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«Утверждаю»

Исполнительный директор

ООО «Современное аналитическое агентство»

отученностью Семпетров

2019 г

HUMAN RIGHTS POLICY

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1. Our commitment to human rights

Respect for human rights is an integral part of our corporate culture. We respect and support the protection of human rights within our sphere of influence.

Our commitment to human rights includes the acknowledgement of the following internal documents:

- The Universal Declaration of Human Rights of the United Nations;
- Fundamental Conventions of the International Labour Organization (ILO);
- Principles of the United Nations Global Compact.

In our view, the protection of human rights is only possible when we understand the human rights, are aware of abuse and know how to manage risks and opportunities to improve the conditions of the people we impact with our operations, management and supply chain. We have a responsibility to raise our employee's awareness about human rights related issues and encourage them to safeguard their protection.

2. Key areas

2.1. No forced labour or child labour

CAA, LLC (hereinafter – the Agency) refuses to use any form of forced or bonded labour (in accordance with the definition of this term in ILO Convention No. 29) and does not confiscate money or identity documents at the beginning of the employment in order to retain employees against their will.

The Agency respects the rights of children and refuses to use child labour as defined by this term in accordance with the current legislation in the country where the research is carried out, and in no case attracts workers who have not reached the minimum age established by ILO Convention No. 138.

2.2. Respect for diversity and non-discrimination

The Agency rejects any form of discrimination and seeks to ensure respect for its employees and potential employees in terms of equal representation, as well as to create equal opportunities, both at the beginning of the employment relationship and at each stage of work.

2.3. Freedom of Association and collective bargaining.

The Agency recognizes the right of its employees to form and participate in organizations aimed at protecting and supporting their interests, and does not affect their decisions. The Agency also recognizes their right to be represented (within various working units) by trade unions or other persons elected in accordance with the legislation and practice in force in the territory of the Russian Federation.

The Agency recognizes the importance of collective agreements as a privileged instrument for determining the contractual terms of work of its employees, as well as for regulating relations between management and trade unions.

2.4. Labor protection and safety.

The Agency is responsible for ensuring high level of labor protection and safety in the workplace.

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The Agency supports the dissemination and strengthening of a safety culture by raising awareness of risks and educating all its employees to be responsible, including through information and training.

The Agency strives to preserve the health and safety of its employees, as well as the interests of other stakeholders, in particular through the use of preventive measures.

2.5. Fair and favourable working conditions.

In order to ensure decent and favourable working conditions, the Agency rejects any form of abuse, physical violence, verbal abuse, sexual harassment or psychological abuse, threats or intimidation in the workplace. In the formation of the remuneration takes into account the principles of fair pay and equal pay for men and women for work of equal value and complexity on the basis of objective job evaluation on the basis of the amount of work that needs to be performed (ILO Convention No. 100).

The minimum compensation received by employees of the Agency may not be lower than the minimum level set out in collective labour agreements and legislation in force in each country, in accordance with the provisions of ILO conventions.

The Agency also recognizes the importance of professional guidance and training for the development of skills of employees by improving the forms of involvement and participation of employees and their representatives.

3. Implementation and review

We work continuously with our employees and managers to ensure that they are well informed and trained with regard to the impacts our business can have in order to increase their ability to protect human rights and related issues. Where appropriate, we undertake risk assessments. Furthermore, this policy statement as well as other policies which include particular issues on human rights in more detail will be reviewed and continuously improved in order to assure a suitable implementation within our management processes and procedures. To address problems and concerns about the effective implementation and the corresponding enforcement, we encourage employees to contact either their line manager or directly our Executive Director at the Agency.