

# CODE OF CONDUCT

## PREAMBLE

Prodimex is one of the leading Russian agricultural companies which plays the key role in the country's agriculture and food processing. Our business impacts the interests of employees, partner companies and consumers purchasing our products.

The Code of Business Conduct (hereinafter referred to as the "Code") is a set of basic rules, principles and values that we stick to in our business. It establishes the company's commitment to conduct business according to our values and culture as well as our social responsibility to employees, business partners, to society and the state.

This document contains guidelines and standards of conduct that each of us must adhere to. It enables to build interaction properly, to make the right decisions and to contribute to the well-tuned work of the entire team.

The Prodimex Code of Business Conduct shares the main ethical norms and principles of the Charter of Corporate and Business Ethics (Russian Union of Industrialists and Entrepreneurs, 2002), contains accepted standards and is based on the rule of law.


# MISSION



Our mission is to produce natural products of high quality that satisfies the needs of our customers. Our work uses modern, environmentally friendly and sustainable farming and manufacturing methods that consider the wellbeing of people and nature.

# VISION

The Prodimex vision is based on our aim to expand the activities and strengthen the position in the CIS market as a leading integrated technology company producing crops and sugar.



# VALUES

The main values of activity on which this Code is based are:

## 1. ENTREPRENEURSHIP

Personal initiative in the search for new ideas and technologies, implementation of the best innovations, making well balanced business decisions, striving for continuous development, entrepreneurial spirit, focus on results that contribute to growth and success.

## 2. QUALITY

The company strives to provide consumers with high quality and safe products that meet all applicable standards and legal requirements.

The company controls the quality of products at every stage of producing and sale, carries out independent quality evaluations and improves control systems.

We consider carefully the choice of logistics partners in order to maintain the quality and safety of products until they are received by the consumer.

# VALUES

## 3. SOCIAL RESPONSIBILITY

We respect and support the communities of the regions we operate in; we strive to minimize the impact on the environment considering the limited resources and to apply sustainable manufacturing and agricultural practices.

## 4. RELIABILITY

Honesty, decency, responsibility, open dialogue, fulfillment of the commitments ensure confidence in our company from our customers and employees and form the image of "Prodimex" as a trustworthy partner.

## 5. RESPECT

The Company respects its employees, arranges and maintains a friendly atmosphere at workplace, does not accept any insults, humiliation and other actions that are harmful for the workplace environment.

We express respect for our employees, customers, suppliers and stakeholders and comply with applicable laws and regulations on equality and non-discrimination.

We are open to different opinions expressed with respect..

# PRINCIPLES

## FOR EMPLOYEES

### 1. HUMAN RIGHTS

"Prodimex" recognizes and protects the rights and freedoms of a person and a citizen, does not use forced and child labor, does not allow discrimination according to generally recognized principles and norms of international law and to the Constitution of the Russian Federation.

Prodimex is a team of like-minded professionals.

In the stability of the development of our business and in the pursuit of continuous improvement we are focused on long-term cooperation with each person accepted into our team. We expect that our employees work as efficiently as possible.

We adequately pay the work of our employees and comply with all legislative regulations regarding the payment of wages. We will never knowingly cooperate with companies that use the labor of children and adolescents, as well as forced labor.

Within the company each employee has equal opportunities for career growth, regardless of confession or ethnicity. This principle is implemented at every stage of employment, including selection, promotion, transfer to another position, training or dismissal.

We respect the individuality and value of each employee, encourage initiative guiding and at the same time ensuring free creative activity.

# **PRINCIPLES**

## **FOR EMPLOYEES**

### **2. PROTECTION OF THE HEALTH OF WORKERS**

Prodímex considers the working team as the most important element of its long-term and sustainable development and respects the rights of every person to fair and favorable working conditions.

The Company takes measures to protect the health of employees, ensure industrial and fire safety within the framework of existing legislation and also implements its own social programs in this area.

Employees of the company follow the internal regulations and are personally responsible for compliance with labor protection requirements.

### **3. PROTECTION OF PERSONAL DATA AND PRIVACY**

We protect personal data, maintain the confidentiality of employees, business partners, consumers and other persons data.

Employees with access to personal data are required to maintain its confidentiality and comply with all relevant laws regarding the collection, use and disclosure of data. Each employee of the company must protect the confidential information of the company, not disclose it to third parties, not discuss it publicly during the period of work in the company, including after hours.

Only authorized employees are authorized to communicate on behalf of the company with the media, financial analysts, creditors, business partners and others.

# PRINCIPLES

## FOR EMPLOYEES

### 4. REPUTATION OF THE COMPANY

Employees must speak honestly, respectfully and professionally about the company and their work for it and refrain from comments that are harmful for the company's reputation.

We value our reputation and cooperate with proven and reliable partners only. Official communication with the media is carried out by authorized employees.

### 5. COMPANY PROPERTY/ASSETS

We respect and protect the property of the company, tangible and intangible assets (trademarks, information systems and other intellectual property) and do not allow any damage, misuse and fraudulent activities in relation to these assets.

# PRINCIPLES FOR PARTNERS

## 1. COMPETITION

Prodimex complies with the requirements of Russian legislation in the field of commodity markets competition.

We are confident that competition is the basis for the efficient functioning of commodity markets, increasing efficiency and competitiveness of the Russian economy, modernizing enterprises and providing the needs of citizens in goods and services in a cost-effective way.

## 2. BUSINESS INTEGRITY

Conducting business with integrity is the foundation of our company's success. We always comply with deadlines and agreements, we do not use our advantages for unseemly purposes and expect that partners fulfil their commitments and compliance with ethical standards within the framework of the current legislation and the terms of contracts.

## 3. STABILITY AND ECONOMIC EFFICIENCY

An effective system of strategic planning, risk assessment and management, a profound analysis of the current situation when making decisions contribute to the stable development of our company.

We strive to minimize losses along the entire value chain, develop production, economic and financial potential in a volatile market and build resilience to market, climate and other changes.



# PRINCIPLES

## FOR PARTNERS

### 4. ANTI-CORRUPTION AND CONFLICTS OF INTEREST

We comply with anti-corruption legislation, do not allow illegal actions of our employees and believe that objectivity and rationality should prevail over the emotions of those involved in decision making.

It is prohibited, directly or through intermediaries, to offer or accept any improper remuneration or benefit from third parties that may influence management decisions.

Unlawful rewards include money, loans, securities and valuable gifts.

Employees must not allow their personal interests to conflict with the interests of the Prodimex Group of Companies. In the event of such situations, the employee must report them to the immediate supervisor.

# PRINCIPLES

## FOR PARTNERS

### 5. TRANSPARENCY

We adhere to the principles of transparency and openness in communication and information exchange within the company and strive to engage in open dialogue with stakeholders and to cooperate and resolve issues in a reasonable manner.

When choosing partners we are guided by the criteria of transparent business conduct which include among other things the quality of goods and services and its costs. Our counterparty provides us the requested information to confirm their reliability, and we in turn are ready to share such information.

Prodimex assists to governmental institutions in obtaining the necessary information in accordance with the regulatory legal acts of the Russian Federation.

# PRINCIPLES

## FOR SOCIETY

### 1. PRODUCT QUALITY AND SAFETY

We demonstrate a responsible approach by regularly testing our products for compliance with Russian and international quality and safety standards.

Respecting our consumers, we do our best to satisfy their needs to the utmost.

### 2. LOCAL COMMUNITIES

To expand opportunities and improve the quality of life of people working at our enterprises and living in the regions affected by our activities we participate in the construction and renovation of infrastructure facilities, cultural and educational institutions and support youth sports.

# PRINCIPLES

## FOR SOCIETY

### 3. ENVIRONMENT

Being one of the largest land users we are aware of our responsibility for the ecological situation of the territories. We operate rationally while using natural resources. We pay attention to the natural ecosystems conservation, we do not allow work to be carried out in the vicinity of the specially protected natural areas. We improve agricultural practices and introduce modern technologies in manufacturing.

### 4. SUSTAINABILITY

We implement the principles of sustainable development at every level of our activities - from the agricultural production until the point when our produce is delivered to our consumers, aimed at building a traceable sustainable supply chain and expanding sustainable practices.