

APPROVED  
by Order of the General Director  
Leipurien Tukku LLC  
Smirnova E.A.  
dated 15.12.2020 № 102

**EMPLOYEE CODE OF CONDUCT  
OF LEIPURIEN TUKKU LLC**

**St. Petersburg  
2020**

## Table of contents

1. OUR COMMITMENT TO PROFESSIONAL ETHICAL STANDARDS	3
1.1. As Aspo employees, we shall:	3
1.2. Furthermore, the company management shall:	3
2. OUR EMPLOYEES AND OPERATING ACTIVITY	3
2.1. Respect for employees and observance of human rights	3
2.2. Non-discrimination, socio-cultural diversity, and equal opportunities	3
2.3. Well-being, occupational health and safety	4
2.4. Environmental responsibility and Product Safety	4
3. PROFESSIONAL ETHICS	4
3.1. Intolerance of corruption and bribery	4
4. COMPANY ASSET AND INFORMATION PROTECTION	4
4.1. Tangible and intangible assets	4
4.2. Information Disclosure and Confidential Information	5
4.3. Making decisions and documenting	5
4.4. How to avoid conflicts of interest	5
5. OUR STAKEHOLDERS	5
5.1. Business Partners	5
5.1. Ensuring Anti-Money Laundering and Trade Regulatory Compliance	5
6. COMPLIANCE WITH REGULATORY REQUIREMENTS APPLIES TO EVERYONE	5
6.1. Voice of Concern - Reporting Illegal Activity	6

## 1. OUR COMMITMENT TO PROFESSIONAL ETHICAL STANDARDS

The Code of Conduct explains the conduct standards to be adhered to by the employees of Leipurien Tukku LLC (hereinafter referred to as "the Company", "Aspo Group" or "Aspo") in the performance of their duties. It provides guidance for those cases when employees face personal and ethical decisions. The present Code of Conduct shall apply to all employees and all Aspo Group activities.

In our Company, we believe that acting ethically and responsibly is not only the right thing to do in general, it is also right for our business. The Aspo Group Code of Conduct ("the Code") is the foundation for running our business the right way.

We comply with all applicable Laws and Regulations in all of our activities. For us, business ethics begins from our Code of Conduct and day-to-day working practices.

The Code of Conduct describes the principles which help us make ethically impeccable decisions. We all should know the Code of Conduct, act properly and understand the importance of doing so.

By making the right choices, we protect the value we create at Aspo every day. By making the right choices, we protect the value we create at Aspo every day. By demonstrating ethical conduct, we build our reputation as a reliable partner, supplier, customer and employer.

As a member of the United Nations Global Compact, we appreciate its ten principles related to human rights, labour, the environment and the anti-corruption.

### 1.1. AS ASPO EMPLOYEES, WE SHALL:

- Be familiar with, understand and abide by our Code of Conduct.
- Report your concerns if we suspect any improper conduct.
- If you are unsure whether your actions are proper or not, you shall consult with your supervisor or

Aspo's legal compliance Department.

### 1.2. FURTHERMORE, THE COMPANY MANAGEMENT SHALL:

- Set an example.
- Communicate our legal compliance guidelines and Company policies to his or her employees and find time to discuss their applicability to our Team.
- Create an atmosphere so that our team members are free to voice their concerns.
- Listen to team members' concerns and report above any suspicions of improper conduct of which they become aware.
- Provide mentoring and support to his or her employees to meet the aforementioned expectations.

## 2. OUR EMPLOYEES AND OPERATING ACTIVITY

### 2.1. RESPECT FOR EMPLOYEES AND OBSERVANCE OF HUMAN RIGHTS

Aspo is committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. We ensure decent working conditions. We do not tolerate the use of forced or child labor in any circumstances.

### 2.2. NON-DISCRIMINATION, SOCIO-CULTURAL DIVERSITY, AND EQUAL OPPORTUNITIES

Aspo treats everyone with respect and recognition. All of our employees shall respect everyone's right to freedom of thought, belief, expression, religion and the right to peaceful assembly. We do not tolerate any discrimination on the basis of education, personal skills, position, personality, lifestyle, work experience, ethnicity, religion, gender, sexual

orientation, age, national origin, ability or other employee characteristics. This applies to all employees, including temporary, migrant, student, contract employees, key employees and all other employees or applicants for employment.

Aspo respects socio-cultural diversity and seeks to create an accepting and free of harassment work environment.

### 2.3. WELL-BEING, OCCUPATIONAL HEALTH AND SAFETY

Aspo cares about employees' well-being and health. We never compromise on safety issues and deal only with partners who share our commitment to occupational health and safety. We bear responsibility for occupational safety at all times, and we shall comply with relevant occupational health and safety Laws as well as our Company's Safety Policies and Standards. Supervisors are responsible for instructing, supervising and supporting his or her employees to ensure occupational safety.

### 2.4. ENVIRONMENTAL RESPONSIBILITY AND PRODUCT SAFETY

Aspo respects the natural environment and is committed to mitigating environmental impact of its business. We bear responsibility for ensuring that our Products are safe to the intended use and in compliance with regulatory requirements.

## 3. PROFESSIONAL ETHICS

### 3.1. INTOLERANCE OF CORRUPTION AND BRIBERY

We do not tolerate all forms of *corruption* or *bribery*. We neither offer nor pay bribes or allow bribes to any government officials or individuals, nor do we ever ask for or accept bribes.

In particular, we shall not give or offer anything of value with the intent to inappropriately influencing a business decision to close a deal, keep a deal, or gain an unfair advantage. We are not allowed to do so directly or indirectly, in other words, through a third party acting on Aspo's behalf. In addition, we shall neither directly nor indirectly solicit or accept anything of value that could influence or seem to influence our ability to maintain objectivity in our business decisions. The expression "anything of value" shall be construed broadly and includes any payments, loans, discounts, political or charitable donations, reimbursements, gifts, gift certificates, meals, entertainment, travel, employment or internships, business opportunities, services or other benefits.

We ensure that gifts and hospitality are always in line with a clear business goal, recorded accurately, of reasonable value and in line with the nature of business relationships. Any requests or offers of any improper payments, benefits, gifts or hospitality shall be rejected. They must also be promptly reported to the person in charge of Legal Compliance (Compliance) at Aspo.

We actively compete within the framework of applicable *Competition Laws*, in a fair and ethical way. Every Aspo employee shall comply with the Competition Laws, Regulations and Local Policies.

## 4. COMPANY ASSET AND INFORMATION PROTECTION

### 4.1. TANGIBLE AND INTANGIBLE ASSETS

In our day-to-day activities, we bear responsibility for Aspo and its business partners' assets, such as machinery, equipment, raw materials, vehicles, information and mobile devices, funds, intellectual property and information. We shall treat them carefully and protect them from *damage, loss, theft and misuse*.

All of our employees shall take proper steps to keep our Company's and our business partners' *confidential information* protected. We are careful about confidential information and only pass it on to those who are entitled to access the information and who need it to carry out his or her job.

We comply with our corporate policies and procedures to protect data against threats or unauthorized and illegal use. We respect our colleagues', stakeholders' and their representatives' *privacy* since we handle their personal data in accordance with applicable laws and Company policy.

#### 4.2. INFORMATION DISCLOSURE AND CONFIDENTIAL INFORMATION

As a Public Company, we shall comply with applicable laws and stock exchange regulations when disclosing Aspo information. Only authorized Aspo employees are permitted to make public statements on Aspo's behalf to the media. We are committed to complying with market abuse and inside information rules and regulations, such as trading and disclosure limitations.

#### 4.3. MAKING DECISIONS AND DOCUMENTING

Our decisions should be made in the best interest of Aspo. Legal and financial approval procedures are used across our entire Organization, and we are committed to following them. These procedures include the appointment of authorized persons, setting financial limits and segregation of duties.

All business transactions shall be correctly and accurately recorded in our accounting books and records. Precise accounting and reporting helps us comply with our legal and regulatory requirements, for example, with regard to taxation.

#### 4.4. HOW TO AVOID CONFLICTS OF INTEREST

Each of us shall act in Aspo's best interest. This means that each of us should, *inter alia*, avoid conflicts of interest. A conflict of interest occurs when your personal interests interfere with Aspo's interests. Even the appearance of a conflict of interest can be damaging to the Company and our goodwill.

### 5. OUR STAKEHOLDERS

#### 5.1. BUSINESS PARTNERS

We are committed to fruitful, ethical and transparent relationships with our suppliers, agents, distributors, customers and contractors. We expect our partners to comply with all applicable laws and regulations and adhere to our Memorandum on Leipurien Tukku LLC Suppliers Requirements.

#### 5.1. ENSURING ANTI-MONEY LAUNDERING AND TRADE REGULATORY COMPLIANCE

We operate in an international trade environment, and this means importing and exporting products, other goods, services and information from one country to another.

We comply with all applicable Laws and regulations that affect our business. These regulations include, with no limitation, *embargoes and sanctions, customs import and export regulations, export controls, customs valuation, country of origin and preferential trade terms.*

We do not conduct business with violations of current *anti-money laundering, anti-terrorism or anti-financial crime laws.*

### 6. COMPLIANCE WITH REGULATORY REQUIREMENTS APPLIES TO EVERYONE

Each of us is liable for complying with Aspo's unified ethical standards. If we suspect improper conduct, we are obliged to report it and also to listen to others' concerns. Never assume that someone has already reported a risk or concern.

### 6.1. VOICE OF CONCERN - REPORTING ILLEGAL ACTIVITY

We support a culture in which everyone has the right to freedom of speech. We provide a safe, secure and confidential way for employees to voice their concerns and to raise issues when normal channels are unavailable or inappropriate.

All employees should immediately report any violations of the Law, this Code of Conduct, our Compliance Manual or other Aspo policies that he or she suspects or witnesses,

- to his or her Supervisors or to the Company's General Director,
- to the Legal, Human Resources or Internal Audit Departments of Aspo, or
- use the Aspo channel to report illegal activity via email: [secretary.board@aspo.com](mailto:secretary.board@aspo.com).
- and via ASPO's anonymous reporting channel: <https://report.whistleb.com/asporussia>.

This allows us to resolve and correct issues in a timely manner, preventing them from occurring again in the same or another business unit.

We carefully check the misconduct reports, handle personal data properly, and keep reports confidential to the fullest possible extent.

We do not tolerate harassment of any person who in good faith reports suspected misconduct or participates in an investigation to address suspected misconduct. The examples of harassment include demotion, dismissal, denial of promotion, pay cuts, and any type of threats, bullying or harassment. Disciplinary action will be taken against any person who commits repressive acts for reporting a violation, regardless of the position he or she holds.

Violations of this Code, including failure to report a known Code violation in a timely manner or false reporting of a violation, may result in disciplinary action up to and including dismissal.