

CORPORATE SOCIAL RESPONSIBILITY POLICY

NEO GROUP to be a good corporate citizen in everything that it does. We have therefore determined to bring together our existing operating principles into one framework policy under the heading of Corporate Social Responsibility (CSR). The principles encompassed in this policy cover all areas of the operations and have been developed and continue to be reviewed against and updated by reference to relevant codes of corporate governance and international standards including the United Nations (UN) Universal Declaration of Human Rights, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Guidelines for Multinational Enterprises established by the Organization for Economic Cooperation and Development (OECD), the Rio Declaration on Environment and Development and the UN Convention against Corruption. The NEO GROUP Board of Directors and Management support the principles set out in those codes and standards and the aim of this policy is to translate that support into a set of guidelines and standards and provide practical guidance for our managers and employees on the ground.

Compliance, monitoring and reporting

Compliance will be reported to stakeholder and Board of Directors through annual Corporate Social Responsibility Report. Each local manager is responsible for ensuring that the principles set out in this policy are communicated to, understood and observed by all employees and for ensuring compliance in their area of responsibility. Employees who reasonably suspect that there has been a breach of this policy must report it to their line manager, senior management, or other mechanisms established to report such breaches. We recognize that employees may be reluctant to report concerns for fear of retaliation and will take disciplinary action against any employee who threatens or engages in retaliation, retribution or harassment of any person who has reported or is considering reporting a concern in good faith. The Board of Directors of NEO GROUP will not criticize management for any loss of business resulting from adherence to the principles set out in this policy. All sections of this policy are underpinned by the Code of Business Ethics. The other areas covered by this policy are Safety, Employment, Customer and Community and Environment.

CODE OF BUSINESS ETHICS

This code applies to all of the operations of NEO GROUP and sets out the minimum standards which the Board of Directors of NEO GROUP expects from staff in their internal and external dealings with colleagues, customers, stakeholders and third parties.

1.1 Basic Standards of Conduct

We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties.

We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.

We will maintain the highest standards of integrity – for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.

1.2 For the employee, NEO GROUP

- is committed to creating and maintaining a safe and healthy working environment for its employees.
- will strive to create a workplace in which there is mutual trust and respect and where every person feels responsible for the performance and reputation of our company.
- will respect the individual and each other's rights, customs and traditions including the right to freedom of association and the right to decide whether or not to join a trade union and will negotiate in good faith with the properly elected representatives of its employees.
- will work towards achieving a diverse workforce, recruiting, employing and promoting employees only on the basis of objective criteria and the qualifications and abilities needed for the job to be performed.
- will maintain good communications with employees
- will assist employees in realizing their potential.

1.3 Customers

NEO GROUP is committed to providing safe, value for money, high quality, consistent, accessible and reliable products and services to our customers.

1.4 Shareholders

NEO GROUP will conduct its operations in accordance with the principles of good governance.

1.5 Business Partners and Stakeholders

We aim to develop strong relationships with our suppliers, stakeholders and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect our partners to adhere to business principles consistent with our own.

NEO GROUP will conduct own operations in accordance with the principles of fair competition and applicable regulations.

1.6 Compliance with Law

NEO GROUP will comply with the laws and regulations applicable wherever company do business. Appropriate training will be provided for employees as necessary.

1.7 Business Integrity

No NEO GROUP shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain and no employee may offer, give, seek or receive any gift or payment which is, or could be construed as, such. If an employee is in any doubt as to whether he or she may accept an offer, that employee should discuss the issue with his or her direct manager, HR responsible or Company lawyer.

NEO GROUP accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

No undisclosed or unrecorded account, fund or asset will be established or maintained.

NEO GROUP will not facilitate, support, tolerate or condone any form of money laundering.

SAFETY

The health and safety of our employees and customers is our paramount concern. Safety underpins all our operations and our central motto is "If you cannot do it safely, don't do it".

We have developed the following high-level health and safety policy, which underpins all of our operational health and safety policies:

General Statement

The Board of Directors of NEO GROUP and Management team is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of all of its employees and third parties at work and also the safety of product in respect to food safety requirements.

This policy seeks continuous improvement and compliance with legislation, having proper regard to the protection of people, premises, property and the environment. It is based on the principles that:

- All injuries can be prevented
- The goal is zero injuries
- Safety and hygiene is responsibility of all employees
- Working safely is a condition of employment

The key **safety principles** with which all NEO GROUP employees are required to comply are set out below:

Do not endanger yourself or others. Report any hazardous condition or practice that may cause injury to people property or the environment.

Obey all rules, signs and instructions. If you do not understand speak to your manager before you start work.

Keep your work area clean and tidy. Disorder causes accidents, wastes time, energy and materials.

All accidents, incidents and near misses must be reported to your manager. Seek immediate help and first aid (if necessary).

Use only the correct tools and equipment for the job. Check that they are in good condition before use and use them safely.

If you have any suggestions to improve safety in your workplace, tell your supervisor or manager.

EMPLOYMENT

Our employment policies cover all employees of NEO GROUP

3.1 Equal Opportunities and Diversity Policy

NEO GROUP is committed to equality of opportunity both in the provision of products and services to the customers and as an employer. This policy sets out NEO GROUP commitment to treat equally and with fairness at all times its employees, customers, contractors and those who come into contact with the company.

We are committed to seeking continuous improvement and compliance with legislation based on the following principles:

- Everyone has the right to be treated with dignity and respect.
- We will not discriminate on the grounds of race, gender, disability, nationality, religion, philosophical belief, political belief, age, sexual orientation, family status, trade union activity or any other factor.
- We will adopt fair and inclusive practices throughout our operations and will seek to eliminate all prejudice, discrimination, bullying and harassment.
- All employees have a personal responsibility for the practical application of this policy in their day-to-day activities and must support the policy at all times.
- Non-compliance with this policy will be treated seriously and will not be tolerated.

Legislation and Codes of Practice:

We will comply with and exceed where possible, current national and international legislation and relevant codes of practice in the countries where we operate. We will monitor our compliance with this policy and the requirements of relevant underpinning legislation as appropriate.

We will also take reasonable steps to ensure that our vehicles are accessible to customers and staff and comply with the relevant legislation for the country in which they operate.

Access to Information:

We will seek to ensure that information is made available to our customers and employees in alternative formats as required.

Recruitment

All recruitment will be carried out with regard to fairness, equality and consistency for all candidates at all times. Recruitment practices will be inclusive and we will endeavor to ensure there are no barriers to employment of suitable candidates.

Staff Training

We will provide our staff with the necessary guidance and training to ensure the effective implementation of this policy and to ensure we are an inclusive employer and service provider.

Complaints

Any employee who feels that he or she has grounds for complaint in relation to bullying, discrimination, harassment or victimization has the right to pursue the complaint through our grievance procedures.

Customers who feel they have grounds for complaint may pursue these through our operating company customer complaints procedures. We will ensure our complaints/feedback procedures can be accessed and used by everyone.

Audit

We are committed to ensuring that our operations comply with the requirements of this policy and will periodically audit its implementation.

3.2 Human Rights

We will adhere to the following principles in respect of our staff:

We will treat all employees fairly and honestly, regardless of where they work. All staff will have agreed terms and conditions in accordance with local law or practice and will be given appropriate job skills training.

We will pay a fair wage reflecting local markets and conditions. We will always meet any national minimum wage.

Working hours shall not be excessive. They shall comply with industry guidelines and national standards where they exist.

We will not employ illegal child labor, forced or bonded labor, forced overtime or condone illegal child labor.

Employees have the rights of freedom of association and collective bargaining. We respect the right of our employees to choose whether or not to join a trade union without influence or interference from management. Furthermore, we support the right of our employees to exercise that right through a secret ballot.

We will negotiate in good faith with the properly elected representatives of our employees.

We will abide by the non-discrimination laws in every country where we operate.

We will not use or condone the use of corporal punishment, mental or physical coercion or verbal abuse. We have disciplinary procedures for any member of staff whose conduct falls below the required standard.

We have formal grievance procedures through which staff can raise personal and work-related issues.

All staff will be given reasonable access to bathroom and rest facilities.

3.3 Data Protection

We will comply with the relevant principles governing data protection in each country in which we operate.

CUSTOMER AND COMMUNITY

4.1 Customers

Our vision is to be a team of professionals, which continuously improves its activities, products and services. By aiming for the top in everything that we do, and helping each other, we can deliver the highest levels of production and service and give greater customer and employee satisfaction.

We will

- act in accordance with fair business, marketing and advertising practices and take all reasonable steps to ensure the safety of our services
- respect the human rights of our customers – our security and revenue protection arrangements are consistent with international standards for law enforcement

- provide transparent and effective procedures that address customer complaints and contribute to fair and timely resolution of disputes without undue cost or burden
- not make representations or omissions nor engage in any other practices that are deceptive, misleading, fraudulent or unfair
- respect customer privacy and provide protection for personal data in accordance with the relevant local law.

4.2 Stakeholders

We are committed to maintaining open and regular dialogue with all our stakeholder groups in matters that affect their interests.

4.3 Suppliers

Ethical Purchasing Policy:

We purchase a wide range of goods and services required in the operation of our business and we also rely heavily on a number of key suppliers for the delivery of our core services. Good working relationships with our suppliers are therefore central to the success of our business. For this reason, we clearly state our purchasing policy as part of ensuring that our business standards are integrated throughout the supply chain.

We are committed to obtaining and retaining competitive goods and services while at the same time ensuring they are from sources which have not jeopardized human rights, safety or the environment.

We aim to develop strong relationships with our suppliers, based on mutual trust, understanding and respect.

More specifically we expect our suppliers to:

- Adhere to business principles consistent with our own.
- Ensure that their products and services are produced and delivered to comply with all legislation relevant to their business.
- Seek to maintain continuous improvement in their supply chain relationship with us.
- Ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labor, human rights, social and legal standards in line with our own code and to ensure these issues are acceptably managed within the supply chain for any products supplied to us.

We will seek to work with our key suppliers to:

- Develop long-term meaningful relations to the benefit of both parties.
- Improve the quality, environmental performance and sustainability of goods and services where this can be achieved to the benefit of both parties.

ENVIRONMENT

5.1 Environmental Policy

We recognize the environmental impacts arising from our business activities and are committed to reducing these through effective environmental management.

Our policy is to strive to achieve continual improvement in environmental performance.

We are committed to:

- preventing pollution and reducing the overall impact of our operations on the environment
- maintaining an internal management structure for the management of environmental issues which includes clearly defined responsibilities for environmental management capable of delivering this policy commitment
- complying with, and where possible exceeding applicable legal and other requirements relating to the organization.
- monitoring our environmental performance and setting objectives and targets for improvement
- providing appropriate training and awareness programs for our employees

We recognize the key role we have to play in both reducing and contributing to greenhouse gas emissions from the consumption of electrical energy.

5.2 Climate Change Policy

Climate change has now been recognized as an international issue with national governments committed to taking action to reduce greenhouse emissions. We recognize that we emit greenhouse gases from transportation of our products by vehicle and electric power, required for our production operations.

We are committed to reducing the greenhouse gas emissions from our operations in a way which supports national government strategies and in line with our commitment to our clients to provide product on time.

Our key climate change commitments are:

- To assess the potential impact to our business from evolving climate change policies as part of our on-going risk management processes.
- To work actively with our suppliers to improve the fuel efficiency of vehicles.
- To report annually on our greenhouse gas emissions.
- To actively promote improved energy efficiency and fuel efficiency within our business.

General Manager

Ruslanas Radajevs