



YNBC - Code of Conduct

Youth Networking Business Committee of Asia-Pacific Region



SECTION I. GENERAL PROVISIONS

1.1. INTRODUCTION

The Code of Conduct and Ethics (hereinafter referred to as the "Code") is a set of basic rules, principles and values that we (hereinafter referred to as the "Organisation", "YNBC") are guided by and follow in our organisation, standards of organisation and social behaviour, high ethical standards within and external corporate relations, as well as our social responsibility to employees, shareholders, business partners, the state and society.

The Code is intended to define corporate values, the adherence to which demonstrates the commitment of the Organisation and its employees to the basic ethical values that determine business behaviour and form the reputation of the Organisation, its competitiveness and efficiency.

The Code of Conduct and Ethics is an important tool for creating a sustainable corporate culture and a coherent system of corporate values. The Code is developed on the basis of generally accepted norms of corporate ethics and business conduct, international laws and documents defining the best practices of corporate governance. The Code applies to all subsidiaries and to all companies belonging to the YNBC group of companies only if such companies make an appropriate corporate decision.

1.2. PURPOSE AND OBJECTIVES OF THE CODE

Purpose of the Code

The purpose of the Code is to define mandatory rules of business conduct and ethics aimed at increasing capitalization and strengthening the Organization's reputation, financial stability and efficiency. The Code is designed to create an inspiring working atmosphere in which every employee can feel responsible for the results of the Organization's activities and reputation and at the same time count on the Organization's attention to his personality when performing work duties. The Code of Ethics is one of the tools for creating an Organisation in which all employees are members of a team of professionals.

Objectives of the Code

- Determination of criteria of conscientious behaviour of employees within the Organisation and in relations with third parties on the basis of common values
- Development of a unified corporate culture based on high ethical standards, maintaining an atmosphere of trust, mutual respect and decency in the team
- Identification and prevention of any abuse and abuse of office powers, as well as relevant potential risks to the Organisation



- Increasing and maintaining trust in the Organisation from the business community, strengthening the reputation of an open and honest market participant.

1.3. SCOPE OF THE CODE

This Code contains the basic principles of business conduct and ethics of the Organisation. It should be considered as a document containing a minimum set of standards and requirements, and designed to prevent abuse and promote honest and ethical business conduct.

The provisions of the Code apply and apply to members of the Board of Directors, management staff and other employees of the Organisation. All Employees should be familiar with the Code and adhere to the principles and procedures set out therein. It is the responsibility of each employee to comply with all provisions of the Code, as well as other provisions related to business conduct and ethics, internal policies and procedures of the Organisation.

The Code is not intended to be an exhaustive set of rules and cannot provide recommendations for every situation that may be encountered in the course of doing business. Accordingly, we make changes and additions to the Code, in accordance with the procedures described in the Chapter "Amendments and Additions to the Code".



SECTION II. MISSION AND VALUES OF THE ORGANISATION

2.1. THE ORGANISATION'S MISSION

YNBC's mission is to provide a platform for promoting the vital role of the businessmen in the region, increasing regional business interaction, enhancing regional economic growth as well as establishing an international network of professional relations.

2.2. CORPORATE VALUES OF THE ORGANISATION

The fundamental corporate values of the Organisation are:

1. **RESULT** - we set ambitious goals and achieve success
2. **CONTINUOUS IMPROVEMENT** - we do our job better every day and become better ourselves every day
3. **TEAMWORK AND COOPERATION** - we achieve goals TOGETHER and appreciate everyone's contribution
4. **OUR PEOPLE** - We respect individuality, value professionalism and realise our dreams together
5. **HONESTY** - we value trust and count on everyone's honesty. Honesty is more expensive than profit

2.3. ETHICAL PRINCIPLES OF THE ORGANISATION

The fundamental ethical principles of the Organisation are:

EFFICIENCY AND PROFITABILITY

The Organisation is aware of its duty and its responsibility to shareholders and partners, therefore profitability and efficiency of activities, achievement of results, both expected and exceeding expectations, are an indisputable value for it.

COMPLIANCE WITH LAWS AND REGULATIONS

The Organisation strictly complies with the requirements of applicable legislation, industry and corporate rules, standards, procedures.

SOCIAL RESPONSIBILITY

The Organisation promotes the development of the regions of its presence, takes care of the environment, carries out professional management of health protection employees and labour safety, timely pays taxes and wages, and also carries out extensive charitable and sponsorship activities.

MORALITY



In its diverse activities, the Organisation does not just formally follow the laws and the intended goals. It is also important for the Organisation how and for what it works. Following its mission, YNBC carries out its activities on the basis of honesty and fairness, respect and decency.

PARTNERSHIP

The Organisation forms, maintains and highly values the established relations with business partners, public organisations and consumers. Achieving highly effective results is impossible without long-term and mutually beneficial cooperation, without interest in the sustainable business development of our partners, without mutual respect and responsibility for fulfilling the obligations assumed



SECTION III. STANDARDS OF CORPORATE CONDUCT AND ETHICS

3.1. MUTUAL RESPONSIBILITY OF THE ORGANISATION AND ITS EMPLOYEES

The Organisation's employees are its valuable resource. The Organisation strives to create an environment in the teams that promotes the disclosure of the best professional and human qualities of employees.

The Organisation does not discriminate against employees based on gender, age, race or nationality, religion, political beliefs, etc. Mutual responsibility means that both the Organisation and its employees share common basic beliefs, consciously and conscientiously fulfilling their duties towards each other.

ORGANISATION RESPONSIBILITY:

1. Build relationships with employees on a long-term basis
2. Provide employees with proper trust and ensure an open dialogue
3. Develop and improve the systems of training, motivation, and evaluation of the potential of employees
4. Support the initiative and desire of employees for self-development, professional competence improvement, fulfilment of complex tasks
5. Maintain an atmosphere of cooperation, mutual understanding and stability in the Organisation.

Interaction in the Organisation is based on respect for the individual and focus on results in order to successfully solve professional tasks and maintain constructive relationships in the team.

EMPLOYEES ARE REQUIRED TO COMPLY WITH THE FOLLOWING RULES:

1. Treat every employee with respect, regardless of race, nationality, gender, age, marital status, political preferences and work experience.
2. Strive to improve the quality of the results of their work, increase its productivity and efficiency, create and maintain a friendly psychological climate in their team.
3. Work in a single team to achieve the goal. At the same time, be personally responsible for the results of their own and joint activities and, if necessary, help their team members.
4. Constantly improve their professional level through the personnel training system, learn new skills and acquire the necessary professional knowledge.
5. Constantly look for new opportunities in their activities, exchange experience with employees of the Organisation, disseminate advanced methods and technologies of work.



If you cannot choose the right position in the team, you do not know how to behave in a particular situation related to the performance of work duties, contact your direct supervisor and/or the Human Resources Department.

EMPLOYEES ARE PROHIBITED FROM:

1. Allowing discrimination against other employees on the grounds of race, nationality and religion, gender, age, marital status, political preferences.
2. Harassment of any kind, including sexual harassment, is unacceptable.
3. Behaving aggressively or offensively towards other employees.
4. Promoting the promotion of the Organisation's employees on the basis of family, friendly or other relations.
5. Using your official powers and opportunities to extract your own benefit or the benefit of persons associated with you.
6. Using your office time, employees' office time and the Organisation's property entrusted to you for personal purposes.

3.1.1. EMPLOYEE LOYALTY TO THE ORGANISATION

Employees are proud to belong to the Organisation and care about its reputation. Therefore, both inside and outside the Organisation, employees correctly respond to its activities (we are talking about both oral and written reviews, including publications in the media and the Internet).

Employees are always aware that directly or indirectly they are representatives of the Organisation, and the business reputation of the Organisation largely depends on their actions and behaviour, and the damage caused to it may have material expression.

If an employee allows unflattering reviews and/or distribution defamatory information about the Organisation, its activities or other employees, then, depending on the nature of this information, he may be held liable in accordance with the norms of civil/ administrative / criminal legislation, and he may also be deprived in whole or in part of bonuses, compensations and other incentives.

3.2. IMPLEMENTATION AND COMPLIANCE WITH LAWS

Each employee is required to comply with all applicable laws, rules and regulations, as well as Organisation policies and regulations. The Employee must not participate in any actions or assist others in participating in any actions that violate any laws, rules and instructions applicable to the Organisation, as well as all policies and regulations of the Organisation.

These include, without limitation, laws on giving and receiving bribes and commercial bribery, copyright, trademarks and trade secrets, information protection, confidentiality of personal data, transactions using insider information, illegal contributions to political parties or campaigns,



antitrust regulation, anti-corruption, giving or receiving monetary rewards., harmful effects on the environment, discrimination in employment or harassment, working conditions and safety, improper or distorted financial information and improper use of corporate property.

EMPLOYEES OF THE ORGANISATION ARE OBLIGED TO:

Notify their immediate supervisors and Compliance Officer about all cases of any persons contacting them in order to incite them to commit corruption offences:

- Offering or giving a bribe (financial and other benefits)
- Demand, consent to receive or receive a bribe (financial and other benefits);
- Bribery of government employees.

Such a statement can be made by email - compliance@ynbc.org

EMPLOYEES ARE PROHIBITED FROM:

- Offering or giving bribes (financial and other benefits).
- Demanding, agreeing to receive bribes (financial and other benefits).
- Carrying out actions that can be considered as bribery of civil servants.
- Involving third parties in order to circumvent the anti-corruption requirements of this Code.

AS PART OF THE IMPLEMENTATION OF COUNTERACTION ACTIVITIES OF CORRUPTION IN THE ORGANISATION:

- Conducting business only with reliable business partners (clients, suppliers, contractors, consultants) who are engaged in legitimate activities and are not associated with corruption, for which he makes all possible efforts within the framework of legislation in terms of warning them about this, as well as in terms of studying their business.
- Making every possible effort to prevent bribery on behalf of the Organisation by developing and implementing a system of adequate procedures.
- Performing all kinds of actions provided for by law, to obtain information indicating the targeted use of funds allocated by the Organisation for charity and sponsorship.

All of these principles and prohibitions also apply to agents, consultants and other third parties working on behalf of the Organisation. Neither the Organisation nor any of the Organisation's employees have the right to circumvent the anti-corruption requirements of this Code by using such agents, consultants or other third parties.

If an employee believes that another employee or business partner has violated or possibly violated the anti-corruption provisions of this Code, he should be informed about this in accordance with



the procedure provided for by the internal program of notification of deficiencies “Employees warn!”. Such a statement can be made by email compliance@ynbc.org.

3.3. CONFLICT OF INTEREST

1. For the purposes of this Federal Law, persons interested in the commission by a non-profit organisation of certain actions, including transactions, with other organisations or citizens (hereinafter - interested persons), are recognized as the head (deputy head) of a non-profit organisation, as well as a person who is part of the management bodies of a non-profit organisation or bodies supervising its activities, if these persons are in labour relations with these organisations or citizens, are participants, creditors of these organisations or are in close family relations with these citizens or they are creditors of these citizens. At the same time, these organisations or citizens are suppliers of goods (services) for a non-profit organisation, large consumers of goods (services) produced by a non-profit organisation, own property that is fully or partially formed by a non-profit organisation, or can benefit from the use, disposal of property of a non-profit organisation.

The interest in the commission of certain actions by a non-profit organisation, including transactions, entails a conflict of interests of interested persons and a non-profit organisation.

2. Interested persons are obliged to respect the interests of a non-profit organisation, primarily with respect to the purposes of its activities, and must not use the capabilities of a non-profit organisation or allow their use for purposes other than those provided for in the constituent documents of a non-profit organisation.

For the purposes of this section, the term "opportunities of a non-profit organisation" means property belonging to a non-profit organisation, property and non-property rights, opportunities in the field of entrepreneurial activity, information about the activities and plans of a non-profit organisation that has value for it.

3. If the interested person has an interest in a transaction to which a non-profit organisation is or intends to be a party, as well as in the event of another conflict of interests between the said person and the non-profit organisation in relation to an existing or proposed transaction:

It is obliged to inform about its interest to the management body of a non-profit organisation or the body overseeing its activities before the decision is made to conclude a transaction (in a budget institution - to the appropriate body exercising the functions and powers of the founder);

The transaction must be approved by the management body of the non-profit organisation or the body overseeing its activities (in a budget institution - the relevant body exercising the functions and powers of the founder).



4. The interested person is liable to the non-profit organisation in the amount of losses caused by him to this non-profit organisation. If losses are caused to a non-profit organisation by several interested parties, their liability to the non-profit organisation is joint and several.

EMPLOYEES ARE PROHIBITED FROM:

1. Have a personal interest in the activities of the Organisation's business partners, if such an interest contradicts the interests of the Organisation.
2. To engage in additional non-core work or other activities outside of working hours, if such activities negatively affect the performance of official duties in the Organisation.
3. Conceal the fact of a conflict of interest and its causes.
4. To carry out trips, participate in various kinds of events (seminars, conferences, etc.), the costs of which for transportation or accommodation are paid by individuals or legal entities having business relations with the Organisation or seeking such relations, except in cases when such trips are agreed by the head of the parent Organisation or a Compliance officer and are related to training or gaining the experience necessary to run a business. All travel expenses for such trips must be borne by the Organisation in accordance with market prices, with the exception of the above trips agreed by the head of the parent Organisation or a Compliance Officer.

3.4. PROTECTION AND PRESERVATION OF THE ORGANISATION'S ASSETS

Assets and other resources (hereinafter referred to as assets). The Organisation is the basis of its prosperity and long-term development. The Organisation's assets include property, confidential and official information, intellectual property, cash, as well as equipment issued to employees for use. All assets can be used only for work purposes in the interests of the Organisation.

The preservation of assets, their efficient and rational use, as well as a clear and transparent reflection of assets and production activities in documentation and reporting are important components of the Organisation's policy to fulfil obligations to shareholders and other interested parties.

Officials and employees of the Organisation are obliged to protect the assets entrusted to them from loss, theft, misuse, illegal or inefficient use.

The Organisation expects from its employees:

- Efficient use of equipment and its resources
- Careful handling of its property and equipment
- The proper use and protection of commercial and technical information representing its intellectual property



- Following the instructions set out in internal documents that help to properly handle its equipment or resources.

If an employee believes that another employee or business partner has violated or possibly violated the above provisions of the Code, he should be informed about this in accordance with the procedure provided for by the internal program of notification of deficiencies "Employees warn!". Such a statement can be made by email compliance@ynbc.org.

3.5. PROTECTION OF CONFIDENTIAL INFORMATION

The Organisation takes care of the protection of confidential information as one of the necessary conditions for maintaining its stability and competitiveness.

Disclosure of confidential information may result in damage to the Organisation.

The Organisation insists on compliance with the following rules:

- The use of confidential information is possible only within the framework of the performance of official duties. Its transfer to any other persons, including colleagues whose work is not related to its use, is allowed only with the permission of the direct supervisor.
- Compliance with the obligation of non-disclosure of confidential information must be carried out even after the employee completes his work in the Organisation (if there are no other agreements between him and the Organisation in this regard).
- Disclosure of information to investors and government agencies should be made only in accordance with the procedure provided for by the current legislation, the Charter and internal documents of the Organisation. The information must meet all the requirements established by the legislation and the rules of stock exchanges, and not contain information that does not correspond to reality.
- It is necessary to respect the information that is the property of business partners, including their intellectual property, copyright and related rights.
- It is unacceptable to use information obtained by an employee in the course of activities in the Organisation in order to recommend someone to make transactions with securities of the Organisation and subsidiaries.
- It is necessary to refrain from making transactions with securities of the Organisation and subsidiaries using confidential information.

3.6. INFORMATION DISCLOSURE AND INSIDERS

In order to comply with the Organisation's business ethics standards in the field of information disclosure, to ensure confidence in YNBC and to maintain its reputation,

EMPLOYEES ARE REQUIRED TO COMPLY WITH THE FOLLOWING RULES:



1. Honestly and conscientiously qualify the official information you have for belonging to insider information. If you have doubts or you cannot clearly qualify it, contact your direct supervisor and Compliance Officer.
2. Warn colleagues against negligence and violations in matters of information disclosure and insider transactions. If your efforts are not yielding results, inform your immediate supervisor and Compliance Officer about it.
3. Consider the right of access to insider information as a high trust and a duty to preserve information, the dissemination of which may entail a significant change in the value of securities.
4. Securely store all official information from loss or falling into the hands of persons to whom it is not intended for service.

EMPLOYEES ARE PROHIBITED FROM

1. Use insider information for personal gain or for the benefit of persons related to you. An insider's duty is to put the interests of shareholders and investors above their investment interests.
2. To carry out transactions with the Organisation's securities personally or to encourage other persons to commit them on the basis of insider information known to you.
3. It is unreasonable to act as a public representative of the Organisation, to make public statements and speeches if they are not entrusted to you in accordance with the established procedure.
4. To transfer insider information to third parties even after the termination of their employment relationship with the Organisation or termination of their powers in the Organisation's management bodies is above their investment interests.

In order to comply with the standards of business conduct and ethics, as well as compliance with international laws, the Organisation has developed a Code of Conduct regarding Insider Information, which is mandatory for all employees of the Organisation.

3.7. ENVIRONMENTAL PROTECTION

In its activities, the Organization not only guarantees full and unconditional compliance with all requirements of the current legislation in the field of protection of nature, human health, but also tries in every possible way to minimise the impact of negative factors on people, natural resources and the environment. The principles of ensuring ecological and economic balance between production and environmental safety form the basis of the Organization's activities and allow minimising financial and reputational risks, identifying problematic issues at an early stage and making the most effective decisions. Being aware of its responsibility to society, the Organization counts on employees to understand the complexity and scale of the tasks facing it. The Organization's contribution to the preservation of a favourable environment is aimed at:



- Reducing the negative impact on the environment in all business segments.
- Production of more environmentally friendly products.
- Rational use of natural resources, both involved in production and located in the regions of the Organisation's activities.

The Organisation is open to dialogue with the public and other interested parties on environmental protection and rational use of natural resources.



SECTION IV. STANDARDS OF EXTERNAL CORPORATE BEHAVIOUR AND ETHICS

4.1. STATE BODIES AND PUBLIC ORGANISATIONS

The Organisation, realising the social significance of the results of its activities, adheres to the principle of openness of information about its work, strives to build and maintain stable, constructive relationships with public authorities and local self-government. The Organisation operates in strict accordance with the laws and other regulatory legal acts of the countries of the Organisation's presence. The Organisation's relations with state and local government bodies are based on the principles of responsibility, integrity, professionalism of partnership, mutual trust, as well as respect and inviolability of obligations.

The Organisation allows its employees to participate in political processes, public organisations and trade unions when it does not contradict the laws and customs of the country. At the same time, under no circumstances can an employee call himself a representative of the Organisation and its subsidiaries and affiliates. The employee's participation in political and public organisations is possible only outside of working hours and without using the Organisation's resources, so that this participation is not regarded as its political or public position.

4.2. BUSINESS PARTNERS AND COMPETITORS

The Organisation interacts with business partners (customers, suppliers, contractors, consultants) on the basis of long-term cooperation, mutual benefit, respect, trust, honesty and fairness. The Organisation does business only with reliable business partners who are engaged in legitimate activities.

- Considering its status as a public joint stock Organisation, the Organisation selects suppliers mainly on a competitive basis.
- The Organisation faithfully fulfils its contractual obligations to business partners and demands the same from them.
- The Organisation always resolves disputes arising in the course of its activities by legal means, negotiating and striving to find mutually acceptable compromises.
- The Organisation always takes into account the requirements of the legislation of the countries with which it does business.

The Organisation builds relationships with competitors on the principles of mutual respect, always welcomes and supports mutually beneficial cooperation. Any manifestations of unfair competition or abuse of a dominant position are unacceptable in the Organisation's activities.



- The Organisation strictly complies with the anti monopoly laws of the countries in which it operates.
- Employees of the Organisation are obliged to avoid harsh statements to competitors and have no right to unreasonably criticise their products and services.
- Employees should consult with their direct supervisors about difficult situations in relations with competitors.



SECTION V. APPLICATION OF THE CODE

5.1. COMPLIANCE WITH THE NORMS OF THE CODE AND RESPONSIBILITY FOR ITS VIOLATION

In their professional activities, all employees must comply with the rules and regulations established by the Organisation. Violation of the norms of the Code may lead to the imposition of administrative sanctions, a decrease in the efficiency of the Organisation's activities and the occurrence of losses, which will directly affect the well-being of all its employees.

Each employee is responsible for compliance with ethical standards. Strict compliance with this Code is mandatory for all employees, regardless of their position and position in the Organisation. If an employee has questions about the application of the rules and regulations of this Code, or he is not sure of the compliance of his actions or decisions with the norms of the Code, he can seek advice from his direct supervisor and/or Compliance Officer or by email compliance@ynbc.org.

If an employee believes that another employee, consultant or partner has violated or possibly violated the provisions of the Code, he should be informed about this in accordance with the procedure provided for by the internal program of notification of deficiencies "Employees warn!". Reports of violations or alleged violations may be transmitted:

- Compliance officer
- To the immediate supervisor or higher management;
- By email compliance@ynbc.org.

If, for some reason, the applicant cannot or does not want to give his name for possible contacts with him, he should provide sufficient information to conduct an effective investigation of his message.

The Organisation expects that any interested person who is not an employee of the Organisation (for example, a supplier of products or services for the Organisation, an investor, etc.) will also report violations by an employee of the Organisation that have become known to him.

Such a statement can be made by email compliance@ynbc.org.

The person who received the appeal is obliged to verify its authenticity independently or with the involvement of the relevant services. If the facts reported in the statement are confirmed, materials about this and recommendations for further actions are transmitted to the Compliance Officer.

If the revealed fact is related to a violation of the law, then the official is obliged to transmit the information to the relevant authorities of the Organisation. In case of reliability of information about the commission of actions (or inaction) that have signs of a criminal or administrative offence, information about this is transmitted to law enforcement agencies.



If the violation of the Code does not affect the issues of legislation, the following measures may be applied to the employee: deprivation of bonuses or other incentives, refusal of promotion, public censure.

If there are legal grounds, the issue of bringing the violator to disciplinary responsibility may also be considered.

If the statement is reliable, each applicant is guaranteed confidentiality of information about the fact of his statement, the absence of any kind of harassment, as well as material incentives in accordance with the internal policy of the Organisation. If the appeal was made for the purpose of spreading false information or the fact of the commission of an offence by the applicant himself is established, appropriate liability measures may be applied to him.

Joint meetings of the Audit Committee of the Board of Directors of the Organisation, the Compliance Officer and the General Director of the Organisation are held in order to monitor compliance with the requirements of the Code, make additions and amendments to it. Meetings are held as necessary, but at least once a quarter.

5.2. AMENDMENTS AND ADDITIONS TO THE CODE

All proposals to amend and supplement the Code are sent by the Organisation's employees to the heads of their departments and/or Compliance Officer or by email compliance@ynbc.org.

These proposals are studied, systematised and reviewed by a Compliance Officer.

The recommendations of the Compliance Officer on changing or supplementing the Code are submitted to the General Director of the Organisation, who has the right to submit the issue of changing or supplementing the Code for consideration by the Board of Directors of the Organisation/Audit Committee of the Organisation's Board of Directors.