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Approved under
Decree of CMB LLC
Dated 10.06.2019 No.32



CODE OF ETHICS AND BUSINESS CONDUCT OF CMB LLC EMPLOYEES

1. SUBJECT AND SCOPE OF THE CODE

1.1. The Code of Ethics and Business Conduct of CMB LLC Employees (hereinafter referred to as the Code) has been developed in compliance with the provisions of the Russian Federation Constitution, Article 13.3 of Federal Law dated 25.12.2008 No.273-FZ «On the Corruption Control», other Federal Laws containing limitations and restrictions on, and duties of CMB LLC employees (hereinafter referred to as the employees), the Anti-Corruption Action Plan approved under Decree of CMB LLC (hereinafter referred to as the Company) dated 10.06.2019 No.28, and is also based on the commonly recognized moral principles and rules of the Russian community and state.

1.2. This Code has been developed in order to establish an occupational culture of the Company, eliminate corrupt practices, enhance the image of the Company, optimize the interactions with the external environment, improve the governance structure, and support a sustainable growth of the Company.

1.3. The Code is a set of general principles of occupational business ethics and basic rules of business conduct to be followed by the employees of the Company.

1.4. An individual getting employed with the Company (hereinafter referred to as an employee) shall read and understand the provisions of the Code and comply with the same in the course of his or her activities.

1.5. Every employee shall take all necessary steps to comply with the provisions of the Code.

1.6. The employees' knowledge of and compliance with the provisions of the Code shall be a quality assessment criterion of their occupational activities and work discipline.

1.7. The Company shall establish the necessary conditions to implement the provisions of the Code in full.

1.8. The Code shall be a document that is open for examination by all the employees of the Company.

1.9. The Code shall set forth the general values, principles, and rules of conduct such as:

- compliance with high moral standards of conduct;
- maintenance of high occupational activity standards;
- adherence to best corporate governance practices;
- development and maintenance of a mutual confidence and respect atmosphere;
- adherence to a fair competition principle;
- adherence to a corporate social responsibility principle;
- compliance with law and the contractual obligations undertaken;

- compliance with the fairness and honesty principles concerning personnel decision-making.

1.10. Amendments and alterations to the Code can be made as initiated by individual employees as well as business units of the Company.

2. BASIC BUSINESS CONDUCT DUTIES, PRINCIPLES AND RULES OF EMPLOYEES

2.1. In accordance with Article 21 of the Labor Code of the Russian Federation, an employee shall:

- discharge faithfully the employment duties imposed thereon under the employment contract;
- comply with the internal work order rules;
- comply with the labor discipline;
- fulfill the established worktime standards;
- comply with the occupational health and safety requirements;
- treat carefully the assets of the employer (including third party assets held by the employer, if the employer is responsible for integrity of the assets) and other employees;
- inform promptly the employer or direct supervisor about the occurrence of a situation posing a threat to human life and health, integrity of the assets of the employer (including third party assets held by the employer, if the employer is responsible for integrity of the assets).

2.2. The basic business conduct principles of employees shall underlie the conduct of individuals under their employment relations with the Company.

The employees, while recognizing their responsibility to the citizens, community, and state, shall be intended to:

- take as a premise that the recognition, observance, and protection of human and individual rights and liberties are an important part of the Company's business;
- comply with the Constitution of the Russian Federation, laws of the Russian Federation, refrain from violation of laws and other statutory instruments on the basis of political, economic expediency or for other reasons;
- support efficient operations of the Company;
- carry out their activities within the subject and goals of the Company's business;
- when discharging the official duties, not give preference to any occupational or social groups and organizations, be independent of an influence exerted by individuals, occupational or social groups and organizations;
- eliminate actions relating to an influence of any personal, proprietary (financial) and other interests preventing their faithful discharge of the official duties;
- be correct and careful when dealing with individuals, fellow workers, partner and contracting party representatives;
- tolerate and respect the customs and traditions of Russian nations and those of other states, pay due regard to the cultural and other specific features of various ethnic, social groups and confessions, promote interethnic and interreligious concord;
- abstain from the behaviors that could raise a doubt of faithful discharge by the employee of the official duties as well as avoid the conflicts capable of prejudicing his or her reputation or the Company's image;
- not use the official position to influence the activities of public authorities, local self-government bodies, organizations, officers, and individuals, when solving the personal problems;
- abstain from public statements, judgements, and opinions concerning the Company's business, Chief Executive Office, if this goes beyond the official duties of the employee;
- comply with the proprietary information disclosure and public addresses rules established by the Company;

- strive permanently to support as much efficient allocation as possible of the resources within his or her responsibility areas;
- counteract the corrupt practices and take steps to prevent the same under the procedure established by effective laws, local statutes of the Company;
- be honest, unbiased, and fair when discharging the official duties, prevent corruptive behaviors (behaviors that can be conceived by others as a promise or offer to give, as a consent to take, or as a request for a bribe, or as a possibility of committing another corruption offence).

2.3. For the purposes of corruption control, an employee shall be recommended to:

- notify the employer, law enforcement of all the occasions, when some persons contact the employee in order to induce him or her towards corruption offences;
- not receive, in relation to discharge of the official duties, rewards from individuals and legal entities (gifts, cash incentives, loans, tangible services, payments for entertainment, relaxation, for use of transport, and other rewards);
- take steps to prevent a conflict of interest and settle the arising conflicts of interest, not allow for personal interest when discharging the official duties, which result or can result in a conflict of interest, notify the direct supervisor of an arising conflict of interest or a potential for the same, as soon as he or she becomes aware of that.

2.4. An employee may treat and transfer proprietary information in compliance with the effective regulations and requirements of the Company as adopted under laws of the Russian Federation.

An employee shall take appropriate steps to maintain security and confidentiality of the information, which unauthorized disclosure is his or her responsibility, or (and) which came to his or her knowledge in relation to his or her discharge of the official duties.

2.5. An employee vested with administrative powers towards the other employees shall strive to set a standard of professional competence, unblemished reputation to them, contribute to development of a moral and mental climate that is favorable for efficient operations of the Company or its business unit.

An employee vested with administrative powers towards the other employees shall be intended to:

- take steps to prevent corruption as well as cause the subordinate employees not to allow for corruptive behaviors, and set a pattern of honesty, impartiality, and fairness through his or her own behaviors;
- not allow the cases of compelling the employees to be involved in the activities of political parties, nongovernmental associations, and confessional organizations;
- where possible, take steps to prevent or settle a conflict of interest in case he or she becomes aware of an employee's personal interest that results or can result in a conflict of interest.

2.6. In respect of the personnel policies, the Company is committed to a principle of promotion to a superior position based on the employee's business qualities only.

3. ETHIC BUSINESS CONDUCT RULES OF EMPLOYEES

3.1. When operating on behalf of the Company, an employee shall keep in mind that civil laws of the Russian Federation prohibit the exercise of civil rights only with an intention to prejudice another party, actions by improper means for an illegal purpose as well as other patently unfaithful exercise of civil rights (abuse of rights). The exercise of civil rights to restrict competition as well as abuse of market domination shall not be allowed.

3.2. The business conduct of an employee shall avoid:

- any kind of discriminatory statement or action on the grounds of sex, age, race, nationality,

language, citizenship, social, proprietary or family status, political or confessional preferences;
- discourtesy, manifestations of defiance, presumption, prepossession, wrongful and unjustified claims;

- menaces, slanderous expressions or speeches preventing self-respecting communication or provoking wrongful behaviors;

- taking meals, smoking during business meetings, interviews, other business contacts with individuals.

3.3. The employees shall contribute their business conduct to establish corporate business relations and fruitful cooperation with each other.

3.4. The employees shall be polite, benevolent, attentive, correct, and tolerant when communicating with individuals and fellow workers.

3.5. The appearance of an employee when he or she discharges the official duties shall, depending on the working environment, contribute to respectful attitudes of the public towards the Company as well as, where necessary, conform to a commonly recognized business style featuring moderation, conventionality, and exactitude.



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