



Code of Business Ethics

Major Cargo Service

2020

A decorative graphic at the bottom of the page features two thick, hand-drawn style lines. One line is red and the other is blue. They both curve upwards from the left side towards the right side, with the red line positioned above the blue line.

Introduction

The Code of Business Ethics of Major Cargo Service reflects our general values, principles and rules of conduct to form ethic and conscientious behavior of our employees. The Code bases on high moral principles and ethical values, missions and politics of the Company and reflects the internal relations, relations with business partners, state authorities and society.

The Company's activities always base on the principles of civilized business, which include mutual respect, honesty, objectivity and observance of the current legislation requirements.

Each employee have to remember – he forms the reputation of our Company in the society, state authorities and among business partners, not only makes a powerful contribution to develop our Company.

The purpose of the Code of Business Ethics is to establish the standards of business ethics in the Company and to implement regulations for their observance.

The tasks of the Code of Business Ethics are to develop understanding, support and respect for the general principles of business ethics among the employees; create and maintenance corporate culture; promote ethic behavior; aspire to observance of rules; not allow illegal behavior.

Key Ideology

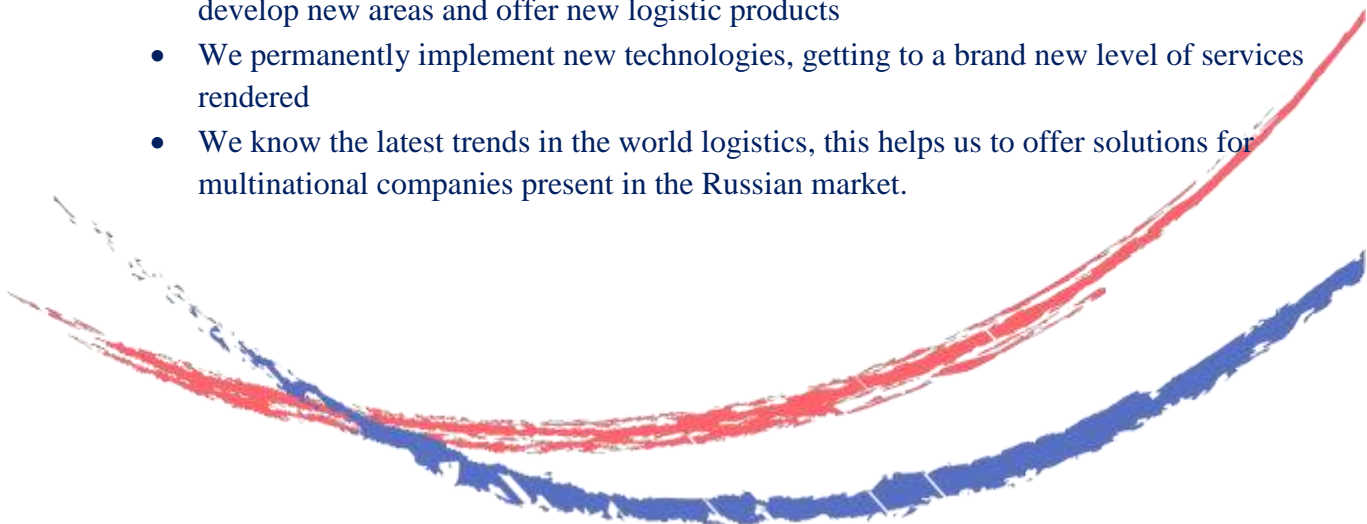
- Develop continuously. Achieve perfect results. Be the best
- Enjoy your job and team work
- Be honest and open
- Bring benefit and joy to people
- Create civilized society for ourselves and our children.

Our motto "**Moving forward, attention to details**" is our life style and philosophy of our work.

Moving forward

Continuous development and moving forward is our principle of work.

- We never stop on what we have achieved
- We are not satisfied with a good result, we are always looking for the best solution
- We are constantly improving technologies of work with our clients. We look for and develop new areas and offer new logistic products
- We permanently implement new technologies, getting to a brand new level of services rendered
- We know the latest trends in the world logistics, this helps us to offer solutions for multinational companies present in the Russian market.



Attention to details

Attention to details is a guaranty of our success.

We thoroughly study the needs of our clients – nothing is left without attention. Standard Operational Procedures (SOP) are developed for each client individually, they are introduced in the system and controlled at each stage of the process.

We permanently control the indicators, important for our clients. We present reports on these indicators with convenient periodicity for the client. We do not render standard set of services. We are flexible. We have an individual approach to each client in accordance with his needs. The services rendered are to meet or surpass the client's expectations.

We understand all the importance of information exchange, its accuracy and timeliness of delivery. The system of information and notification, standard and special on-line reports, file exchange in the format, convenient for the client, integration into the client's supply network—these all are options, accompanying our service, due to which our clients can control their cargo traffic.

We exercise permanent control over the quality of the services rendered, which allows us to improve the procedures of work with the client. The objective assessment allows us to find the balance of our opportunities and the client's expectations, which rules out provision of non-developed schemes and solutions.

Internal relations

Our business is based on quality efficient service, and our people make this possible. We appreciate the employees and expect high standards of business conduct and professional achievements from them.

We respect personal liberty, human rights and dignity, treat our employees with trust and provide equal opportunities to everyone. We do not allow any forms of discrimination or oppression at work. The Company's employees must build interpersonal relations at a high professional and personal level. Such relations must be built on mutual respect, trust, and self-esteem. This means that the employees should avoid acts or words, which can be perceived as hostile, inappropriate or offensive.

Offensive, unfriendly behavior or behavior, which unreasonably prevents the employee from fulfillment of his/her duties, is set equal to offense, which is inappropriate and unacceptable behavior, admissible in the Company under no circumstances.

The Company always fulfills its obligations to the employees and the employees always observe their obligations to the Company and to each other.

We welcome leadership as an ability to take decisions at all levels. The required powers are delegated to each employee, everyone is expected to assume personal responsibility for fulfillment of the set tasks. We expect initiative and maximum contribution of each of us to solution of tasks, the Company faces, and appreciate teamwork, where everyone will be heard.

We expect that our employees are guided only by the interests of the Company when they fulfill their functions and seek for achieve best results. Any situations and circumstances when the private

interests of the employee, his relatives and other concerned parties contradict or can contradict the interests of the Company are forbidden.

We always communicate in an open manner, expressing our thoughts clearly. We encourage any feedback, important for our work, and can refer with an offer on improvement of activity to any chief of the Company, up to the chief executive officer of the Company.

The Company creates conditions for professional development of the employees. Professional development is aimed at improvement of quality and efficiency of executed work and achievement of set goals. We appreciate our employees and encourage them for success in work, based on achievement of the goals of our business.

External relations

We do not resort to illegal acts or unfair competition to capture the market or establish contacts with the customers. This means that we must act honestly and in an open manner in relations with the customers, suppliers, competitors and colleagues, respect their rights.

We always fulfill our obligations and expect fulfillment of obligations from our partners. We are interested in sustainable development of our business and business of our partners. We strive for long-term and mutually beneficial cooperation and think that relations with business partners, based on respect, trust, honesty and justice, are paramount for our success.

We value our clients. Our success depends directly on preservation and retention of our clients. We are sure that our reputation and the quality of the service rendered is a passport to our growth and emergence of new long-term partnership relations. We are oriented towards the clients' needs and guarantee high quality of our products and services, stability and predictability.

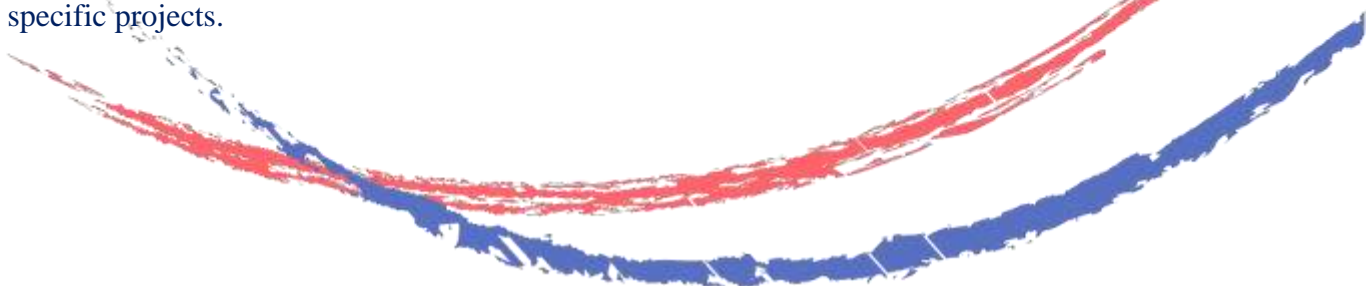
The Company always solves working disputes in a legal way, conducting negotiations and aiming to reach mutually acceptable compromise.

We value our reputation, strictly observe norms and rules of business ethics and law. We expect that our business partners keep to high ethical standards. Agents, representatives and consultants of the Company should confirm their readiness to act per the adopted policies and procedures of the Company and not to violate our principles and values.

We conduct business with those clients and business partners, who have good reputation and are engaged in entrepreneurial business, whose financial assets come from lawful sources.

We create a civilized society for us and our children. We bear responsibility to the company, we live and work in. We are obliged to be good citizens, to support working and charitable undertakings. We try to improve life in the cities of our presence, keep in touch with local communities, and help to non-profit organizations and public associations in the socially significant directions. At the same time, we don't make payments to charity foundation in order to obtain commercial benefits in specific projects.

Our Company doesn't make payments to any political parties to obtain commercial benefit in specific projects.



We don't accept any kind of discrimination, including race-basics, religion, sex, family status or pregnancy, age, political opinion, national origin, disability, health, sexual orientation or any other grounds during recruitment of employees and during their working-period.

Wherever we conducted our business, we should comply strictly with the law, applied in the field of import and export regulation and trade. When engaged in transactions of export, export or re-export of products, services, technologies and software, each of us should take the required actions, aimed at ensuring compliance of the indicated transactions with the norms of the local and international trade law, including norms of customs regulation.

We comply with all laws and requirements, applied to our activity in each country of the Company's presence, as well as guidelines, adopted by the Company.

In cases, when it is required to disclose information on the Company's activity in different reports and documents, provided by it to authorities, exercising control over securities, or in any other documents for wide use, we guarantee accuracy, objectivity, aptitude, timeliness and reliability of this information.

Occupational Safety policy

We value the human life and health above economic results and production achievements. We support behavior, contributing to improvement of health of the employees and their family members. We do our best to achieve no accidents, production traumas. We develop and improve the occupational safety systems/

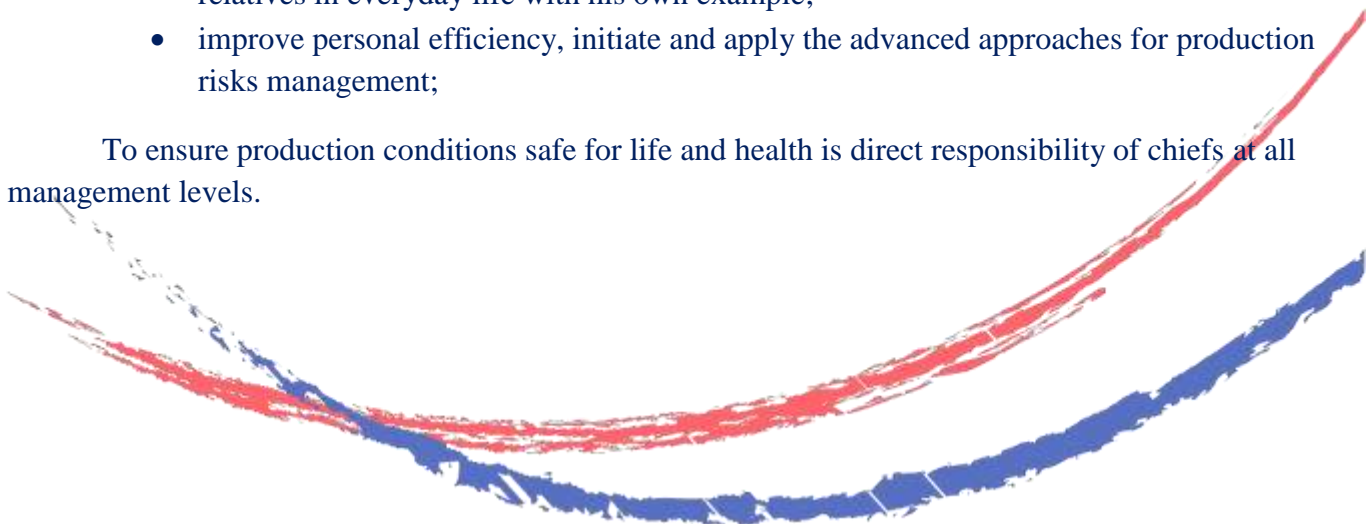
We prohibit hiring employees under working age in accordance with the legislation of the Russian Federation.

We are compliant with the applicable legislation of the Russian Federation in case of young workers employment (people who are younger than 18, but officially reached working-age) and we protect them from any kind of work that can threaten their health, safety or moral principles due to their age.

Any employee of the Company and each specialist performing works on behalf of the Company, must:

- be aware of the risks, accompanying his activity and affecting safety of his life and health as well life and health of people around him;
- be aware of personal responsibility for his life and health as well life and health of people around him; encourage safe conduct of his colleagues and contractors at work, as well as relatives in everyday life with his own example;
- improve personal efficiency, initiate and apply the advanced approaches for production risks management;

To ensure production conditions safe for life and health is direct responsibility of chiefs at all management levels.



Environment Policy

Environmental care makes an integral part of the Company's policy. The management of the Company realizes objectively its duty to the society for preservation of the favorable environmental conditions and rational use of resources. We try to make our activity to be in harmony with the environment for the purposes of its preservation for future generations.

We organize activity so that to prevent emergence of damage for health of people, engaged in production and population in general.

The Company conducts its activity in accordance with the requirements of the Russian environmental law, and other requirements the Company agreed with. The Company cooperated with the organizations concerned and the public in the field of environmental protection.

The Company raises responsible attitude of their employees to the issues of occupational safety and health, environment and security by organization of their training and education.

Quality policy

We exercise permanent quality control of the services rendered, and production processes, which allows us to improve work procedures.

Execution of the Company's policy in the field of quality is ensured through:

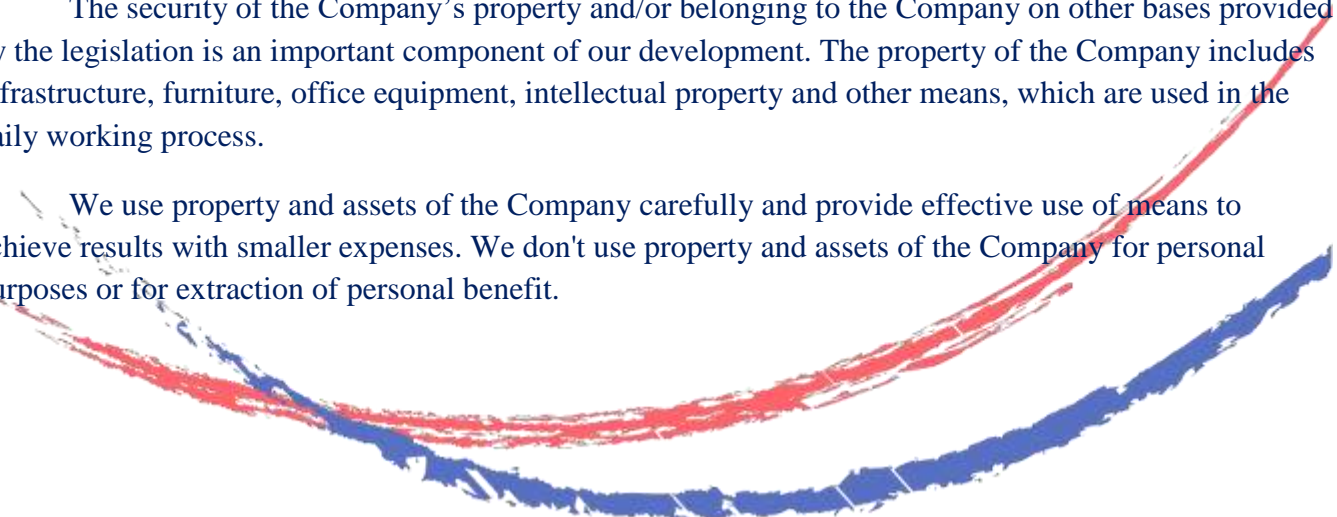
- Establishment of the quality management system, based on introduction of requirements of the standard ISO 9001-2015;
- Compliance with the requirements of ISO 9001-2015 and permanent improvement of QMS performance
- Interaction with suppliers and consumers for the purposes of improvement of quality of the services rendered;
- Permanent study of satisfaction of needs of our market sector;
- Involvement of the personnel of the organization in active participation in management of works and services quality.

The guarantee of fulfillment of this Policy is its understanding by all employees of the Company and strive for its everyday execution.

Property of the company

The security of the Company's property and/or belonging to the Company on other bases provided by the legislation is an important component of our development. The property of the Company includes infrastructure, furniture, office equipment, intellectual property and other means, which are used in the daily working process.

We use property and assets of the Company carefully and provide effective use of means to achieve results with smaller expenses. We don't use property and assets of the Company for personal purposes or for extraction of personal benefit.



Confidential Information and Trade Secret

Our Company takes care about the all kinds of confidential information. It is one of necessary conditions of our stability and competitiveness, observance of requirements of the legislation.

Disclosure of the confidential information can cause damage the Company and cause to the civil, administrative, criminal, disciplinary and other kinds of responsibility, provided by the legislation.

The company expects that all employees understand and follow the rules of work with confidential information:

- Confidential information is used only within performance of functions and according to the work procedures;
- Obligations about nondisclosure of Confidential information have to be performed also after leaving the Company (except cases of other agreements between the employee and the Company);

We expect our employees to respect not only corporate intellectual property, but also our partner's confidential information, if they had an access to it in working process.

Responsibility for fulfillment of the code, procedure in case of revelation of violations

The Code of the Company is called to facilitate understanding of the rules of conduct, adopted in the Company by the employees. Though it answers to most questions, it cannot cover all cases, which can happen in life.

If the employee has some questions or problems related to observation of this code, he should refer to the immediate supervisor or supervisor of the working group, personnel director, head of the quality control service, or to the general director. In the most serious cases he has the right to refer confidentially with the questions on observation of ethical norms, conduct of business to the General Director of Major Cargo Service

