

Code of Ethics:

The code of ethics includes norms of conduct and ethics which Trentwood employees take as regulative norms of their conduct and as basic principles in communication with colleagues, cooperation partners and society.

1. Employees' norms of ethics

1.1 Fairness, honesty and responsibility

- 1.1.1. Employees act fairly and honestly, treating all colleagues and partners equally and not demonstrating any favour or unreasonable privilege to anybody.
- 1.1.2. Employees discharge their duties with responsibility and diligence, using their knowledge, skills and experience to reach the best professional result and provide fulfilment of company's tasks, work efficiency and quality requirements.
- 1.1.3. Employees are enterprising and determined, show initiative and propose how to improve work. Company's management provides employees' professional training and supports career development.

1.2 Objectivity, independence, loyalty

- 1.2.1. Employees make decisions based on objective and verified information.
- 1.2.2. Employees are independent when discharging their duties and stand apart from personal and outside interests (other persons, companies, political and social groups).
- 1.2.3. Employees are loyal to company's goals and values. Loyalty means not only fulfilment of tasks and duties but also creative support and contribution to fulfilment of company's goals.

2. Main principles of employees' behaviour

- 2.1. Employees are polite, kind, helpful and cooperative, do not allow harassment, discrimination and improper criticism, respect all employees' rights, duties and viewpoint and do not misuse other colleagues' mistakes or lack of knowledge. Discussions are always held in frank, understanding and collegiate atmosphere. If involved in a dispute, employees are willing to discuss and manage conflict in open manner with a goal of reaching resolution.
- 2.2. Employees support new colleagues and shares professional knowledge and experience.
- 2.3. Employees observe good behaviour and dress code principles. With their behaviour and personal appearance employees show company's high working culture.

3. Non-disclosure of information and communication ethics

- 3.1. Employees do not use information known to them by virtue of their position in the company for personal advantage or outside interests.
- 3.2. Employees as private persons care for company's reputation and show their loyalty to the company in all their statements and actions.

4. Conflict of interest and private deals

- 4.1. Employees always act with responsibility without giving a preference to their own, family, relatives', friends', or acquaintances' personal interests.
- 4.2. Carrying out private deals employees care for company's reputation and avoid engagement in any doubtful deals.
- 4.3. Giving or accepting business gifts from cooperation partners employees follow hospitality norms and avoid any action if that can impact gift receiver's opinion or decision, is illegal, does not conform to general business principles or endanger prestige of the company.

5. Relationship with cooperation partners and society

- 5.1. Relationship with cooperation partners is based on principles of responsiveness, honesty and trust. Employees do not disclose cooperation partners' confidential and business information known to them by virtue of discharging their duties. Cooperation partners' country traditions are always respected.
- 5.2. Employees' professionalism and honesty make a basis for successful cooperation.

6. Implementation of the Code of Ethics

Employees acknowledge and support observing the principles and norms of the Code of Ethics.