

APPROVED
by order of MC Delo
dated February 16, 2022 No.9

**CODE OF CONDUCT FOR SUPPLIERS
OF MC DELO
(revision No. 1)**

City of Moscow

2022

1. General provisions

This Code has been developed and implemented in order to inform existing and potential suppliers about the basic principles of Limited Liability Company "Management Company "Delo" (hereinafter - "MC Delo").

When selecting suppliers MC Delo gives preference to suppliers, who seek to comply with the principles of sustainable development considering the results of appraisal using relevant indicators throughout the supply chain.

MC Delo maintains equitable business relations with suppliers and encourages them to operate in compliance with the principles specified in this Code.

Suppliers are advised to:

- be guided by the principles (ethical, anti-corruption, environmental, labor protection) and human rights in their organization;
- build and maintain effective management systems based on the principles of sustainable development, including setting adequate goals, regular assessment of performance and continuous improvement practice.

And also adhere to the following principles:

- full compliance with the legislation of the Russian Federation;
- transparency and competitiveness.

As part of implementation of this Code, when making contracts MC Delo invites suppliers to confirm acceptance of the principles listed in this document.

2. Ethical principles

2.1. MC Delo calls on its suppliers to follow the following ethical principles:

2.1.1. Respect. To respect honor, dignity, rights and legitimate interests of people, their cultural traditions. Not to allow discrimination on sexual, political, religious, national or any other grounds.

2.1.2. Veracity. To follow the principles of fair competition, to act openly in relations with their suppliers, customers and business partners.

2.1.3. Legality. To comply with the generally recognized principles and norms of international law, the requirements of applicable legislation.

2.1.4. Responsibility. To be responsible for the results of their work.

2.1.5. Openness and transparency. To interact with employees, suppliers, customers, business partners, officials and mass media based on openness and transparency principle subject to restrictions and requirements of applicable legislation.

2.1.6. Employment and diversity of labor resources. To strive to use uniform principles and approaches to HR management in all regions of their presence in view of local specifics and peculiarities.

2.1.7. Engagement with local communities. To pay special attention to maintaining long-term and constructive relations with the local communities in the regions of presence.

3. Anti-corruption principles

3.1. MC Delo expects its suppliers to follow the following anti-corruption principles:

3.1.1. Compliance with legislation and generally accepted rules: measures to counter corporate fraud shall comply with the Constitution of the Russian Federation, principles and norms of international law, international treaties signed by the Russian Federation and the legislation of the Russian Federation.

3.1.2. Zero tolerance to corporate fraud.

3.1.3. Adequacy to risks and efficiency of anti-corruption procedures.

3.1.4. Involvement and informing employees about measures to prevent corruption and corporate fraud.

3.1.5. Control and regular monitoring.

3.1.6. No retaliation against reporters.

3.2. Waiver by supplier of the above-mentioned principles gives rise to termination of business relationship.

4. Occupational safety principles

4.1. MC Delo calls on its suppliers to comply with the following principles in the field of occupational safety:

4.1.1. the principle of priority of preserving life and health of employees in the course of their working life;

4.1.2. the principle of recognizing probability of damage to health of employee in view of severity of consequences as an occupational risk;

4.1.3. the principle of involvement of management and employees in occupational safety management system;

4.1.4. the principle of resources capability, which involves allocation of funding to achieve goals and objectives set in the field of occupational safety;

4.1.5. the principle of disclosure of information about activities in the field of occupational safety;

4.1.6. the principle of continuous improvement of occupational safety system according to changes in external and internal work environment;

4.1.7. the principle of social partnership within the framework of direct dialogue between employer and employee;

4.1.8. the principle of personal responsibility of management and employees for proper performance of their duties in the field of occupational safety;

4.1.9. the principle of providing fair and equitable wages, benefits and other employment conditions in accordance with the existing legislation.

5. Human rights principles

5.1. MC Delo calls on its suppliers to respect human rights and uphold the following principles:

5.2. to prohibit the use of child labor;

5.3. not to allow the use of forced, slave or involuntary labor;

5.4. to prevent outrageous treatment of employees, including any form of physical and sexual violence or verbal abuse, harassment or other forms of oppression;

5.5. to recognize and respect the right of their employees to freedom of assembly subject to applicable law;

5.6. to apply fair and reasonable terms of employment, including, but not limited to, working hours and remuneration;

5.7. to eliminate all forms of discrimination and encourage socio-cultural diversity of staff.

6. Environmental principles:

6.1. MC Delo calls its suppliers to follow the following environmental principles:

6.1.1. compliance with legal requirements, following recommendations, international conventions, best practices and standards in the field of preservation of the environment;

6.1.2. consideration of environmental factors and assessment of potential negative impact on the environment when making investment decisions;

6.1.3. need to reduce negative impact on the environment, responsible resource consumption and increase of responsibility for the state of the environment;

6.1.4. continuous promotion of development, implementation and dissemination of environmentally sound technologies and best practices in environmental impact management;

6.1.5. support for precautionary approach to environmental issues.

7. Links

7.1. You can find the codes and policies of MC Delo at: [delo-group.ru/about/esg /](https://delo-group.ru/about/esg/).
