

SUPPLIERS CODE OF CONDUCT

(Approved by the General Director of GDC Services LLC, order ref.no. 553 dated 20.09.2016)

This document represents a collection of principles that suppliers and business partners of GDC Services LLC (hereinafter also referred to as "the Organization") must adhere to.

Purpose of the document:

Describe and consolidate the basic principles that must be observed by the suppliers and business partners of the Organization;

FOREWORD

GDC Services LLC is responsible in front of its customers, employees, founders and investors, the society, as well as in front of the environment. This corporate responsibility obliges the Organization to comply with laws, respect ethical values and follow the principles of sustainable development. By adopting this Code of Conduct for Suppliers and Business Partners (hereinafter "the Code"), GDC Services LLC approved the principles and expects its suppliers and business partners to adhere to them.

DEFINITIONS AND TERMS

Supplier is a legal entity or an individual with whom the Organization is planning to or has already entered into contractual relationship for receiving goods, works, services.

Business partner is a legal entity or an individual fulfilling the functions of an intermediary and/or a representative acting in the interests or on behalf of the Organization.

SCOPE OF THE CODE

Carrying out a policy of corporate social responsibility, GDC Services LLC expects a responsible behavior and compliance with the principles set forth in this Code from its suppliers and business partners, as well as from their employees. If suppliers or business partners transfer their obligations to third parties (for example, subcontractors or representatives) within the framework of business relations with GDC Services LLC, GDC Services LLC expects these third parties to comply with these principles.

01

CORPORATE RESPONSIBILITY

GDC Services LLC expects suppliers and business partners to pay special attention to the following principles:

Human rights

Suppliers and business partners of GDC Services LLC shall comply with the current international norms for the protection of human rights. Suppliers and business partners of the Organization shall not use forced or child labor. Suppliers and business partners shall comply with the rules set forth in International Labor Organization conventions Nos. 138 and 182 concerning child labor.

Equal opportunities without discrimination

Suppliers and business partners of GDC Services shall not discriminate against anyone on the basis of ethnic, national or social origin, skin color, sex, race, religion, ideology, age, disability, sexual orientation, political views, etc.

Product safety

Suppliers and business partners of GDC Services LLC shall comply with all applicable standards and requirements for the safety of products and services provided.

Safety in the workplace and working hours

Suppliers and business partners of GDC Services LLC shall comply with all legal standards of labor protection and safety at work. They shall strive to further develop and improve working conditions of their employees.

Minimal salary

Suppliers and business partners of GDC Services LLC shall guarantee their employees a salary that is not lower than the minimum wage established and guaranteed by the law.

02

ENVIRONMENT AND CLIMATE PROTECTION

GDC Services LLC is striving to contribute to the environmental protection. The Organization has developed an environmental protection program. GDC Services LLC expects its suppliers and business partners to follow the following principles:

Observance of legal norms in the sphere of nature management and environmental protection

Suppliers and business partners of GDC Services LLC shall be responsible for environmental protection and comply with the applicable legislation regarding environmental protection and environmental management.

Increasing energy and resource efficiency

Suppliers and business partners of GDC Services LLC shall carefully use natural resources and minimize negative impact on the environment from their production processes and products. They shall contribute to reducing energy consumption and CO2 emissions.

03

TRANSPARENCY OF BUSINESS RELATIONSHIPS

GDC Services LLC expects its suppliers and business partners to pay attention to compliance with the principles:

Avoidance of conflicts of interest

Suppliers and business partners of GDC Services LLC shall make decisions purely on the basis of objective criteria and shall not be guided by their own interests or personal relationships.

Prohibition of bribery

Suppliers and business partners of GDC Services LLC shall not allow corruption. They shall ensure that their employees, subcontractors or representatives do not offer bribes, do not allow commercial bribery, illegal donations or other prohibited payments or benefits to customers, officials or other third parties and in turn do not accept bribes from them.

Gifts, treats and invitations

Suppliers and business partners of GDC Services LLC shall not offer unacceptable privileges to the employees of GDC Services LLC or third parties, directly or indirectly, in the form of gifts, treats or invitations to unlawfully influence these persons. In addition, they shall not extort and shall not accept such privileges.

State orders and behavior towards authorities

Suppliers and business partners of GDC Services LLC, when applying to governmental and state bodies and institutions, shall comply with all applicable laws. They observe the legal norms and rules of free and fair competition.

Consultants and intermediaries

Suppliers and business partners of GDC Services LLC shall use services of consultants or intermediaries only in accordance with the current legislation. They shall pay attention to the fact that consultants or intermediaries are rewarded only for actually provided services and these payments are commensurate with the services provided.

04

ETHICS OF MARKET BEHAVIOR

GDC Services LLC expects honest and responsible behavior from its suppliers and business partners, in particular compliance with the principles:

Free competition

Suppliers and business partners of GDC Services LLC shall comply with the current antimonopoly legislation. They shall not enter into anticompetitive agreements with competing companies, suppliers or customers. Suppliers and business partners shall not abuse of the leading position.

Export control

Suppliers and business partners of GDC Services LLC shall ensure compliance with all applicable laws regarding the import and export of goods, services and information.

Business information

Suppliers and business partners of GDC Services LLC shall publish business information and reports on their business activities truthfully and in accordance with the applicable legislation.

05

PROTECTION OF INFORMATION, COMMERCIAL SECRETS AND ASSETS OF THE ORGANIZATION

GDC Services LLC expects that its suppliers and business partners to pay attention to compliance with the following principles:

Data security

Suppliers and business partners of GDC Services LLC shall comply with all applicable laws regarding protection of personal data of employees, customers, suppliers and other interested parties.

Protection of know-how, patents, industrial and commercial secrets

Suppliers and business partners of GDC Services LLC shall acknowledge the know-how, patents, industrial and commercial secrets of the Organization and third parties. They shall not transfer this information to third parties without prior written consent of GDC Services LLC.

Treatment of the company's assets

Suppliers and business partners of GDC Services LLC shall ensure security of tangible and intangible assets of GDC Services LLC and prevent unfair use of these assets. They shall ensure that their employees, as well as any third parties involved in their business relationships (such as subcontractors or representatives), do not damage the assets of GDC Services LLC and do not use them improperly.