




# LLC NPP ITELMA SUPPLIER CODE OF CONDUCT







In accordance with the Corporate Code of Business Ethics, NPP ITELMA adheres to a “Zero-tolerance” policy regarding unethical conduct of business such as discrimination, forced labor, violation of security requirements, bribery and corruption. We sincerely believe that our suppliers will adhere to similar standards.

The Code of Conduct for suppliers of NPP ITELMA defines the principles that should be foundational for their business activities.

All suppliers of NPP ITELMA are required to comply with the rules and requirements specified in this Code of Conduct, as well as their contractual obligations.

## Human rights

### Suppliers NPP “ITELMA” should:

- Respect personal dignity, privacy and the rights of everyone;
- Do not force a person to work against his will.
- Prohibit behavior, gestures, words, and physical contact of a sexual, coercive, threatening, abusive, or exploitative nature.

## Fair labor conditions

### Suppliers should ensure fair labor conditions, in particular:

- Refrain from discrimination based on gender, age, ethnicity, nationality, religion, physical restriction, union membership, political opinion or sexual orientation;
- Respect the rights of workers to freedom of meeting;
- Do not accept or use child labor at any stage of your activity, except in accordance with all applicable laws and regulations;
- Do not use forced labor, including but not limited to forced labor in prisons, victims of slavery and human trafficking, and provide all workers with the opportunity to freely leave their work with timely notice;
- Pay fair compensation to employees and follow local pay rules and/or collective bargaining agreements.
- Ensure that working hours, including overtime, do not exceed applicable legal requirements, and if such requirements do not exist, we recommend that working hours not exceed sixty hours per week, including overtime;
- Ensure that employees have at least one continuous day off per week.
- Comply with all local laws and the Labor Code regarding employees.





## Health, safety and environmental management

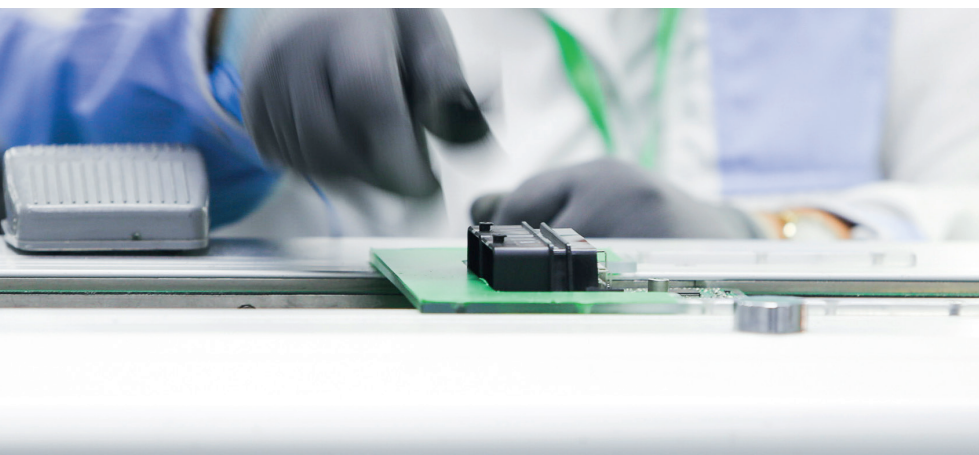
Suppliers should provide a safe and non-threatening workplace for all their employees and conduct their activities in accordance with environmental requirements, including:

- Formally appoint a competent person to manage and improve performance in the field of labor protection, health and the environment;
- Create an appropriate organizational structure and procedures for the effective management of risks in the field of labor protection, industrial safety and the environment;
- Verify that all employees are sufficiently knowledgeable about the risks and properly trained to comply with safety measures;
- Timely provide their employees with the necessary personal protective equipment in the required amount.
- Provide clear route diagrams for evacuation and free access to these routes.

## Material compliance and conflict minerals

We comply with regulatory and customer requirements regarding the prohibition and restriction of the use of substances, including hazardous substances, as well as minerals mined in conflict zones. Suppliers of NPP ITELMA should ensure that the goods supplied comply with the requirements of all relevant rules. In particular, you should:

- To declare NPP ITELMA about the substances listed in the “List of environmental laws and regulations applicable to incoming materials and components of ITELMA products” (Appendix 1) contained in the goods that you supply;
- Implement special policies regarding materials mined in the conflict zone and exercise due diligence in selecting the source of these materials; Respond in a timely manner to NPP ITELMA's requests from for confirmation of compliance with these requirements.



## Business ethics

Suppliers should conduct their business in accordance with ethical standards, including:

- Refrain from any form of corruption, extortion and bribery;
- The supplier can give gifts of reasonable value to customers and business partners or receive those from them if the gift cannot be considered as an incentive to make a decision in the interests of the donor.
- Comply with antitrust and other competition laws;
- Notify the management of NPP ITELMA about potential conflicts of interest related to your activities as a supplier, including disclosing information about the personal financial interest of employees of NPP ITELMA in cooperation with you;
- Protect all confidential information provided by NPP ITELMA and its business partners;
- Respect the intellectual property of others, including NPP ITELMA;
- Comply with international trade rules and export control rules.

## Secure business

Suppliers should conduct their business safely. It is necessary:

- Take reasonable measures to minimize the exposure of NPP ITELMA to security threats, such as cyber-attacks, terrorist threats, crime, pandemics and natural disasters;
- Fulfill the requirements of the procedures of NPP ITELMA for information security while on the territory of the company NPP ITELMA;
- Report any security problems to the Purchasing Direction of the NPP ITELMA.



## Procurement by supplier

Suppliers should procure goods and services in accordance with international standards of the Automotive Industry and Quality Management System. In particular:

- Select their first-level suppliers who directly or indirectly provide goods or services to NPP ITELMA and are guided in their activities by rules similar to those set forth in the Code of Conduct for suppliers of NPP ITELMA;
- Subcontracting on the territory of the company NPP ITELMA is carried out only by prior agreement with NPP ITELMA

## Inspections and corrective actions

To ensure and confirm compliance with the Code of Conduct for Suppliers of NPP ITELMA, the following rules should be followed:

- Suppliers are required to provide supporting documentation at the request of NPP ITELMA;
- NPP ITELMA has the right to conduct an audit and inspection of suppliers and their facilities at their own expense;
- NPP ITELMA has the right to involve a third party in audits and inspections, with timely notification of the supplier;
- In case of non-compliance with the requirements of the Code of Conduct, suppliers should timely take the necessary corrective actions, according to the recommendations of the company NPP ITELMA;
- In case of non-compliance with the requirements of the Code of Conduct, the company NPP ITELMA may take appropriate measures to the supplier, including to suspend or terminate cooperation.

## Access to remedy

As part of our business relationship, if you or your employees consider that NPP ITELMA does not comply with the requirements of the Code of Conduct, please inform the Procurement Direction. Anonymity of the appeal is guaranteed.





LLC NPP ITELMA strives for high standards of honesty and sustainable development.

We hope that our suppliers share this direction with us.



Thank you for your cooperation!

Best regards,  
Purchasing Director  
Lyudmila Ineshina



## **Appendix 1**

List of environmental laws and regulations applicable to incoming materials and components of ITELMA products

Directive 2000/53 / EC of Article 4 (2) on the limitation of lead, cadmium, 6-valent chromium, and mercury, subject to the official amendments to Directive 2000/53 / EC regarding requirements for regulated harmful substances (RVV).

- The maximum allowable concentration in a homogeneous (homogeneous) material (coating, layer) for lead, mercury, hexavalent chromium is not more than 0.1% by mass, for cadmium - not more than 0.01% by mass.

EU Regulation No. 1907/2006 paragraph 6 of the Annex XVII «Registration, Evaluation, Authorisation and Restriction of Chemicals» as amended by EC Regulation No. 552/2009 – The materials included in the product must not contain asbestos.

Directive 2005/64 / EC and Regulation 2003/138 / EC - on the presence of mandatory material marking on parts made of plastic and thermoelastomers weighing 100 grams or more, on parts made of rubber and elastomers weighing 200 grams or more.

Decree of the Government of the Russian Federation of March 24, 2014 N 228 (as amended on March 20, 2018) "On measures of state regulation of the consumption and circulation of substances that deplete the ozone layer". It is forbidden to use the substances specified in this regulation.

Decree of the Government of the Russian Federation of July 8, 2015 N 1316-r On approval of the list of pollutants in respect of which measures of state regulation in the field of environmental protection are applied.

- The list of pollutants for which measures of state regulation in the field of environmental protection are applied