

## CODE OF CONDUCT

### INTRODUCTION

Reputation is an asset that takes many years to build but can be destroyed within minutes. Our organization is a successful company that continuously aims to maintain a reputation for conducting its business with integrity and obvious care for its customers and employees. To succeed this requires the highest standards of behavior of our team. This Code of Conduct defines the general principles behind those standards. We are all expected to conduct our business activities in accordance with these principles.

The responsibility of the management is to ensure that all our employees are familiar with this Code of Conduct and to build the business based on these principles for the local situation as appropriate. This Code is more than a collection of high-sounding statements, it serves as a practical guidance in our day-to-day business.

### OBEY THE LAW

eastconsult<sup>®</sup> and its employees are expected to behave as good corporate citizens and are required to conduct business in compliance with the laws of the countries in which we operate. Sometimes laws do not support our business, and we have the right to lobby against those that are opposite to the interest of our company. However, we will always respect the existing laws.

### COMPETITION

eastconsult<sup>®</sup> believes in fair competition and is fully aware of increasingly strict competition laws, which are followed by eastconsult<sup>®</sup> and its employees in the most devoted manner.

### BUSINESS INTEGRITY AND UNCORRUPT RULES

eastconsult<sup>®</sup> refuses any form of corruption and will not offer or accept bribes. We obtain the orders fairly, based on the quality and prices of our products and services. No employee may offer, give or receive any gift or payment that is or may be construed as being a bribe. For similar reasons, we do not participate in or provide for lavish forms of entertainment.

We do have promotional activities and incentives to boost the sale and we organize such activities in inventive ways. Incentives and forms of entertainment that go beyond normal business practice are not acceptable.

### EMPLOYEES

eastconsult<sup>®</sup> is committed to the working environment which is open and honest, based on mutual trust and respect. Employment, recruitment and promotion are based on skills, talent and experience. We will not tolerate discrimination and any form of harassment in our operations. eastconsult<sup>®</sup> has a systematic approach towards health and safety matters to reduce risks, learns from experience and achieves continuous improvements in these areas.

## **PUBLIC ACTIVITIES**

eastconsult® has a responsibility towards the local societies and communities in which it operates. The company will not support political parties or contribute funds to groups whose interests are meant to promote political party interests. Our company has the right and responsibility to make its position known on matters that directly affect the company, its employees or its customers.

## **CONFLICT OF INTEREST**

All eastconsult® employees – but especially managers – will see to it that there are no conflicts between private interests and the interest of the company. Our employees must not seek gain for themselves or for others through unfair use of their positions.

## **COMPLIANCE**

Compliance with these principles is a vital element to maintain our reputation and to succeed in our business. eastconsult® management takes responsibility for ensuring that these principles are communicated to, understood and observed by all the employees.

eastconsult® executive board will not criticize management or individual employees for any loss of business resulting from adherence to these principles. Individual employees will not suffer as a consequence of reporting breaches of principles.

Moscow, August 26th, 2012



Hubert Weiss  
The founder