



CODE OF BUSINESS ETHICS



The state of the UNI Capital Group CEO address

Dear friends,

Since the foundation of the UNI Capital Group, we attach a particular importance not only to the business, but also to the moral qualities of our team, and we strive to meet the highest international standards and best corporate practices.

The significant scale of our activity and its wide geography determine our multi-thousandth team, consisting of people of different nationalities, ages and cultures. At the same time, we have always been united by a common mission and common values, which allowed us to grow into a global energy company in just a quarter of a century.

Today, the UNI Capital Group enjoys a high level confidence of a wide range of the parties concerned. This confidence is invaluable capital, which is formed by actions of each employee, each leader. Responsibility, professionalism, the adhesion to the pledged word, knowledge and observance of laws, respect for human rights, rejection of corruption, the safety concern and the environmental care - all this plays a fundamental role in the sustainable development of the Company.

Therefore, each of us must follow the values of the Company, the principles of morality and corporate ethics standards in his daily work. All these requirements are reflected in the UNI Capital Code of Business Ethics, which takes into account the international experience, the specifics of the Company and the principles entrenched in the UN and the ILO Conventions.

Mr. ARTIOM BABOGLO,
CEO of the UNI Capital Group – Global Partnership

OUR LEAD PRINCIPLES

Leadership by Example
Ethics First
An Openness to New Ideas
Dedication to Excellence





“The adherence to the “Ethics is above all” rule unites our employees around the world. This principle is one of the core values of the UNI Capital Group, and is the foundation of our Business Ethics Policy”

CEO-A. N. Baboglo

OUR MISSION

In its activity, the Company is inalterably faithful to its mission, which involves turning the energy for the sake of progress and man.

Our Company's activity is based on its corporate values, which allow us to conduct business in accordance with the highest ethical standards. The UNI Capital is mindful of the fact that its reputation depends not only on the strict observance of the local and international laws and the enforcement of human rights; to a wide extent, the Company's reputation and success are based on high social responsibility and adherence to moral and ethical standards and rules.





OUR VALUES

Efficiency and technological effectiveness

High efficiency and technological effectiveness are the most important components of our business success and the basis for achieving high results. Continuous work on improving the efficiency and innovative development are the key tools for implementing the strategic goals of the Company.

People

Our main value is people working to achieve the goals of the Company. Everything that the Company does is done by people and for people. High professionalism of our employees and extensive opportunities to reveal their talents for the benefit of the Company and the employees themselves are the keys to achieving the goals set by the Company.

Security

Preserving and protecting human life and health, ensuring labor safety and protecting the environment are our top priorities.

Social responsibility

The UNI Capital recognizes its responsibility before all interested parties in the countries and regions where the Company operates. The Company respects national and cultural characteristics, respects the rights of the indigenous peoples and pursues a socially responsible policy on labor and employment issues, provides support to employees, people with disabilities and veterans, and carries out an extensive charity and sponsorship activities.

Partnership

The Company forms and appreciates long-term relationships with business partners, clients and public organizations on the basis of respect and responsibility for the fulfillment of obligations.

Morality and ethics

In its activity, the UNI Capital is guided not only by financial goals, but it's also important for the Company how and in the name of what it works. The UNI Capital conducts its business on the basis of honesty and fairness, respectfulness, integrity and openness strictly fulfilling its obligations.

ABOUT THE CODE

The UNI Capital Code of Business Ethics (hereinafter referred to as the "Code") is a set of rules of individual and collective behavior that defines the corporate values of the Company for both, employees and external interested parties, and describes the requirements and expectations of the Company regarding the compliance with the rules of the ethical conduct of business.

The Code governs the basic ethical aspects of relationships both, within the UNI Capital organization structures and with external interested parties: investors, authorities, business partners and competitors, clients and society.

The Code is made in Russian and English languages and is put out in the open on the Company's website www.uni-capital.com

Who the Code is for?

Кодекс предназначен для каждого члена команды UNI Capital: всех сотрудников вне зависимости от занимаемого уровня (включая членов Правления) Кодекс устанавливает единые принципы деловой этики и делового поведения для всех сотрудников Холдинга UNI Capital, независимо от их местонахождения.

Мы также призываем наших партнеров и прочие заинтересованные стороны разделять содержащиеся в Кодексе нормы и следовать стандартам этичного ведения бизнеса.





Compliance with the Code

The compliance with the provisions of the Code is mandatory for all members of the UNI Capital structures, and is an indispensable working condition for each of us.

The UNI Capital conducts its business in many countries around the world, and therefore the Holding's activity is regulated by many different laws, customs and cultures. In our work, we must comply with standards and provisions of the applicable laws.

Each member of our team must:

- comply with legal requirements;
- be guided by the provisions of the Code in his daily work, and avoid inappropriate behavior;
- respect human rights and respect his co-workers;
- take care of the reputation of the Company and effectively use its resources;
- be responsible for and when handling the information and not disclose confidential information;
- avoid situations of conflict of interests;
- relate with opposition to corruption and fraud;
- take care of the environment, own safety and the safety of others;
- when attracting third parties to cooperate and work with the UNI Capital, make sure that the partner has a proper reputation;
- timely report of violations of the law and the Code, and assist during the investigation;
- in case of any questions as to application of the Code or any doubts as to the compliance with ethical principles, seek help from his immediate supervisor.

Additional responsibility of the company officers

The UNI Capital company offices, executives and members of the Management Board have an additional responsibility to create and maintain that level of cultural behavior at which employees know and understand their responsibilities and freely inform their managers about any doubts and problems they have.



Company officers must:

- through personal example, show commitment to the ethical principles;
- create an open communication environment in the structure where each employee feels himself comfortable, bringing up a particular issue for discussion;
- not give employees any instructions that violate the requirements of the current law, the Code or other local regulations;
- provide support to employees who in good faith initiate discussion of ethical issues, and facilitate their interaction on ethical issues with the management;
- immediately take measures to eliminate violations of the current law and the Code;
- take into account the compliance of the employees with the requirements of the Code when conducting an annual assessment of activity in the Company's structures.

INFORMING OF VIOLATIONS OF THE CODE

For employees:

If there is reliable information about the violation of the provisions of the Code, you must follow the procedure stated below:

- to indicate the violator onto the inadmissibility of violation of the provisions of the Code and to demand to cease these actions;
- in the absence of a positive result, to inform the violator's immediate supervisor about the violation;
- if the immediate supervisor is involved into the violation, does not take any measures to prevent the violation, or doesn't have such an opportunity to do so, to inform the higher management about the violation.

The decisions on the business ethics are taken basing on the principles of independence and objectivity.

For clients:

For its clients the Company has created a round-the-clock communication system:

- Hotline: +420 234 717 519
- Email: info@uni-capital.com

For employees:

To provide information and consulting assistance in the field of exercising the rights of employees, the Company has established a counselling center:

- Hotline: +420 234 717 519
- Email: office@uni-capital.com

The Company guarantees that for a conscientious member of the UNI Capital team, as well as for a representative of external interested parties who had informed about the violation of the provisions of this Code or has decided to prevent the violation, there will be no negative consequences (including dismissal, any form of discrimination and/or any other type of harassment). The applicant has the right to maintain the anonymity of his oral and/or written appeal. The Company guarantees confidentiality during the audit and the application of liability measures only on the basis of the results of an objective investigation of the circumstances of violation.

Violations to be immediately informed about

The UNI Capital supports the development of atmosphere of trust in the team where any ethical issues can be discussed. However, there are violations that must be immediately informed about:

- violation of the requirements of the current law or actions that may lead to its violation, as well as actions that carry risks of loss of the Company's business reputation;
- a proposal for cooperation from a competitor;
- fraud, including intentional accounting misstatement.



The UNI Capital as an employer

The team of craft professionals is our key competitive advantage, and thus we strive to make the Company the best place to work with. The UNI Capital strictly observes the current law, advocates a reasonable balance between the work and the personal life of its employees, respects their interests outside work. The Company seeks to create in its structures that environment which will help to reveal the best professional and human qualities of employees.



HUMAN RIGHTS AND WORK ENVIRONMENT

The multinational UNI Capital team, working in different countries and on different continents, is very much valuable for its diversity. The Company respects and ensures human rights, and recognizes their importance. We fully support the fundamental principles established in the Universal Declaration of Human Rights (UDHR), the European Convention on Human Rights (ECHR), declarations and conventions of the International Labor Organization (ILO) and other international documents in the field of human rights observance and protections. Our agreement with these principles is reflected in our policies and actions in relation not only to colleagues, but also to clients, employees and all other persons who we interact and collaborate with. Human Rights must be respected in any country, by all cultures and under all circumstances.

The Company ensures equal rights for employees, and provides equal opportunities to realize their potential.

The Company excludes any discrimination in determining the amount of remuneration, providing ac-

cess to training, in career advancement, dismissal or retirement, including discrimination on the grounds of gender identity, sexual orientation, marital status, age, physical disability, race or nationality, religion, political opinion, membership in public organizations, etc. The Company completely excludes any forms of forced labor and child labor, threats to physical, sexual or other violence, verbal abuses and any forms of abasement of human dignity.

The standard working time is set in accordance with the current applicable law of the countries where the Company conducts its business, and according to labor agreements the overtime works are always carried out by employees from their consent only.

The UNI Capital creates all possible conditions for the continuous development of employees, helping them to acquire new knowledge, to master new technologies and new forms of organization. The Company encourages innovative approaches and creates the conditions for the exchange and distribution

of best practices, new knowledge, innovative ideas, projects and developments.

The UNI Capital maintains an effective system of remuneration and recognition of employees, ensuring equal payment for work of equal value and additionally motivating the employees whose qualification and performance contribute to the successful fulfillment of the Company's mission and the achievement of business goals.

The Company welcomes the formation of labor dynasties, when not only professional experience, but also loyalty to the Company and adherence to its values are passed on from generation to generation.

The Company respects the diverse views of its employees belonging to different cultures, religious denominations and nationalities. The employees of the Company have the right to create professional structures or join them in their sole discretion.

You should:

- respect Human Rights and respect every employee regardless of his gender identity, sexual orientation, marital status, age, physical disability, race or nationality, religion, political opinion, membership in political, religious or any other public organizations, and work experience;
- maintain a friendly psychological climate in the team;
- work in a team, share experience with other employees of the Company, distribute advanced work methods and technologies, and constantly look for new opportunities in your activity.

OCCUPATIONAL SAFETY AND HEALTH

Human life is priceless; therefore, ensuring the safety and comfortable working conditions and maintaining a healthy lifestyle is the most important priority of the Company.

The Company takes all necessary measures to prevent accidents and personal employees' injuries in the result or in the course of duty performance, eliminating, as far as possible, the causes of risk factors occurrence at the workplace.

The Company on a systematic basis assesses the working conditions of employees and implements a set of measures to maintain safety at a high level.

When organizing job sites, the Company complies with sanitary and hygienic standards providing its employees with opportunities to fulfill basic physiological needs, including access to drinking water, hot food and sanitary facilities.

We believe that a healthy lifestyle is the basis for the harmonious development of our team.

You should:

- take care of your own safety and the safety of other people around;
- know and comply with applicable safety instructions at the workplace.

PERSONAL SAFETY

The UNI Capital considers a reliable protection of personal data of employees and clients from external and internal threats to be one of the key conditions for the normal functioning and development of the Company. The Company believes that failure to adhere to generally accepted personal safety rules can significantly damage the business reputation of the UNI Capital, as well as to lead to financial and other losses.

The UNI Capital provides its employees with the necessary protection against emerging threats related to the performance of their work obligations and employment duties.

You should:

- act with prudence when posting data about yourself in the public domain (on social networks, etc.);
- warn your co-workers against actions and behavior that can harm them.



ASSETS, INTERESTS AND REPUTATION MANAGEMENT

Деловая репутация, авторитет, дальнейшее успешное и устойчивое развитие Компании зависят от каждого из нас. Об этом всегда следует помнить при обращении с активами и иными ресурсами Компании (имущество, конфиденциальная информация, интеллектуальная собственность, денежные средства, а также оборудование, выданное работникам в пользование).

CONFLICT OF INTERESTS

The UNI Capital recognizes and respects the diversity and importance of the extraoccupational goals and interests of its employees. At the same time, the Company cannot be indifferent to the situation when in the result of personal, family and other reasons and circumstances, the Company's employee loses (or may lose) the loyalty and objectivity in relation to the Company. The conflict of personal interests with the corporate interests occurred thence may adversely affect the business effectiveness of the Company. Therefore, the Company is taking a number of actions to prevent such conflicts.

The Company has implemented a set of preventive and control procedures designed to ensure the prevention of abuse of authority and occurrence of situations for conflict of interests. When identifying the signs, reasons or facts of unlawful acts, abuses of authority and situations of conflict of interest, the official proceedings are conducted, and, if necessary, the complexes of additional measures aimed onto establishing the causes and conditions of committed violations are applied.

In order to prevent the conflict of interests, one should not directly or indirectly participate in business relations with clients or competitors, except as in the process of doing business on behalf of the Company, and also to receive loans, services, gifts or other personal benefits from them. The suppression of facts of conflict of interest and its causes is unacceptable.

It is unacceptable to have a personal interest in the operation of the Company's business partners, if such interest conflicts with the interests of the Company.

You should:

- relate with opposition to competitors' offers and fraud;
- avoid any actions that may affect your ability to make objective business decisions for benefit of the Company;
- before entering into relations with any organization whose interests may conflict with the interests of the Company, discuss this issue with the immediate supervisor and obtain a corresponding permission in the manner established by the Company

SOUNDNESS OF ASSETS AND THEIR EFFECTIVE USE

The soundness, safety and effective use of the Company's assets is the basis of the UNI Capital sustainable development and one of the main obligations of the Company before its clients.

All assets, including office equipment, consumable and expendable materials, intellectual property and other production means used in a daily work, can be used for business purposes only and for benefit of the Company.

You should:

- take care of the Company's assets, ensuring their effective use to achieve the set goals;
- not use the Company's assets other than as intended, as well as not use them for personal purposes or for deriving personal profit.

PROTECTION OF CONFIDENTIAL INFORMATION

Information which is commercial secret, information for internal use only, corporate information with restricted access and other information about the activity and development of the Company largely determine its competitiveness in the market and are a valuable asset. The disclosure of confidential information may harm the interests and reputation of the Company, and therefore each of us is obliged to responsibly handle and protect the information.

You should:

- use confidential information only within the scope of employment duties performing and in accordance with applicable corporate procedures;
- when processing personal data, strictly comply with the requirements for their protection;
- fulfill obligations on non-disclosure of confidential information, including the period after the completion of work and cooperation with the Company;
- with due care and respect, treat not only the corporate information of the Company, but also the corporate and personal information of its partners the access to which you get when working with them.

TRANSACTIONS USING INSIDER INFORMATION AND MARKET MANIPULATION

During our work, we often come across information about the activity of the Company before this information is publicly disclosed by it. The insider information is accurate and specific information included by the Company into the list of information, the disclosure of which can have a significant impact onto the business reputation of the Company. The use of insider information for personal profit is unacceptable. In addition, the Company employees should not transfer such information to relatives or any other persons even after completion of work at the Company and until the information received by such persons loses signs of the Company's insider information.

You should:

- objectively and conscientiously qualify the available proprietary information for its belonging to insider information. If you have doubts or you cannot unambiguously qualify it, please contact your immediate supervisor.
- warn your co-workers against negligence and violations as to disclosure of information. If your efforts come to nothing, inform your immediate supervisor directly about this.
- provide the required information on transactions, including any other information required to establish interest in consummation of transaction.



INFORMATIONAL TRANSPARENCY AND REABILITY OF REPORTING

The UNI Capital ensures the transparency of its activity by openly interacting with various interested parties and by publishing reliable and time-sensitive information of financial and non-financial nature.

We fully comply with the requirements of regulatory authorities as to information disclosure, and publish additional information necessary to interested parties for creating a complete and objective understanding and imaging of the UNI Capital business and for taking investment and other decisions regarding the Company.

When disclosing information, the Company adheres to the principles of regularity, consistency, efficiency, equal access, reliability, completeness and comparability of the data disclosed, while maintaining the confidentiality of important commercial information which can have a significant impact onto the Company competitiveness.

The financial and non-financial reporting of the UNI Capital is prepared in accordance with the accepted standards and fully reflects the financial position and business results of the Company's activity. The distribution of false, inaccurate, distorted and/or discredited the Company's business reputation information is unacceptable.

PUBLIC COMMUNICATIONS

The Company has defined a list of persons who has the right to make statements on behalf of the Company, and has established a procedure for coordination and transfer of information for its public distribution. Authorized persons when communicating with media representatives, employees, investors and/or other external interested parties, or when making other public communications are responsible for complying with the requirements of the Company and applicable law, and for ensuring the reliability and integrity of the transferred information. Authorized persons should promote the formation of a positive image of the Company and its activity before the external interested parties, and to avoid misrepresentation by distorting or hiding essential information about the Company's business activity.

You should:

- assist authorized persons in the timely receipt of reliable and accurate information;
- if an external interested party which you are not authorized to negotiate with refers to you, recommend it to contact an authorized person;
- in the absence of appropriate powers, avoid public statements about the activity of the Company, including on public Internet resources;
- play nice and be attentive when communicating with external interested parties.





UNI CAPITAL AND EXTERNAL INTERESTED PARTIES

The UNI Capital, realizing the importance of its business activity, strives towards building and maintaining sustainable and constructive relationships with all external interested parties.

CLIENTS

Customer relationships are an important component of the Company's business. We build relationships with our client being guided by the principles of honesty and openness. We always strive to meet the highest standards of service, provide only professional services and take care of every our client.

When working with clients, each our employee promptly responds to requests, bears personal responsibility for the results of his work, takes actions necessary for the qualified performance of his duties and provides comprehensive advices that do not mislead the clients. Our client's feedback is an integral part of our development and self-improvement. Working with appeals, we immediately take measures to quickly resolve any issues arose. The Company strives to continuously improve the quality of its customer service and to provide customer-oriented services.

You should:

- if client referred to you, redirect him to an authorized manager;
- when handling personal data of the client, strictly observe the requirements of applicable law and local regulations establishing the procedure for personal data handling.
- know and apply the main components of a customer-oriented service: customer care, professionalism and the art of communication;
- be polite, friendly and attentive with the client;
- comply with reasonable boundaries when assisting the Client and advising him in the selection of goods, products and services of the Company, avoiding to push them upon the client.

GOVERNMENT BODIES

The relations of the UNI Capital with the state authorities, government bodies and municipal authorities are based on the principles of compliance with the current law, transparency, cooperation, respect and inviolability of obligations.

You should:

- follow the procedure established by the Company for employees' participation in public events;
- when interacting with representatives of state and other regulatory bodies and authorities, exclusively express only the official position of the Company formed in the prescribed manner;
- if the state and/or other regulatory bodies and authorities send a request, provide them with complete and reliable information in accordance with the procedure established by the Company within the limits of the powers granted, or redirect the request to an authorized unit;
- contact your immediate supervisor and/or an authorized unit, if you cannot evaluate the correctness of your actions in relations with the state authorities, government bodies, municipal authorities and/or public organizations;
- inform your immediate supervisor, if you are aware of any violation of rules regarding to the state authorities, government bodies, municipal authorities and/or public organizations.

BUSINESS PARTNERS AND COMPETITORS

ΔThe activity of the UNI Capital business partners has a direct impact onto the reputation of the Company. For this reason, the UNI Capital collaborates with partners who comply with the Company's high standards of ethics, legality, openness, respect and observance of human rights.

The selection of suppliers and contractors of the Company is based on honest and competitive interaction. Thereat, the Company's employees should not have any hidden preferences and should not create any benefits for anyone.

The Company respects its competitors and interacts with them in accordance with the generally accepted standards of business ethics.

You should:

- when attracting third parties to collaborate or work with the UNI Capital, make sure that the partner has the proper reputation and shares the norms of the Code;
- clearly articulate the Company's expectations to the business partners;
- take measures established by the current law and local regulations, if the offers or actions of business partners do not meet the agreed expectations or obligations.

SOCIETY

Recognizing its responsibility before society, the Company promotes long-term economic growth, development and social stability, and promotes prosperity and progress in the countries and regions where the Company operates.

We implement a number of voluntary initiatives in various fields, protecting and preserving the world cultural, historical and natural heritage. We respect and treat environment with due care.





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