



GROUP OF COMPANIES

## **"A+A Group of Companies" Code of Conduct and Ethics**

### **Introduction**

The *Code of Business Conduct* ("*Code*") of A+A Group of Companies ("*Company*") sets forth standards of conduct for all of the Company. Throughout the *Code*, "*Company*" is used to refer to the enterprise as a whole, to each person within it, and to any person or entity who represents the Company or any part of its organization, including suppliers, consultants, and third-party representatives.

The *Code* provides information about our standards of integrity and explains our legal and ethical responsibilities. It is intended to provide guidance on our responsibilities and to assist in making the correct business decisions. The *Code* is a complementary document that describes our objectives and explains our responsibilities to our company and people.

Adherence to the *Code* is required of all employees and representatives of the Company. Any employee or representative of the Company who violates stated legal or ethical responsibilities will be subject to appropriate discipline, which may include dismissal. Non-compliance with certain aspects of the *Code* also may subject the individual offender and the Company to civil and/or criminal liability.

### **Statement of Policy**

We comply with the A+A Group of Companies *Code of Business Conduct*. We manage our business in compliance with all applicable laws and regulations of the countries in which we operate, and in accordance with our company's high standards of business conduct. All employees and representatives of *Company* are expected to comply with the *Code*, which is essential to maintaining our reputation for honesty, quality, and



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Integrity. It also is each person's responsibility to report to the company any situation where our standards or national and local laws are being violated. Any person disclosing, in good faith, violations or suspected violations of legal requirements or *Company's* business standards will not be subjected to retaliation or retribution. Likewise, failure to comply with the provisions of the *Code* will not be tolerated.

All employees should report any violation of this Code to the responsible officials listed below:

- Immediate line manager
- Head of relevant department/division/section
- Lawyer responsible for Compliance matters

To the extent possible, all information should be received and transferred confidentially. Disciplinary action may not be taken against an employee who reports about violation in good faith. However, those who violate any provision of his code, by their actions, will be subject to disciplinary action even if they report in good faith. If disciplinary action is deemed necessary and employee decides to report about violation, in any case, it would be taken into account.

Cases of compliance with violation of the rules will be taken into consideration during employees' performance appraisal.

## **Our Company**

### ***Choosing Suppliers and Consultants***

We strive to be fair in our choice of suppliers and consultants and are honest in all business interactions with them. We choose our suppliers and consultants based on appropriate criteria, such as qualifications, competitive price, and reputation. Anyone responsible for buying or leasing materials or services on behalf of the Company must conscientiously guard their objectivity. These persons are required to disclose to the Company any personal, financial or ownership interest in the supplier or consultant prior to or during engagement by the Company.



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We expect our suppliers and consultants—and others who do business with us or on our behalf—to conduct their business in compliance with all applicable laws and regulations, and in accordance with the highest ethical standards. To avoid conflicts of interest, we also expect our suppliers and consultants to disclose any personal or business relationships with our employees.

We must be aware of legal and business risks associated with choosing suppliers and consultants. In all cases, due diligence of new business arrangements must be completed prior to engagement by the Company.

### ***Due Diligence of New Business Arrangements***

As part of its global operations, Company uses various business arrangements, including independent contractors, general sales agents, joint ventures, customs brokers, immigration agents, and tax agents to conduct operations.

Due diligence of new business arrangements is critical, mandatory, and must be completed prior to engagement to minimize the potential business and legal risks that could arise from these business arrangements.

Relevant employees are required to arrange completion of “*Client Intake and Verification Form*” prior to starting new business arrangements.

### ***Company Property and Services***

The use of company time, labor, supplies, equipment, tools, buildings, or other assets for personal benefit is prohibited. Employees and representatives are required to pay for personal use of the Company services. Company property used in the course of work with the Company remains the property of the Company and must be returned upon request by the Company or upon termination of employment.

Collectively, we have the responsibility for safeguarding and making proper and efficient use of Company’s property, including:

- Cash, checks, drafts, and charge cards
- Company time
- Computer hardware, including laptops and accessories, and software
- Equipment, including copiers, fax machines, telephones, cell phones, mobile devices, and accessories
- Information assets, including electronic data and intellectual property
- Land and buildings
- Materials and supplies
- Scrap and obsolete equipment
- Company uniforms and identification media, including badges
- Vehicles

Company property must not be used for any purpose unrelated to Company business without prior authorization from the appropriate manager.

## **Our People**

### ***Business Continuity Management and Workplace Violence Prevention***

Company is committed to a safe work environment that is free of threats, intimidation, and physical harm. Everyone has a right to work in a safe environment and everyone shares the responsibility for ensuring the safety of others. We have zero tolerance for workplace violence, and we will investigate and take appropriate action up to and including dismissal regarding any threats to a safe workplace.

Company prohibits violent behavior in the workplace including, but not limited to, physical assaults, fighting, threatening comments, intimidation, threats through electronic communications including social media, and the intentional or reckless destruction of property of the company, employee, Company representative, or customer. Comments or behavior that reasonably could be interpreted as intent to do harm to people or property will be considered a threat. We also prohibit

the unauthorized possession and/or use of weapons by any employee or Company representative while at work, on company property, or while on company business.

Any employee or representative who believes that he or she may be the target of violence or threats of violence, or is aware of violent or threatening conduct by, or directed at an employee or Company representative that could result in injury to a person or the destruction of property, has a responsibility to immediately report the situation to his or her immediate supervisor or manager. If an individual is unable to do so, or prefers not to contact a supervisor or manager, the Compliance Line should be used.

### ***Drug and Alcohol Policy***

Unauthorized use of alcohol and/or controlled substances creates serious health, wellness, and safety risks in the workplace. The unauthorized use, sale, or possession of alcohol and/or controlled substances is strictly prohibited while at work, on company property, or on company business.

This prohibition also includes use, sale, or possession of illegal drugs or improper use of controlled substances.

We comply with all laws and regulations regarding the use, sale, or possession of alcohol, controlled substances, and illegal drugs.

### ***Equal Opportunity and Fair Treatment***

We treat each individual fairly, and recruit, select, train, promote, and compensate based on merit, experience, and other work-related criteria. We comply with all laws governing fair employment and labor practices. We do not discriminate against any applicant for employment or any employee in any aspect of their employment at the Company because of age, race, religion, sex, disability, sexual orientation, gender identity, national origin, other legally protected characteristic or basis, or any unlawful means.

Freedom from wrongful discrimination includes any form of discriminatory harassment. Prohibited harassment includes conduct that is intended to interfere, or that has the effect of unreasonably interfering with a person's work performance or creating an environment that is intimidating, hostile, or offensive to the individual.

### ***Workplace Health, Wellness, and Safety***

The well-being of our people is of utmost importance to Company. We are committed to protecting the health, wellness, and safety of each employee. We strive to protect our people, customers, and the public from injury and illness through our health and safety programs. Government regulatory standards and employee input are used to develop comprehensive programs and work processes that are designed to promote safe workplaces and good health. We all are responsible for understanding and complying with Company's Health and Safety processes, procedures, and guidelines, as well as those issued by applicable regulatory authorities.

Employees are required to report to the company in a timely manner any vehicle accident, workplace injury, instance of non-compliance, or any situation presenting a danger of injury. This information will assist in preventing injuries, and will ensure appropriate medical attention is provided in the event an injury occurs. Through investigation of such reports, we can identify contributing factors and determine if our policies and processes are effective and adequately communicated. When an unsafe condition or practice, or non-compliant action is identified, prompt and appropriate action must be taken to correct the condition and prevent it from recurring.

Approved by: *Rauf Aliyev* CEO

Signature: \_\_\_\_\_

Date: 10.01.2019

