e-promo group

# CODE OF CONDUCT
# E-PROMO

2022

# 1. THE MAIN GUIDELINES AND VALUES OF THE COMPANY

## 1.1. VALUES OF EMPLOYEES

**LEADERHIP**

- Challenge
- Ambition
- Leading
- Expertise
- Advanced technologies

**CONCERN FOR PEOPLE**

- Flexibility
- Openness to initiatives
- Inclusion
- Family type of team

**FOCUS ON THE OVERALL RESULT**

- Involvement
- Mutual Aid
- Responsibility

**DECENCY**

- Mutual Respect
- Tolerant Attitude
- Ethics

**TRANSPARENCY OF INTERNAL PROCESSES**

- Trust
- Clear payroll calculations
- Growth Transparency
- No barriers in communication with top management

## 1.2. CLIENT VALUES

**GROWTH/ DEVELOPMENT/ LEADERSHIP**

- Proactivity
- Client training and professional development
- Industry expertise
- Innovativeness, new technologies

**CONCERN FOR CLIENTS**

- Involvement
- 24/7 approach
- Solving of customer problems as your own
- Fast resource mobilization

**PARTNERSHIP**

- Win-win Agreements
- Mutual Respect
- We are part of the client's team

**OPENNESS**

- Clear working conditions
- Access to the agency's top executives

**DECENCY**

- Fulfillment of commitments made
- Fairness
- The six handshakes rule
- We do not provide services that we do not understand

## 2. MUTUAL RESPECT, TOLERANCE AND EQUAL OPPORTUNITY

Our main asset is the team, so what we value most is the team spirit within the agency.
The Company has rules for communicating with colleagues and customers, which are accepted and observed by all employees.

### WHAT WE DO

**IN COMMUNICATION WITH THE COLLEAGUES**:
- We help colleagues when they ask for it.
- We respect each other.
- We wish each other happy birthdays and celebrate joyous events in life.
- We give a heads-up if we cannot complete assignments on time or in full.

**WHEN ORGANIZING WORK:**
- We finish urgent tasks after work if we didn't have time to do them during the day.
- We treat company property with respect and report situations when something is broken or out of order.
- We wash our own dishes and clean up after corporate events in the office.
- When we see opportunities in the company to improve or optimize processes, we communicate that to the executive.
- We independently look for opportunities to extend our knowledge in the professional environment, independently study industry media and new technologies.
- We always take calls from colleagues, partners and clients, even after hours. If a colleague decides to call, it means he/she has an important question.
- We always call back if there is a missed call.
- On resignment, we try to hand over as much detail as possible to our colleagues.

**WHEN WORKING WITH A CLIENT:**
- We treat all our clients with respect.
- We communicate politely with clients on the phone and in correspondence.
- We congratulate client employees on birthdays and holidays, subject to the anti-corruption provisions of this Code.
- We respond to the client's request (by e-mail or phone) within 8 working hours. If we do not meet this deadline, we write a letter with a forecasted resolution date.

## WHEN ORGANIZING AND CONDUCTING MEETINGS/ CALLS WITH CLIENTS:

- We book meeting rooms in advance.
- We always write follow-up letters after meetings and calls with clients.
- If we came to a decision with the client during skype communication, we put it down in an email.
- We always forward the event on the calendar to the client after the appointment has been arranged.
- We remind the client about a meeting the day before.
- At the beginning of a meeting with a client, we always talk about its purpose, agenda and timing.
- We try not to be late for a meeting with a client and give a warning if we are.
- When we meet with a client, we match our looks to the looks of the client.

## IN CORRESPONDENCE/ PHONE CONVERSATIONS:

- When communicating with clients on the phone / in messengers:
  - we start the conversation by making sure that the person we are talking to has time for it;
  - we always greet the recipient of the letter with "Good afternoon, ...", "Hello, ...";
  - we always make the subject of the letter / purpose of the call clear and concise;
  - we try to be succinct and concise in our letters;
  - we don't make up answers, but promise to clarify and come back (and we do come back!);
  - we always maintain a discreet and polite style of communication;
  - we smile on the phone; you can hear it :)

- In correspondence with someone at work, we:
  - if we do not have time to do the task, we inform about it, (a) without waiting for a reminder and (b) in advance to have time to find help/ reschedule;
  - if we can't do something, we immediately look for alternatives and suggestions;
  - we confirm receipt of the letter and let the originator know when we can respond (if it's not a newsletter);
  - we report bad news about a project/client/task to colleagues immediately, indicating what has been done to solve the problem and what remains to be done;
  - we check if our letter has been received. Clients sometimes miss important emails.

# WHAT WE DON'T DO

## IN COMMUNICATION WITH THE COLLEAGUES:

- We do not judge the religious/sexual preferences, nationality, or personal lives of colleagues.
- We aren't rude and we don't raise our voice or insult our colleagues.
- We don't set colleagues up in work.
- In communicating with subordinates, we don't perform "public punishments", we provide negative feedback in private.
- We don't gossip.

## WHEN ORGANIZING WORK:

- We don't leave work at 6:00 p.m. sharp if there are still urgent things to do today.
- At the same time, we do not spend the whole day at work from 8:00 to 22:00 and leave time for rest and personal life.
- We do not disclose proprietary or confidential information after termination.
- We don't write empty letters with an attachment with no subject and no explanation of its purpose.
- We don't go on vacation leaving work not fully handed over.
- We don't stay home to work without getting approval from the manager.

## WHEN WORKING WITH A CLIENT:

- We do not say to the client on the phone/ in correspondence "It's not my problem / Sort it out yourself" when it comes to our company's area of responsibility. In such a situation, we forward the letter to our colleagues who are responsible for it.
- We do not discuss religious/sexual preferences, nationality, or clients' personal lives.
- We don't give negative connotation to clients in our internal corporate correspondence/ discussions.
- We do not use obscene language in our written or verbal communication with clients, even if the client behaves that way.
- We don't raise our voice to a client's employee, even if that's how the client behaves.
- We do not discuss clients, employees or the specifics of working with them with other clients without consulting them first. When client A asks about the specifics of client B, we say that we don't comment on the work with other clients.

## 3. CONCERN FOR THE INTERESTS AND REPUTATION OF THE COMPANY

The Company's business reputation, credibility and further successful and sustainable development depend on each one of us. You should always keep this in mind when communicating with colleagues, business partners, as well as when posting information on the Internet, interacting with the media, handling confidential information and Company property.

### 3.1. CAREFUL HANDLING OF PROPERTY AND ASSETS

The preservation of property owned and otherwise held by the Company under the civil law is an important component of its sustainable development and well-being. The Company's property includes production equipment, tools, office equipment, consumables, intellectual property and other means of production that are used in day-to-day operations.
We treat the Company property and assets with care, ensuring their efficient use to achieve results at a lower cost.
We do not misuse Company property or assets for personal purposes or gain.

### 3.2. DECLARATION OF SECRECY OR NDA

Each of us signs a non-disclosure agreement (NDA) in addition to our employment contract.
This document allows the employer to prevent unauthorized use and disclosure of confidential information.

**DO NOT** share the following information with third parties (friends, clients, other companies):

- Information about the employer's business activities: information about current and former clients, conditions of work with them, potential clients, partners, etc;
- Information about the financial status of the employer:
- information on turnovers, income, accounting, management and accounting data, etc.;
- information about the employer's production processes: work regulations, production processes, internal standards and documents, etc;
- Information about the personnel and organizational structure of the employer: names of current and former employees, roles of employees in the company, etc;
- information about the employer's physical and information security processes and policies in place.

### 3.3. MEDIA RELATIONS AND ACTIVITIES IN THE INFORMATION SPACE

When mentioning the company on social media, keep in mind:

- Each of us is part of the E-Promo brand. Publications on social media on behalf of an agency specialist have a real impact on clients, industry peers and, ultimately, on the business of the entire company;
- Everything you post stays on social networks forever;
- Don't write about things that are covered by the NDA;
- Participate in discussions on topics you are competent in. Be polite, don't criticize your opponents unreasonably;
- Support the E-Promo brand. When sharing successes or professional expertise, don't forget the tag #epromo.

You can publish these posts on your personal pages to promote yourself as a professional and to make it interesting for clients and colleagues to follow you:

- expert commentary on industry news;
- reviews, industry observations;
- instructions;
- development forecasts;
- case studies;
- reviews of the company and the work there;
- "inner workings";
- reviews of books, movies, cultural events.

All posts on personal pages related to the agency's work must be approved by the head of marketing before publication.

If you feel you have more than just a post on your personal account, write an article! We provide editorial and publication assistance when posting employee articles on the corporate blog and profile media.

## 4. HEALTH, SAFETY AND ENVIRONMENT

Management of occupational, industrial, fire and environmental safety is one of the Company's priority tasks.
The fundamental document defining the principles of workplace safety in the Company is the Company Regulation on the Occupational Health, Industrial, Fire and Environmental Safety Management System.

The main objectives of the Occupational Health, Industrial, Fire and Environmental Safety Management System:

- prioritizing preservation of life and health of employees in the course of their work activities;
- compliance of working conditions at workplaces with occupational safety requirements;
- implementation of consistent and continuous measures to prevent incidents and cases of deterioration of employees' health, industrial injuries and occupational diseases, including through the management of occupational risks;
- consideration of the individual needs of employees, including through the design of workplaces, the choice of equipment, personal and collective protective equipment, the development of production processes;
- continuous improvement and enhancement of the effectiveness of the OHSAS;
- mandatory involvement of employees and their authorized representative bodies in the management of labor protection and ensuring labor conditions that meet labor protection requirements through the necessary resource provision and encouragement of such participation;
- personal interest in ensuring, as far as possible, safe working conditions;
- performing other duties in the field of HSE based on the specifics of their activities.

## 5. PREVENTING VIOLATIONS OF ADOPTED RULES AND STANDARDS

In all regions, the Company works exclusively in accordance with legal requirements. We do not tolerate any form of illegal business conduct, bribery, corruption, insider trading, fraud or money laundering. Our employees are guided solely by the interests of the Company in the performance of their duties.

### 5.1. PREVENTING CORPORATE FRAUD AND CORRUPTION

In its daily operations, the Company is guided by Russian and foreign anti-corruption laws, the principles of this Code, the provisions of the Company's policies on corporate fraud and involvement in corruption, and reaffirms its commitment to global anti-corruption standards.

The Company prevents all types of corporate fraud, misrepresentation of financial statements, corrupt practices, theft, intentional damage and other abuses of Company assets.

Corrupt practices are the offering, giving, promising, soliciting or receiving of bribes, mediation in bribery, making payments to facilitate administrative, bureaucratic and other formalities in any form, including money, other valuables, services or giving/ receiving an unjustified material or immaterial benefit from any persons/ organizations or to any persons/ organizations, including government representatives, public authorities, private companies and political figures.

### 5.2. GIFTS AND OTHER BENEFITS

Gifts, invitations to hospitality events and all sorts of services to business partners (or from business partners) can help develop long-term business relationships. However, this should not reduce our responsibility and professional requirements to cooperation with potential partners.
When deciding whether or not to give or receive a gift to or from a business partner, we follow these rules:

- we do not accept or give gifts (including in the form of money, securities, precious metals and stones, loans, certificates and gift cards, discounts and services not provided on a general basis) worth more than 4,000 rubles from current and potential counterparties and officials without the approval of the immediate supervisor,
- the cost and frequency of giving and receiving gifts and/or participating in hospitality events must be determined by business necessity and be

reasonable. This means that gifts and business hospitality accepted must not result in any recipient's reciprocal obligations and/or affect the objectivity of his or her business judgment and decisions.
- the gift itself, the corporate event and its value must comply with the rules adopted in the business environment, legislative, corporate restrictions, as well as national peculiarities.
- when in doubt about the propriety or ethics of their actions, employees must inform and consult with their manager before giving or receiving gifts or engaging in any activity.

## 5.3. PREVENTING AND MANAGING CONFLICTS OF INTEREST

We are guided solely by the best interests of the Company in fulfilling our job duties and striving to achieve the best possible results.

A conflict of interest is any situation or circumstance in which the private interests of an employee or his/her close associates conflict or may conflict with the interests of the Company and thus affect or may affect the proper performance of his/her duties, including making decisions in the performance of job duties that may result in harm, violation of rights or legitimate interests, loss of property and/or business reputation of the Company and/or the Group Companies.

We strive to avoid conflicts of interest in the Company. Accordingly, we should not:
- own shares or securities of a business partner or competitor of the Company, obtain a loan or surety from them, be a member of their management bodies, act as their agent or representative, or have any other financial interest in the performance of these or other organizations in violation of the requirements established by the Company on these matters;
- have close associates or participate in their promotion within the Company, performance evaluation or compensation (including wages, bonuses and other compensation);
- use one's official position for personal gain.

In all cases, the situation that has led or may lead to a conflict of interest must be resolved.

## 5.4. FINANCIAL REPORTING AND MANAGEMENT ACCOUNTING

The company is interested in strengthening its reputation as an open and bona fide market participant. The Company ensures completeness, accuracy and reliability of the data reflected in the accounting and reporting in strict compliance with the Russian and international legislation, as well as the principles and rules established by the provisions of this Code.

The company adheres to certain standards, which are primarily intended for employees responsible for maintaining and reporting financial statements and management accounting data:

- business transactions are fully and accurately reflected in financial statements and other accounting documents in accordance with the principle of transparency of the Company's activities;
- reliability of financial information maintenance and accounting is supported by strict compliance with internal control procedures;
- storage and use of records are carried out in accordance with the requirements of applicable standards and legislation.

# 6. APPLICATION AND AMENDMENT OF THE CODE

## 6.1. CODE COMPLIANCE

In our day-to-day activities, we comply with the rules and standards set forth in this Code.
The Company's management actively supports and demonstrates its commitment to conducting business in a lawful and ethical manner in accordance with the principles set forth in this Code, organizing regular information campaigns, appropriate staff training and other activities.
Each employee is responsible for adhering to ethical standards. The procedure for applying the norms of this Code is mandatory for all employees, regardless of their position and role in the Company, and is established by the internal documents of the Company.
The Company endeavors to include in its contracts with suppliers (contractors) commitments by suppliers (contractors) to comply with the provisions of this Code.

## 6.2. AMENDMENT OPTIONS FOR EMPLOYEES

Every employee can make suggestions for changes to the Code by sending them to the e-mail address: info@e-promo.ru.
All of them will be accepted for review by company management. Once the Code is implemented in accordance with corporate procedures, its provisions are binding on all employees of the Company.