

THE CODE OF CORPORATE ETHICS

Radekhivskyi Sugar LLC



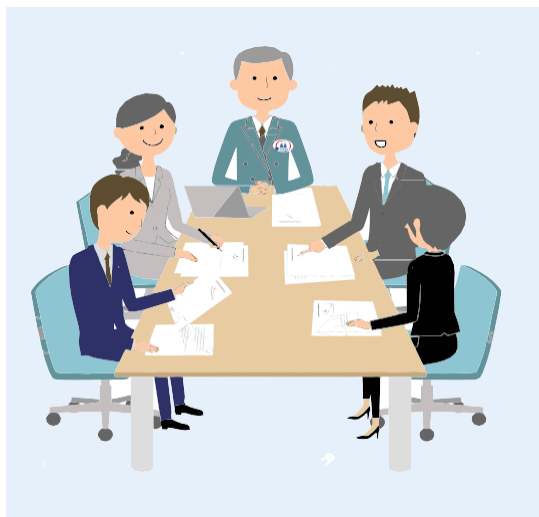
1. THE PURPOSE OF THE CODE OF CORPORATE ETHICS.

We are the Ukrainian company, dynamically developing and aspiring to be the leaders in the domestic and foreign markets. The cornerstone of our success is represented by the people, efficiency, and advanced technology. To achieve this goal, the managers of Radekhivskyi Sugar LLC decided to implement standard ethical rules called "The Code of Corporate Ethics".

2. SCOPE OF THE CODE.

Familiarization with the Code and compliance with its provisions is mandatory for all the employees of the Company, it is also applied to business partners, counterparties, consultants, auditors, etc., when they are in contractual relations with the Company, represent its interests or act on behalf of the Company.

3. THE MISSION OF THE CODE.



The goal of the Code is securing the Company values, norms and code of conduct of employees in order to establish the absolute priority of safety, ensure awareness of the employees of their role in achieving the Company's strategic goals. Compliance with the requirements of the Code is a prerequisite for working in the Company. Within their professional activities, all the employees of the Company must apply the principles stipulated in the Code.

4. VALUES OF THE COMPANY ACTIVITY

The key value of the Company is represented by the employees with professional knowledge, skills and experience, who conscientiously perform their duties and strive for continuous career development.

Within our Company we appreciate:

- respect of the personal rights and interests of the Company employees, business partners and counterparties;
- fairness, which guarantees the remuneration of employees of the Company, in accordance with the results achieved;
- equal conditions for professional growth of employees;
- honesty and clarity in relations between the employees, business partners and counterparties;





The key principles of our activity are:

- compliance with the legislation of Ukraine;
- economic efficiency of business activity;
- conduct of activities based on the principles of openness and transparency within the limits defined by the legislation of Ukraine;
- use and observance of the modern occupational health and safety management system that meets the international standards;
- implementation of full, accurate, timely and understandable disclosure of information in reports and documents that are filed by the Company to various regulatory authorities within the limits defined by the legislation.



5. ETHICAL PRINCIPLES.

The Company is governed based on the principle of strict compliance with the requirements of the Convention for the Protection of Human Rights and Fundamental Freedoms and legislation of Ukraine.

Our commitment is to meet the following principles:

- health, safety and well-being of the Company employees as well as the environment are of vital importance;
- integrity, transparency and respect in relations with the Company employees, business partners, representatives of state bodies, etc.;
- intolerance to bribery or corruption in any form whatsoever and unacceptability of such phenomena;
- respect for human rights as defined by the Constitution of Ukraine and other regulations;
- striving to minimize the potential impact of the Company activities on the environment;
- honest and open cooperation with business partners.

6. RELATIONS WITH EMPLOYEES.

The Company respects its employees as their work is the key to its success: the Company expects high standards of business conduct and professional achievements therefrom. Wherever we work, we are working towards the overall outcome.



The Company motivates the employees:

- To unite in order to achieve a common goal, appear in a team game.
- Ask questions in difficult situations.
- Show respect at the workplace.
- Carry out safe work within the Company premises.

- Observe the principles of ethics in business relations.
- Fulfill obligations to our partners as such fulfilment forms the image of the company.
- Help to make the Code of Ethics applicable by complying with its provisions.



The Company does not tolerate the employees if:

- the employees stay indifferent.*
- the employees use strong language while communicating with colleagues or partners.*
- the employees show disrespect to colleagues, commit moral pressure.*
- the employees ignore or do not comply with the Code of Ethics.*

7. RULES OF CONDUCT FOR THE EMPLOYEES OF THE COMPANY.

In their activities, the Company employees should do the following guided by the principles of corporate ethics and code of conduct established on their basis:

- comply with the terms of the employment contract concluded with him/her and responsibly perform the duties;
- respect the colleagues, maintain the culture of communication;
- be aware of personal responsibility for your own life and health and for the life and health of others, the likely consequences of bad habits;
- keep resource management, realize the necessity of careful attitude to the property and material values of the Company;
- do not use any proprietary information obtained in the course of work in order to achieve personal benefit or cause harm to the Company;
- realize the responsibility for the usage and storage of trade secrets and confidential information of the Company;
- work in safe conditions;
- do not use the name of the Company, financial, material or any other resources of the Company in order to conduct one's own political, religious or social activities;
- refrain from actions (to allow inaction) that may discredit the Company, cause conflict of interests or inflict damage to the Company or its reputation. If necessary, take possible measures to prevent them;
- keep formal dress code established by the Company.



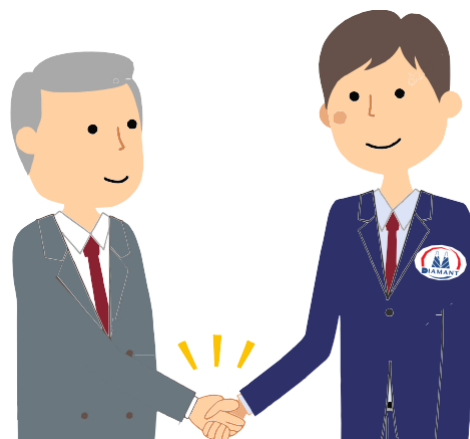


8. RELATIONSHIPS WITH BUSINESS PARTNERS AND COUNTERPARTIES.

External interactions of the Company are formed on the grounds of partnership and mutual respect. Square dealing is the basis for all transactions and interactions of the Company.

We are looking forward to long-term and mutually beneficial cooperation and believe that relationship with business partners and counterparties shall be based on respect, trust, honesty and fairness which are primary for success. We guarantee timely and full consideration of all requests, wishes and claims of counterparties.

In case of disputes, negotiations and compromise are preferred.



The Company pursues a zero tolerance policy if employees of our business partners and counterparties show disrespect to colleagues, ignore or do not comply with the Code. In this regard, the Company has developed a clear system of penalties and fines applied to gross violators of the Code, including the occupational safety and health regulations.

9. INTERACTION WITH THE STATE AUTHORITIES AND LOCAL SELF-GOVERNMENT.

We are looking forward to build and maintain healthy, constructive, open and conflict-of-interest-free relationships with the state authorities and representatives of the state authorities and local self-government in accordance with applicable law.

We do not attempt to influence government decision-making in an unfair way.

We comply with all legal requirements applicable to our business. The Company and its employees pay taxes on time and in full.

10. GIFTS.

The Company allows the possibility to accept or make gifts that correspond to the generally accepted concepts of hospitality (business hospitality), except as provided by the Law of Ukraine "On prevention of corruption".

The Company employees:

- do not offer, do not provide, do not promise to provide any improper advantage to any persons;
- do not request acceptance, accept or agree to accept any improper advantage

from any person, directly or indirectly.

11. RESOURCES USAGE.

The Company trusts its employees and provides all the necessary resources for the work. We welcome the careful attitude to the property and assets of the Company.

The concept of theft is unacceptable.

The company loses credibility for employees who committed theft.

Data processing within the Company is carried out in accordance with the current legislation and organizational and administrative documents of the Company.



12. CORRUPTION CONTROL AND MONEY LAUNDERING.

The Company proclaims zero tolerance and absolute inadmissibility of any form of corruption. The Company does not resort to corruption in order to obtain any advantages in the area of its activities from governmental and international organizations, does not make illegal payments for facilitation or simplifying of formalities related to economic activities, in particular to ensure faster resolution of certain issues, and operates strictly in compliance with anti-corruption laws.

13. ENVIRONMENTAL PROTECTION.

The Company adheres to the principle of dynamic economic development with the most sustainable use of natural resources and reducing waste and emissions in the course of work.

The Company assumes a commitment to continuously improve the environmental performance of its activities. In order to achieve this the Company:

- adheres to the norms of national legislation on environmental protection related to its activities;
- encourages respect and sustainable attitude of each employee to the environment, as well as personal participation of each employee in improving the economic activity of the Company and minimizing its impact on the environment;
- in the course of work continuously monitors emissions and waste in order to bring them to a lower level of danger due to the effective design, operation and maintenance of facilities;
- ensures quick and effective response to all the environmental incidents arising from the Company activities;
- keep public relations on environmental issues and shares its experience with others;

14. HEALTH PROTECTION.

Health Protection of the Company provides:

- identification and assessment of health risks associated with working in the Company;
- on the employment of the employee and during the performance of official duties to determine the ability



of the employees perform their work without undue risk to themselves or others (for health reasons);

- providing or ensuring that the workers are provided with the medical services necessary for the treatment of injuries, as well as for emergency medical care in the workplace;
- compliance with applicable laws and regulations, as well as the application of relevant standards in cases where there are no laws and regulations;
- conducting voluntary programs aimed at improving the personal safety of employees of the Company.



15. OCCUPATIONAL HEALTH AND SAFETY.

The Company adheres to the national legislation, standards and requirements in the field of occupational health and safety management. The company makes every effort, financial and human resources in order to make the workplace of each employee safe.

To implement this, the Company introduces **7 "Golden rules»:**



1. **Responsibility and leadership in ensuring labor protection.**
2. **Identification of hazards and risks is the systematic identification of hazards and risks, risk assessment and analysis of accidents and occupational diseases.**
3. **Determination of goals in the occupational health and safety (priority risks and goals of prevention programs).**
4. **Creation of a safe system – a system organization of occupational health and safety.**
5. **Use of safe and serviceable equipment.**
6. **Professional development.**
7. **Investments in personnel is the motivation of the Company employees in order to form the effective functioning of the occupational health and safety management system, changing the role of workers from passive one to active one, sealing the incentive framework for safe conduct.**

The company pursues a policy of zero tolerance for violations of the occupational health and safety rules by its employees, as well as by the employees of counterparties (including contractor and subcontractor organizations), and therefore there are a number of strict prohibitions:



Drinking of alcohol, drug abuse and psychotropic drugs abuse is unacceptable at the workplace. This prohibition concerns any and all the employees, as well as guests, visitors, employees of counterparties, contractor organizations. Smoking within the premises is strictly prohibited (the Company belongs to the food industry).

We have developed and implemented a system of rules of conduct within the territory of the Company, as well as articles of violations that are not tolerated by the enterprise as a whole. The team of specialists in occupational health and safety regularly conducts appropriate checks on compliance with occupational health and safety rules. Persons responsible for violation of the occupational health and safety rules at the workplace are brought to justice in accordance with the approved List of violations and liability.

16. EFFICIENCY AND PROFITABILITY.

Reliable and successful activity of the Company depends on the effective work of each employee of the Company.

Each employee is engaged into goal setting while performing his/her obligations according to the interests of the Company. We are always open for changes and new challenges of the environment.

We analyze the risks associated with the Company activities and constantly minimize them.

The Company constantly increases the profit and value of its business focusing on the production of goods that meet the needs of our customers, conquering new markets, increasing production facilities, and introducing new technologies.



17. CONFLICT OF INTERESTS

The Company considers its employees to be the main value, but stays alert when there is a conflict of employee between his/her personal interests and functional responsibilities as this poses a threat to the reputation of the Company and may cause harm to its legitimate interests and negatively affect its activities.

The employees should interact with business partners solely in the interests of the Company, without the protection or preferences of third parties based on personal considerations of employees.

18. PRIVACY.

The Company is responsible for the information protection, namely:

- adheres to the confidentiality rules with respect to information received from third parties (business partners, counterparties);
- does not allow the dissemination of false information, distortion of facts that may cause harm to itself, its partners and the country as a whole;
- protects its own information: information is used by the employees of the Company only to perform the functional duties and can be disclosed or transferred to third parties only to the extent and in the manner provided by the current legislation of Ukraine and organizational and administrative documents of the Company;
- stores personal data of the employees in confidentiality to the extent and according



to the procedure provided by the current legislation of Ukraine and organizational and administrative documents of the Company. Collection and processing of personal data is carried out in compliance with the requirements of the current legislation.

19. IMPLEMENTATION OF THE CODE.

The provisions of the Code apply to all the employees of the Company and counterparties being in contractual relations with the Company.

All employees of the Company and counterparties involved in contractual relations with the Company undertake to adhere to them in course of their work regardless of their position and status, and must take appropriate measures in order to prevent violations of the Code.

The employees of the Company must fully contribute to the investigation (internal audit) of the Code violations; provide true, accurate, up-to-date information (materials and documents) necessary to verify the circumstances of the violation.

20. CONTROL AND SUPERVISION OF COMPLIANCE WITH THE DEMANDS OF THE CODE.

The immediate superior of the employee must prevent manifestations of unethical behavior of subordinates by organizing systematic work on the development of business (professional) ethics of employees as well as through training, outreach and monitoring compliance with the norms hereof.

All the employees are entitled to comply with this Code.

Control and supervision of compliance with the requirements of this Code is up to the Company management, Corporate Governance Department, Occupational Health and Safety Department, HR managers, as well as the heads of departments and services of the Company.

21. FINAL PROVISIONS.

This Code is an integral part of the Company's Corporate Code of Conduct.

This Code is in open access on the official website of the Company:







Radekhivskyi Sugar LLC 2019