

CODE OF CONDUCT

OUR PRINCIPLES AND VALUES

XyloSuisse has developed a Code of Conduct that applies to employees at all levels of the company. This Code defines our daily behavior.

Respect, tolerance, honesty and openness with our employees and customers, as well as the willingness to accept social responsibility are the main principles of the Code of Conduct and all employees of our company.

The Code of Conduct is based on international Conventions and guidelines, such as the Universal Declaration of Human Rights, conventions of the International Labor Organization (ILO) and the UN Global Compact. The basic concepts are respect for human rights, equality, transparency and the fight against discrimination, bribery and corruption.

INTRODUCTION

Reputation is an asset that takes many years to build but can be destroyed within minutes. Our organization is a successful company that continuously aims to maintain a reputation for conducting its business with integrity and with obvious care for its customers and employees. To succeed this, required the highest standards of behavior of our team. This Code of Conduct defines the general principles behind

those standards. We are all expected to conduct our business activities in accordance with these principles.

It is the responsibility of the management to ensure that all our employees are familiar with this Code of Conduct and to build the business based on these principles for the local situation as appropriate. This code is not only a collection of high-sounding statements, it serves as a practical guidance in our day-to-day business.

OBEY THE LAW

XyloSuisse and our employees are expected to behave as good corporate citizens and are required to conduct business in compliance with the laws of the countries in which we operate. Sometimes laws do not support our business, and we have the right to lobby against those that are opposite to the interest of our company. However, we will always respect the existing laws.

COMPETITION

XyloSuisse believes in fair competition and is fully aware of increasingly strict competition laws, which are followed by all of us in the most devoted manner.

BUSINESS INTEGRITY AND UNCORRUPT RULES

XyloSuisse refuses any kind of corruption and will not offer or accept bribes. We obtain the orders fairly and competitively, based on the quality and prices of our products and services. No employee may offer, give or receive any gift or payment

that is or may be construed as being a bribe. For similar reasons, we do not participate in or provide for lavish forms of entertainment.

We do have promotional activities and incentives to boost the sale and we organize such activities in inventive ways. Incentives and forms of entertainment that go beyond normal business practice are not acceptable.

EMPLOYEES

XyloSuisse is committed to a working environment which is open and honest, based on mutual trust and respect. Employment, recruitment and promotion are based on skills, talent and experience. We will not tolerate discrimination and all forms of harassment in our operations. XyloSuisse has a systematic approach toward health and safety matters to reduce production risks, learns from experience and achieves continuous improvements in these areas.

PUBLIC ACTIVITIES

XyloSuisse has a responsibility toward the local societies and communities in which we operate. The company will not support political parties or contribute funds to groups whose interests are meant to promote political party interests. Our company has the right and responsibility to make their position known on matters that directly affect the company, our employees or our customers.

CONFLICT OF INTEREST

All XyloSuisse employees and managers will see to it, that there are no conflicts between private interests and the interest of the company. Our employees must not seek gain for themselves or for others through unfair use of their positions.

COMPLIANCE

Compliance with these principles is a vital element to maintain our reputation and to succeed in our business. XyloSuisse management takes responsibility for ensuring that these principles are communicated to, understood and observed by all our employees.

XyloSuisse executive board will not criticize management or individual employee for any loss of business resulting from adherence to above principles. Individual employee will never suffer because of reporting breaches of the principles.

Town of Shatura, Moscow region

January 30, 2018

Nicolas Pazos, the Chairman of Executive Board of the company-founder

Jerome Zanus-Fortes, the Secretary of the Executive Board of the company-founder