



**Maritime Agency Primtanco Ltd.**

10 b, Pogradichnaya Street,  
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## **Employee Code of Business Conduct**

As an employee, you are responsible to behave appropriately at work. We outline our expectations here. We can't cover every single case of conduct, but we trust you to always use your best judgment. Reach out to your manager or HR if you face any issues or have any questions.

### **Dress code**

Our company's official dress code is Business Casual. However, an employee's position may also inform how they should dress. If you frequently meet with clients or prospects, please conform to a more formal dress code. We expect you to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g. workout clothes.)

As long as you conform with our guidelines above, we don't have specific expectations about what types of clothes or accessories you should wear.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity or disability.

### **Cyber security and digital devices**

We want to set some guidelines for using computers, phones, our internet connection and social media to ensure security and protect our assets.

### **Internet usage**

Our corporate internet connection is primarily for business. But, you can occasionally use our connection for personal purposes as long as they don't interfere with your job responsibilities. Also, we expect you to temporarily halt personal activities that slow down our internet connection (e.g. uploading photos) if you're asked to.

You must not use our internet connection to:

- Download or upload obscene, offensive or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.



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Download or upload pirated movies, music, material or software.  
Visit potentially dangerous websites that can compromise our network and computers' safety.  
Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

### Cell phone

We allow use of cell phones at work. But, we also want to ensure that your devices won't distract you from your work or disrupt our workplace. We ask you to follow a few simple rules:

Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.) Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.

- Avoid playing games on your phone or texting excessively.
- Don't use your phone for any reason while driving a company vehicle.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal or obscene material using our corporate internet connection.

### Corporate email

Email is essential to our work. You should use your company email primarily for work, but we allow some uses of your company email for personal reasons.

Work-related use. You can use your corporate email for work-related purposes without limitations. For example, you can sign up for newsletters and online services that will help you in your job or professional growth.

Personal use. You can use your email for personal reasons as long as you keep it safe, and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download ebooks, guides and other safe content for your personal use.

### Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable or suspect websites and services.
- Sending unauthorized marketing content or emails.



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- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our Cyber Security Specialists.

## Social media

We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing our company through social media.

### Using personal social media at work

You are permitted to access your personal accounts at work. But, we expect you to act responsibly, according to our policies and ensure that you stay productive.

Specifically, we ask you to:

- Discipline yourself. Avoid getting sidetracked by your social platforms.
- Ensure others know that your personal account or statements don't represent our company. For example, use a disclaimer such as "opinions are my own."
- Avoid sharing intellectual property or confidential information. Ask your manager first before you share company news that's not officially announced.
- Avoid any defamatory, offensive or derogatory content.

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- Avoid sharing intellectual property (e.g trademarks) or confidential information. Ask your manager first before you share company news that's not officially announced.
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## **Representing our company through social media**

If you handle our social media accounts or speak on our company's behalf, we expect you to protect our company's image and reputation. Specifically, you should:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.
- Coordinate with Manager when you're about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.
- Correct or remove any misleading or false content as quickly as possible.

## **Conflict of interest**

Conflicts of interest are a serious issue for all of us. We expect you to be vigilant to spot circumstances that create conflicts of interest, either to yourself or for your direct reports. Always act in our company's best interests. Whenever possible, do not let personal or financial interests get in the way of your job. If you are experiencing an ethical dilemma, talk to Manager or HR and we will try to help you resolve it.

## **Friendships at work**

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. But, we expect you to focus on your work and keep personal disputes outside of our workplace.

Employment of relatives

## **Employee relationships**

We want to ensure that relationships between employees are appropriate and harmonious.



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Everyone in our company should be hired, recognized or promoted because of their skills, character and work ethic. We would not like to see phenomena of nepotism, favoritism or conflicts of interest, so we will place some restrictions on hiring employees' relatives.

As an employee, you can refer your relatives to work with our company. Here are our only restrictions:

- You must not be involved in a supervisory/reporting relationship with a relative;
- You cannot be transferred, promoted or hired inside a reporting relationship with a relative;
- You cannot be part of a hiring committee, when your relative is interviewed for that position;
- If you become related to a manager or direct report after you both become employed by our company, we may have to transfer one of you.

### Workplace visitors

If you want to invite a visitor to our offices, please ask for permission from our Manager first.

When you have office visitors, you also have responsibilities. You should:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are dangerous machines, confidential records or sensitive equipment.
- Prevent your visitors to distract your colleagues from their work.