

ETHICS & CSR CODE OF CONDUCT

Kamyanka
Machine-Building Plant



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PREAMBLE

This Ethical and CSR Policy is intended to help you understand what is expected of a KAMYANKA MBP employee at all levels of the company, without exception. These principles are not only a reminder of the need to comply with the applicable legal rules, but also to promote honest and exemplary conduct in all circumstances.

“Ethics is everyone’s business”

The objectives of this Ethical and CSR Policy can only be achieved through the commitment, insight and accountability of each individual. Our values, KAMYANKA MBP’s reputation and image are at stake, as well as the trust of all our stakeholders: employees, customers, suppliers, local communities, public authorities. etc.

The information contained in this Ethical and CSR Policy are not merely discretionary:

- you should respect them both in spirit and to the letter
- you should set an example in your behavior and actions
- you should be proud to be part of an ethical and honest company

This Policy applies to all KAMYANKA MBP employees.

Managers have a duty to set an example and have the responsibility to promote the values and commitments of this Policy to their staff and to ensure its implementation.

Finally, **the principles contained in this Policy are intended to apply to all suppliers** in their contractual relationship with KAMYANKA MBP.

This Policy is regularly updated according to the changes in the activities as well as legislative and regulatory changes.

Actions contrary to the principles of the Ethical and CSR Policy may also result in economic, image and reputational damage to KAMYANKA MBP.

They can also lead to:

- disciplinary (e.g. dismissal for gross misconduct), civil (e.g. damages) and criminal (e.g. fines and/or imprisonment) sanctions applied to an employee who is responsible for such conduct
- the termination of any business relationship with a business partner that does not act in accordance with the values and principles of the Ethical and CSR Policy

This Ethical and CSR Policy is based on 7 pillars:



AT KAMYANKA MBP, COMMITMENT TO PEOPLE AND THE PLANET COMES NATURALLY.

More determined than ever, our ambition is to continue to meet all of our customers' needs and expectations in terms of narrow textiles, and to do so in a more sustainable and responsible way.

Our conviction is simple: it is through our commitment as human beings and as an organization that we can collectively have a positive impact in responding to these increasingly important social, community and environmental challenges. This is an opportunity for us to remain agile, to challenge ourselves, to innovate and to stay close to our customers' concerns.

This document: **“code of conduct”**, describes the various commitments we have made in terms of ethics and CSR. We want them to be shared by all our employees, but also by our partners and suppliers.



Ivan Nasonov,
Managing Director of KAMYANKA MBP



HUMAN RIGHTS

CHILD LABOR

Child labor includes any form of work carried out by children that deprives them of their dignity and is harmful to their normal physical and mental development.

KAMYANKA MBP is committed to:

- employing only workers who have reached the legal age in the country and in no case under the age of 18
- being extremely vigilant in the choice of its suppliers and service providers.



FORCED LABOR AND HUMAN TRAFFICKING

Forced labor is defined as work performed under coercion or threat.

KAMYANKA MBP is committed to:

- not using forced labor or restricting the freedom of movement of employees
- not withholding any part of the salaries or allowances, or personal documents (identity card, passport, etc.) of employees in order to force them to continue their employment
- allowing employees to leave the company with reasonable notice, as defined by the applicable legislation and social practices
- allowing employees to leave their workplace at the end of a regular working day or in case of a medical or family emergency.

UNDECLARED WORK

Undeclared work is defined as work carried out by a person who is in an irregular situation with regard to the law, as a result of failing to register with the social security system and paying the corresponding social security contributions, or possibly by a foreigner who is in an irregular situation with regard to immigration legislation.

KAMYANKA MBP is committed to:

- never using undeclared labor. Each worker must have all the documents required by law to work in the host country.



DIVERSITY, DISCRIMINATION

Discrimination in the workplace takes on different forms. It is when an employee, trainee or job applicant is discriminated against on the basis of subjective criteria.

KAMYANKA MBP is committed to:

- not tolerating or practicing any form of discrimination in recruitment, employment, salary, access to training, promotion, termination or retirement on any grounds whatsoever (race, ethnic origin, caste, national origin, religion, disability, illness, gender, pregnancy, marital status, sexual orientation, trade union membership, political affiliation, physical appearance or age, etc.)

HARASSMENT

Psychological harassment takes the form of repeated and hostile behavior, words or actions that infringe the dignity or integrity of the employee. Any behavior or action that goes against the right to respect and human dignity is unacceptable.

Harassment is the repeated imposition on a person, of either sex, of sexually oriented remarks or behavior which violate their dignity by being degrading or humiliating or which create an intimidating, hostile or offensive environment. The same applies to any form of pressure, even if not repeated, with the real or apparent aim of obtaining an act of a sexual nature to the benefit of the harasser or a third party.

Such conduct may include unwanted or inappropriate physical contact, emails, looks or gestures, comments, invitations or solicitations in any form.

KAMYANKA MBP does not tolerate any form of psychological or sexual harassment. KAMYANKA MBP asks each employee to alert management, which will take the necessary steps to put an end to any situation of psychological or sexual harassment.

PROTECTION OF IMAGE AND REPUTATION

Personality rights are a category of rights such as the right to privacy, the right to one's image, the right to one's family name, the right to respect for one's honor and reputation. Like natural persons, legal persons have the right to respect for their reputation and are entitled, where necessary, to instigate actions for defamation or denigration.

KAMYANKA MBP is committed to:

- obtaining the express permission of individuals before using any material that includes one or more personal attributes of an employee or a person outside KAMYANKA MBP (photograph or video of an identifiable person, name, etc.)
- employees who post on social networks on a subject directly or indirectly related to KAMYANKA MBP, not providing confidential information and/or information that could damage KAMYANKA MBP's reputation.



INFORMATION SYSTEMS SECURITY

IT security consists of managing information risks at all levels of the company: security of access to information and dedicated sites, access rights associated with managers, IT risk awareness training, etc.

KAMYANKA MBP is committed to:

- setting up a dedicated information systems security organization
- defining rules for the use of IT systems in the company and ensuring that its most critical systems are highly available
- implementing technological solutions to protect personal data (customers and employees).

Reporting system

KAMYANKA MBP allows all its employees to report all acts of discrimination, harassment, corruption, influence peddling or in relation to health, safety, hygiene at work and the environment.

No employee will be sanctioned or otherwise punished for initiating a report.



WORKING CONDITIONS

WORKING TIME

KAMYANKA MBP is committed to:

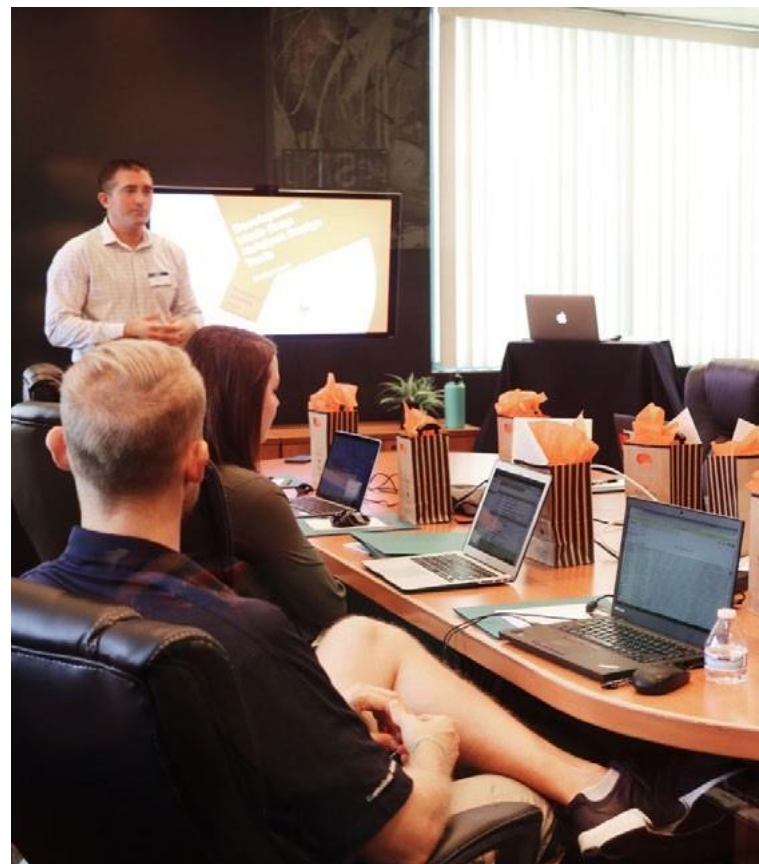
- respecting the law and international standards regarding working hours, breaks, holidays and the right of employees to a work-life balance
- granting weekly rest and paid annual leave in accordance with the local legislation
- applying the legal provisions concerning absences, maternity, paternity and family-related leave.

REMUNERATION

Remuneration should be at least at the level of the legal minimum wage, taking into account the associated statutory benefits, ensuring that the frequency, means of payment and pay slip comply with the relevant regulations.

KAMYANKA MBP is committed to:

- ensuring that the remuneration of all employees is in accordance with the legislation in force in the country
- not applying deductions from wages for disciplinary reasons that do not comply with the laws and regulations in force
- paying overtime at a premium rate as defined in national law or established by a collective agreement or defined in applicable industry standards.





SOCIAL DIALOGUE

Social dialogue is at the core of harmony between people. It focuses on the ongoing search for consensus and is thus the key to reducing social conflicts. Encouraging dialogue brings us closer to all employees and gives everyone the opportunity to make their voice heard.

KAMYANKA MBP is committed to:

- holding monthly meetings with employees
- enabling everyone to have access to clear information on their rights, duties and the benefits available to them
- providing appropriate information media.

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE REPRESENTATION

The purpose of freedom of association and the right to collective representation is to allow employees to form and join organizations of their own choosing to defend their interests within the company.

KAMYANKA MBP is committed to:

- ensuring compliance with locally applicable laws on freedom of association for its employees
- encouraging all forms of collective expression by employees within our company
- not preventing or obstructing the procedure for setting up an internal staff representation body
- respecting the deadlines for consultation with stakeholders and staff representatives, particularly in the case of reorganizations or disciplinary procedures
- ensuring that employees have the opportunity to express themselves freely within the company on issues relating to the conditions in which they carry out their duties.



CAREER MANAGEMENT AND TRAINING

Employee training and dedication is a key principle for KAMYANKA MBP.

KAMYANKA MBP is committed to:

- providing its staff with training to acquire, maintain and develop their skills
- using apprenticeships to develop new talent and allow our employees to share their experience, expertise and know-how
- providing the appropriate level of training for employees to work safely.

HEALTH AND SAFETY

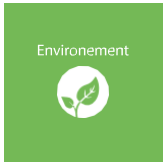
Every KAMYANKA MBP employee has the right to a safe working environment in which local managers are the primary health operatives who must prevent risks, identify them if necessary, and implement an appropriate action plan.

Upstream analyses must be carried out in order to anticipate and reduce the short- and long-term risks induced by each job or activity. Physical constraints, where possible, must be avoided, and appropriate training must be provided.

KAMYANKA MBP is committed to:

- ensuring the workplace is properly constructed and maintained in accordance with the applicable standards
- defining an evacuation procedure, explained to employees and regularly tested through evacuation drills
- providing employees with free access to clean drinking water, clean toilets and, where applicable, healthy food and accommodation facilities
- providing adequate training and tools to prevent accidents, injuries and health problems related to their jobs
- identifying and assessing the short- and long-term risks involved in the job, department or workstation
- identifying the list of chemicals and having their safety data sheets, setting up a secure storage system with appropriate signage, training employees in the handling of these products with personal protective equipment.





ENVIRONMENT

As a responsible company, we conduct our business in a way that respects the planet by reducing our impact.



ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Energy consumption, in addition to being a significant cost, is one of KAMYANKA MBP's primary impacts on the environment.

KAMYANKA MBP is committed to:

- adopting responsible management of our energy consumption
- measuring energy consumption and putting in place practices to reduce it
- replacing its most energy-intensive machines with more environmentally friendly ones.

WATER

The protection of water resources is a major concern for KAMYANKA MBP.

KAMYANKA MBP is committed to:

- protecting water resources by regularly monitoring consumption and adapting actions and equipment that consume less
- developing a range of environmentally friendly products that use less water.

WASTE AND RECYCLING

The waste generated at KAMYANKA MBP is mainly metal waste.



KAMYANKA MBP is committed to:

- ensuring that the waste produced is properly treated in appropriate channels, duly approved by the local authorities, especially when hazardous waste is concerned
- drawing up appropriate procedures for the separation of hazardous and non-hazardous waste, storage, handling and disposal of waste
- reducing the amount of raw materials used by limiting packaging and other disposable products, particularly plastic, and by giving preference to recycled and/or recyclable materials;
- seeking to minimize the amount of waste produced and finding solutions for recycling.

POLLUTION AND DISCHARGES

KAMYANKA MBP's activities are likely to generate direct or indirect pollution. The quality of groundwater or air can be impacted by organic matter, particles or chemicals released by KAMYANKA MBP. Certain nuisances (noise, visual, olfactory) may arise from the way we conduct our operations.

KAMYANKA MBP is committed to:

- controlling the impact of its waste
- implementing environmentally friendly practices by limiting any nuisance (noise, visual, olfactory) or air pollution.



PROTECTION OF PROTECTED SPECIES AND BIODIVERSITY

KAMYANKA MBP is committed to:

- complying with all regulations concerning the protection of protected species and biodiversity.

EMPLOYEE AWARENESS AND TRAINING

Raising awareness of environmental issues on a daily basis is a key part of any environmental protection initiative.

KAMYANKA MBP is committed to:

- continuously training and raising awareness among its employees on environmental issues, waste management procedures, eco-actions, etc.

HEALTH AND SAFETY OF CONSUMERS

KAMYANKA MBP is committed to:

- complying with the applicable legislation in force
- using use of materials that are safe for human health and the environment





GOOD BUSINESS PRACTICE

COMMON GOAL, CUSTOMER SATISFACTION

Achieving 100% customer satisfaction is KAMYANKA MBP's goal.

KAMYANKA MBP is committed to:

- implementing the necessary means to obtain the required quality and eliminate the risk of non-conformity.

KAMYANKA MBP's suppliers and subcontractors may not subcontract all or part of the products manufactured for KAMYANKA MBP without our consent, which shall be subject to compliance with this Policy. The supplier is responsible for the quality of the items or service provided by its subcontractor even after KAMYANKA MBP has approved them.



CORRUPTION

Corruption in all its forms is a criminal offence, carrying heavy penalties for both a company and an individual participating in any form of corruption, including indirect.

KAMYANKA MBP is committed to refraining from corrupt practices.

The principle is that an employee should neither receive nor offer a gift or personal benefit in the context of a business relationship.

Gifts offered as a simple courtesy are only acceptable if they are exceptional and of low value.



CONFLICT OF INTEREST, MONEY LAUNDERING OR TERRORIST FINANCING

A conflict of interest arises when an employee's personal or private interests (financial, business, family or other relationships) may influence or appear to influence a decision made by the employee in the performance of his/her duties. While respecting the privacy of its employees, KAMYANKA MBP expects them to avoid conflicts of interest. In the course of their work, employees are expected to act in the best interests of KAMYANKA MBP at all times.

In addition, KAMYANKA MBP requires all employees to report any conflict of interest situation as soon as they become aware of it and, wherever possible, before taking action.

KAMYANKA MBP does not accept money laundering or terrorist financing.

COMPLIANCE WITH LEGISLATION

KAMYANKA MBP is committed to:

- complying with the applicable laws and regulations
- complying with the national environmental legislation and striving for the application of the European and international standards
- strictly applying, without circumventing, the rules of international trade. They provide all the documents required by the authorities of the various countries and guarantee that they are authentic and valid.
- And beyond the regulatory and mandatory aspects, KAMYANKA MBP makes every effort to ensure that the Customer receives a product that meets their expectations, particularly with regard to safety and health risks.

PROTECTION OF INTELLECTUAL PROPERTY

Intellectual property includes intangible rights such as trademarks, domain names, designs, patents, know-how and copyrights.

Failure to comply with these rights constitutes an infringement punishable in particular by a sentence for counterfeiting or unfair competition.

All documents, information, materials, patterns and prototypes provided by our customers or by KAMYANKA MBP for the purpose of providing services are the exclusive property of our customers or of KAMYANKA MBP and are considered confidential. As such, they may not be disclosed to anyone in any way, in whole or in part, without the prior agreement of the customer or KAMYANKA MBP.

KAMYANKA MBP is committed to:

- keeping any document or information provided by the other party strictly confidential
- refraining from using a customer's name or products for commercial purposes without the customer's express permission
- manufacturing for a customer products similar to a previous manufacture of another customer, which could amount to an infringement.
- KAMYANKA MBP's suppliers undertake to return all confidential documents on first request without retaining a copy.

ORIGIN OF PRODUCTS

KAMYANKA MBP undertakes to providing all information concerning the products or components, including their origin and composition.

PROMOTION OF RESPONSIBLE PURCHASING

This document can be made available to and used by all stakeholders.

It is the starting point for a responsible purchasing approach that should enable environmental protection, social progress and economic development.

KAMYANKA MBP encourages its suppliers to use this document for its own suppliers and manufacturers to ensure that the values it promotes are respected throughout the chain.



CUSTOMER PROTECTION

PERSONAL DATA

KAMYANKA MBP is committed to:

- keeping strictly confidential any data relating to personal circumstances (title, surname, first name, address, etc.) or professional circumstances (position, place of work, etc.) that may be communicated in the context of the provision of products or services.

Please note that this commitment is a regulatory obligation for KAMYANKA MBP and its European partners.

RESPONSIBLE MARKETING AND COMMUNICATION

Responsible communication must be ensured through communication actions with the aim of ensuring transparency of service, relationship and offers, as well as customer protection.

KAMYANKA MBP is committed to:

- ensuring the responsibility of all communication initiatives by drawing up a process for validating communication contents before they are disseminated and by integrating environmental impact into its criteria for the choice of media and the organization of its events
- acting and communicating transparently, in particular by guaranteeing price transparency to our customers.





DEVELOPPEMENT LOCAL



KAMYANKA MBP is embedded in its local communities and contributes directly to a shared economic momentum through direct and indirect employment, while protecting what is most precious and most fragile: children, the cultural wealth of the people and natural ecosystems.

KAMYANKA MBP is committed to:

- encouraging the use of local staff where possible
- fostering the integration of people with mental and/or physical disabilities and to developing rehabilitation in the region.
- providing access to training to develop the skills and job readiness of local employees who do not benefit from initial training in our businesses
- contributing to the emergence of talent by creating partnerships with schools, artists, etc.
- developing interaction with associations.