

Approved by the Order of the  
General Director of Fenix LLC  
dd 19.01.2022 № 15/56

**Business ethics policy**  
**Fenix LLC**

Saint-Petersburg  
2022

## Business ethics policy Fenix LLC

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Fenix LLC business ethics policy outlines the ethical values and moral standards for all employees of the Company both in their relationships within the team, and in their relations with Clients, business partners, government agencies, public organizations and competitors.

### **Goals:**

Respect for Human Rights, compliance with ethical rules and moral norms, high legal standards of business conduct, constant concern for the safety of employees and environmental protection, and respect for partners. Honesty in the team and in business relationships. Refusal of the Company from political activity.

### **Corporate value:**

Professionalism, initiative, thrift, mutual respect, openness to dialogue, continuity, image.

### **Our ethical rules and Business principles:**

- comply with all applicable laws and regulations, especially those related to environmental protection, competition, corruption and employment;
- financial responsibility (accurate records). Fair competition and compliance with anti-trust legislation.
- participate honestly and responsibly in competition in accordance with the principles of a market economy;
- bribery, extortion and corruption, conflict of interest, violation of privacy, obtaining personal benefits at the expense of official position, accepting and transferring money and gifts to obtain an illegal advantage of one of the parties, using of counterfeit parts are prohibited;
- selection of its contractors based on the criteria of impartiality and integrity;
- respect for the interests of each party when developing clear and fair contractual terms;
- each employee will responsible for ensuring that their participation in the Company's activities complies with all applicable laws and regulations, as well as the health, safety and environmental regulations of Fenix LLC;
- all information, verbal or written, documents and reports received by employees while working in the Company will be considered strictly confidential;
- comply with applicable requirements and laws governing the use and protection of intellectual property.

### **Interaction with the media:**

Fenix LLC constantly interacts with mass media and builds it on the principles of openness and transparency. The Company's special division is responsible for information policy conduction.

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### **Liability**

The rules and principles set out in the Fenix LLC business ethics policy will apply to all employees. The ethical leadership of the Company's management is the basement for the system. By their ethical beliefs, they encourage the corporate culture behavior, the unacceptability of corruption, and form models of ethical behavior.

### **Compliance with the Policy**

All *Fenix LLC* employees and contractors are offered training on the provisions of the Policy, and the training of employees, contractors, and suppliers will cover the provisions of this Policy.

To support compliance with this Policy, *Fenix LLC* encourages its employees to report any concerns regarding potential violations of this Policy, or any related law or regulations using Hotline at <https://port-bronka.ru/en/contacts/> , which is available for use twenty-four hours per day.

Reports can be made without fear of punishments or reprisals.