



Foreword

EAST METAL, as one of the largest full-cycle metalworking companies in Latvia, wishing to ensure sustainable business, has developed guidelines for observing a responsible and ethical business environment.

The Code of Conduct defines the requirements set for EAST METAL business partners to ensure that ethical, social and environmental responsibility is observed.

The Code of Conduct is based on applicable legislation and internationally recognized and approved principles and is applicable to all EAST METAL business partners and is considered as an integral part of the contracts concluded with business partners.

The definition of business partners includes suppliers, distributors and intermediaries, as well as subcontractors of business partners.

EAST METAL business partners must comply with the rules defined in this Code of Conduct in all their activities, as well as national laws and regulations applicable to their activities in the countries in which they operate.



Prohibition of corruption and unfair competition

EAST METAL respects the principle of honesty in all business transactions. Any form of extortion, bribery and/or corruption, including the illegal giving or receiving of bribes, material values, material or other benefits from employees, business partners, state and local government institutions or any other person, is prohibited.

EAST METAL does not cooperate with companies who violate regulatory enactments or attempt to influence company employees or other people through corrupt practices.

Business partners must support and strive to achieve fair competition, as well as comply with all applicable competition and antimonopoly laws and regulations. Business partners must not directly or indirectly offer any advantages to EAST METAL employees or any person doing business on behalf of EAST METAL. In addition, business partners must observe that EAST METAL employees and any person doing business on behalf of EAST METAL may not accept gifts, except for gifts of symbolic value.



Anti-Money Laundering



Business partners must comply with applicable anti-money laundering laws worldwide and must not allow, contribute or support money laundering.

Trade Compliance

Business partners must comply with all applicable laws, regulations, licensing requirements, boycotts, embargoes, sanctions and restrictions on the export and import of goods, technology, information and services. Business partners must provide exact and true information about products and other items to customs authorities and other relevant authorities upon request.

Conflict of Interest Prevention

EAST METAL avoids situations where private or individual financial interests' conflict with the interests of EAST METAL or its business partners.

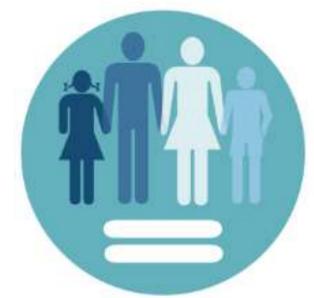
Data Protection

The Business Partner shall ensure that personal data is processed in a manner that is appropriate to the security of the data, including protection against unauthorized or unlawful processing, accidental loss, destruction or damage, using appropriate technical or organizational measures.

Human Rights



The Business Partners shall comply with internationally recognized human rights standards and shall guarantee that they have not engaged in and will not engage in human rights violations.



Child Labor and Forced Labor

The Business Partners shall under no circumstances employ children under the minimum age specified in the applicable laws and regulations. The minimum age shall be the age at which a person has completed mandatory education or is not less than 15 years of age (or 14 years of age, if permitted by national laws and regulations).

Children who have reached the minimum age for employment shall not be employed in dangerous working conditions or in work that is likely to be harmful to the child's personal growth, morals and development.

Business partners must not use forced labor. Forced labor means any work or service which is exacted from a person under the menace of any penalty and for which the person has not voluntarily offered himself or herself.

Prohibition of discrimination



Business partners must treat their employees with respect and provide fair and equal development opportunities. Any form of direct or indirect discrimination is prohibited, mainly discrimination against a person's race, skin color, gender, age, disability, religious or political beliefs, national or social origin, sexual orientation.

Harassment of a person and instructions to discriminate against them are also considered discrimination.

Work safety and working environment

Business partners' employees have the right to a safe and healthy working environment. Business partners undertake responsibility for implementing health and safety requirements in their company. Violations of work safety standards set out in regulatory enactments are not permitted in the workplace.

Business partners are obliged to protect the safety of their employees and ensure that the working environment complies with applicable health and safety legislation and requirements.

Business partners must take appropriate measures and training to ensure work safety and prevent accidents and illnesses arising from work environment factors. This includes the availability of first aid equipment and personal and collective protective equipment. Business partners undertake to report, investigate and act on all accidents, near misses and unsafe situations, if necessary.

The Business Partner undertakes to ensure that working premises and conditions are such that employees can perform their functions in a safe and healthy environment, including fire safety requirements, and to ensure that equipment protects the person and meets personal hygiene needs.

Environmental protection and sustainability



Business partners must support measures regarding environmental issues and take the initiative to promote greater responsibility for the environment.

Business partners must comply with all environmental protection requirements set out in regulatory enactments, environmental permits or other applicable regulations, and must have an environmental management system or policy.

EAST METAL supports the development and dissemination of environmentally friendly technologies and encourages business partners to implement and maintain a system for applying best practices within the company to manage environmental issues and their impacts and to achieve a systematic reduction of environmental impact.

Business partners undertake to conduct their business in a way that protects and preserves the environment and undertakes to prevent and minimize the negative environmental impact that products and services may cause during their production, distribution and use, as well as their disposal.

All business partners must have a structured waste management system and control of hazardous waste. Methods, procedures and equipment must be in place for the safe introduction, handling, labelling, storage and disposal of chemicals to reduce negative impacts on people and the environment.

Confidentiality and Intellectual Property



EAST METAL's intellectual property, such as patents, trademarks, copyrights and trade secrets, as well as technical data and software, is a valuable asset of EAST METAL and must be particularly protected. Business partners must respect the intellectual property owned by EAST METAL and ensure that it is not used in any way other than as authorized by EAST METAL in writing.

Business partners shall pay increased attention to ensure the security and protection of confidential and trade secret information received from EAST METAL and shall not disclose or otherwise transfer it to third parties.

Application of the Code of Conduct

A business partner is obliged to comply with the principles set out in this Code of Conduct, as well as generally accepted norms of conduct and morality, and to ensure that its subcontractors also comply with these norms. EAST METAL has the right to inspect and monitor the implementation of the requirements of this Code of Conduct and the business partner is obliged to allow an audit to be carried out in their companies to verify compliance with the provisions of the Code of Conduct.

The business partner must immediately inform EAST METAL of any violation of the provisions of this Code of Conduct. EAST METAL will not tolerate any person to be punished or otherwise directly or indirectly causing adverse consequences to him because he has reported such violations.

Any violation of the Code of Conduct will be investigated appropriately and any significant violation of the provisions of the Code of Conduct may be a reason for termination of the business relationship with the business partner.

