



**Maritime Agency Primtanco Ltd.**

10 b, Pogradichnaya Street,  
Nakhodka, 692900, Russia  
E-mail: [agency@primtanco.com](mailto:agency@primtanco.com)  
Phone: +7 4236 740380  
Fax: +7 4236 684150  
WWW.Primtanco.com

## Code of ethics policy

### Policy brief & purpose

Our professional code of ethics policy aims to give our employees guidelines on our business ethics and stance on various controversial matters. We trust you to use your better judgment, but we want to provide you with a concrete guide you can fall back on if you're unsure about how you should act (e.g. in cases of conflict of interest). We will also use this policy to outline the consequences of violating our business code of ethics.

### Scope

This policy applies to everyone we employ or have business relations with. This includes individual people such as employees, interns, but also business entities, such as vendors, enterprise customers.

### Policy elements

**Professional ethics:** they are a set of principles that guide the behavior of people in a business context. They are essential to maintaining the legality of business and a healthy workplace.

Our **code of ethics** definition refers to the standards that apply to a specific setting – in this case, our own organization.

### The purpose of a professional code of ethics.

Professional code of ethics corresponds to laws that we absolutely must know to do our job properly, so we mention it in our code of ethics.

When an employee behaves, or intends to behave, in a way that's against our professional ethics, or applicable laws, we will have clear guidelines on what disciplinary actions we will consider.

### The components of our code of professional ethics:

We base our business code of ethics on common principles of ethics:

- Respect for others. Treat people as you want to be treated.



## Maritime Agency Primtanco Ltd.

10 b, Pogradichnaya Street,  
Nakhodka, 692900, Russia  
E-mail: [agency@primtanco.com](mailto:agency@primtanco.com)  
Phone: +7 4236 740380  
Fax: +7 4236 684150  
WWW.Primtanco.com

- Integrity and honesty. Tell the truth and avoid any wrongdoing to the best of your ability.
- Justice. Make sure you're objective and fair and don't disadvantage others.
- Lawfulness. Know and follow the law – always.
- Competence and accountability. Work hard and be responsible for your work.
- Teamwork. Collaborate and ask for help.

Here's a more detailed overview of our code:

### Respect for others

It's mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy.

As a general rule, try to put yourself in someone else's place. How would you feel if someone behaved a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we don't tolerate this behavior no matter the person it comes from.

If someone, be it customer, colleague or stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to HR or your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

### Integrity and honesty

Always keep in mind our organization's mission. We all work together to achieve specific outcomes. Your behavior should contribute to our goals, whether financial or organizational.

Be honest and transparent when you act in ways that impact other people. We don't tolerate malicious, deceitful or petty conduct.

### Conflict of interest

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that undermine our company. This includes situations like using your position's authority for your own personal gain or exploiting company resources to support a personal money-



## **Maritime Agency Primtanco Ltd.**

10 b, Pogradichnaya Street,  
Nakhodka, 692900, Russia  
E-mail: [agency@primtanco.com](mailto:agency@primtanco.com)  
Phone: +7 4236 740380  
Fax: +7 4236 684150  
WWW.Primtanco.com

making business. Even when you seemingly act to the company's advantage, you may actually disadvantage it.

### **Justice**

We never act in a way that exploits others, their hard work or their mistakes. We give everyone equal opportunity and speak up when someone else doesn't. We try to be objective when making decisions.

When exercising management, we try to be fair. We don't show favoritism toward our employees and are just toward customers or vendors, too. If we think our company was in the wrong in a specific instance, we don't try to cover it up or accuse the other side. We always try to find solutions that can benefit both sides.

### **Lawfulness**

We are obliged to follow all laws which apply to our organization and to our business and we are fully aware of them and guided.

We're also covered by our confidentiality and data protection policy. We must not expose, disclose or endanger information of customers, employees, stakeholders or our business. We always follow our cybersecurity policy, too.

Following laws regarding fraud, bribery, corruption and any kind of assault is a given. You are also obliged to follow laws on child labor and avoid doing business with unlawful organizations.

### **Competence and accountability**

We all need to put a healthy amount of effort in our work. Not just because we're all responsible for the organization's success, but also because slacking off affects our colleagues. Incomplete or slow working might hinder other people's work or cause them to shoulder the burden themselves. This comes in direct conflict with our respect and integrity principles.

We take up opportunities for learning and development, either on-the-job or via educational material or training.

We take responsibility for our actions. Sometimes we all make mistakes or need to make tough decisions and it's important we own up to them. Our readiness to take responsibility and come up with ways to fix our mistakes where possible, allows to our Company to be in a far better position.



## **Maritime Agency Primtanco Ltd.**

10 b, Pogranichnaya Street,  
Nakhodka, 692900, Russia  
E-mail: [agency@primtanco.com](mailto:agency@primtanco.com)  
Phone: +7 4236 740380  
Fax: +7 4236 684150  
WWW.Primtanco.com

### **Teamwork**

Working well with others is a virtue, rather than an obligation. Each of us is able will certainly get to work autonomously and be focused on our own projects and responsibilities. But, we prefer teamworking to collaborate with and help others.

Generosity in a sharing with our expertise and knowledge, an opening to learning and evolving allows us to use opportunities for excellence. Nobody of us hesitate to ask for help when we need it.