

**CODE OF CONDUCT
of Stratus Ltd**

General provisions

The Code of Conduct sets the rules, which follow the generally accepted moral norms of conduct, and apply to all persons employed by the company while performing their duties. The principles and requirements of the Code of Conduct should be the starting point for decision-making on “allowed and unallowd issues”, i.e. about morality and the conduct of everyone to create a more favorable working environment. For most of their life, almost everyone is involved in some work environment and is required to comply with ethical standards established at a workplace.

The Code is a standard of good practice that guarantees the key principles of work – to be a good example for ourselves and for the others, to treat everyone with respect and attention.

Company values

The trust of the community, the clients and partners of the company, is based on the integrity and responsibility of the management, as well as of every employee in the performance of their duties.

- The term “**Integrity**” includes fair, ethical, conscientious and lawful conduct towards all employees of the company, its clients and partners.

- The term “**Responsibility**” in the professional behavior includes active activity oriented towards the best performance, the quality of the provided goods and services expected by the clients, in compliance with the requirements for protection of the human health and the environment, as well as the correct fulfillment of the contractual obligations of the company.

Rules of conduct

The Code of Conduct defines the specific rules at the workplace in the following directions:

Respect for the rule of law and human rights

- The employees of the company shall perform their duties in unconditional observance and respect of the rule of law. Actions contrary to the legal regulations, or the good commercial practice are inadmissible, regardless of the reasons justifying them. Good intentions do not justify illegal actions. Although employees are not

expected to be familiar with all applicable laws, they need to be familiar with the basic rules affecting their field of activity, and in case of hesitation to seek guidance from the management.

- The management of the company shall not violate the employees' right of association and shall not discriminate on the basis of gender, nationality, age, minority status, religion, social abilities, etc.

Respect for the individual

- The management of the company shall require from its employees to treat each other with mutual respect, courtesy, and honesty, respecting the dignity of everyone, regardless of gender, religion, background or other differences.

- Any form of workplace harassment – exceeding of authority, insult, defamation, etc., is inadmissible.

- Employees are treated with respect by the company's management, which creates conditions for a fruitful and safe work environment and a balance between their personal and professional life. If a behavior that does not meet the established ethical standards is reported, the respective employee is invited for discussion. The reasons for such behavior and the ways to eliminate it are sought, and it is also clearly stated that such behavior is inappropriate and needs to be changed.

- All employees shall treat their coworkers and the management of the company with respect. If you notice that a colleague of yours is behaving incorrectly, do not rush to report it immediately, try to talk to him / her and fix the problem at its start. Everyone happens to be wrong sometimes, and maybe your coworker just made an unintentional mistake. Empathy (within reason) is an expression of good will and education, and can turn an awkward situation into good working relationships in the future.

Professional development and equal opportunities

- The company's management encourages the professional and personal development of all its employees by providing them equal opportunities according to their abilities.

- The management of the company supports the development of a culture based on the merits and contribution of employees in the production process.

The merits and contributions are assessed in terms of competence, qualification, workload, quality and timely performance of professional duties, contribution to increasing the company prestige, the profitability of its operations, and compliance with the rules of this Code.

Cooperation and involvement

- The company's management creates conditions for development of cooperative and teamwork environment, aiming to ensure proper use of the resources and capacity.
- All employees work in a spirit of cooperation, providing their coworkers with skills and knowledge that would contribute the achievement of the company's goals. Personal feelings cannot interfere with the fair attitude towards the undertaken tasks and the people they work with.
- The goal-oriented efforts of all employees create an environment of trust, mutual respect and support, combining the strengths and abilities of everyone, so that the total sum of the team's energy significantly exceeds the individual efforts.

Providing safe and healthy working conditions

- The company's management is committed to ensuring that its employees feel safe and secure at the workplace by implementing measures for compliance of the law, that regulate this activity.
- All employees of the company (each according to their position) are familiar with and comply with the rules on safety and health at work. Everyone is responsible for their own safety and that of the others.
- The management must be notified of any doubts about hazardous equipment, processes or conditions that pose a risk to safety and health.

Appropriate use and protection of the company assets

- The company provides its employees with the necessary means of production (assets) for the fulfillment of their business commitments.
- All employees use the company assets of only for the purpose of performing their duties in an effective manner and only in view of their intended purpose. The company assets cannot be used for an illegal activity or not related to its production and commercial operations. Protecting the property from theft, misuse, damage and waste is the duty of everyone.

Inadmissibility of acts of corruption and bribery

- The company policy is zero tolerance for acts of corruption.
- The management of the company and the employees, in their activities, must not allow any influence on the personal will through unethical and immoral practices in order to acquire benefits that could affect the commercial and professional relations or administrative decisions.
- Employees must act honestly and ethically in their business relations: it is inadmissible to give and accept gifts, to accept invitations for lunch, dinner or visits, which would place either party in a position of obligation (except those that are in line with the usual business practices).
- In case of doubt or established cases of corruption (including bribery), the company management must be notified.

Inadmissibility of unregulated payments and money laundering

- Money laundering occurs when individuals try to make the proceeds of criminal activity appear legitimate by moving them through legitimate businesses.
- The company's management complies with the applicable legislation to prevent unauthorized payments or money laundering.
- The company must check in advance the information available for its clients and suppliers in order to establish the legality of their activities.
- Employees who carry out activities on behalf of the company shall pay special attention to any extraordinary payments, not provided for in the agreements or commercial contracts, with the understanding that the funds will be used or may be used for any purpose other than the specified.

Loyalty to the company and avoidance conflicts of interest

- Conflict of interest is present in the cases when the employees' personal interests contradict the interests of the company, and when the proper performance of their duties is jeopardized.

- The relationship between the management of the company and the employees is based on mutual interest. In this respect, any involvement of the employees in other activities, financial or entrepreneurial, where such activities are lawful, not a prerequisite for unfair competition, not contradicting their corporate responsibility to the company and not interfering with the fulfillment of their official duties, is respected.

- The employees must inform the management of the company when they or their close relatives participate, or intend to participate in the management bodies of other companies, which would have the same and competitive interests with the company they are engaged in.

- The employees of the company must refrain from expressing opinions on behalf of the company, acting or influencing decision-making in all cases where, directly or indirectly, these actions are related and pursuing personal interest.

- In the cases of suspicion, employees must inform the management of the company in order to prevent the taking of decisions, which would give rise to doubts that they are in favor of personal benefits or are against the interests of the company.

Treatment of internal company information

- Internal company information is specific information, which is not in the public domain and is an important asset in the management and the operations of the company and is therefore subject to particular attention.

- Internal persons are all who work in the company under an employment or civil contract, and have permanent or incidental access to internal information that relates directly or indirectly to the company's business.

- The objectivity of the information is a basic prerequisite for a successful business activity, and employees are therefore required to provide accurately all the information they have to provide, in order not to mislead the recipient.

- The employees adhere to the required confidentiality regarding the internal company information that they have access to when performing their duties.

- Employees who have information about the company's strategy, policy, plans or assets do not use it in an unauthorized manner – without the necessary permission, outside of their official duties, for their own benefit or for the benefit of third parties.
- In cases of doubt about the nature of the information, employees shall consider it confidential until the contrary is confirmed.

Best treatment of the company clients

- The production of quality goods and services for the clients is the most important indicator of good treatment and development of long-term relationships with them, based on trust and mutual respect.
- The information provided to customers about the goods and services is always true, complete and presented in plain language. This rule is considered violated when the information provided is ambiguous or presented in a way, which may mislead the clients, or put them in a position to make a wrong decision. The comparisons with competition products and services must be balanced, credible and verifiable.

Best treatment of the company partners

- The good treatment of the company partners (suppliers of goods and services) is an important prerequisite for achieving the plans and goals set by the company, as well as for the protection of its economic interests.
- The individuals who have the duty to select and choose partners of the company, must make an impartial assessment of this activity by applying quality criteria and optimal prices for goods and services, and preventing any conflict with the interests of the company.

Environmental protection

- Compliance with applicable environmental protection legislation is a natural duty of the management and of each individual employee of the company.
- Employees of the company comply with the rules and internal instructions aimed at protecting the environment to meet the set objectives of the company in this respect.

- In their contacts with employees from other cooperating companies the employees of the company, where appropriate, shall pass on these good practices for environmental protection.

Compliance with the Code of conduct

- This Code is mandatory for all company employees.
- The management of the company informs all employees about the content of this Code, after which it becomes mandatory for them.
- The company's management evaluates the work of the company's employees also taking into account the compliance with this Code.
- Any doubt as to the interpretation and application of this Code is discussed with the management.
- When issuing internal administrative and other acts, the strict compliance with the rules of this Code is strictly observed
- Failure to comply with the Code puts at risk the prestige of the company, therefore every employee must notify the management for any nonobservance of the rules that have come to their notice in the course of their duties. It should not be assumed that the management already knows or does not care about a problem or situation, and that no action will be taken.
- The Code is applicable to any person engaged in the company from the date, on which the person is introduced to the code.
- The Code of Conduct is meaningless if it is not observed. If the inappropriate behavior becomes a habit after conversations and warnings, all the necessary measures will be taken for the dismissal of the persons, who show disrespect to their colleagues and the work process.
- Any amendments to the Code of Conduct must be approved by the company Manager.

04.06.2018

Approved: Managing director