



**BLRT Grupp
CODE OF CONDUCT**

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Tallinn
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LIST OF CHANGES TO THE INITIAL EDITION

Modified date: 30.05.2019

Paragraph no. 7 has been reworded: Money laundering and tax evasion

BLRT GRUPP CODE OF CONDUCT

1. INTRODUCTION

The BLRT Grupp Code of Conduct is our principles of work and business.

Trust of clients and partners is a cornerstone for the success of the concern as a whole and every employee in particular. It has been earned by many generations of employees during over 110 years' history of BLRT Grupp.

Our reputation and success depend on all of us. We bear responsibility for observation of our principles and follow our values in all that we do and say.

The Code of Conduct covers the main aspects of our activity, which are described in detail in the regulations of the concern.

2. CLIENTS AND PARTNERS

We see potential for efficient and long-term cooperation with clients and partners that are aimed at compliance with the BLRT Grupp Code of Conduct. Our clients and partners protect confidential information and use honest working methods. They observe the principles of fair and open competition, as well as the requirements of laws on taxation and legal acts which are directed against corruption and monopoly. The clients and partners of BLRT Grupp comply with all the applicable import and export norms, as well as the other trade regulations of the countries in which the concern has business interests. They provide transparency and relevant reports and documentation to a degree that demonstrates compliance with all the applicable requirements for materials and services, industry standards and legal regulations.

The employees of the concern show willingness to help the clients and partners to achieve their goals and bear responsibility for fulfilment of the undertaken commitments and work results.

3. EMPLOYEES

The concern ensures fair treatment by others and equal opportunities in the work environment that is free from any discrimination to all of its employees.

We protect the rights of our employees, do not accept any form of forced labour, support the prohibition of child labour use. We treat all the employees equally and respectfully. We are against any form of discrimination or persecution on the basis of gender, religion, race, nationality or affiliation to any ethnic, cultural, social group, as well as in connection with disabilities, sexual orientation, marital status, age or political beliefs.

We actively promote the development of each employee within the existing legal acts, increase knowledge and experience, stimulate comprehensive awareness. Thus, we support the conditions necessary to continuously improve the level of productivity. High labour productivity is the key to reliability and development of the concern, and it also contributes to the preservation of jobs.

4. RESOURCES

We strive for economical production and try to eliminate all kinds of losses. Each of us is responsible and careful in the use of the resources entrusted to us, contributing to their rational use.

5. ETHICS

We work and conduct business on the basis of the principles that maintain trust in us as professionals in all respects. Each of us is aware that he/she is a representative of BLRT Grupp all the time and in all kinds of situations.

We stand ready to help colleagues, clients and partners. Each of us is guided in decisions and actions by such ethical norms as honesty, good faith, fairness and transparency.

6. LEGAL REGULATIONS

We observe the legal regulations that apply on the international level and in all the countries where we conduct business. We pay special attention to the provisions of the Universal Declaration of Human Rights, as well as the legal acts concerning environmental aspects.

In all cases, when any regulatory authority addresses any enterprise, subdivision or employee of the concern, it should be reported to the Law Department of BLRT Grupp.

7. MONEY LAUNDERING AND TAX EVASION

One of priorities of BLRT Grupp AS is anti-money laundering and counter-terrorism financing.

BLRT Grupp AS strictly observes the laws and international acts on anti-money laundering and counter-terrorism financing as well as all laws and regulations on taxes of countries and regions in which jurisdiction the Group's companies are represented.

We do not want the companies of our Group to be used for laundering of illegal income, terrorism financing or for any other criminal activity. The Group actively counteracts laundering of illegal income and doesn't do business with persons against whom sanctions have been imposed or criminal penalties applied.

We act prudently, preventing participation or involvement of the Group's companies in money laundering / tax evasion transactions or other criminal activities. Therefore, before establishing relationship with a client or a third party, we give due attention and recognize possible warning signs, typical for illegal activities. Any suspicious activity that may involve money laundering, terrorism financing, tax evasion, or other unlawful actions should be reported immediately to the Legal Department of BLRT Grupp.

8. RISK MANAGEMENT

Risk management is an integral part of the management of BLRT Grupp. It is a unified system that encompasses the strategy, processes, employees and technologies of our concern. Risk management contributes to reasonable and consistent decision-making, and also promotes prompt response to all the identified material risks which are faced by the concern as a whole and each employee in particular.

9. COMPETITION

We support and maintain active, free and fair competition, and encourage our clients and partners to observe the principles that contribute to its development. We comply with the requirements of laws on taxation, as well as legal acts which are directed against corruption and monopoly and applicable in the countries in which BLRT Grupp has business interests.

10. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Confidentiality and protection of intellectual property are important to ensure the competitiveness of the concern.

The intellectual property of BLRT Grupp includes patents, trademarks, commercial secrets and copyrights, as well as scientific and technical knowledge, know-how and experience accumulated by our employees. Each of us contributes to providing, preserving and protecting the intellectual property rights of the concern, and also has a responsible attitude regarding their use.

Moreover, each of us guarantees full confidentiality and strictly observes the rights concerning the intellectual property of our clients and partners.

11. QUALITY, SAFETY AND PROTECTION OF THE ENVIRONMENT

Our products and services comply with the standards of quality and reliability. We are constantly improving our professional competence and striving to meet the needs and expectations of our clients. We provide services in accordance with the requirements of legal regulations and standards, confirming the results of our work by measuring client satisfaction.

We provide a safe and healthy working environment for all our employees.

We try to reduce the negative impact of our activity on the environment by reducing emission of harmful substances, consumption of energy and natural resources. We contribute to the protection of the environment by supporting the use, development and distribution of environmentally safe technologies.

12. COOPERATION

To achieve these common goals, all the enterprises and subdivisions of the concern work as a single team. This system of cooperation creates all the conditions for us to fully apply our experience, knowledge and talent, as well as openly exchange information and express ideas. The contribution that each of us makes to the success of the joint activity enables the achievement of personal goals, too.

When making a decision, we prioritize those interests that allow the concern to manufacture a product or render a service in line with a client's expectations.

We regularly analyze our performance in order to detect the risks hindering the achievement of common goals and to minimize the possibility of their occurrence.

13. COMMUNICATION

We provide efficient and long-term cooperation both inside and outside of the concern through effective communication — the timely exchange of objective and accurate information among employees.

We reasonably document and store information so that it can be effectively used and transmitted only by authorized employees, taking into account all the principles of confidentiality, regardless of the place and time of work performance.

Official statements, including through the media, on our activity may be done only by authorized employees. Meanwhile, the information concerning clients and partners is agreed with the latter in advance.

Our statements and actions are the same.

14. SOCIAL RESPONSIBILITY

We realize that every action or failure to act has its consequences, including for society.

We are proud of our history and reputation. Together with our accumulated experience, they provide us an opportunity to work constructively with non-government organizations and state authorities to provide competent solutions that improve the welfare of our concern, our clients, our partners and society as a whole.

We respect cultural and social traditions and also appreciate achievements in the fields of education, culture and sports in all the countries where we conduct business. For their development, we openly encourage appropriate initiatives by our employees and provide sponsorship.

We honor the BLRT Grupp brand as one of our most valuable achievements, regarding which no compromise is possible.

15. COMPLIANCE WITH THE CODE OF CONDUCT

Each employee observes this Code of Conduct and other regulations of our concern. Managers of the enterprises and subdivisions bear responsibility for observation of the Code of Conduct by the employees. They are obliged to set an example in following the principles, standards and regulations of the concern, and also provide employees with an opportunity to observe them.

We welcome comments concerning observation of the BLRT Grupp Code of Conduct. If someone becomes aware of any violation of this Code of Conduct or other actions against the interests of the concern, he/she shall immediately report it. A violation should be reported to an immediate supervisor. If transmission of such information within a subdivision or an enterprise is not appropriate or a violation concerns the interests of the proprietaries, it is necessary to turn to the Internal Audit and Control Service at the following email address: IAD@blrt.ee. At the request of the employee who has made a report, he/she may be granted anonymity. Employees' reports on violations do not entail negative consequences for their work or career.

If legal regulations, the Code of Conduct or other regulations of BLRT Grupp are violated, appropriate measures shall be taken in respect of the violator.