

CODE OF CONDUCT UNDER CODE OF CORPORATE GOVERNANCE

Purpose and Scope

In the global competitive environment, our customers and business partners expect, in addition to high-quality products, professional and honest behavior that includes compliance with legal regulations and ethical standards. By meeting these expectations we cement confidence in our company and the Shezan brand. At the same time, we maintain the values that have characterized Shezan's activities for decades.

We are jointly responsible for our company's reputation. Improper behavior by even one person can damage our reputation for a long time. That is why we need a binding concept of what defines our shared understanding of professional and honest business behavior. We have summarized the relevant guidelines and key rules in the following Code of Conduct. We will keep a close eye on future developments in the legal and business environment and adapt the Code as required.

The Shezan's Code of Conduct offers orientation and assistance but also contains the binding requirements our actions need to be based on. Fully committed to these rules, we expect consistent adherence to the following "core values" from our managers and employees at all levels and will monitor this in an appropriate manner.

Obeying the Law

Shezan and its employees are bound by the law. Compliance with all applicable laws and regulations must never be compromised. Additionally, employees shall adhere to internal rules and regulations as they apply from time to time in a given situation. Those internal rules are specific to the Company and may go beyond what is required by the law.

Employees

- Company is committed to create the working environment where there is mutual trust and respect and everyone feels the responsibility for the improved performance and reputation of the Company.
- Company recruits, employs and remunerate its employees on merit and on the basis of the qualification, experience and abilities needed for the work to be performed.
- It is committed to provide safe, healthy, and pleasant working environment to all employees. Company will not use any form of forced, compulsory or child Labour.
- It is committed to work with employees to develop and enhance each individual's skills and capabilities, provide training to groom them on the basis of their Training Needs Assessment analysis.
- It respects the dignity of employees and the right of individual to express themselves freely.
- Company maintains good communication link with employees through Company based information and consultation procedures.

Customers

It is committed to provide high quality of products to its customers by meeting the requirements of health standards.

Shareholders

Company will conduct its operations in accordance with principles of good corporate governance. It will provide timely information of its activities, structure, financial situation, and performance to all the shareholders.

Business Partners

- Company is committed to establish mutually beneficial relations with its business partners.
- In the business dealings, the Company expects its partners to adhere to business principles and ethical practices consistent with its own.

Community Involvement

Company strives to be a trusted corporate citizen and, as integral part of society, to fulfill its responsibilities to society and communities where it operates.

Public Activities

- Company will promote and defend its legitimate business interests.
- It will co-operate with the government in the development of proposed legislation and other regulations that may affect legitimate business interests.
- Company neither supports any political group or party nor contributes to the funds of any group whose activities are aimed at, directly or indirectly, to promote party interests.

The Environment

- Company is committed to making continuous improvement in the management of environmental impact and to the long term goal of developing a sustainable business.
- Company will work in partnership with others to promote environmental care, increase understanding of environmental issues, and disseminate good practice.

Competition

Company and its employees will conduct their operations in accordance with the principles of fair competition and all applicable regulations without compromising on ethical practices.

Business Integrity

Its accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions transparently.



Conflict of Interest

Company's directors and employees are expected to avoid personal activities and financial interests that could conflict with their responsibilities to the Company. They must not seek gain for themselves or for others through misuse of their positions.

Compliance-Monitoring-Reporting

- Compliance with these principles is an essential element in our business success. The Company's Board of Directors (the Board) is responsible for ensuring that these principles are communicated to, and understood and observed by, all employees.
- Responsibilities are properly delegated to the senior management. They are responsible for implementing these principles, if necessary through more detailed guidance tailored to local needs.
- Assurance of compliance is given and monitored from time to time. Compliance with the Code is subject to review by the Board and supported by the Audit Committee of the Board.
- Any breaches of the Code must be reported in accordance with the procedure specified by the management.
- The Board of the Company expects employees to bring to their attention, or to that of senior management, any breach, or suspected breach of these principles.
- Provision has been made for employees to be able to report in confidence and no employee will suffer as a consequence of doing so.