

**CORPORATE SOCIAL RESPONSIBILITY POLICY  
OF IMMER GROUP**

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## 1. General

Corporate social responsibility of IMMER GROUP is a philosophy of the long-term and sustainable development of the company, which aims to harmoniously combine successful business with basic human values.

### Socially responsible approach of IMMER GROUP to business includes:

- high quality satisfaction of our customers' demands;
- compliance with legislation;
- ensuring labor safety and investing in human potential;
- care for the environment;
- effective investments in production development, aimed at improving the competitiveness of IMMER GROUP in the interests of the company and society;
- consideration of the expectations and opinion of the concerned parties, a system approach to establishing trustworthy and mutually beneficial relationship with them based on ethics requirements;
- transparency, development of social reporting.

## 2. Objectives of IMMER GROUP Policy in the field of corporate social responsibility (CSR):

- Leadership based on the desire to increase the comprehensive contribution to practical and lasting solutions to social problems;
- Harmonious development of the dialogue and cooperation between IMMER GROUP and key concerned parties;
- Significant contribution of the socially-oriented programs and projects of IMMER GROUP to the long-term business sustainability;
- Improving corporate governance practice.

We aim to achieve a reputation as a successful and reliable company that will be an important competitive advantage of IMMER GROUP in the current challenging social and economic conditions. Social responsibility of IMMER GROUP consists in a successful and ethical business because it provides people with jobs and decent working conditions, allowing them to confidently face the future.

In the field of CSR IMMER GROUP is guided not only by charitable motives, but also by good judgment: the success and sustainability of business directly depends on the social and economic well-being of our personnel and their families.

## 3. Principles of CSR

**In practice IMMER GROUP is guided by the following principles to achieve the CSR objectives:**

- Recognition of IMMER GROUP's role in social development and responsibility of IMMER GROUP for the company's long-term, comprehensive, transparent and understandable contribution to the development;

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- Recognition of the rule of law in all spheres of social and economic life, respect for human rights;
- Unconditional priority of programs related to the occupational safety, personnel development and other CSR aspects in relation to the Company employees;
- Consideration of international experience and best practices in the field of CSR;
- Dialogue with society, transparency and publicity.

We strongly believe that the entire set of corporate principles in the field of CSR and related programs and activities is purely voluntary. An effective social mission, the limits of which exceed the legal requirements, can be afforded only by a successful company, which has no reason to doubt the long-term sustainability of their business.

#### **4. IMMER GROUP and key concerned parties**

Sustainable business development is only possible in a socially favorable environment. The society quite legally puts forward demand to the business to adhere to the universal values (protection of the environment, positive economic and social impact of the enterprises, etc.) and not to side-track discussing difficult questions.

Concerned parties - groups in society with whom the business organization is in direct or indirect interaction - form these demands and show the increasing activity in establishing channels of communication and interaction with business.

In order to conduct the successful and effective CSR policy, it is crucial to identify concerned parties that are of priority for IMMER GROUP and interest groups, to find out their expectations and offer efficient forms of interaction ranging from dialogue to possible joint actions and programs. In particular, the key concerned parties of IMMER GROUP business include the following target groups that have common interests with us:

**Shareholders and investors** have a direct interest in the long-term sustainable growth of the value of IMMER GROUP and its ability to manage risks and minimize them, openness and ethical principles and practice of corporate governance.

##### **State authorities and local self-government authorities**

are interested in the complete and incentive nature of taxation, adequate participation of IMMER GROUP in the implementation of the priority strategies for social and economic and cultural development of the country and regions, super inducement of business approaches and modern management techniques in the social sphere.

**Consumers** are interested in the quality of products, improvement of legal mechanisms to protect their rights, the growth of investments and innovations.

**Employees** expect full implementation of legislation on labor relations, and the provisions of individual and collective labor contracts; the respect of the rights and dignity of the individual by the management; daily care of IMMER GROUP to minimize the effects of production harmful to health and environment; goal-directed assistance in the development of their qualifications and direct influence of successful business on payment for labor and size / nature of the additional social package.

**Business partners** are interested in the widest possible dissemination of the principles of transparency, fairness and justice, respect for moral norms, reinforced by laws and corporate codes of ethics.

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**Public and non-governmental organizations (NGOs) and civil society structures** are interested in the adequate and timely informing the Company about the expectations and concerns of local communities, improving the transparency and efficiency of public authorities and local self-government authorities, ensuring the autonomy and independence of public organizations and increase in their expertise.

The development of a structured dialogue and effective cooperation with the parties concerned on the basis of balance of interests has certain conditions and restrictions: the concerned parties should also be aware of their responsibility in society and adhere to ethical principles in their relations with business and with each other.

According to the CSR principles adopted in the world, IMMER GROUP stands aside of politics and religion. Political preferences and world-view positions of employees are their personal business, but the company refrains from participating in political life and in no way interferes in the affairs of denominations.

## **5. Main components of IMMER GROUP social policy**

In determining the scope and areas of social responsibility IMMER GROUP is guided by the following laws and regulations:

- Constitution and current legislation;
- UN Universal Declaration of Human Rights, 1948;
- Declaration of the International Labour Organization;
- UN Global Compact 2000;
- Social Accountability Standard SA 8000:2008.

These fundamental documents are developed in IMMER GROUP documentation, regulating activities in areas such as corporate governance, business ethics, security and occupational safety, labor relations, environmental protection, etc.

## **6. Policy implementation areas**

### **6.1 Corporate governance and business ethics**

Large modern companies with a branched structure require appropriate corporate governance systems and processes and effective control over business activities that contribute to reduce risks and ensure business sustainability for its shareholders, managers and employees, as well as for communities which are part of IMMER GROUP.

In its practical work IMMER GROUP is guided by common values – Professional competence, Responsibility, Desire to improve, Solidarity, Openness - and the principles of ethics; thus ensuring responsibility and honesty of our corporate behavior. IMMER GROUP strives to meet the best international standards.

Practical activity of IMMER GROUP is based on compliance with the international standards of corporate governance and continues to develop in this direction.

IMMER GROUP operates under complete transparency and in good faith, providing no advantages or benefits for the employees or their friends and families.

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Accordingly, the employees should not have any relationship, financial or otherwise, with the supplier, which may conflict with the employee's obligation to act in the interests of IMMER GROUP. No personal relationship can be used to influence the decision-making by the employees of IMMER GROUP.

If a supplier's employee is kinship (husband, wife, parent, brother or sister, grandparent, son or daughter, parents of a husband or a wife or civil partner) with an employee of IMMER GROUP, or if a supplier has any other relationship with the employee of the company, which may create a conflict of interest, the Contractor shall report the fact to IMMER GROUP or take the necessary steps to ensure that it is made by IMMER GROUP employee.

Friendly relations beyond the day-to-day interface are inevitable and perfectly acceptable.

The employees of IMMER GROUP are not permitted to take from suppliers any gifts other than courtesies generally accepted in business practice that are reasonable and acceptable under certain circumstances.

IMMER GROUP does not transfer directly or indirectly, any material or other valuables to any government official, employee or a public authority or company with state participation, or a political party in order to obtain any benefits or advantages.

## **6.2. The right to land**

IMMER GROUP has all the permits to the land used for production facilities.

## **6.3. Working conditions**

Employees are the main asset and the key concerned party of IMMER GROUP. The tasks of business development necessitate the need to give special priority to involvement and retention of talented employees, training and development, as well as define a policy in the social sphere and in the sphere of labor relations.

- policy objectives in the field of working conditions:
- attracting, motivating and retaining the talented and initiative specialists;
- constant updating of knowledge and skills to meet current and future business tasks of IMMER GROUP;
- development of management potential and a highly professional and stable management of IMMER GROUP;
- creation of favorable labor conditions ensuring health care for all employees, workplace safety, as well as the implementation of procedures aimed to minimize the risk of accidents, injury and health hazards.

### *Principles in the field of working conditions*

- observance of existing labor laws and respect for human rights;
- provision of decent, fair and competitive remuneration for the personal contribution of the employees with regard to their professional competence, job complexity and responsibility;
- investment in education and training of employees in order to help them realize their potential and make a worthy contribution to the business success of IMMER GROUP;
- provision of social support to the employees, the size and form of which will depend on the business efficiency of IMMER GROUP.

### *Discrimination*

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- IMMERS GROUP implements principles to eliminate discrimination on the basis of gender, race, religion, national origin or other factors protected by law.
- employment, remuneration of labor and opportunities for advancement are based on the competence and experience, rather than personal or physical characteristics.

#### Insults and humiliation

- IMMERS GROUP undertakes to comply with all applicable local and national laws regarding the abuse of labor of the workers and is committed to establish a ban on the brutal treatment of workers.
- IMMERS GROUP in its activities exclude outrages to personal dignity - human abuse, the infliction of physical pain is associated with brutality and violence in many cases. Its manifestations are threats, humiliation, intimidation of another person, outbursts of anger, attempts on private property, public insults or sexual exploitation.

#### *Hours of work and overtime*

IMMERS GROUP provides a competitive remuneration in accordance with the standards for the industry and local labor market. Their activities are in full compliance with the applicable laws on wages, working hours, overtime and benefits, and also offers the employees the opportunity to develop their skills and abilities, and the potential for career growth.

IMMERS GROUP complies with all applicable state laws on working hours and overtime.

#### **6.4 Child labor and forced labor**

- IMMERS GROUP does not employ persons who are under the age from which the legislation permits the recruitment and involvement of employees, as well as does not tolerate any physical or other unlawful abuse of the right or harassment of employees or the use of any forms of forced labor in any of the activities.
- Procedure for admission to employment of all employees provides for documents with a photo to prove the age and identity.
- Age of employment specified in the contract or statement of employment corresponds to the requirements of the legislation.
- In IMMERS GROUP it is prohibited to use any forms of forced labor, including labor of prisoners, pupils, bonded labor, military labor, slave labor and any form of human trafficking.

#### **6.5 Freedom of associations and collective contracts**

- IMMERS GROUP respects the right of employees to identify the third party to represent their interests and collective bargaining in accordance with the applicable law.
- IMMERS GROUP supports freedom of association and recognizes the right to collective labor contracts.
- IMMERS GROUP respects the right of employees to form trade unions, to join or not to join them, without fear of negative consequences and penalties, intimidation or harassment.
- Employees are free to engage in collective labor contracts.
- IMMERS GROUP respects the terms of collective labor contracts.

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## 6.6 Environmental protection

Business of IMMER GROUP is associated with an intensive industrial production, and we are aware of the impact of production cycles on the environment. As a socially responsible company IMMER GROUP believes that growth and development of business activities must be sustainable from both an economic and environmental point of view. Care of the environment and reducing the impact of business activities on the environment are important strategic **objectives** of IMMER GROUP.

Environmental sustainability is attained by investing in the improvement of IMMER GROUP environmental profile and rational use of natural resources. With the objective to ensure advancement in the environmental field, IMMER GROUP has adopted a separate Policy in the sphere of environmental protection, based on the following principles:

- conservation and rational use of natural resources, including energy;
- minimization and prevention of the negative effect of production cycles on the environment (land, air, water and ecosystems);

## 6.7. Relationship with local communities

System cooperation with local authorities and communities is very important for IMMER GROUP because the well-being of the city and the conditions of life of the employees' families directly influence the job well-being in the company. Staffing and human resources of the enterprise depend on quality of life and desire of people to live and work in the city where the enterprise is located. In view of this, we take a proper share of responsibility for the situation in the area of our presence, but do not replace or substitute the responsibility of local authorities for the life of communities. IMMER GROUP considers the practice of "forced charity" to be non-constructive and hopeless.

### Policy objectives in relationship with local communities

To be a worthy citizen in the community means for IMMER GROUP to be liable to local communities and to work in partnership with all concerned parties so that to improve the quality of life in communities. IMMER GROUP is ready to support the programs of the local authorities in accordance with their strategic plans of social and economic development, moreover, actively promoting the opportunity of local authorities to get technical assistance in the development of such plans.

## 7. Implementation of CSR policy: compliance and responsibility

### Approval of the Policy

The text of CSR Policy as well as possible subsequent amendments thereto is agreed upon by the Board of directors of IMMER GROUP upon the recommendation of the CSR Manager and approved by the President of IMMER GROUP. The Policy comes into force after its approval by the President of IMMER GROUP. After the approval by the President the Policy should be posted on the company website and placed in the company departments.

### Policy compliance

The CSR Manager is responsible for the preparation of recommendations in the area of development of the Policy and implementation of CSR strategy; solutions for specific areas and areas related to CSR. The heads of IMMER GROUP departments bear responsibility for the effectiveness of ways to implement the principles set out in the Policy as a document containing a program of action. Heads of IMMER GROUP departments must comply with the requirements of the Policy in the planning

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process. Allocation and approval of funding necessary for the implementation of this Policy, is carried out in accordance with the planning process established in IMMER GROUP.

### **Responsibility**

Compliance with this Policy is a responsibility of every employee of IMMER GROUP regardless of his or her position. None of the employees or managers of IMMER GROUP have the right to make or approve any action in violation of this Policy. IMMER GROUP managers of all levels are obliged to set an example of law-abiding and ethical behavior, lead and actively support the implementation and execution of this Policy.