

# **POLICY OF RESPONSIBLE RESOURCING OF “ORION.GROUP” LLC COOPERATION WITH SUPPLIERS 2019**

This policy contains mandatory requirements which all suppliers must follow in order to continue cooperation with “ORION.GROUP” LLC. We firmly believe that this process will benefit not only the company “ORION.GROUP” LLC, but also our partner suppliers, as it helps the society and the environmental development.

\_\_\_\_\_ Karban Vasyl Ivanovych  
General director

## **1. Our main principles:**

- Legal and fair business.
- Work performance on the basis of voluntarily agreed and documented conditions of employment.
- Treatment of all employees on the basis of equality, with respect and dignity.
- Work performance on a voluntary basis.
- Compliance with current restrictions on all employees' age.
- Fair remuneration and work schedule for all employees.
- Smart work schedule for all employees.
- Protection of health and workers safety in the workplace.
- Fair procedure of legal protection.
- Carrying on business, taking into account the principles of sustainable development and reducing the impact on the environment.

The company "ORION.GROUP" LLC did not initiate these principles. They are enshrined in internationally recognized standards.

## **2. Mandatory requirements to run business with the company "ORION.GROUP" LLC**

### **2.1. Legal and fair business**

#### **Compliance with legislation**

You should comply with all laws and regulations of the country in which the supplier operates. You must comply with all international regulations, data protection and competition.

#### **Bribe**

Any form of bribery, corruption or extortion is prohibited, therefore, to prevent bribery in all business transactions of the supplier, the relevant procedures apply.

#### **Gifts and hospitality**

Any business entertainment and hospitality towards the company "ORION.GROUP" LLC should be provided reasonably, solely in order to maintain good business relations, and not to influence on decision-making as for provision of future orders.

#### **Confidential information and data about your competitors**

All information about competitors must be obtained legally and can be used only for the legal purposes in accordance with all laws and regulations. Any attempts to disclose confidential information about competitors to "ORION.GROUP" LLC, as well as to disclose confidential information about the company "ORION.GROUP" to the third parties without a special permit of "ORION.GROUP" LLC, are prohibited.

#### **Financial documents, money laundering and insider trading**

All business and commercial transactions must be carried out transparently and carefully recorded in the supplier's accounting system. It is forbidden to use the supplier's confidential information about the company "ORION.GROUP" LLC to carry out or support insider trading.

### **Information and property protection**

You should respect and protect the confidential information, know-how and intellectual property of the company "ORION.GROUP" LLC. All information provided by "ORION.GROUP" LLC which is not freely available, is considered confidential and is used only for a specific purpose. The use of personal information of individuals, consumers or employees of "ORION.GROUP" LLC shall be conducted confidentially and in compliance with all relevant laws and regulations.

### **Product quality and responsible approach to innovation**

Products and services should be provided in accordance with the specifications, as well as the standards and quality criteria specified in the relevant documents and should be safe in the use.

### **2.2. Work performance on the basis of voluntarily agreed and documented conditions of employment**

All employees, both permanent and temporary, should be provided with documents that regulate their labor relations with the company, which are drawn up on a voluntary basis and taking into account all the legal and contractual rights of employees.

### **2.3. All employees treatment on the basis of equality, with respect and dignity**

All employees need to be treated with respect and dignity. No employee may be subjected to physical, sexual, psychological, verbal abuse, mistreatment or other form of humiliation. Employment discrimination, including hiring, remuneration, promotion, work discipline, termination of employment and retirement are prohibited. Discrimination based on race, ethnicity, age, position, gender, gender identity, skin color, religion, country of origin, sexual orientation, marital status, pregnancy, dependents, disability, social class, union membership or political views are not allowed. In particular, special attention is paid to the rights of workers most vulnerable to discrimination.

### **2.4. Work performance on a voluntary basis**

In no case should the supplier use forced and illegal labor, mental and physical coercion, slavery and trafficking in human beings.

### **2.5. Compliance with current restrictions on the all employees' age**

Under no circumstances should the supplier employ the workers aged under 15 or a minimum age for work, or compulsory education provided for by local law, whichever is longer. Minor employees should not perform mentally, physically, socially or morally dangerous work, as well as work that interferes with school education, depriving them of the opportunity to attend it.

### **2.6. Fair remuneration and work schedule for all employees**

The payment for labor and work schedule of employees are established in accordance with the procedure that does not contradict the current legislation of the supplier's country.

### **2.7. Protection of health and workers safety in the workplace**

Workplace that is safe for life and health is provided in order to prevent accidents and injuries during work or as a result of employee actions.

### **2.8. Fair procedure of legal protection**

Employees should be provided with transparent, fair and confidential procedures, which result in rapid, objective and fair problems solutions that may arise within their work relationship.

### **2.9. Carrying on business, taking into account the principles of sustainable development and reducing the impact on the environment**

Operating activity, resource mobilization, production, product distribution and service provision are carried out in order to protect and preserve the environment.

## **3. Informing about the breach**

Any breach of this Policy (including, but not limited to, breach by an employee of "ORION.GROUP" LLC or by any person acting on behalf of "ORION.GROUP" LLC), which will be known to the supplier, should be immediately reported to the company "ORION.GROUP" LLC by phone or via the Internet (message may be provided confidentially and anonymously). Failure to comply with this requirement will be considered a breach of this Policy provisions. The company "ORION.GROUP" LLC will investigate all cases of informing about the problems and will discuss the results of investigations with suppliers. The supplier must assist with the investigation and must provide access to any reasonably requested information. If it is necessary to eliminate the breach, the supplier should develop and inform the company "ORION.GROUP" LLC about its actions, plans for their implementation and the timelines for effective and rapid breach elimination.