

## **Business & Human Rights Resource Centre Survey Questions**

### **For companies operating or investing in Ukraine**

#### **Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Ukraine? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

#### **Assessing risks**

2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
  - a. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

#### **Mitigating risks and tracking effectiveness**

3. What measures is your company or subsidiary taking to ensure that your business relationships, products, services, operations, or other actions do not contribute to Russian military activities or occupation in Ukraine (including Crimea and occupied parts of Donetsk and Luhansk Oblasts)?
4. Is your company or subsidiary planning to scale-down or suspend your operations in Ukraine? If so, what are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate the negative impacts of this decision on affected communities and your workers?
5. What steps is your company or subsidiary taking to ensure that your risk prevention and/or mitigation measures do not negatively impact Ukrainian civilians?

#### **Exercising leverage**

6. Is your company or subsidiary taking any other actions to promote respect for humanitarian law, human rights, democracy, and peace in Ukraine?

### **For companies operating or investing in Russia**

#### **Nature of involvement**

1. How long has your company or subsidiary been operating or investing in Russia? In summary, can you briefly describe the nature, sector, scale, and geographic area of these operations or investments?

The Group has been operated in Russia since 2010 with the production and sales of components for insulating glass units and glass decoration, and previously exporting from Europe for more than 15 years. From our facilities in Lipetsk we serve processors of glass in Russian Federation territory and CIS Countries.

## Assessing risks

2. How is your company enhancing its due diligence to identify, prevent, and mitigate heightened human rights risks and comply with international humanitarian law?
  - a. What measures is your company taking to ensure it relies and acts upon robust monitoring of the situation, including through consultation with your workers, affected communities, human rights groups, and/or humanitarian organizations?

Our internal company policy complies with human and workers rights and is applied in Russia plants as in the other plants of the Group. This policy is also monitored by third party.

## Mitigating risks and tracking effectiveness

3. As the situation in Ukraine unfolds, is your company or subsidiary planning to cease operations in or divest from Russia? If so:
  - a. What have been the key considerations informing this decision and did you consult with your workers and/or other affected stakeholders as part of your decision-making process?
  - b. What are the immediate and longer-term steps that your company has taken or is prepared to take to mitigate any negative impacts of your exit on affected communities and your workers, including addressing any loss of income?
4. If your company or subsidiary chooses to continue operating in Russia, what human rights due diligence has been undertaken and how are you planning to mitigate harm in Ukraine?

### Answer for questions number 3 and 4:

Since the beginning of the conflict, we drastically reduced the business volume in Russia and CIS countries. We immediately stopped on going and new investments and all marketing activities. We have not closed the facilities yet just to protect our local team, guaranteeing salaries even if the production activities are limited to few days a month. The Group feels the duty to lend as much support as possible to our more than 80 employees and their families, who have been working for our company since 2010 and would not be able to find other local employment.

5. What kind of due diligence measures does your company use to ensure that it does not have any business relationships with sanctioned Russian individuals and entities? Beyond sanctions compliance, how does your company ensure that it does not have any business relationships with individuals or entities with a track record of rights violating conduct?

At the moment we maintain a very low business volume with just few historical companies in the glass sector industry which have been cooperating for many years with our companies. We are not aware that the shareholders of these companies are included in the list of sanctioned Russian individuals and entities, and we periodically monitor the companies chamber of commerce certificates.

## Exercising leverage

6. How does your company intend to use your leverage to protect the rights of your workers and communities affected by your operations in Russia, including freedoms of association and expression?

Since the beginning of our business in Russia we established the same rules and policy with high attention to workers and human rights as in the other facilities of the Group.

7. Is your company providing any support to Russian activists who are taking action against the war and in support of democracy and peace in Ukraine?

The Group respects the privacy of the workers and doesn't ask if they are involved in political activism.

