

BUSINESS ETHICS POLICY

Premiumfocus Nautilus Ltd and its business theory attribute their prosperity to a nucleus set of values:

- **Integrity**, which is one of the main values, leads to our trustworthiness and the following points highlight the way in which our employees should act so as to experience this kind of value.
- **Being safe and secure**
According to our company's policy, we have set one fundamental priority for our customers, their Health & Safety.
- **Being honest and trustworthy**
The employees should show constant obedience to the law, denial to any form of bribery and generally preserve working conditions to the best possible level.
- **Being fair and considerate**
We believe in being mindful and respectful towards everyone by showing our esteem to them as well as to the environment.
- **Being professional and proud**
Premiumfocus Nautilus Ltd employees and contractors are required to protect their company by doing their best and showing their professionalism.

The **Premiumfocus Nautilus Ltd** Ethics Code is of utmost importance for every single employee working in this company.

The aim of this code is to give a thorough analysis of the company's policy to the directors and employees as far as **Premiumfocus Nautilus Ltd** performance and our customers' aspirations are concerned. Hence, this Business Ethics Policy should be followed in every country we operate. Our managers and employees are required to comply with this code. In the event of not complying with it, we are determined to act accordingly so as to avoid ignorance of our standards.

Business Ethics Policy

Our fundamental aim is to be a good corporate citizen by showing our assets to the fullest and reducing any drawbacks as much as possible.

Human Rights

We perpetually support the Declaration of Human Rights in every action we take as our esteem to the individual is a prerequisite for our company. Our co-workers and customers should act similarly so as not to violate any human right. Due to the variety of the cultures in the countries we work, we assure you that none of our employees will ever put in risk these human rights.

The environment

Working and simultaneously doing our best to respect the environment is rather important for us. We are constantly trying to decrease any environmentally 'unfriendly' results, our actions may have, by focusing on our carbon footprint etc.

Local communities

Premiumfocus Nautilus Ltd totally respects the local communities via charities, sponsors and volitional help by our workers. Their good is our priority and under no circumstances will we ever act in way which will affect them negatively. Thus, we offer job vacancies and goods for the people of these communities.

Our standards of business practice

Our high ethical criteria highlight the trustworthiness of our employees and the flawless operation of our company.

Bribery and corruption

By no means will we ever accept any form of bribery or corruption in our company. We are definitely against these actions and operate in the best possible way to avoid such matters. As a result, we offer services and products in the name of quality and value for our own good by avoiding actions leading to bribe.

For this reason, our employees are not entitled to receiving any gift which might be considered as a form of bribery. Despite the fact that giving back a gift is considered impolite, employees should follow this policy and even adopt the notion of donating gifts to charities instead of keeping them for personal use.

Political contributions

Our policy is to avoid financial participation in any political party or anything related to politics. However, some countries do require this action but payments must be permitted beforehand. The Managing Director is required to report the offer to the **Premiumfocus Nautilus Ltd** Board of Directors and if approved proceed to the payment.

Treatment of customers

Our customers are of utmost importance to us and our bonds are based on common credence. Thus, **Premiumfocus Nautilus Ltd** employees do their best to satisfy them by meeting their demands to the fullest.

Suppliers

We firmly believe in objective manners towards our suppliers. The company's ethical policy allows us to pay our suppliers in due time and treat them in the best possible way.

Competition

By no means do we underestimate our competitors. On the contrary, we work hard to achieve excellent value and service. **Premiumfocus Nautilus Ltd** employees will never share private information concerning the company or ever try to elicit such content from our competitors. No actions will be made to violate the rules of our policy and put the company in risk.

Our approach to corporate governance

Premiumfocus Nautilus Ltd is devoted to shield the shares of our stock owners and follow the rules to ensure the best possible business environment along with the handling of risks that might occur.

Compliance with the law

Conforming to the law is our priority on national and international levels. Our administrators are conscious of the principles which must be followed in any business area.

Accounting standards and records

Clarity on financial affairs is depicted via our accounting records. **Premiumfocus Nautilus Ltd** employees contribute to the true fiscal image of the company by not distorting any administrative information for their own benefit.

External reporting

Our company carefully handles any announcements that have to be forwarded to regime organizations. We follow certain rules when it comes to financial affairs with the help of the Board of Directors. When addressing to the media, truth becomes our image. Questions from the media people should reach **Premiumfocus Nautilus Ltd** only through spokespersons.

Policies and procedures

Risks are always present in the business fields, thus certain strategies have to be implemented in order to avoid them. Our employees should be conscious of these risks and always be willing and prepared to face them with the assistance of the company's strategies.

Our commitments to our employees and contractors

Premiumfocus Nautilus Ltd always chooses the most skilled employees and contractors to ensure the best possible working conditions for the company's success. They are undoubtedly treated with honesty and respect at all levels to safeguard the principles of the company.

National regulation

We follow certain national laws for the sake of our employees and obey to rules related to the obligations we have as a company towards our workers.

ILO (International Labor Organization) Declaration on Fundamental Principles and Rights at Work

Premiumfocus Nautilus Ltd is committed to the values of the ILO Declaration. We have no intention of discerning employees at any level as we obey to the local legislation and practice.

Harassment

Under no circumstances do we accept any form of harassment throughout our company. Should our workers think that they have faced harassment, they are entitled to report it to the Personnel Manager who is responsible for the prompt resolution of the matter.

Equal opportunity

Premiumfocus Nautilus Ltd employees are always free and encouraged to increase their chances of promotion on equal terms. We respect them to a high degree and appreciate their offering for the company's own good.

Health & safety

By no means would we ever put the lives of our employees in risk. Their health and safety concern us the most especially in their working environment. As a result, we never cease to supervise how effective our functionality methods are in order to shield them in the best possible way.

Terms of employment

Obedience to national rules promotes the creation of permanent relationships among businesses and their employees. Their payment is always in compliance with the national legislation and the pacts made from both sides.

Pre-employment screening and selection

Due to the business character itself, our company always conducts precise pre-employment screening and selection methods on the potential employees who are willing to work with us.

Confidential information

By no means should employees reveal private information concerning the company during or after their employment. Confidential information must never be exposed to anyone outside the circle of Premiumfocus Nautilus LTD and most important for the sake of the employees themselves.

Conflicts of interest

Employees must ignore any kind of business which is opposed to the interests of the company. Should only the business be defined as ethical by the top management, it could – consequently – be taken into account provided it would not put the company's reputation in risk.

Social networking

Participation of **Premiumfocus Nautilus Ltd** employees in social networking should comply with the company's principles and strategies. Their priority must be the protection of their being and that of the customers so as not to be set in risk.

Access to Business Ethics Policy

Our Business Ethics Policy can easily be obtained via our Management System Manual and every single **Premiumfocus Nautilus Ltd** Director, should be aware of this policy. An Ethics code will be available for staff and contractors through training and even newsletters.

Staff complaints, concerns and suggestions

Our company is always willing to accept and review staff and contractors complaints, concerns and suggestions. Employees and contractors are entitled to address -even anonymously- to the Personnel Manager and/or the Quality and Security Manager. However, they should not discuss their thoughts with others because it is considered to be violating the company's confidentiality policy.

Adherence to policy

No actions against our Ethics Policy will be accepted. Employees must be devoted to the Code and should someone violate or break it will have to face criminal proceedings.

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