Conduct. ESTRALIN has established and is maintaining appropriate management systems related to the content of this Code of Conduct. ESTRALIN actively reviews, monitors and modifies their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct.

### 4. Labour

ESTRALIN adheres to the principles set out in International Labour Standards.

### 5. Freedom of Association and Collective Bargaining

ESTRALIN recognizes the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

### 6. Forced or Compulsory Labour

ESTRALIN prohibits forced or compulsory labour in all its forms.

### 7. Child Labour

ESTRALIN doesn't employ children below 18 years of age for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

### 8. Discrimination

ESTRALIN ensures equality of opportunity and treatment in respect of employment and occupation without discrimination on grounds of race, colour, sex, religion, age, political opinion, national extraction or social origin, disability and other individual peculiarities not connected with the ability of the employee to perform the work.



ESTRALIN takes all appropriate measures to ensure that it is not engaged in any gender-based or other discriminatory employment practices, including those relating to recruitment, promotion, training, remuneration and benefits.

### **9. Wages, Working Hours and Other Conditions of Work**

ESTRALIN ensures the payment of wages in legal tender, at regular intervals, in full and directly to the workers concerned. ESTRALIN keeps an appropriate record of such payments. Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law and regulations. ESTRALIN informs the workers concerned of such deductions at the time of each payment. The wages, hours of work and other conditions of work in ESTRALIN are not less favorable than wages, hours of work and other conditions of work in other companies of the same character performed in the trade or industry concerned in the area where work is carried out.

### **10. Human Rights**

ESTRALIN supports and respects internationally proclaimed human rights and is not complicit in human rights abuses. Each employee is entitled to protect the labor rights with all ways not prohibited by law. If an employee in the course of direct discussion with an employer did not solve the differences himself or with the participation of his representative he can submit an appeal to the company's dispute commission which is formed from the representatives of employees and the employer in equal numbers. The labor dispute commission is to consider the individual labor dispute within ten calendar days from the date of the submission of the appeal by an employee.

### **11. Harassment, Harsh or Inhumane Treatment**

ESTRALIN creates and maintains an environment that treats all employees with dignity and respect. ESTRALIN neither uses or engages in, nor allows its employees or other persons engaged by them to use or engage in, any: threats of violence, verbal or psychological harassment or abuse, and/or sexual exploitation and abuse. Sexual exploitation and abuse violate universally recognized international legal norms and standards. Such standards include, but are not limited to, the prohibition of: engaging in any sexual activity with any person under the age of 18, regardless of any laws of majority or consent, exchanging any money, employment, goods, services, or other things of value, for sex, and/or engaging in any sexual activity that is exploitive or degrading to any person.

### **12. Health and Safety**

ESTRALIN ensures that the workplaces are safe and without risk to health in compliance with the State regulations in the field of health and safety of labor. ESTRALIN takes appropriate measures of protection against the risk of accidents or of adverse effects on health (professional illnesses), ensures the functioning and continuous improvement of health and safety of labor.

### **13. Environment**

ESTRALIN provides an effective environmental policy and complies with existing legislation and regulations regarding the protection of the environment: materials posing a hazard if released to the environment are identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal; wastewater and solid waste generated from operations,





industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal; air emissions of volatile organic combustion by-products generated from operations are characterized, monitored, controlled and treated as required prior to discharge or disposal. Waste of all types are reduced or eliminated at the source or by practices such as modification of production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

#### **14. Corruption**

ESTRALIN adheres to the highest standards of moral and ethical conduct, respects local laws and does not engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

#### **15. Conflict of Interest**

ESTRALIN precludes any situation that may be interpreted as a conflict of interest.

#### **16. Confidentiality**

ESTRALIN is committed to complying with applicable laws concerning private, confidential and personal information. Business partners are expected to comply with all applicable laws and regulations governing the protection, use and disclosure of ESTRALIN's private, confidential and personal information.

#### **17. ESTRALIN Alert Procedure**

Employees may use the ESTRALIN Alert Procedure if they have reason to suspect a violation of the Code of Ethics or ESTRALIN rules and policies. The Alert Procedure provides employees with an alternative method for reporting potential violations if informing the direct manager could cause difficulties, or if it is believed that the reported irregularity will not receive the proper follow-up. The person wishing to report has the choice of reporting by

##### **Contacting anyone of the following managers:**

- CEO  
Anton Markin - [anton.markin@estralin.com](mailto:anton.markin@estralin.com)
- Deputy General Director for Legal Affairs  
Mikhail Polnyakov - [mikhail.polnyakov@estralin.com](mailto:mikhail.polnyakov@estralin.com)
- Director of HR and Administration  
Tatiana Gatilova - [tatiana.gatilova@estralin.com](mailto:tatiana.gatilova@estralin.com)

Every measure will be taken to respect employee confidentiality. ESTRALIN takes on the commitment that no employee will be subject to any form of retaliation, such as a change of status, harassment or any other form of discrimination, as a result of using the Alert Procedure or disclosing information in good faith.

Chief Executive Officer

Anton Markin

