



Code of Conduct for a Business Partner of OJSC “Savushkin product”

Table of Contents

- 1. Preamble 1.1.
Introduction
- 1.2. Scope of Application of the Code of Conduct for a Business Partner
- 2. Professional Ethics
 - 2.1. Compliance with Laws
 - 2.2. Compliance with Export Laws
 - 2.3. Anti-corruption and Bribery
 - 2.4. Protection against Fraud
 - 2.5. Fair Competition
 - 2.6. Protection of Intellectual Property
 - 2.7. Protection of Confidential Data
 - 2.8. Financial Integrity
 - 2.9. Resolution of Conflict of Interest
- 3. Human Rights
 - 3.1. Prohibition on Compulsory and Child Labour
 - 3.2. Just Working Conditions
 - 3.3. Anti-discrimination and Harassment
 - 3.4. Occupational Safety and Health Protection
- 4. Environmental Protection
- 5. Application
 - 5.1. Observance
 - 5.2. Violation of the Code of Conduct for a Business Partner of OJSC “Savushkin product”
- 6. Report Violations

1. Preamble

1.1. Introduction

“Savushkin product” develops its business on the basis of strict compliance with the existing legislation and pursuant to the principles of social responsibility. In 2006, our company declared its commitment to CSR and assumed a range of responsibilities: to consumers, business partners, employees and society as a whole. Responsible and ethical conduct in relation to all stakeholders is an integral part of our company’s system of values.

This Code of Conduct for a Business Partner of OJSC “Savushkin product” accumulates fundamental principles of long-term, fair and transparent relationships with our partners.

We thank all our business partners who share our commitment to the principles of responsible and ethical conduct in carrying out economic activities. And we expect strict adherence to the principles of the proposed Code of Conduct for a Business Partner.

1.2. Scope of Application of the Code of Conduct for a Business Partner

Following the Code assumes adherence to the principles set forth herein by all partners and third parties who act for and on behalf of “Savushkin product” company.

Partners and third parties include suppliers, trading partners and representatives, mass media, subcontractors, consultants, freelancers.

2. Professional Ethics

2.1. Compliance with Laws

Our business partners know and comply with laws, legislative acts, rules and regulations adopted at the local, national and international levels.

“Savushkin product” expects that all our partners strictly comply with the laws and generally accepted ethical standards in conducting business. This is exactly what guarantees strong and trusting partnership relations between our companies.

2.2. Compliance with Export Laws

Business partners, cooperating with our company, keep strictly to all international laws that govern trading activity, import and export, cash and capital flow in all countries of their presence. They clearly understand and adhere to all procedures and instructions to guarantee full compliance with the foreign trade regulations, legality of all financial transactions.

Our partners carry out all necessary procedures to guarantee legality of transactions with third parties, as well as their full compliance with the rules of trade, import and export control.

Only such behavior can facilitate building trust and long-term business relations between our companies.

2.3. Anti-corruption and Bribery

“Savushkin product” stands for transparent conduct of business and strict compliance with the requirements of the national legislation as well as the legislation in the field of anti-corruption of our business partners’ countries.

- Our business partners exclude any forms of corruption and bribery, whether active or passive.
- Our business partners can give gifts and provide benefits related only to advertising events and only to the extent permitted by the law.

2.4. Protection against Fraud

Our business partners are not involved in frauds, because any forms of fraud (tax evasion, theft, forgery, embezzlement, money laundering, etc.) are prohibited by the law.

Our business partners do not allow and condemn all forms of fraud against “Savushkin product” and third parties.

2.5. Fair Competition

Our company is absolutely convinced that only fair and open competition is beneficial to business and is the main incentive to growth and development.

And our business partners strictly abide by antitrust legislation and laws on protection of fair competition, avoiding conclusion of agreements with competitors concerning prices, as well as on division of the market by clients and regions.

Our business partners are not involved in illegal exchange of confidential information.

2.6. Protection of Intellectual Property

“Savushkin product” expects its business partners to observe intellectual property rights, which covers all results of intellectual activities of the company.

By intellectual activities we shall understand all results of mental activity: IT, marketing researches and technological developments, informational brochures, books, articles, publications developed by our company’s employees, all video materials relating to the company and manufactured by the company’s order, inventions, utility models, industrial designs, production secrets (know-how); trade names, brands, trademarks, etc.

- Our business partners cannot freely use, distribute, display intellectual property objects of the company without approval of the company’s authorized representatives

2.7. Protection of Confidential Data and Business Information

“Savushkin product” adheres to ethical business policy.

- Upon receipt, storage and use of information that constitutes a trade secret of our company, our business partners maintain strict confidentiality and ensure that data are not transferred and are not available to unauthorized persons.
- Our business partners protect goodwill of our company in public statements.
- Unauthorized disclosure of confidential information in publicly available sources, media and social networks is a breach of confidentiality obligation.
- Use of the information provided by “Savushkin product” is permitted solely for fulfillment of binding contractual obligations, and not for personal and commercial purposes for implementation of unethical and illegal activities.

2.8. Financial Integrity

When implementing partner activities, keeping financial records, our business partners follow the principles of professional ethics. All financial transactions must be confirmed documentarily in accordance with the laws.

- Any manipulations with financial statements, making inconsistent and misleading records in them, are unacceptable.

2.9. Resolution of Conflict of Interest

Faced with the conflict of interest in relation to “Savushkin product”, our business partners shall immediately notify us of this fact and shall take all possible measures to resolve it in the shortest possible time.

3. Human Rights

“Savushkin product” expects our business partners to recognize, respect and support the principles approved by the Universal Declaration of Human Rights, the UN Convention, and the ILO core labour standards.

- Our business partners cannot be implicated in human rights abuses.

3.1. Prohibition on Compulsory and Child Labour

Our business partners comply with all requirements of the national legislation on labour relations.

- Our business partners do not permit the use of child labour. The age of employed staff should not be below the age established by applicable Labour Code of the country of business location.
- Our business partners do not use compulsory labour, which is considered to be work performed under threat of punishment, blackmail, etc. The use of prison labour, slave labour or other associated with trafficking in persons is unacceptable.

3.2. Just Working Conditions

Our business partners comply with the regulations on just working conditions and allow their employees to express their opinion freely without fear of possible consequences.

- Our business partners comply with the regulations ensuring just working conditions, including the terms of payment, working hours and the protection of private life.
- Our business partners recognize the right of freedom of trade union associations and the right of collective bargaining in accordance with the current laws and regulations.
- Our business partners exclude the attempts of intimidation and retaliation of the employees who honestly report the actual or alleged violation.

3.3. Anti-discrimination and Harassment

“Savushkin product” expects that our business partners ensure equal opportunities and equality in respect of employment and occupation without any discrimination on grounds of race, colour, sex, religion, political opinion, national or social origin, or any other ground.

- Our business partners maintain respectful and trust relationships within the staff, based on moral-ethical norms and prevent cases of harassment, intimidation and coercion.

3.4. Occupational Safety and Health Protection

Our business partners comply with the legislative requirements and acts in the field of health protection and occupational safety applicable to their activities. They constantly and consistently implement activities aimed at improving working conditions and increasing the level of occupational safety, reducing the risk of industrial accidents and occupational diseases.

- “Savushkin product” expects that our business partners to provide their employees with reliable and safe workplaces, equipment and processes, as well as protective clothing, if required, in order to avoid the risk of accidents.

4. Environmental Protection

“Savushkin product” takes good care of environmental protection. We expect that our business partners also closely monitor the ecological impact of its production activities: improve their manufacturing processes, implement resource-saving and energy-saving technologies, and seek to rational use of material and energy resources.

- Our business partners mandatorily observe the applicable regulatory acts in the field of environmental protection.

5. Application

5.1. Compliance

Our business partners guarantee implementation and compliance with the Code of Conduct for a Business Partner of OJSC “Savushkin product” as an integral part of contractual relations with “Savushkin product” company.

- To this effect, our business partners bring the values and principles of the Code of Conduct for a Business Partner to their employees, working in the interests of OJSC “Savushkin product”, and ensure their observance.
- Our business partners take all possible measures to familiarize their own business partners selected for work in the interests of or on behalf of “Savushkin product”, with the minimum requirements of the Code of Conduct for a Business Partner of OJSC “Savushkin product” and ensure their compliance.

5.2. Violation of the Code of Conduct for a Business Partner of OJSC “Savushkin product”

Violation of the Code of Conduct for a Business Partner of OJSC “Savushkin product” can lead to taking appropriate measures by “Savushkin product”.

- The Code of Conduct for a Business Partner of OJSC “Savushkin product” is an integral part of all contract-based agreements with business partners of “Savushkin product” within the meaning of paragraph 1.2 of this Code.
- In the event of alleged violations of the Code, the business partner assists in investigation conducted by “Savushkin product”.
- In the event of violation of the Code of Conduct for a Business Partner, “Savushkin product” reserves the right to react appropriately, depending on the severity of violation. This implies, among other measures, the requirement to eliminate violations immediately, to claim for damages or terminate the contract. In the event of serious violations of the Code of Conduct for a Business Partner of OJSC “Savushkin product”, the company reserves the right to terminate the contract without preliminary notice.

6. Reporting Violations

Our employees and our business partners may use various channels to report violations of the Code of Conduct for a Business Partner.

- It is possible to report significant violations of conformity, in particular, illegal commercial practice, through the official website in the section “Hotline” <http://www.savushkin.com/>
- You can also contact us by the official company’s email info@savushkin.com or telephone +375 (162) 30-45-45.