

Corporate social responsibility and ethics code (translation)

Introduction

The code of business ethics, described in this document, specifies the goals and corresponding rules of conduct applicable to employees, managers, board members, suppliers, partners and subcontractors. The main emphasis of the principles is on integrity, ethical and lawful conduct and protecting the good name and reputation of Heavy Industry Estonia OÜ.

Our goals

- We offer an opportunity of success to all employees, suppliers, partners and subcontractors in the spirit of fair competition and mutually beneficial cooperation.
- In cooperation, we have regard to the standards of integrity, respect and trust.
- We see our employees as the focal point of our strategic development and create the conditions that enable men and women to reach their full professional potential.

Business practices

The interest groups that have a direct stake in the business include the owners, clients, employees, partners and competitors of the company, while the wider society and natural environment can be seen as indirect stakeholders.

- Our goal is to cooperate with those business partners whose principles are similar to ours in terms of respect for human rights and ethical conduct.
- We are a responsible company and consider the social, economic and environmental impact of our business, trying to increase positive and reduce negative impact in everything we do.

Social responsibility

Social responsibility pertains to all areas of business ethics: the conditions created for our employees, responsible investment strategy, production planning, environmental sustainability, promotion of social justice and welfare. Social responsibility is the company's contribution towards social development and promotion of justice.

- We treat all people equally, irrespective of race, colour, gender, religion, political or other opinion, ethnic or social origin, wealth, social standing or other status.
- We protect our employees from all forms of discrimination at workplace. We do not tolerate any behaviour that amounts to racial, sexual or other form of harassment of an employee.
- We provide our employees with basic skills training and refresher training, as well as professional development opportunities.
- We do not use child labour. Minors of at least 17 years of age can complete practical training at the company under a traineeship contract.
- We maintain a positive working environment, where employees and managers cooperate to strengthen our business.
- We develop open dialogue with employees regarding important decisions that have a direct impact on them.
- We encourage our suppliers and subcontractors to integrate the values specified in this document in their business practices.

Local communities

- We are committed to supporting and helping local communities through various means, incl. financial support for projects, volunteer work by our employees, etc.
- Our actions are guided by respect and care for the local community and the environment.
- We reduce our environmental impact as much as possible through waste management and reduction of energy consumption.
- We serve the interests of our local communities by creating good jobs.

Confidentiality clause

- Employees are required to refrain from disclosing any business or production secrets of the employer and from making them available to any third parties and from taking advantage of them in their own interest or in the interest of any third parties.
- Employees undertake to maintain confidentiality of such information (in particular, information on the financial status and economic activities of the employer, the strategic decisions of the management bodies and the working arrangements of the employer, clients of the employer, concluded contracts, the information systems and software obtained by the employer and the principles of product pricing) and refrain from disclosing it to any third parties without a prior written consent of the employer.
- The business and production secrets of the employer do not include information that has been released to the public or is publicly available (such as information contained in public registers, annual reports). Employees can disclose the employer's business and production secrets to public authorities in the cases and to the extent required by laws, subject to a prior notification of the employer.

Handling inside information

- The employer holds the rights to any works, drawings, designs or other work results created by employees while performing their duties, including the right to submit applications for registration of trademarks, patents, utility models, industrial designs, etc.
- Employees do not have the right to use, or enable any third parties to use, any intellectual property, which belongs to the employer or is created by an employee in connection with his/her professional duties, for personal purposes or for personal needs or for any other purposes not connected to their professional duties.
- Employees may not use, or enable any third parties to use, the information systems and software, developed and/or used by the employer, for their personal gain during the term and also after expiry of their employment contracts.

Bribery, hospitality, gifts and corruption

- We do not practice any forms of corruption, including bribery.
- Heavy Industry Estonia OÜ does not provide financial support to political parties or individual politicians.
- Our decisions on procuring services and products from suppliers are based exclusively on quality, performance and price.
- We never accept any monetary or other benefits (gifts, concessions, training, training trips, etc.), except for normal hospitality (e.g., business lunches), which cannot be construed as attempts or opportunities to influence business decisions.

- The manager should be notified if, despite the foregoing, a gift is received in the company. Employees are not permitted to keep personal gifts from suppliers, partners or other persons directly associated with their work. Any such gifts have to be handed over to the head of the office, who will store them in a place designated for that purpose.
- In a culture where refusal of a gift can be considered as an insult, any such gifts have to be declared to the company and donated to a charity whenever feasible.

Competition rules

The employer's competitors include all undertakings, self-employed persons and other natural persons whose business fully or partially overlaps with that of the employer, i.e., who manufacture containers, incl. pressure and storage tanks, offshore sector products, incl. lifting equipment, and other complex and large steel structures.

- We do not disparage our competitors.
- When communicating with competitors, employees may not disclose any confidential information and may not use unlawful means to obtain information on business secrets or competition aspects of competitors.
- It is prohibited for employees to talk about pricing principles or become involved in unlawful actions or operations.
- During the term of the employment contract, employees do not have the right to operate as self-employed persons, partners, shareholders, management or supervisory board members, procurators, auditors, employees, servants, contractors, subcontractors or mandataries for entities operating in the same line of business as the employer. Furthermore, employees do not have the right to work for persons who are not competitors of the employer, unless the employer gives them consent in writing or in a format, which can be reproduced in writing. The restriction on competition applies to competition on the territory of the Republic of Estonia during the term of the employment contract.

Equal treatment, treatment of clients

- All suppliers have the right to equal treatment and potential new suppliers have to be given a reasonable opportunity to engage in cooperation.
- All employees are required to aspire to providing an excellent service, with a good value-for-money ratio, that meets clients' expectations and anticipates their changing needs.
- We are open and honest in our communication with clients.
- We provide our employees with equal opportunities for career advancement and in applying for vacant positions.