



## Supplier Code of Conduct

***Central Plains Group Limited is a company having subsidiaries in Ukraine and it is guided by the requirements of the current Ukrainian legislation, implements its interests exclusively by legal means and requires its partners to behave accordingly***

LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine", being subsidiaries of Central Plains Group Limited, adhere to such cooperation principles as the desire for long-term partnerships, fair competition in determining the possibility of becoming a supplier or buyer, and partnership development. Our customers expect the same behavior from everyone we work with, and especially from our suppliers. In order to implement the above principles, the company takes measures aimed at strengthening healthy business relations both within the company and with its suppliers. The company's internal measures include setting-up a transparent decision-making system and process of interaction with suppliers, establishing cost control, staff training and development, etc. To improve interaction with suppliers, the company has implemented a supplier assessment system. The assessment of the supplier's performance is taken into account at selecting a supplier, developing a strategy for interaction with suppliers, as well as at taking decisions on development of relations with suppliers. Provisions of this Code set forth the minimum standards expected to be adhered to by Suppliers of LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine".

A **Supplier** is an individual or legal entity capable of supplying the goods required by an enterprise, performing the necessary work or rendering services, and participating in procurement procedures. The Supplier shall also ensure that its management, employees and contractors comply with this Code. By signing this Code, the Supplier acknowledges that all existing and future agreements and business relations with LLC "Strong Energy Zakhid"/ LLC "Central Plains Group Ukraine" will be subject to the provisions of this Code.

### LABOUR AND HUMAN RIGHTS

**Non-discrimination:** The Supplier shall not allow discrimination against employees based on race, colour, sex, language, religion, political or other beliefs, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability or other distinguishing features. Any decisions regarding professional activities of employees, including their hiring, dismissal and retirement, must be based solely on legal and non-discriminatory criteria.

**Forced labour:** The Supplier shall not be engaged in or benefit from any form of forced/slave labour or human trafficking and shall comply with applicable anti-slavery and anti-human trafficking laws; it shall maintain its own policies and procedures to ensure such compliance; it shall ensure that its supply chain is free of slavery or human trafficking by implementing due diligence procedures for its subcontractors, suppliers and other supply chain participants; and it shall notify subsidiaries of Central Plains Group Limited as soon as it becomes aware of any violation or potential violation of relevant applicable laws or any actual or suspected slavery or human trafficking in the supply chain relevant to any agreement with Central Plains Group Limited.

**Child labour:** The Supplier shall not engage in or benefit from the use of child labour. All full-time Supplier's employees shall be at least 15 years old, or their age shall be not lower than that required by the applicable law, whichever norm is higher. If the minimum working age is 14 years, according to the UN exceptions for developing countries, this lower age should apply.

The Supplier shall refrain from hiring employees under 18 years of age for positions requiring hazardous work that may harm their health, safety, or morale.

**Freedom of association and collective bargaining:** The Supplier shall respect the right of employees to join (or not to join) a trade union or other organization of their choice and to bargain collectively in support of their mutual common interests without fear of retaliation such as intimidation, harassment or dismissal.

**Threats and harassment:** The Supplier shall protect employees from any act of physical, verbal, sexual or psychological harassment, stalking, bullying or threats at the workplace by colleagues or supervisors.

**Working hours, benefits and wages:** The Supplier shall comply with the strictest applicable laws or industry standards regarding minimum wages, working hours, overtime work, and benefits. The Supplier's employees shall not be required to work more than 40 hours per week, including overtime work, on a regular basis (or more than the normal working hours and overtime work, subject to compliance with the applicable law). Overtime wages must be paid legally on a regular basis. The Supplier's employees shall have the right to at least one day off in every seven days, as well as to adequate breaks during work and sufficient rest periods between shifts.

**Paid vacation:** The Supplier shall provide all employees with the right to be absent from work in case of temporary disability (sick leave) and annual leave, as well as with parental leave for eligible employees with a newborn or newly adopted child, in accordance with the applicable law. Employees taking such a leave should not be dismissed or threatened with dismissal as a result.

**Employment agreements:** The Supplier shall provide all employees with a written, understandable and legally binding employment agreement.

## **OCCUPATIONAL HEALTH AND SAFETY**

The Supplier shall ensure that it and its contractors provide its employees with safe working conditions, including compliance with rules and procedures, use of protective equipment, and training necessary to perform their tasks safely. In addition, the Supplier shall proactively identify and eliminate or duly control any hazards endangering employees (and other persons present at its facilities) and the environment. The Supplier shall develop and implement plans that clearly outline appropriate measures to protect employees and other persons affected by its activities.

## **RESPONSIBLE CONDUCT OF BUSINESS**

The Suppliers shall carry out their activities in compliance with the laws of Ukraine and other countries the Supplier conducts its business in.

The Supplier shall provide only reliable information. Should it be detected that the Supplier deliberately provided false information, the enterprises shall reserve the right to suspend or terminate cooperation on current issues (within the framework of the current legislation), as well as to draw appropriate conclusions regarding future cooperation.

The Suppliers shall carry out their activities in compliance with anti-corruption legislation and the enterprise's requirements in business ethics. LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" require their Suppliers to adhere to the principles of legality and transparency, strictly comply with the provisions of anti-corruption legislation and not take any measures that may violate provisions of anti-corruption legislation or cause such a violation by the enterprise, including not offering, authorizing, promising or making illegal payments directly or through third parties, including (but not limited to) bribes whether in cash or in any other form, to any individuals or legal entities, including (but not limited to) commercial companies, government and self-government authorities, public officials, private companies and their representatives. Fulfillment of the contractual terms on time and with proper quality: LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" express their hope that all Suppliers are interested in delivering products (rendering services/ performing work) on time, according to the agreed schedule, in compliance with the order (contract, agreement), fulfill the terms of warranty service in full and with due quality.

## **HONESTY IN BUSINESS**

Interaction with enterprise employees only within the scope of their official duties and only in the interests of the enterprises. The enterprises do not accept any undue influence on employees to force them to act in the interests of any Supplier to the detriment of the enterprise's interests or for any other purpose, by offering them monetary (or other material) compensation, by threats or other illegal actions. Should information about the fact or attempt of unlawful influence on the enterprise employee by the Supplier be detected, the enterprise shall reserve the right, within the framework of the current legislation, to suspend or terminate cooperation, as well as to draw appropriate conclusions regarding future cooperation. LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" also reserve the right to report this fact to the relevant public authorities. If, in the course of interaction with the enterprise employees, the Supplier discovers facts or

receives information about dishonest fulfillment of their official duties by an enterprise employee, we ask that such information be sent to us. LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" share the opinion that it is necessary to build transparent partnerships primarily between companies as such, regardless of the change of the companies' managers or ordinary employees.

### **GIVING AND RECEIVING GIFTS**

Gifts and souvenirs of appropriate value may be accepted for common occasions in compliance with the Business ethics policy. At the same time, LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" ask you to remember that presence or absence of a gift will not and should not in any way affect the actions, commitment or non-commitment of the enterprise employee to whom the gift was or was not given by the Supplier. The enterprise employees may occasionally accept or extend invitations to a lunch, dinner or other entertainment event if: the cost of the lunch, dinner or entertainment is within appropriate limits; the purpose of the meeting or event is business; and the costs will be paid by the enterprise as due business expense, unless paid by the other party. Entertainment of reasonable value may include lunches, dinners, or attendance of sporting and cultural events, if they are generally offered to other customers or Suppliers.

### **DESIRE TO FIND A MUTUALLY BENEFICIAL SOLUTION**

LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" hope that the Supplier also strives to develop partnerships in addressing both strategic and current issues of interaction. The enterprises expect to receive information from the Suppliers on possible hazards, risks or possible lost profits threatening the enterprise. In order to take mutually beneficial decisions, LLC "Strong Energy Zakhid" and LLC "Central Plains Group Ukraine" welcome transparency of the Supplier's internal business processes (such as safety and quality assurance system, logistics structure, tax calculation and payment procedure, etc.)

### **PROTECTION OF CONFIDENTIAL INFORMATION**

The Suppliers that have gained access to confidential information in the course of business relations should not share this information with anyone unless they have received permission to do so from LLC "Strong Energy Zakhid"/ LLC "Central Plains Group Ukraine". If the Supplier believes it gained access to the confidential information of the enterprise by mistake, the Supplier shall immediately inform the enterprise employee through whom it contacts LLC "Strong Energy Zakhid"/ LLC "Central Plains Group Ukraine", and refrain from further dissemination of such information. Accordingly, the Supplier shall not share information relating to any other company with the enterprise, if the Supplier is under a contractual or legal obligation not to disclose such information.

### **ENVIRONMENTAL PROTECTION**

LLC "Strong Energy Zakhid"/ LLC "Central Plains Group Ukraine" expect that their Suppliers have effective environmental policies in place and that they comply with applicable environmental laws and regulations. Whenever possible, the Suppliers shall take a proactive approach to environmental issues, implement initiatives promoting environmental responsibility, and promote technologies contributing to environmental protection and sustainable product life cycle practices.

LLC "Strong Energy Zakhid"/ LLC "Central Plains Group Ukraine" express the hope that the above principles of work will help us in creating, developing and maintaining business partnership relations that will ensure mutually beneficial cooperation.

This Code applies to all Suppliers and is an integral, binding part of any agreement between Central Plains Group Limited (its subsidiaries) and the Supplier.

