

Approved by the Order of the  
General Director of Fenix LLC  
dd 19.01.2022 № 11/56

**Human Rights and Working Conditions Policy  
Fenix LLC**

Saint-Petersburg  
2022

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**Fenix LLC** adheres to responsible corporate practices in the area of human rights and working conditions and implements practices required by the Laws of the Russian Federation, the World Convention on Human Rights (1948) and industry standards.

**Fenix LLC** also adheres to the principles set forth in the fundamental ILO Conventions, namely the Forced Labor Convention (1930), the Minimum Age Convention (1973), the Worst Forms of Child Labor Convention (1999) and ILO Declaration on Fundamental Principles and Rights at Work (1998).

Fenix’s human rights expectations apply to all of our personnel, business partners and other parties directly linked to our operations, products or services; as such, Fenix LLC obliges to comply with the requirements of the legislation of the Russian Federation and International Conventions in the field of human rights and working conditions ratified by the Russian Federation and its principles within our operations and supply chains. The working conditions of our employees are in compliance with the laws of the Russian Federation and international conventions ratified by the Federation in the field of human rights and working conditions.

**1. No Child Labor**

Fenix LLC will not employ children below the minimum age for employment according to applicable Russian Law, in any case not under the age of 14. Furthermore, Fenix LLC shall ensure that persons under the age of 18 do not perform any offshore duties or undertake any hazardous work that could jeopardize their health or safety, including night shifts and overtime. “Child labor” means any work by a child or young person, unless it is considered acceptable under the ILO Minimum Age Convention 1973 (C138).

Fenix LLC supports the use of legitimate workplace learning programs that comply with all laws and regulations, provided that these laws and regulations are aligned with Russian Law, national and international standards. Fenix LLC will ensure proper management of student workers through effective maintenance of student records, rigorous due diligence of educational partners, and protection of students’ rights in accordance with applicable law and regulations. In any case, appropriate support and training shall be provided to all student workers.

**2. No Forced Labor**

Fenix LLC does not tolerate any form of forced labor, including debt bondage, indentured labor or involuntary prison, nor any involvement in human trafficking in its business activities. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Fenix LLC will not unreasonably restrict workers’ freedom of movement throughout company-provided facilities nor unreasonably restrict workers’ entering or exiting company-provided facilities.

Fenix LLC will engage with suppliers to eradicate modern slavery, forced labor and human trafficking in its supply chain.

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**3. Prohibition of Human Trafficking Related Activities**

Fenix LLC complies with the requirements of Russian and International Law on the prohibition of slavery and human trafficking.

**4. Working Conditions**

Working hours, breaks, holidays and leave periods will be established in compliance with local laws and agreements, and in any case, a workweek should not be more than 40 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

Fenix LLC shall ensure that all employees are provided with written agreements of employment and are free to leave their work after giving reasonable notice. Furthermore, compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the Russian Law. Imported and migrant workers are to be provided equal wages, benefits and working conditions. The employer, in the hiring process of attracting personnel from abroad, provides reliable information about the working conditions.

As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees have been paid by workers, such fees shall be repaid to the worker.

**5. Health and Safety**

Fenix LLC consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements.

Fenix LLC furthermore commits to continual improvement of its operations, progressively reducing the potential ESH impact of its activities, by focusing on: the health, safety and productivity of employees and processes; efficient use of natural resources; and prevention of pollution.

Fenix LLC sets and reviews relevant ESH objectives and targets for its operations worldwide and on a regular basis.

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**6. Freedom of Association & Collective Bargaining**

All workers have the right to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly.

Fenix LLC will respect the right of workers to refrain from such activities, and respect their freedom of opinion and expression.

Additionally, workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices, both without fear of discrimination, reprisal, intimidation or harassment. Finally, where employees participate in a strike for a lawful object, Fenix LLC shall not interfere with, impede or diminish their right to strike, or to affect the limitations or qualifications on that right.

**7. Non-Discrimination & Anti-Harassment**

Fenix LLC ensures equal opportunity for all without discrimination or harassment on the basis of sex, race, age, color, disability, ethnic or national origin, sexual orientation, religion, social or marital status, or other status protected by applicable law. Fenix LLC respects employee's and business partners' freedom of thought, conscience and religion. Fenix LLC does not tolerate any acts of sexual harassment or other forms of discrimination or harsh treatment. Fenix LLC encourages all employees and business partners to report and remedy harassing workplace conduct with the goal of eliminating such conduct quickly and effectively, even in cases in which the reported conduct may not be severe and pervasive so as to constitute a violation of the law.

Fenix LLC has established an Ethics Hotline at <https://port-bronka.ru/en/contacts/>, which is available for use twenty-four hours per day. Fenix LLC is committed to gender equality, and believes that equal work deserves equal pay.

**8. Contractor and Supplier Requirements**

Beyond observing these requirements in its own operations, Fenix LLC requires that its contractors, subcontractors, suppliers and their sub-suppliers adhere to the requirements of this Policy.

Suppliers that fail to adhere to these requirements may be subject to sanctions, including, but not limited to, termination of their agreements with Fenix LLC for default.

**9. Verification of Compliance & Measures to Address NonCompliance**

Compliance with this Policy at Fenix LLC facilities will be reviewed and documented by periodic internal audits.

Fenix LLC supply chain compliance efforts will focus on direct suppliers, and their employees and contractors, all of which are required to comply with applicable laws and to acknowledge and agree to Fenix LLC's Code of Business Conduct and Ethics, and this Policy.

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Fenix LLC will conduct periodic audits of its suppliers. Subcontractors or suppliers that pose potentially greater risks may be subject to more detailed risk assessments and additional verification.

Non-compliance with this Policy or relevant laws and regulations may lead to warning or sanctions, including, but not limited to, contract termination.

**10. Relationship to Fenix’s Code of Business Conduct and Ethics**

This Policy is intended to supplement and strengthen Fenix LLC ’s commitment to human rights under its existing Code of Business Conduct and Ethics.

**Compliance with the Policy**

All Fenix LLC employees and contractors are offered training on the provisions of the Code of Business Conduct and Ethics, 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 its Ethics 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.