



# Ethical Code of Conduct

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## Introduction

Webropol Group is committed to carrying out its business in a sustainable way. The company strives to maintain the highest legal and ethical standards in all its business practices. Each employee is expected to act responsibly and with integrity and honesty, and to comply with this code and its underlying policies and instructions.

## Compliance with laws

All business and other activities of Webropol Group shall be carried out strictly in compliance with all applicable laws, and under the principles of good corporate citizenship. Each employee is expected to comply with the requirements of those laws and regulations that apply to Webropol Group's operations and to his/her job.

## Openness

Webropol Group promotes openness and transparency, as well as continuous dialogue with its stakeholders, including customers and other business partners, personnel and authorities.

## Respect for human and labour rights

Webropol Group supports and respects the protection of human rights as defined in the United Nation's Universal Declaration on Human Rights. No employee is allowed to take any action that violates these human rights principles, either directly or indirectly.

Webropol Group supports basic labour rights as defined by the International Labour Organization.

Webropol Group does not accept any form of forced or compulsory labour, or the use of child labour.

## Fair employment practices

According to the Webropol Group's Equality Policy Webropol Group promotes freedom from discrimination based on race, ethnic or national origin, colour, gender, family status, sexual orientation, creed, disability, age or political beliefs, or other characteristics protected by law. Webropol Group fosters equal opportunity and employees are selected and treated on the basis of their abilities and merits.

Webropol Group does not accept any form of discrimination, harassment or bullying from its employees.

## Occupational health and safety

By applying high standards of occupational health and safety Webropol Group endeavours to create hazard-free workplaces for its employees. Details are documented in our HR Manual, which is reviewed annually.

## Anti-corruption

No Webropol Group or any of its employees may, directly or indirectly, promise, offer, pay, solicit, or accept bribes or kickbacks of any kind, including money, benefits, services or anything of value. Such payments and favours may be considered bribery, which violates local legislation and internationally recognised principles for combating corruption and bribery.

## Environment

Webropol Group's target is to develop and produce for its customers environmentally advanced solutions and services that fulfil essential requirements, such as low emissions and high efficiency. Efforts are made to achieve sustainable development by means of processes, products and wastes. Each employee shall comply with the policies and instructions regarding environmental protection.

## Relationship with authorities and local communities

Webropol Group maintains constructive co-operation with authorities and regulatory bodies, at both local and international levels.

## Innovation and protection of proprietary information

Webropol Group supports and encourages innovation by its employees in all areas of its activities.

Webropol Group's intellectual property is one of its most valuable assets and the patents, trademarks, copy-rights, trade secrets, and other proprietary information of Webropol Group must be protected. At the same time, each Webropol Group employee must respect the intellectual property rights of others.

## Accuracy of accounting records

Webropol Group's accounting records must be accurate and reliable in all material respects. Unrecorded funds are prohibited. The records cannot contain any false, misleading, or artificial entries.

### Competition and fair dealing

Competition laws aim to protect consumers and businesses against unfair business practices. Each employee shall comply with those laws. Actions such as participation in cartels, abuse of a dominant position in the market place, or the exchange of price or other commercial information between competitors, are prohibited. Webropol Group's employees should be sensitive to competition concerns when attending occasions where competitors, or potential competitors, can be present.

### Implementation

Webropol Group takes an active approach to the application of this code and promotes its implementation through the effective communication of its contents to its employees.

The application of the code will be reviewed from time to time by the Board of Management, which may decide on necessary revisions or interpretations

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### Webropol Group's tools for sustainability

#### Systems and processes

Quality Management System  
Environmental Management System  
Occupational Health and Safety Management System  
Supplier Management System  
Risk Management Process

#### Others

Sustainability target setting  
Sustainability management reviews  
Business development tools: Due diligence, Environmental surveys  
Stakeholder dialogue  
Sustainability reporting

**Continuous improvement process:** performance measurement, target setting, taking actions and review of the results

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