

APPROVED BY

Order of Director General of Joint-Stock
Company (ZAO) CROC incorporated

of January 31, 2020 No. 44a/SMK

QUALITY MANAGEMENT SYSTEM

CODE OF ETHICS

OD 06.



JSC (ZAO) CROC incorporated

2020

DOCUMENT DETAILS

Document ID	ОД 06. Code of Ethics
Version No.	1.0
Effective date	January 31, 2020
Basis	Order of January 31, 2020 No. 44a/SMK
Prepared by	Chief Compliance Officer _____ Vladimir Gromov

TABLE OF CONTENTS

1	PURPOSE AND SCOPE	4
2	NO DISCRIMINATION	4
3	GOOD WORKING CONDITIONS	5
4	NO HARASSMENT AND ABUSE OF AUTHORITY	5
5	NO FORCED LABOR	5
6	NO CHILD LABOR	5
7	EMPLOYEE PERSONAL DATA PROTECTION	5
8	BINDING NATURE OF THE CODE OF ETHICS	6
9	CROC COMPLIANCE HOTLINE	6

1 PURPOSE AND SCOPE

1.1 This Code is an internal regulatory document of JSC (ZAO) CROC incorporated (hereinafter – the “Company” or “CROC”) and should be followed by all Company employees, including top managers.

1.2 CROC declares its unconditional adherence to the widely accepted principles of protecting human rights and freedoms.

1.3 People and human rights and freedoms are the highest value for the Company.

1.4 CROC employees are the core value of our Company. CROC respects each employee's contribution to our common efforts and strives to do everything possible to create the most comfortable atmosphere in the Company.

1.5 As an employer, CROC undertakes to unconditionally comply with the requirements of the labor legislation of the Russian Federation. In addition, where possible, CROC strives to provide its employees with more comfortable working conditions than those required solely by the effective legislation and by-laws.

2 NO DISCRIMINATION

2.1. Any form of discrimination is prohibited in the Company. In particular, CROC does not tolerate negative or prejudiced attitude towards employees and deprivation of any rights or opportunities solely on the basis of:

- gender;
- race;
- skin color;
- nationality;
- sexual orientation;
- language;
- origin;
- property, family, social and official status;
- age;
- place of residence;
- religion;
- beliefs;
- belonging or non-belonging to public associations or social groups;
- other factors not related to employee's business qualities.

2.2. CROC strives to prevent discrimination against its current employees and when hiring new employees. Company employees in management positions shall evaluate the performance of their subordinates solely on the basis of their business qualities. Matters such as employee salaries and bonuses, transfers to other positions, new employee hiring, dismissal, and involving employees in certain projects should be solved solely on the basis of their business qualities (provided that a conflict of interest is avoided).

2.3. Company employees in management positions are prohibited from providing direct or indirect patronage or connivance to their subordinates. Any employee salary, bonuses and transfer to another position may not be based on personal hostile or benevolent attitude towards this employee.

3 GOOD WORKING CONDITIONS

3.1. CROC is committed to taking care of the health of its employees.

3.2. As an employer, CROC undertakes to provide all its employees with workplaces that conform to labor protection requirements. If possible, CROC will strive to improve working conditions of its employees in order to achieve the most comfortable atmosphere in the office.

3.3. Any CROC employee may refuse from performing the work assigned to him/her if it poses a danger to his/her life and health due to violation of labor protection requirements.

3.4. CROC undertakes, at its own expense, to provide employees with all necessary personal and collective protective equipment in accordance with labor protection requirements.

4 NO HARASSMENT AND ABUSE OF AUTHORITY

4.1 CROC and all employees must respect personal dignity and the right to privacy of Company employees.

4.2 Sexual, psychological or any other harassment against other Company employees is prohibited.

4.3 Employees in higher positions are prohibited from abusing their positions to compel other employees to do anything beyond their job duties.

5 NO FORCED LABOR

5.1. CROC declaims against and does not allow any slave or forced labor in its activities.

5.2. No one can force the Company employees to perform work for which they did not agree.

5.3. Involvement of Company employees in any work under the threat of any sanctions or without payment is prohibited.

6 NO CHILD LABOR

6.1. CROC does not use child labor.

7 EMPLOYEE PERSONAL DATA PROTECTION

7.1. CROC guarantees proper protection of any employee personal data transferred to the Company.

7.2. Only those Company employees who are to process it by virtue of their job duties shall have access to such personal data, and the number of Company employees accessing other employees' personal data shall be limited as much possible.

7.3. Employees accessing other employees' personal data shall only use such personal data for the performance of their job duties and in strict compliance with the personal data protection legislation.

8 BINDING NATURE OF THE CODE OF ETHICS

8.1. The provisions of this Code of Ethics shall be followed by the Company and all its employees.

8.2. Disciplinary actions or other measures at the discretion of Director General of the Company shall be applied to those Company employees who have violated provisions of this Code.

9 CROC COMPLIANCE HOTLINE

9.1. Any employee who becomes aware of a violation of any provision of this Code must report it to his/her line manager, HR officer or Chief Compliance Officer. Compliance Hotline email is compliance@croc.ru.

9.2. All those who contact the Compliance Hotline are guaranteed anonymity along with prompt and efficient review of their report.

9.3. It is prohibited to apply sanctions or any other unfavorable measures to an informer.

AGREED BY

Approval sheet (annex to Order No. 44a/SMK of January 31, 2020)

Deputy Director General for Human Resources

Polina Khabarova

Deputy Director General for Business Development

Igor Nikulin