



CODE OF CONDUCT

MAXX IUM
RUSSIA

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01

LETTER FROM THE GENERAL DIRECTOR

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LETTER FROM THE GENERAL DIRECTOR

Dear Colleagues,

The rapid and consistent development of our company, coupled with steady growth towards new achievements, brings our employees plenty of new opportunities and challenges, both personally and professionally.

We are a big, tightly welded team of professionals that share common goals and objectives to grow the company. Our company's success has been built by the people working here.

That success is built on a set of shared values, which includes acting with integrity and a passion to succeed in the market. Our reputation is our most valuable asset. As a representative of the company, the actions you take have a direct impact on our reputation and prestige.

It is critical that as a Company we have a set of values and principles to help you make proper, ethical decisions.

Therefore, I am pleased to present our principles – the Maxxium Russia Code of Business Conduct (“Code”).

This Code outlines the Company's approach to business – honest, fair, competitive, and focused always on doing things the right way. It means always managing risk in the business and making decisions within legal parameters. Sometimes that will mean tough decisions on priorities, and this Code should be the cornerstone for your decisions and work in the Company. In addition to addressing key issues, this Code provides information on how to handle a variety of situations you may encounter.

For all employees in the company, including myself, adherence to the Code is an absolute condition of work. It is the sole basis for trust from our partners' and shareholders' trust. The Company's reputation, along with its success and development, are dependent on the principles contained within the Code. I ask you to get acquainted with this updated Code and certify your compliance with it.

Should you have any doubts when making decisions, please seek in advance the advice of your manager and/or counsel of the Legal and Compliance or Human Resources Departments before making a decision.

The Company's present and future largely depends on its reputation. Therefore, it is important to ensure that adherence to this Code is a fundamental part of our day-to-day responsibilities.

There is only one way of doing business – the right way, and I trust you will follow the principles contained within this Code, and operate with a high degree of integrity.

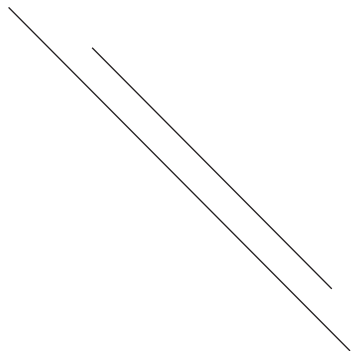
Best regards,

Dmitry Gorbanev
General Director



02

INTRODUCTION TO THE CODE



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Why does the Company have a Code?

At Maxxium Russia* (hereinafter referred to as “the Company”) employees strive to be entrepreneurs, acting boldly to create innovative solutions to beat the competition together. We believe that respect, trust, accountability, and engagement are fundamental components for building effective working relationships. We have outlined the respective definitions and expect all employees will follow that guidance.

Employees are expected to conduct themselves with integrity in all of their business undertakings and relationships. That means undertaking good business practices with a practical understanding of company policies and the laws that apply to our business. This Code outlines some of the key principles and expectations of the Company’s employees and its directors.

In this Code of Conduct you will be introduced to scenarios and situations that employees may find themselves in. Please take these experiences on board, apply them to your everyday roles and behave accordingly in your everyday life.

WHO MUST FOLLOW THE CODE?

No one is exempt from our Code, regardless of position or tenure – this Code applies equally to all Company employees without exclusions. Because this Code serves as a foundation for the Company, it is also expected that all third parties we engage will follow the same principles.

WHAT ARE AN EMPLOYEE’S RESPONSIBILITIES UNDER THE CODE?

Every employee has a responsibility to read and understand this Code and adhere to its guidance. In doing so, employees support an environment of good judgment, candor, and transparency. When employees are unsure of what is expected of them, they should seek advice in advance of acting from the Legal & Compliance Department or other appropriate resources, and take the time to educate themselves on proper protocol and decision-making.

WHAT ADDITIONAL RESPONSIBILITIES DO MANAGERS SHARE?

Managers set the tone and are often the first point of contact in case of any questions. Therefore, managers have a duty to demonstrate a clear commitment to ethics at all times and act as positive role models. Every manager bears a special personal responsibility for the employees entrusted to him or her. Managers should make themselves available to their direct reports, keeping an “open door” policy for questions, comments, concerns, and reports. Managers should also regularly assess if awareness and understanding of the Code is adequate within their area of responsibility and take prompt appropriate steps to address any issues or concerns. All reports of known or suspected wrongdoing should be treated seriously and escalated to persons responsible for Compliance in the Company or at the Shareholder level.

WHAT ARE THE CONSEQUENCES OF VIOLATING THIS CODE?

Violating this Code means you are violating the trust the Company has worked hard to foster with its customers, business partners, shareholders, colleagues, and other third parties. Beyond the Company’s commitment to integrity, employees have a duty to uphold the letter and spirit of the laws upon which this Code is founded. Therefore, violations of this Code, the Company policy, and the law also carry serious consequences in the form of disciplinary action – up to and including termination.

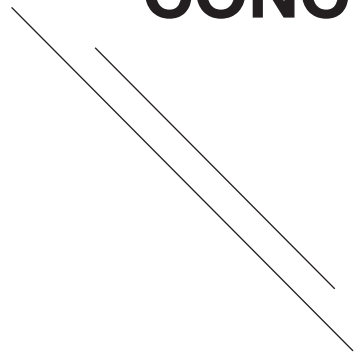
WHAT IS REQUIRED AFTER READING THE CODE?

After a thorough review of this Code, every employee must acknowledge receipt and certify their understanding by signing an appropriate declaration. Your submission of the acknowledgement certifies that you will apply the principles and guidelines contained within this code in your daily work responsibilities and report concerns if they arise. To support this, the Company will regularly provide trainings on the Code. From time to time, the Company will ask employees to reconfirm their understanding of the Code.

* Maxxium Russia includes two companies – CJSC “Denview Limited” and “Maxxium RUS” LLC.

03

ASKING FOR HELP & VOICING CONCERNS



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To Whom can questions be addressed?

This Code of Conduct cannot address every issue that arises. You are always expected to apply good business judgment and common sense. When you have a question, and it is likely that you may, please do not hesitate to contact any of the resources listed in this Code before you proceed. As mentioned above, guidance should always be sought before acting when uncertainty exists.

HOW DO EMPLOYEES SPEAK UP?

The Company can only grow and improve as an organization if employees are open and honest. Therefore, employees are encouraged to report any actual or suspected misconduct, whether there is a concern that the act of misconduct has been committed or is planned to be committed. Doing so helps the Company maintain a culture of transparency and integrity. It also helps the Company address potential problems before they can negatively affect us or our valued stakeholders.

Employees have several resources available to them when asking a question or speaking up about a possible issue:

- **Direct manager or supervisor**
- **The Human Resources Department**
- **Legal & Compliance Director**
- **The Beam Suntory Hotline**
- **Edrington's Speaking Up Policy**

If uncertainty exists employees must first seek guidance from any of the above resources before acting.

WHAT IS THE COMPANY'S POLICY ON RETALIATION?

The Company, Beam Suntory and Edrington all have a no retaliation policy for employees making a report in good faith, even when a subsequent investigation does not confirm the matter(s) raised. When employees voice their concerns truthfully and accurately, they may do so without fear of negative consequences.

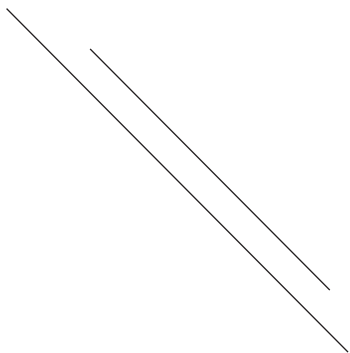
Due care should however be taken to ensure the accuracy of any concern raised. If an individual raises a concern which is found to be deliberately false or malicious, disciplinary action will be taken against the individual. Since reported matters are viewed very seriously, any such disciplinary action may result in dismissal.

WHAT HAPPENS WHEN AN EMPLOYEE MAKES A REPORT?

All reports will be treated as confidential, consistent with the laws of the Russian Federation. When it is about compliance there is no issue too small – all reports will be taken seriously and will be investigated promptly and thoroughly. Where necessary, the Company will take fair and appropriate corrective or disciplinary action.

04

TEN KEY PRINCIPLES



MAXIUM
RUSSIA



Key Principles

This Code consists of the following ten key principles, which are obligatory to follow:

- I. **Treating Each Other with Respect & Dignity**
- II. **Acting Honestly with Business Partners & Competitors**
- III. **Conducting Business Free of Corruption**
- IV. **Conflict of Interest Avoidance**
- V. **Fair & Accurate Selection of Business Partners**
- VI. **Tolerance to Appropriate Gifts & Entertainment**
- VII. **Maintaining Honest & Accurate Books & Records**
- VIII. **Protection of Confidential Information**
- IX. **Responsible Consumption & Business in the Spirits Industry**
- X. **Proper Communication**

I. TREATING EACH OTHER WITH RESPECT & DIGNITY

The Company's success requires employees to work together as a team, one that respects differences and values each member's contributions. The Company places significance on fostering a diverse, inclusive work environment where all ideas, perspectives, and backgrounds are considered. Essentially, this means treating others as you would expect to be treated.

Similarly, the Company does not tolerate any form of unlawful harassment or disrespectful behaviour. Harassment is generally defined as unwelcome behaviours toward a person that stems from that individual's characteristics. Harassing behaviours may vary, but typically share the purpose or effect of creating an intimidating, hostile, or offensive work environment. Examples of harassing acts include sexual advances, threats of violence, and offensive comments – none of which are acceptable at the Company. The same is true of disrespectful behaviour in general, including humiliating, insulting, intimidating, or isolating others.

Respecting each other also requires understanding and acceptance of different cultures. The Company promotes cultural diversity, understanding and accepting the similarities and differences between employees within the Company and beyond.

Managers and supervisors are responsible for assurance of the fair and respectful working conditions as well as for immediate and effective considerations of employees' complaints.

II. ACTING HONESTLY WITH BUSINESS PARTNERS & COMPETITORS

As a key player in the Russian spirits market, the Company and its employees have a responsibility to set a high standard for ethical, professional behaviour. Employees are expected to treat all of the Company's business partners with mutual respect. By implementing honest and ethical sales and marketing practices, and maintaining healthy business relationships, the Company sets a good example for others to follow.

Employees are expected to extend the same respect and courtesy to the Company's competitors as they do to its business partners. Employees should not misrepresent themselves or the Company in an effort to gather competitive data. Instead, employees should only rely on lawful and publicly available channels to collect important competitive information. If a new employee joins the Company from a competing organization, he or she should not be encouraged to share confidential information about his or her former employer(s).

Further, when dealing with competitors, employees must be careful not to discuss topics that could violate, or appear to violate, competition laws. Competition laws preserve a free market and allow the Company to compete fairly and ethically. If employees even appear to enter into a formal or informal agreement with a competitor to restrain trade, the consequences for them and the Company can be severe. Some topics that violate these laws include:

- **Price Fixing;**
- **Bid Rigging;**
- **Division of Territories or Customers;**
- **Tying and Bundling Products;**
- **Abuse of Dominant Market Position;**
- **Creation of Discriminative Conditions.**

Employees must not discuss these or other anticompetitive topics when interacting with a competitor. If employees find themselves participating in such a conversation, they should immediately inform the partner that the discussion is anticompetitive and make clear their unwillingness to violate competition laws.

It is important to remember that competition laws are not limited to interactions with competitors. These laws also extend to formal or informal agreements made with customers, suppliers, or other business partners that may unfairly restrict competition. Any anticompetition-related incidents as well as doubts regarding potential actions must be reported to an employee's supervisor and the Legal Department.

Q: Artur, who is a regional sales manager in St. Petersburg, has many connections throughout our industry. One of his colleagues from a competitor, Alexander, recently suggested it would be much easier for both of them to meet their sales goals if they could just stay out of each other's way. In other words, he suggested splitting their similar territories into areas where only Artur would sell, and vice versa. The idea is appealing to Artur because it does seem like an easier option, but he remembers from his training that it might not be okay to make an arrangement like this. What does Artur need to know?

A: Artur is correct in thinking that Alexander's idea is not acceptable. He has suggested dividing a market territory between competitors, which is illegal under fair competition laws. Artur should know that the best course of action would be to refuse Alexander's idea, immediately end the conversation, and contact the Legal Department for further guidance.

III. CONDUCTING BUSINESS FREE OF CORRUPTION

We believe in doing business fairly and free of any corrupt influence. Engaging in bribery or other forms of corruption is illegal and, regardless, yields no long-term benefit for the Company. In fact, by offering or giving, or accepting or agreeing to accept a bribe, employees compromise the Company's integrity and put the Company, its shareholders, and themselves at risk.

A "bribe" and/or "kickback" can be anything of value to the recipient, or their family, friends, associates or acquaintances, such as money, gifts, entertainment, or special favours with the intention of encouraging the person to:

- Perform their duties other than in good faith in order to obtain or retain an advantage for the Company;
- Perform or expedite an action which would reasonably be considered routine to the person carrying out their duties.

Remember, even the intent to give or receive something of value constitutes a bribe.

Extra vigilance is needed when dealing with government officials. Our Company adheres to a zero tolerance threshold when it comes to bribery and facilitation payments.

In complying with the anti-corruption laws, employees (acting directly or indirectly through third parties, agents, consultants, etc.) must:

- Not make, offer, promise, accept or solicit a bribe to or from a third party, directly or indirectly, including a public official, government personnel, or any candidate for public office;
- Not offer or accept an improper payment or the return of a sum paid or due to be paid as a reward for making business arrangements;
- Never retain a third party to pay a bribe or kickback on the Company's behalf, or knowingly allow one to do so;
- Never make "facilitation payments," being payments made to secure or speed up routine government actions (such as issuing a permit).

It is important to note that Beam Suntory and Edrington must comply with extraterritorial rigorous and far-reaching anti-bribery laws and regulations, including the United States Foreign Corrupt Practices Act (FCPA) and the United Kingdom Bribery Act (UK BA). Both laws directly impact the Company operations, and consequences for violating anti-corruption laws are severe.

An employee having any information that bribes or any types of inappropriate or facilitating payments were or may have been given or received shall neither hide nor take steps to withhold this information without sharing it with the employees responsible for the execution of the present Code and must report the matter to those responsible for compliance within the Company or at the shareholder level.

Q: Vladimir is responsible for safety at the Company, and coordinated a walk-through at one of our warehouses yesterday with an inspector from a government agency. At the end of the day, the inspector informed Vladimir that he noted three safety violations that typically must be reported. He offered, though, to keep the violations quiet if Vladimir can arrange to pay him 1% of the value of the products the facility ships this month. Vladimir knows this deal is risky because the inspector is asking for a kickback, but thinks it might just be what he needs to avoid fines and get the issues fixed. Would it be okay to make this deal, just this once?

A: No, it would be unacceptable for Vladimir to enter or promise to enter into this kind of arrangement. Vladimir is correct that the inspector is soliciting a kickback, which is illegal. Vladimir must refuse the offer and report it immediately to the Legal Department.

IV. CONFLICTS OF INTEREST AVOIDANCE

Conflicts of interest can cause significant damage to the Company's business and reputation. To maintain the Company's market position and preserve the integrity of the brands, employees have a duty to act in the Company's best interest at all times. This includes actively avoiding conflict of interest situations and/or disclosing pre-existing or potential conflicts. A conflict of interest occurs when an employee's personal interests and activities conflict or could conflict with those of the Company. This would include situations where a family member or close relation works for a customer, supplier or competitor. If a conflict is properly reported the individual will be isolated, without disadvantage, from decision-making or operation in the area in which the conflict exists.

The following sections outline some of the more common conflict of interest situations in which employees might find themselves. If employees believe they have a conflict of interest, or may have the potential to enter into one, they should disclose the matter immediately to their manager, supervisor, or the Legal Department.

EXAMPLES OF CONFLICTS OF INTEREST:

- A close relative works for a company that is participating in a tender initiated by the Company. You have the authority to influence the choice of this company as part of your job responsibilities or participate in the approval of the contract terms with such company;
- You hold a second job and that job interferes with your ability to do your work for the Company;
- You use Company property or information for your personal benefit or the benefit of another person; or
- You receive a personal or financial benefit from an actual or potential supplier or customer or a competitor.

Even if an employee is confident that in the circumstances giving rise to the potential conflict would not harm the Company, the conflict must still be disclosed so that management can make an assessment and take any appropriate steps to properly manage the situation. The allegation that the conflict of interest impacts business decisions may harm both the employee's and the Company's reputation.

Q: Who is a close relative?

A: This definition normally includes relatives, spouses, household members, and current or former romantic partners and close friends.

Q: Ekaterina is responsible for choosing a new logistics supplier. Her father owns a company that can meet the Company's needs, and Ekaterina's father has quoted a low price for delivering the services requested. Ekaterina hasn't yet opened the bidding process to other suppliers, but Ekaterina doesn't think anyone will be able to outbid her father. May Ekaterina select her father's company without opening the bidding process to other potential suppliers?

A: No. Ekaterina may not allow her personal relationships to interfere with the purchasing process. Although the Company may ultimately choose the services of Ekaterina's father's company, competitive bids must first be obtained. This ensures fairness, and is the ethical way to secure the lowest cost. Ekaterina should also notify the Legal Department and her manager that this potential supplier is a family member, as Ekaterina may need to excuse herself from the supplier selection process.

Acting in the best interests of the Company requires that employees never try to compete with the Company. They may not take for themselves any business opportunities that they discover through the course of their normal jobs, or through the Company property or information. In addition, employees must never help anyone else take such business or investment opportunities for their own personal gain, including family members and friends.

Q: Michael, being an employee of the Company, wants to make extra money by running his own project that doesn't conflict with the Company's business. Is that permitted?

A: It could be permitted if such activity doesn't compete with the Company's business. However, use of the Company equipment, products, services, and resources is prohibited. Additionally, the time and effort required to support such activities may interfere with Michael's ability to do his job effectively. Because of these factors, the Company doesn't support employees operating their own business or having a second job.

V. FAIR & ACCURATE SELECTION OF BUSINESS PARTNERS

Our Company strives to be compliant with competition law legislation. We trust our partners to adhere to the same principles. The Company will only do business with bona fide third parties who share the Company's commitment to ethical performance.

The choice of the best business partner should be made based on the unified criteria designed to maximize commercial effectiveness and project goals. The procurement process is described in the Company's policies and procedures. Third parties must be evaluated against the Company's Third Party Policy criteria before engaging in new business ventures.

Different types of trade or economic sanctions may also influence the Company and its partners. These sanctions are often complex and subject to frequent change. Sanctions can be country specific, or can be targeted at specifically blacklisted entities or individuals.

Higher risk third parties and third parties operating in the territories included on sanctions lists must go through approval under the third party risk management procedures. The formal due diligence carried out by the shareholders will confirm if the third party is subject to sanctions or other trading restrictions and could therefore not be engaged with. Please contact the Legal Department for any questions.

VI. TOLERANCE OF APPROPRIATE GIFTS & ENTERTAINMENT

The Company strives to build healthy, lasting relationships with all of its business partners. A common manner of fostering good business relationships is through the giving and receiving of gifts and entertainment. However, this practice can easily lead to a conflict of interest, or the appearance of one, if crucial guidelines are not followed when giving or accepting gifts, favours, or entertainment.

Gifts employees provide to or accept from a third party to foster business relationship must be:

- **Reasonable in Value (no more than 4000 RUB);**
- **Infrequent;**
- **In Good Taste;**
- **Unsolicited;**
- **Of the type customarily offered to others having a similar relationship;**
- **Not Cash;**
- **In compliance with anti-corruption laws and regulations and the Company policy on gifts and entertainment.**

Even when giving or receiving gifts or offers of entertainment that meet these criteria, employees must always ensure their actions and behaviour do not create even the appearance of bias. As discussed below, there are additional considerations and requirements that apply to giving gifts to public officials.

All gifts you receive in connection with your employment in the Company and which exceed the amount of 4000 rubles, must be registered in the Gifts register. Please refer to the Gifts & Entertainment Policy for more details.

Q: Valery was given a very expensive bottle of wine from the partner of the Company. It was given by the business partner with no reason. Valery decided to send the bottle of wine back. Was she right?

A: Yes, this is the right approach. Always ask yourself a simple question "Why would a business partner send me this gift?" If the answer implies an ulterior motive the gift cannot be accepted and should be politely declined.

VII. MAINTAINING HONEST & ACCURATE BOOKS & RECORDS

Honesty and transparency are at the core of everything the Company does. These values extend to the Company's financial books and records, which give our shareholders and other key stakeholders a look inside the Company's current market position and financial condition. Employees must each do their part to make certain that this view is an honest, accurate, and complete one. Every piece of data submitted in the Company records – be it personnel, time, or expense – must be truthful, factual, and comprehensive.

The Company's financial statements and all books and records on which they are based must be complete, accurate and reflect the true state of our business. Statements and books and records must also follow the applicable accounting standards and/or regulations to which the Company is subject.

The Company's commitment to honesty demands that employees engage solely in legitimate and authorized business transactions. Employees may not:

- **Make false representation on behalf of the Company, whether verbally or in writing;**
- **Hide the Company funds;**
- **Mischaracterize the Company transactions;**
- **Create unrecorded fund accounts or accounts undisclosed to shareholders;**
- **Knowingly allow any other illegal activities to occur;**
- **Misuse the Company's assets.**

If employees notice any accounting or auditing irregularities, or incidents of fraud by individuals with accounting or financial reporting responsibilities, they should report it to the Financial Controller and/or the Legal Department.

Q: While creating an invoice for a customer, Elena notices that the contract amount in the accounting system is larger than the amount specified in the actual contract, which is in front of her in hard-copy form. After researching, she determines that the contract amount was never as large as the system indicates, so it appears there was an error. What should Elena do?

A: Elena should inform her manager or supervisor about her observations right away. This way, the Company can determine the best way to look into the error. Elena's report helps the Company, because everyone has a responsibility for the quality of the financial records, which are legally and ethically required to be accurate.

VIII. PROTECTION OF CONFIDENTIAL INFORMATION

During the normal course of business, employees invest a significant amount of time and energy in developing sales and marketing strategies for the Company's brands, Company's T&C, and special business initiatives. Throughout this process, they generate information considered secret. Confidential information typically includes all non-public information that may be of use to the Company's competitors or could be harmful to the Company if disclosed.

Examples of our confidential information include but are not limited to:

- **Financial data;**
- **Clients' and partners' database;**
- **Pricing information;**
- **Marketing strategies;**
- **Contract terms;**
- **Technical data;**
- **Processes and strategic projects and initiatives.**

To ensure that the Company's vital confidential information is properly protected, employees may not disclose such data to anyone outside of the Company, unless a disclosure is authorized or legally required. Employees must avoid discussing this information with co-workers who do not have a clear business need to know it, and employees cannot leave confidential information unattended. As a further precaution, never discuss this information where others might overhear, such as airport terminals, trains, restaurants, and common areas on the Company property.

As part of their employment, employees may provide the Company confidential information, including but not limited to employment history, personal data, such as date of birth, marital status, etc. This information is confidential. Additionally, the terms and conditions of employee labour agreements should be treated as confidential information. Employees should not discuss their salaries, bonuses, or other performance results with their colleagues.

All the Company employees are required to ensure confidential information is stored in compliance with the laws and the Company's policies on confidentiality. The obligation to keep the Company information confidential remains unchanged even after an employee leaves the Company.

IX. RESPONSIBLE CONSUMPTION & BUSINESS IN THE SPIRITS INDUSTRY

As a responsible company with a strategic mission to create a unique premium consumer experience with our spirits brands, the Company and its employees have a responsibility to present the Company's brands to consumers in an effective and responsible manner. If you drink, "drink smart". And remember, you should always identify yourself as the Company representative.

The Company supports all laws establishing age restrictions on access to, purchase of, and consumption of alcohol beverages. The Company does not market or sell products to persons below the legal purchase age ("LPA"), as defined in the Russian market.

The Company opposes all forms of underage, excessive or irresponsible consumption, and supports enforcement of drunk driving laws.

For the Company, being able to operate in the Russian alcohol market is fully dependent on having a license to purchase, store, and supply spirits. It takes a significant amount of time, money and effort to obtain this license and it only takes a small breach of the law to result in a suspension or outright forfeiture of the Company's operations. Even rumours concerning a license suspension can result in lasting damage and serious consequences for the Company's reputation and business. Any activities related to alcohol outside of agreed contracts and/or approved Company's policies are absolutely prohibited unless a direct confirmation is provided by the Legal Department.

Q: Maria needs a few sample bottles of the Company's products in the new packaging for a demonstration on the shelves in a retail store during a promo activity. The activity launch starts tomorrow and Maria has no time to buy the necessary SKU in a retail store. Her colleague Mikhael tells her he heard that it is allowed to take bottles directly from the Company's warehouse by issuing an authorized POS material issuance request form. Is that permitted?

A: It is not permitted. Below are the violations that would impact the Company's license:

- Issuance of alcohol product from the Company's warehouse outside of agreed sales contracts;
- Location of the Company's property product at another company; and
- Location of unsold product outside of the Company's warehouse.

X. PROPER COMMUNICATION

Employees connect and share experiences with the Company's consumers, customers, and business partners on a daily basis, including but not limited to, social media platforms. Social media broadly encompasses blogs, micro blogs, social networking sites, wiki pages, photo/video sharing sites, message boards, and chat rooms. While employees may engage in social media, they should always remember that electronic messages are permanent, transferable records of their communications and therefore they can greatly affect the Company's reputation. Employees must never give the impression that they are speaking or acting on the Company's behalf via social media unless they are specifically authorized to do so. Employees who use such media for the Company business should always identify themselves as Company representatives. When using social media in a personal capacity, employees must never disclose confidential information about the Company, customers, business partners, or fellow employees.

Additionally, employees are expected to utilize Company-issued computers and mobile phone devices in an appropriate manner. This includes not downloading unauthorized or pirated software, adhering to software copyright and licensing guidelines, using the internet and email for business purposes only, etc. Please refer to the Company's IT policies for further details.

TEN KEY PRINCIPLES OF MAXXIUM RUSSIA

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- II. Acting Honestly with Business Partners & Competitors
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