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## Code of Conduct of BSGSA «Inflot»

### Our Values

The core values of BSGSA «Inflot» are integrity and transparency in business activities.

The company acknowledges that the corruption and other non-ethical actions undermine the basics of the company's success in the field, notably the support and trust of our customers.

Supported by our values and vision, BSGSA «Inflot» has developed the present Code in order to prevent and confront corruption, bribery and the clash of interests.

The Code of Conduct is a supplement to the acting Regulations of the Inner Labour Discipline of the BSGSA «Inflot».

### The Code of Conduct

#### 1. GOALS

1.1 The Principal goal of the present Code is:

- Implementation of the general business practice in order to prevent and confront the corruption, bribery and the clash of interests.

#### 2. OBLIGATIONS

2.1 BSGSA «Inflot» implements the policy of non-concordance with the acts and principles of bribery and corruption. This policy embraces all business relations and connections, all company branches and ports of operation.

2.2 BSGSA «Inflot» and its employees acknowledge the present Code of Conduct and the key principle of integrity and transparency in the business activities.

2.3. The Code of Conduct establishes the minimal standards and doesn't cancel the necessity of compliance with the Legislation of Ukraine and with the International Standard Acts, that can establish more strict requirements.

#### 3. DEFINITIONS

3.1 Corruption is defined as the abuse of the entrusted power with the aim of a personal profit.

3.2 Bribery is defined as one of the forms of corruption and constitute the offer, or the exchange of any gift, loan, payment, fee or other profit between the person employed or acting on behalf of the Company, and any outside person, presented as a stimulus to perform some dishonest, illegal or trust abusing act during the business activities of the Company. Bribery is considered as the promise, request, consent and / or the exchange of the bribe or other profit. In accordance with the definitions of the present Code, it includes blackmail, that is defined as the demand of a bribe in line with an evident or non-evident threat to be applied in case of refusal of its provision.

3.3. Persons taking part in the corruption actions may be brought to criminal, administrative, disciplinary and material responsibility.

### 4. The Scope of Code of Conduct

Bribery, as well as the corruption in general, can undertake different shapes. Herebelow presented is the list of circumstances, in which corruption and other forms of non-ethical behaviour are met frequently

#### 4.1 Kickbacks

4.1.1 Kickbacks is a form of bribery aimed at the winning in a tender for Contract conclusion. Kickbacks are considered illegal, even on a condition of the company that pays kickbacks, provides the best rate and is able to win the tender without kickbacks.

4.1.2 BSGSA «Inflot» will not pay or promise to pay the kickbacks, aiming to win the tenders or conclude the Contracts with other companies. Employers are not authorized to request or receive kickbacks in exchange of the Contract's conclusion.

#### 4.2 Political Contributions

4.2.1 Political Contributions are defined as the financial or other support of the political parties or political campaigns.

4.2.2 BSGSA «Inflot» does not take part in the payment of political contributions.

#### 4.3 Supporting Payments



4.3.1 Supporting Payments are defined as a form of bribery aiming to accelerate or facilitate the execution of actions by government official, that are considered as his regular duties.

4.3.2 BSGSA «Inflot» confronts the Supporting Payments and fights them.

4.4 Gifts and Hospitality.

4.4.1 The gifts are defined as the handing, for example, of flowers, confectionery, bottled wine. Tickets for sport events or to the theatre performance, provided individually and the provision of which doesn't constitute a tradition in the present business area, are considered as gifts.

4.4.2 Hospitality is defined as the invitation to dinners, receptions, sport and other events, accustomed in the present business area.

4.4.3 Hospitality and gifts must be provisioned in accordance with the Legislation of Ukraine.

4.4.4 BSGSA «Inflot» employees do not offer or accept hospitality or gifts, that may be defined as groundless, excessive or exceeding the nominal market price. Besides, BSGSA «Inflot» employees will never request the gifts or hospitality in relation with their work in the company. BSGSA «Inflot» employees are not authorized to promise, request, provide or accept the gifts in the shape of monetary funds or the gifts with the equal value to the monetary funds, such as gift certificates.

4.4.5 Gifts that could potentially affect the decision making, are prohibited. As a rule, gifts due to the special circumstances such as Christmas, New Year or retirement are not considered as having the influence and, subsequently, can be accepted on condition of their value not exceeding the general limits stated above, in accordance with the point 4.4.4.

4.4.6 Hospitality on the part of business partners is a legal practice, in case it is directly connected with the advertising, exhibition, presentation of the company products. Entertainments and trips to the entertainment or touristic centres must constitute the insignificant part of the hospitality program provided by business partners. Covering of expenses of the family members of business partners is prohibited.

4.4.7 Gifts or entertainments, intended for the parties taking part in tenders or contest auctions, are prohibited.

4.5 Intellectual Property

4.5.1 BSGSA «Inflot» secures the safety of the confidential information of the company and respects the products of other companies, that are subject to the Law on Intellectual Property, and the confidential information regarding them.

4.5.2 While gathering the information about the competitors and different business opportunities is considered as a regular and legal business practice, BSGSA «Inflot» will not attempt to receive the confidential information, that doesn't belong to a public knowledge.

4.6 Independence

4.6.1 The clash of interests and, subsequently, lack of independence can arise in the circumstances where the agent, employee of BSGSA «Inflot» or his / her close family members:

- Have a significant financial interest in the company-competitor of BSGSA «Inflot» or the company, being one of the principal customers or suppliers of BSGSA «Inflot».
- Works for or manages the company-competitor of BSGSA «Inflot» or the one one of the principal customers or suppliers of BSGSA «Inflot».
- Has made the special deals or agreements with the companies, that directly or indirectly provide the privileges for employees, these privileges not constituting a part of the contract.

4.6.2 Any other issue concerning independence or the clash of interests must be solved and fixed in written form with the management approval.

4.7 BSGSA «Inflot» employees

4.7.1 The present Code of Conduct is applied to all the employees of BSGSA «Inflot».

4.7.2 BSGSA «Inflot» employees are not authorized to take part in non-ethical or corruption activities. Particularly, they will NOT:

- Promise or perform any kind of illegal payments or provide the illegal privileges.
- Request, accept or receive illegal payments or request for the illegal privileges.

4.8 Business Relationship

The present Code of Conduct is applied to the relationship of BSGSA «Inflot» with business partners and mediators, usually described as third parties.

4.8.1 Branches and Business Partners

BSGSA «Inflot» adheres to the rules and actions of the due discretion before concluding the partnership relations, and guarantees that all its branches are acquainted with and respect the Code of Conduct, aiming to prevent and confront the bribery and corruption.

4.8.2 Contractors and Suppliers

BSGSA «Inflot» performs its supply activities according to the fair and transparent scheme and adheres to the rules of due discretion in estimation of the probable contractors and suppliers. BSGSA «Inflot» preserves its right to cancel the agreement in case the contractor or supplier offers or demands the bribe, or violate in any other way the regulations of the present Code of Conduct, or the Legislation.

BSGSA «Inflot» will avoid the contractors and suppliers known as bribers.

4.9. Procedures



4.9.1 In case of encountering the request for the supporting payments, excessive gifts or excessive hospitality expenses, the following steps must be undertaken:

1. Actively resist to the payment, gift or excessive hospitality
2. If possible, before any payments have been made, inform about the mentioned requests to the management / senior staff.
3. To reduce any amounts to the minimal rate.
4. To fix the information about the payment.

4.9.2 In case of the clash of interests, the following steps must be immediately undertaken by the BSGSA "Inflot" employees involved in the conflict:

1. Inform the management.
2. Refuse to perform this particular task.
3. In cases where the management considers the existing clash of interests as an insignificant one, the written approval must be consented with the management.

#### 4.10 Complaints and Statements

4.10.1 The employees of BSGSA "Inflot" are recommended to inform about the cases of non-ethical or corruption actions in relation to the business activities of BSGSA "Inflot". To do so, employees may apply to the manager, responsible for abidance to the provisions of the present Code of Conduct (as per point 5.1.4).

4.10.2 Complaints against non-ethical or corruption actions in relation with the business activities may be also made by the third parties.

4.10.3 BSGSA "Inflot" will accept for investigation the complaints, related to the company or its branches. The complaints made by employees of BSGSA "Inflot" are considered as actual only in relation with their duties. Complaints related to the personal matters of employees won't be accepted.

4.10.4 Complaints may be made anonymously. Nevertheless, it is recommended to mention the contact details in order to apply to the bearer, in case BSGSA "Inflot" will need the additional information for the case investigation. Regarding both external and internal complaints the confidentiality of the complainant personality will be kept.

### 5. Implementation of the Code of Conduct.

#### 5.1 Roles and Responsibility

5.1.1 It is a duty of each employee of BSGSA "Inflot" to confront the bribery and corruption by adhering to the present Code of Conduct. Each Manager and employee is individually obliged to guarantee the fact of interaction with government officials being in compliance with all applicable laws and regulations, as well as with the present Code of Conduct.

5.1.2 It is a duty of each manager to inform about the present Code of Conduct and be responsible for the understanding of the goals and subsequent events of the present Code by all the employees, within the limits of their sphere of responsibility.

5.1.3 Clause 4 of the present Code of Conduct establishes the minimal requirements in relation to kickbacks, political contributions, charity contributions and sponsorship activities, supporting payments, gifts and hospitality, intellectual property and independence. These stipulations do not substitute the legislative regulations, therefore the latter must be adhered to in any circumstances.

5.1.4 BSGSA "Inflot" has defined a person responsible for the abidance of the requirements of International Legislation to ensure the implementation of the present Code of Conduct.

5.1.5 The person responsible for the abidance of the requirements of the International Legislation, also performs the tasks of Help Desk system. In case the employees have any doubts regarding the ethical behaviour in business activities performed by, or on behalf of BSGSA "Inflot", they may apply to the mentioned person for advice.

5.1.6 Complaints and requests for assistance will be accepted and studied confidentially.

#### 5.2 Communication and Training.

5.2.1 BSGSA "Inflot" guarantees that all company employees are duly informed as to the content of the present Code of Conduct and fully understand its stipulations.

5.2.2 Each employee must undergo the according introduction to the Code of Conduct, new employees must be informed of the Code's content by means of introductory informing.

#### 5.3 Sanctions

5.3.1 None of the employees can be fined or suffer another punishment for refusal to give a bribe, even the condition of his / her refusal would be possible business loss by BSGSA "Inflot".

5.3.2 None of the employees can be subject to punishment for raising the issue or making a statement about the non-ethical behaviour or corruption.

5.3.3 The violation of the present Code of Conduct may lead to the disciplinary penalties and subsequent termination of the employment. In case the non-compliance with the present Code of Conduct implies the violation of the Law, as well as in case of any kind of bribery, such circumstances will be relayed to the authorized bodies for the criminal prosecution.

6. Amendments and supplements to the present Code (if any) are brought to the knowledge of BSGSA "Inflot" employees.