

TECHIIA

TECHIIA's Code of Ethics and Business Conduct

CONTENTS

1. The word of the holding founders

- 04.** Oleg Krot, the Managing Partner of TECHIIA holding
- 05.** Yura Lazebnikov, the Managing Partner of TECHIIA holding

2. Our values

3. About our Code

- 09.** Managers' Obligations
- 10.** Consultations on conducting activities within the framework of rules of ethics
- 11.** Actions after receiving information about unethical behavior
- 12.** Whistleblower policy
- 13.** Violation Penalties

4. Our commitments to ethical business conduct

- 15.** Rules and principles of our ethics
- 16.** Legal and honest business conduct
- 17.** Fighting Corruption
- 18.** Business hospitality and business gifts

- 19.** Contractors relationships
- 20.** Relationships with public authorities
- 22.** Operations using confidential information
- 23.** Political affairs
- 24.** International trade

5. Our commitments to company

- 26.** The usage and protection of holding resources and fraud prevention
- 27.** Conflict of interest settlement
- 31.** Interaction with the company's enterprises

6. Our commitments to people and the environment

- 33.** Equal opportunities for all employees
- 34.** Employees' confidentiality and personal data
- 35.** Human rights
- 36.** Workplace safety
- 37.** Health, labor, and safety
- 39.** Environmental Protection
- 40.** Sustainable development policy

- 42.** Innovation as a sustainable development tool
- 43.** Our commitments to sustainable development

7. Our commitments to information security

8. Who should I contact?

9. Appendix 1. The Glossary

1 The word of the holding founders

04

Oleg Krot, the Managing Partner of TECHIIA holding

05

Yura Lazebnikov, the Managing Partner of TECHIIA holding



Oleg Krot, the Managing Partner of TECHIIA holding

The TECHIIA holding, which today has more than 10 businesses and projects all over the world, grew from just a small local business.

The bigger the holding, the stronger our impact on communities, partners, customers. As a socially responsible company, we must adhere to the obligations of honest, fair, and transparent activities.

The Code is a declaration of the highest ethical standards and moral principles in all aspects of our activities, uniting

us all in TECHIIA holding by common values, which we are guided by in our daily decisions and actions.

Our Code is a set of rules and values on which the corporate ethics and working actions of our employees are based. It describes how we should behave on a daily basis interacting with colleagues, partners, competitors, the state, and society. It sets out the principles of doing business and the requirements to be followed by all employees of the holding during work, regardless of functional responsibilities, location, or level of the position.

This Code is based on generally accepted principles, norms of Ukrainian and international law. We expect that every employee, regardless of the difficulties that may be in our way, will comply with the basics of this Code.



Yura Lazebnikov, the Managing Partner of TECHIIA holding

The Code of Business Ethics is not just a list of corporate rules. For all of us, this is a key document on communications, which can and should be relied on.

Our activity is a great opportunity and at the same time a great responsibility. We develop the esports and IT service industries. We create and distribute merch, equipment, and accessories for players. We build the infrastructure facilities. We communicate with colleagues, partners, and clients of

different cultures and from different corners of the world. You are reading this document because our paths crossed one day and our values coincided. In fact, the Code only enshrines how we live and build the business. I ask each one of you to make a personal commitment to doing business in accordance with our values and this Code of Corporate Ethics. Refer to this Code in your work, use common sense, and seek guidance when you feel the need for additional help.

We are interested in growing our business, but we must also remember to be honest. Thank you for your everyday work at TECHIIA and your desire to work according to our values.

2 Our values

Our values resemble our way of life. And they apply to everything we do. Today and in the future.

Visionary

We live today, but we look into tomorrow

Partnership

We interact with customers, partners, and employees equally

Enthusiasm

We invest our energy in what we truly believe in

Flexibility and openness to the new

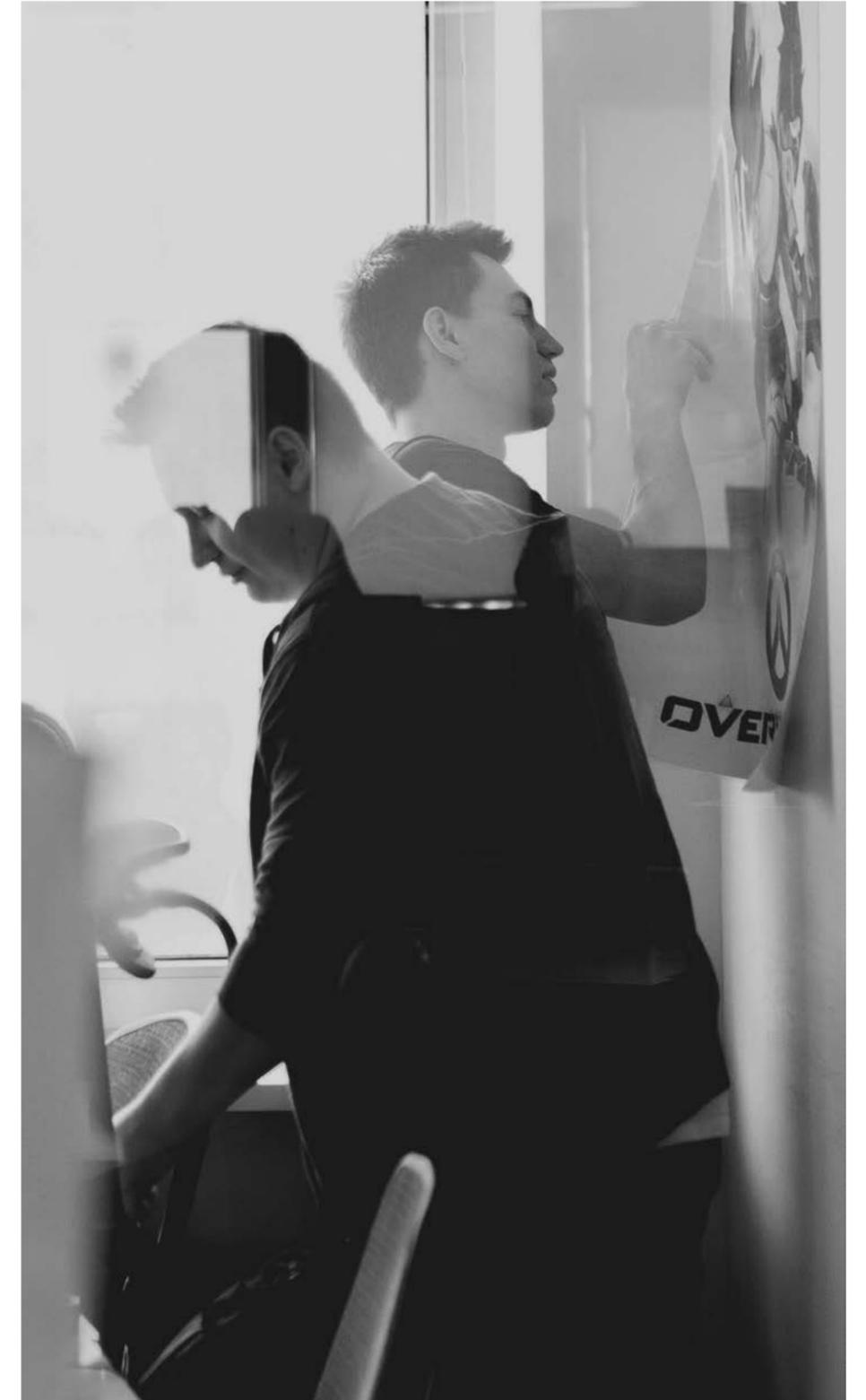
We are continually looking for new ideas and we are flexible in their implementation

Lack of borders

We think on a global scale

Multiculturalism

We respect the cultural features of those with whom we interact



3 About our Code

08

About our Code

09

Managers' Obligations

10

Consultations on conducting activities within the framework of rules of ethics

11

Actions after receiving information about unethical behavior

12

Whistleblower policy

13

Violation Penalties

About our Code

TECHIIA holding strives to be guided in its activities by the principles of openness and transparency. We are a relatively young company, but we adhere to our responsibility to the state, partners, customers, and employees. This Code refers to our common values and standards of conduct that are expected from each employee of the holding and its member companies.

The Code of Ethics and Business Conduct is designed to help each employee to form an idea of our ideology and value system, our corporate culture, our ethical standards of conduct, manner of communication with colleagues, clients, and partners. The Code also helps to resolve complex ethical situations, prevent conflicts of interest in the working process.

The Code describes the fundamental principles and key policies that should guide our business. This Code applies to all employees of the holding and the companies that are part of it. We also expect our business partners to share the principles of conduct described in this Code.

The Code of Ethics and Business Conduct of TECHIIA holding is developed on the basis of generally accepted principles and rules of international law.

TECHIIA is an international holding company, therefore it is understandable that the laws and regulations in a particular country where we operate will differ from the standards set out in this Code. We are aware that we may face a potential conflict with the law. We always follow the current legislation. If an employee notices a possible conflict between our Code and the law, he or she should immediately seek the assistance of the Legal Department.

Managers' Obligations

We hire staff taking into account, in particular, their personal qualities and in compliance with the culture that prevails in the TECHIIA holding and its companies. Heads of departments, teams, and other units, project leaders should demonstrate the values set by this Code, as well as inspire their staff members to follow their example.

Leaders of the holding and companies undertake:

1. To maintain the culture of open communication. Our workspace is an environment where employees can feel free to ask questions and share information and their problems.
2. To be an example, a leader who acts in accordance with the principles and rules set by this Code.
3. To encourage others to act in accordance with the Code. Make sure that those with whom they work are familiar with this Code and follow its rules in their daily work.
4. To be able to listen and offer support. Be attentive to employees who approach them with their questions and help them make ethical decisions.
5. To try to solve problems with the involvement of relevant departments.

Consultations on conducting activities within the framework of rules of ethics

In just one document like this Code, we will not be able to describe all possible situations. If employees need advice on how to act in a particular ethical situation, they can seek advice from one of the many available contacts in our holding.

The holding and its member companies hire full-time employees and contract with individual entrepreneurs. Both should uphold ethical standards within the framework of this Code.

If an employee learns of a suspected or actual violation of the law or this Code, he or she must notify of such violation

Here is a list of colleagues who will help in resolving the issue:

1. The Head Of Department;
2. Responsible for compliance;
3. Legal Department;
4. HR department;
5. Public Engagement Department.

11

Actions after receiving information about unethical behavior

All information about suspected misconduct is properly investigated and treated as confidentially as possible. Employees do not need to conduct their own investigations. Investigations often involve complex legal issues, and actions alone can harm the investigation and negatively affect employees and the holding company.



Whistleblower policy

A whistleblower is an employee who reports activities that he or she considers illegal or dishonest and that do not comply with the rules described in this Code. The whistleblower is not responsible for investigating activities that may oppose the rules described in this Code.

Examples of illegal or dishonest activities are violations of this Code and the state laws where the holding and/or its companies operate. If the employee is aware of the illegal activities of others or has such suspicions, he/she is obliged to report to his direct supervisor or HR Director. The employee must be reasonable to avoid baseless allegations. An employee who intentionally submits a false report of wrongdoing will be subject to disciplinary action until his or her contract is terminated.

The protection of whistleblowers is provided in two important areas, confidentiality and retaliation. The privacy of the whistleblower

will be maintained as far as possible. At the same time, it is possible that in certain circumstances the whistleblower will have to be identified in order to conduct a thorough investigation, comply with the law, and give the accused their legal rights of defense. The company protects whistleblowers from revenge. This includes protection against adverse employment-related actions, such as termination of employment, reduction of compensation, or threat of physical harm. Any whistleblower who believes he/she is being retaliated against should immediately contact the HR Director and report it.

All reports of illegal and dishonest actions will be immediately passed on to the HR Director, who is responsible for investigating and coordinating proper actions.



Violation Penalties

In accordance with the current legislation, employees of the holding company who violate the law or this Code may be subject to disciplinary action, termination of the contract with the company. In addition,

any manager who manages or approves a violation, or is aware of the violation and does not report it immediately, may be subject to disciplinary actions.

4 Our commitments to ethical business conduct

15
Rules and principles
of our ethics

16
Legal and honest business
conduct

17
Fighting Corruption

18
Business hospitality
and business gifts

19
Contractors
relationships

20
Relationships with public
authorities

21
Operations using confidential
information

23
Political affairs

24
International trade

Rules and principles of our ethics

TECHIIA holding complies with the requirements of the legislation of the countries where we operate. We take into account the fact that laws in different countries are different but, at the same time, we strive to adhere to high standards in everything we do. Our Code of Ethics and Business Conduct is not limited to regulatory requirements. We also use internal standards of compliance and honesty.

What is important to us is how we achieve results, not just the results themselves. The company's staff must apply the principles of transparency and honesty while interacting with partners, customers, users, competitors, and other third parties

Our Values



Legal and honest business conduct

Honesty and decency are the basic principles of how we conduct our business. We are honest with our employees, customers, competitors, users, partners, regulatory authorities, and everyone else. We do not use unfair advantages obtained through dishonest or corrupt methods of doing business against others. We produce goods and provide services that we can be proud of. When we advertise, we describe our products and services honestly and accurately.



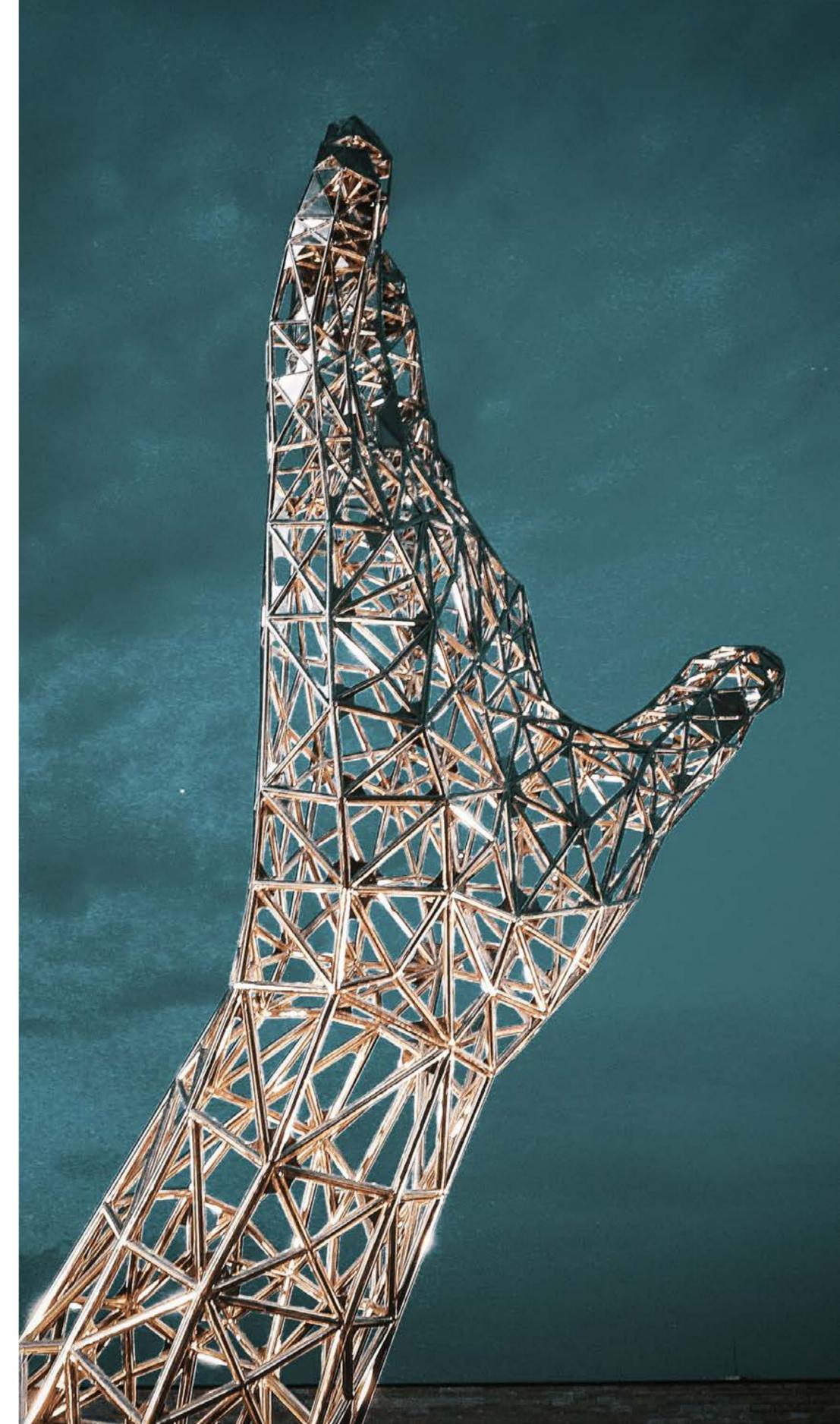
Fighting Corruption

We are totally against corruption, it weakens communities and can cause damage to our holding. Employees have no right to authorize, promise, offer, give or demand, agree to receive or accept remuneration in the form of money, property, valuables, or services.

The company also prohibits the fee payments to state servants and related persons in order to speed up the procedures related to obtaining permits, simplifying formalities, or obtaining other benefits for the holding. The company also strictly prohibits bribery under any circumstances, whether it concerns a state servant, an individual, or other companies.

If an employee is asked to pay money or provide any value that may be perceived as a bribe, he must immediately notify the Legal Department.

Violations of anti-bribery laws can have serious consequences for the holding's employees and for our company, including reputational damage, large fines, and imprisonment for individuals. Employees must be careful in choosing business partners and make sure that they do not give bribes on our behalf. If an employee becomes aware that one of our business partners is giving or receiving bribes, or has such a suspicion, he or she should not be involved but should notify his or her supervisor or legal representative as soon as possible.



Business hospitality and business gifts

18

Employees should be guided by hard-line and objectivity in making business decisions on behalf of the holding. They should not accept gifts and other benefits if this may affect their business judgment or decision, or if such influence can be suspected. Employees should not ask for gifts, entertainment, or any other business courtesy from persons dealing with the holding or its companies.

It is forbidden to give or receive any bribe or «kickback» in the form of a gift or entertainment. We also never provide or accept entertainment or gifts that violate our standards of respect for individuals.

Voluntary gifts and business courtesy, including food and entertainment, are allowed if they are ordinary and generally accepted business courtesy; do not have excessive value and do not occur often, and are provided and accepted without a direct or implicit understanding that the recipient in any way undertakes to accept the gift.

It is forbidden to offer or accept gifts that are of excessive value or are unusual in nature, without the prior written approval of the head of the holding, or the company's CEO. Many of our suppliers and customers have their own gift and entertainment policies. If an employee intends

to make a gift to a business partner within the acceptable rules described in this Code, he should inquire about the policies, norms, and rules for receiving gifts by the other party (if there are any). TECHIIA holding employees and its member companies must be careful not to give or accept gifts or entertainment that violate another company's gift and entertainment policies intentionally.

Contractors relationships

We build relationships with contractors based on trust, mutual benefit, respect, objectivity, responsibility, and long-term cooperation. We faithfully perform our duties under the terms of agreements.

We are guided by the following principles when interacting with contractors:

1. We work with those partners who have an impeccable reputation and are not subject to sanctions.
2. We carry out a careful selection of partners.

3. We strive to resolve all misunderstandings that arise in the process of interaction through negotiations and the search for solutions that satisfy all parties.

4. We comply with intellectual property laws and use only those intellectual property objects that are independently created by the holding company or legally obtained.

5. We do not disclose information about business partners, which may lead to material or financial and reputational losses of the holding and/or its member companies and/or business partners unless the information is provided in accordance with the law..

In different territories, where the holding and its companies operate, there are different opportunities for the legalization of certain agreements or forms of interaction with contractors. Regardless of this form, the holding conducts such activities in accordance with the current legislation of the country in which territory such rules apply.

Relationships with public authorities

We build transparent, constructive, and honest relations with the authorities and local self-government. The holding applies the principles of legitimacy, honesty, partnership, mutual trust, and professionalism.

Therefore, the holding and its companies act as follows:

does not enter into an agreement with a company that is wholly or partly owned by a state servant, a member of parliament or their close relatives, without the prior consent of the Compliance Service;

avoids harsh statements and unfounded criticism of public authorities;

and provides information as laid down in the law at the request of public authorities in the amount and in the manner set by law, does not hide, does not delay, and does not distort the information.

Employees act as follows:

- inform the direct supervisor in advance if they plan to hold elected positions, and discuss the possible negative impact of the elected position on official duties;
- ensure that the information provided to public servants in connection with a request or investigation is accurate and precise and that the legitimate interests of the holding company and/or the company are protected.



Operations using confidential information

21

The employees are required to protect the confidential information of TECHIIA Holding and its member companies, as well as third parties, including customers. We do not disclose confidential information to anyone inside or outside the company unless we have a legal basis and authority to do so.

We adhere to the company's policy of protecting such information from theft or abuse by others. Confidential information includes all non-public information that may be useful to competitors, or the disclosure of which may harm our company or its customers and other third parties.

«The confidential information» means any information or data possessed by the Owner, whether obtained or developed by the Owner, but not open to the public other than by the Owner, and which the Recipient may obtain through any direct or indirect contact with the Owner. Regardless of whether the information is specifically defined as confidential or proprietary.

Confidential information must contain any information provided by the Owner regarding the business, technology, and information of the Owner and any third party possessed by the Owner. For example, digital code,

computer programs, cash flows, service providers, business partners, Owner management information, traffic sources and customer channels, business records and plans, trade secrets, technical data, product ideas, contracts, financial information, discounts, source code and/or object code, copyright and intellectual property, inventions, strategic alliances, partners, customer and customer lists. The nature of the information and the manner in which the information is disclosed is such that a reasonable person will understand as confidential.

Operations using confidential information

Examples of confidential information:

1. Holding and its member companies' financial data (except those published in official sources).
2. Trade secrets and know-how.
3. Acquisition and alienation opportunities.
4. Customer and supplier information.
5. Information on our employees.
6. Marketing plans.
7. Service/product program code.
8. Intellectual property objects.

The obligation to keep information confidential continues after the end of the employee's contract with the company for a period specified in the non-disclosure agreements.

Our employees also cannot disclose the confidential information of the previous employer to our company. In addition, we do not use illegal or unethical means (such as theft, espionage, or misinformation) to obtain confidential information about others.

We also respect and protect the intellectual property of our company and other companies. We do not infringe patents, copyrights, trademarks, and other forms of intellectual property and take appropriate measures to protect intellectual property.





Political affairs

We abide by all laws governing the participation of our holding company and its affiliates in political affairs, including those that determine whether and how we can fund political candidates and parties and seek opportunities to influence government action. Legislation in this area is complex and differs in various areas where our holding

and its companies operate. Employees should consult with the local Compliance Officer and Legal Department before using our company's resources to support a political candidate or party, or before directly or indirectly interacting with a government official on behalf of our company to influence government law or action.

International trade

Our holding operates worldwide, and we comply with applicable laws and regulations governing our operations in various countries, including how we import and export goods and services. We are also subject to laws and regulations that prohibit us from doing business in some countries or from individuals or organizations.

If the employee's responsibilities include the sale or transportation of goods, services, or technology between countries, even if it occurs between subsidiaries of our holding, employees should be aware of current legislation and company policy in this area, and contact the Legal Department if any.



5 Our commitments to company

26

The usage and protection of holding
resources and fraud prevention

31

Interaction with the company's
enterprises

27

Conflict of interest settlement

The usage and protection of holding resources and fraud prevention

All holding and its company's employees must protect the holding and its company's assets, prevent fraud and theft, and report them. Negligence and damage to property directly affect the profitability of our activities. The resources of the holding and its companies, including work time for the company, equipment, materials, resources, and official information should be used only for commercial purposes. When you leave a holding or any of its companies, you must return all his/her property.

The company considers the following actions to be fraud (but not limited to this list):

1. Receipt or provision by employees of illegal remuneration that affects the business decision of the employee or contractor.
2. Supply or acceptance of products/equipment with qualitative or quantitative characteristics that do not correspond to those specified in the documents.
3. Actions aimed at obtaining personal benefit during the claims work in collusion with the counterparty.
4. Presentation of forged payment documents.

Conflict of interest settlement

Conflicts of interest arise when an employee's personal interest may interfere with his or her ability to perform work objectively and effectively for the holding company. The employee is obliged to independently assess the conditions and actions that could potentially affect the objectivity of his activities. Our commitment is to conduct business honestly and ethically, which includes dealing with situations that conflict with interests or that give others the impression that there is conflict.

Employees are the most precious capital for the holding. At the same time, the holding considers it necessary to regulate the conflict situation between personal interests and functional responsibilities of the employee, as this threatens the company's reputation, may harm its legitimate interests, and adversely affect its activities.



Here is an indicative list of situations that may lead to a conflict of interest:

1. The second job, if it interferes with the performance of functional duties in the holding of the company that is part of it.
2. Providing consulting and other services to business partners or competitors of the holding or its member companies.
3. Ownership of an employee or a member of the employee's family by corporate rights in another company that is a competitor of the holding or its company.
4. The work of an employee or family member of an employee in a company that is a competitor of the company.
5. Hiring family members of an employee or other relatives under their direct authority.
6. Financial interests in companies that operate or seek to do business with the holding and its companies, including customers or suppliers, or financial interests of competitors. Employees should not allow their personal financial investments to influence independent judgment on behalf of the holding. This can take many forms, but conflicts are more likely to occur where there is an investment in a competitor, supplier, or customer, and decisions on behalf of the holding company may benefit the third party.
7. Entrust the business affairs of the holding or its companies to a supplier, agent, distributor, or contractor directly or indirectly owned by an employee, his family members, or close friends.
8. Corporate opportunities, i.e. personal advantage over business opportunities, which employees learned about through their work in our holding.

In the field of conflict of interest, employees adhere to the following basic principles:

1. To avoid situations and circumstances in which personal interests in the performance of functional duties may affect the objectivity of decision-making or acts/omissions in the interests of the holding or in any other way may lead to a conflict of interest;
2. To make decisions within the functional powers and only in the interests of the holding and/or the company that is part of it;
3. To refuse to use any assets, resources, information to which the employee has access in connection with the performance of functional duties for personal financial gain, as well as the benefit of other individuals or legal entities.

In order to prevent conflicts of interest, the holding and/or the company shall:

- Recruit family members of employees subject to selection on general and equal terms with other candidates;
- Establish a ban on the work of family members of employees in positions that may lead to a conflict of interest;
- Take appropriate measures to eliminate or minimize the impact of conflicts of interest.
- The holding's policy is also to limit employees in holding the managing position in non-affiliated, commercial organizations and to prohibit employees from holding senior positions in other companies if this could create a conflict of interest or interfere with the employee's performance of duties in the holding companies.
- If an employee believes that he or she has a conflict or if there is information about a possible conflict, he or she should immediately notify his or her supervisor or legal representative.

Interaction with the company's enterprises

The success of the TECHIIA international technological holding is ensured by the joint activities of the management company and its member companies. The company interacts with enterprises in accordance with the requirements of legislation, statutes, internal documents, as well as the principles provided by this Code and builds cooperation on the basis of openness, trust, teamwork.

In order to implement all the above, the TECHIIA holding:

- provides effective corporate management;
- helps to increase the efficiency and profitability of enterprises, their market attractiveness, and competitiveness;
- maintains the atmosphere of cooperation in the implementation of its management functions;
- promotes effective cooperation and interaction between enterprises;
- provides assistance in attracting highly qualified personnel and creating conditions for their successful work;
- develops the scientific, administrative, technological, and reputational potential of enterprises.



6 Our commitments to people and the environment

33
Equal opportunities
for all employees

34
Employees' confidentiality
and personal data

35
Human rights

36
Workplace safety

37
Health, labor, and safety

39
Environmental Protection

40
Sustainable development
policy

42
Innovation as a sustainable
development tool

43
Our commitments
to sustainable development

Equal opportunities for all employees

Our values include multiculturalism, partnerships, and openness to the new. How we treat each other affects our work. We all deserve a job where we are respected. Each employee is responsible for facilitating the creation of such an environment, and managers have a special responsibility for a work environment where honesty, adherence to business ethics, respect, and trust are maintained.

At our holding, we value, support, and respect diversity and partnership, as these are the key to our success as an international company. We provide equal opportunities to all employees regardless of:

- Gender
- Ethnic, social, and foreign origin
- Marital and property status, family responsibilities
- Accommodation
- Membership in a trade union or other association of citizens
- Citizenship
- Races
- Age
- Religious beliefs
- Political beliefs
- Sexual orientation
- Gender identity
- Suspicion or presence of HIV/AIDS
- Disabilities, or any other features protected by relevant laws. Offensive jokes, comments, images, gestures, or other actions that are contrary to our principles are not allowed.

Employees' confidentiality and personal data

34

We respect everyone's privacy. Our company collects and stores employees' personal information only related to their work in the holding. Also, the holding does not allow the dissemination of inaccurate information, distortion of facts, which may harm it and its partners.

Many countries monitor how companies collect, store, and use personal data that include individuals' names, addresses, and other information. Particular attention is paid to restricting access to personal information provided to company personnel when such information is required for lawful commercial use. The holding and each of its member companies protect their own information, the

information is used by employees solely for the performance of functional duties and may be disclosed or transferred to third parties only to the extent and in the manner prescribed by applicable law of the country where the request is made, and internal documents of the holding. The holding store employees' personal data in confidentiality, collection, and processing of personal data is carried out in compliance with the law.

Employees, responsible for the preservation of personal information and those who have been granted access to such information, should not disclose confidential information if it is contrary to applicable laws or policies of

the holding and/or its member companies. Every employee must know the current legislation of their country on this issue and comply with it.

Employees are prohibited from sharing inside information known to them that has not been properly and publicly disclosed to anyone, including relatives and friends, except as part of their job responsibilities. During the term of the cooperation agreement and a certain period after its expiration, which is specified in the cooperation agreement, employees are obliged to maintain the confidentiality of information about the company and its counterparties and take measures to prevent its unauthorized disclosure.

Human rights

Our holding strives to support and promote human rights in all communities where we operate. We oppose child and slave labor and we treat everyone with dignity and respect. We also encourage our contractors and suppliers to uphold and promote human rights. We prefer to work with those who share and actively support the values of our holding.

The holding treats employees with respect and provides them with equal opportunities for professional development, implementation of labor rights, development of professional and creative potential.

To ensure equal rights, the holding provides the following:

- provides decent compensation for work;
- provides recognition and rewarding of achievements in work;
- creates favorable and safe working conditions in each of the holding companies;
- introduces and evolves development and motivation systems of employees, assessment of their potential, realizes all opportunities for professional development, professional growth, effective work;

- cares about the health of employees within the programs implemented by the holding.

The holding and its member companies consider unacceptable threats or physical violence, sexual harassment, or any other harassment, abuse of employees in the performance of their duties, or in communication with colleagues or any other person, located on the premises or on the territory of the holding.

Any behavior that creates a threatening, hostile, or degrading atmosphere for an employee or other person present in the holding's territory or its companies is considered a violation of this Code and is can be considered as a ground for disciplinary action.

Workplace safety

The holding strives to preserve the health of our employees and ensure the safety of workplaces. We all share this responsibility.

Employees must be familiar with and adhere to all safety regulations, as well as notify their immediate supervisor and the security service of any dangerous working conditions,

or accidents at work. Threats of verbal or physical violence against another person or abuse of property of the holding or its member companies must also be reported.

It is forbidden to come to work or work under the influence of drugs or alcohol. No employee may bring a weapon to the workplace (except as provided by applicable law).



Health, labor, and safety

We are equally concerned about health care, and strive to ensure the safe performance of our employees. Therefore, we constantly monitor, identify, and assess the health risks associated with the activities of our holding, which may affect our employees, contractors, or society. We implement risk monitoring programs and measures, as well as preventive measures.

When recruiting, we make sure that the employee will be able to perform their duties according to the state of their health as well (in addition to having the appropriate skills), without undue risk to themselves or others.

We provide and/or make sure that our employees are provided with medical services necessary for the treatment of occupational diseases or injuries, as well as for emergency medical care in the workplace. We comply with all applicable laws and regulations and apply the relevant standards in cases where laws and regulations do not exist. We run health promotion programs to improve the well-being, productivity, and personal safety of our employees.



We undertake to:

1. Create a safe working environment that minimizes harmful working conditions.
2. Establish responsibilities and safety requirements at all levels of the organization.
3. Systematically manage security risks as part of a group risk management program.
4. Provide sufficient resources to successfully manage security risks.
5. Ensure the competence and ability of our employees and contractors to perform the work we commission them to do.
6. Ensure that our employees and contractors understand their responsibilities in the field of safety and familiarize them with the rules of conduct they must adhere to.
7. Investigate security incidents and take appropriate action.



Environmental Protection

The company is aware of its responsibility to present and future generations for the impact of our activities on the environment and for the possible impact caused by the activities of our companies that implement large-scale projects around the world. Therefore, in its activities, the holding seeks to implement environmentally sustainable and safe practices.

To implement this, the holding:

1. Adheres to the norms of national and international environmental legislation relating to its activities and applies the relevant standards in cases where proper regulation and legislation are not present.
2. Encourages each employee in all countries where the holding companies are present to respect and save the environment, as well as encourages personal participation in improving the impact of economic activity of the holding and its companies on the environment. We provide special training for employees.
3. We cooperate with public authorities and industry communities to most effectively promote the development of effective legislation on environmental protection or changes to it in order to take into account the risks, costs, and benefits in those areas that are relevant to the activities of the holding.
4. Provides a fast and effective response to all environmental incidents arising from our activities, including interaction with public authorities.
5. Carries out regular monitoring activities in view of compliance with environmental protection obligations.

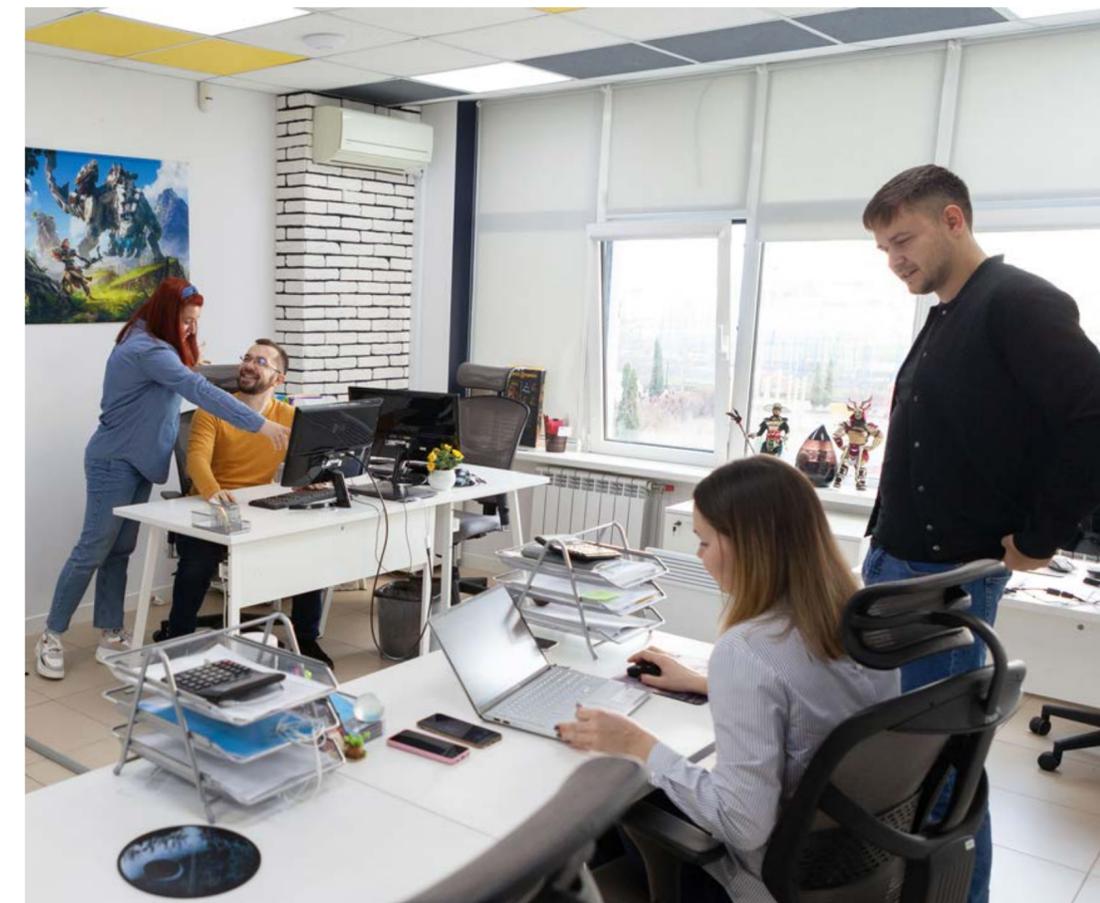
Employees of the holding and its member companies take an active part in the company's environmental projects. Employees are also informed of the need to immediately notify their direct supervisor of situations or conditions that may be potentially hazardous to the environment.

Sustainable development policy

Our corporate strategy and mission are in line with the principles of sustainable development. Implementing it in full, we strive to increase the profitability of our company, working for the public good. TECHIIA holding introduces high technologies and their usage for the benefit of mankind. We develop solutions that will be of great benefit to society now and in the future, will be safe both in production and in the application.

The principles of sustainable development are embedded in the holding's policies, plans, procedures, and processes. To ensure openness and transparency, we have introduced a regular informational provision to stakeholders and reporting

on the effectiveness of corporate social responsibility. We ensure effective interaction with stakeholders when special attention is paid to the communities and risk groups whose interests may be affected by the activities of the holding and its companies. We establish a dialogue between the communities and the holding, and this contributes to the establishment of open, transparent relations, which are a necessary condition for the further development of the region or regions. The holding allocates its own funds for social investments in the territories of its presence, as well as attracts funds from partners. Initiatives aimed at solving pressing problems contribute to a real improvement in the quality of life.



The principles of sustainable development are as follows:

1. Respect and support for human rights.
2. Identification and reduction of economic, environmental, social risks, and impacts.
3. Efficient use of resources, environmental protection, and diversity of life forms.
4. The maximum increase in profitability.
5. Development of strategic partnerships to strengthen the sustainable development of the territories of presence.
6. Open and honest interaction with stakeholders, taking into account their opinions and interests in the decision-making process of the company.
7. Providing sustainable benefits for employees, founders, contractors, business partners, and areas of presence.



Innovation as a sustainable development tool

TECHIIA holding strives to stand out from other companies in terms of innovation and quality, exploring new niches in the markets and providing unique products to new markets that use environmentally friendly innovative technologies.

In this regard, we adhere to the following commitments:

1. To apply the most innovative and effective technologies to develop products and services that meet the criteria of safety, quality and that can create value for current and future generations. Conduct periodic evaluation of their

products and processes, using comparative analysis, in order to continuously improve their activities.

2. To participate in projects, commercial initiatives, and campaigns aimed at promoting the development of an environmentally oriented economy and launching initiatives at the international level that combine innovation, economic value, and protection of natural capital.

3. To implement projects and initiatives aimed at the digitalization of areas of presence and increase their technological progress.

Для дотримання вищеповисаних принципів Політики In order to comply with the above principles of the TECHIIA holding Sustainable Development Policy, we conduct our business activities with maximum responsibility and efficiency.

We contribute to solving current and future social problems of the territories in which the holding's business companies are present, maintaining a balance between economic development, environmental protection, and social responsibility, as well as taking cultural diversity into account.

Our commitments to sustainable development

1. Always include the principles of sustainable development in business plans, procedures, and processes.
2. Always ensure compliance with the laws of the countries where we operate in the field of labor protection, health, environment, and social protection.
3. Provide stakeholders with full information and interact with them on the effectiveness of sustainable development and get their feedback.
4. On a regular basis to develop and implement programs of social investment and sustainable development related to the holding's strategy and strategies of individual business companies that are part of it.
5. Pay special attention to the development of strategic partnerships with external stakeholders to strengthen the positive impact on social development programs and their contribution to improving the welfare of the population in the areas of presence.
6. Adhere to the principles of the UN Global Compact and promote them.

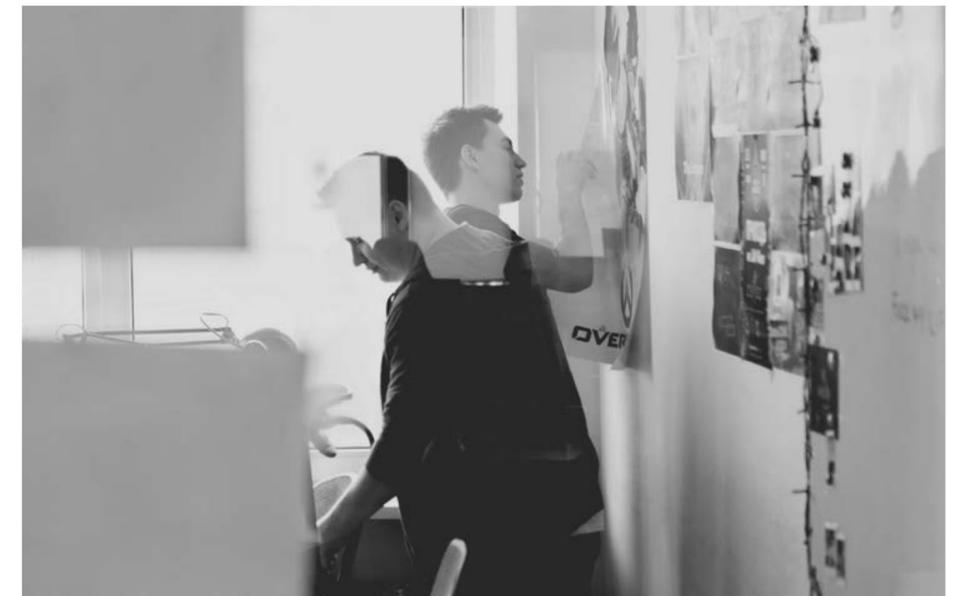


7 Our commitments to information security

Our commitments to information security

The main activity of the holding and its member companies is related to information management. Information is the most valuable asset of the holding. In terms of holding information security, we rely on the ISO 27001 international security standard, as well as standards, laws, and regulations in the field of information security in force in the territories where we operate.

We adhere to a set of rules and principles on information security, which are mandatory for all employees of the holding and its member companies, including interns, contractors, and partners.



Our commitments to information security

1. Non-stop usage information security measures.
2. Initiative search for sources of internal and external threats.
3. Prompt and adequate cessation of threats, localization, and minimization of their adverse effects.
4. Constant and comprehensive analysis of information systems to identify vulnerabilities of information assets of the holding and its member companies.
5. Timely identification of problems that could potentially affect the company's information security.
6. High qualification of personnel in the field of information security.
7. Development and implementation of protective measures adequate to the nature of the identified threats, taking into account the costs of their implementation and the compatibility of these measures with the current information technology process. At the same time, the measures taken to ensure information security should not complicate the achievement of the statutory goals of the holding and its member companies. And also, to increase the complexity of technological processes of information processing and to create additional difficulties for clients of the holding
8. Monitoring the effectiveness of protective measures taken.
9. Personalization and adequate distribution of roles and responsibilities between employees of the holding, based on the principle of personal and sole responsibility for the functions performed.

8 Who should I contact?

If an employee has an ethical dilemma, the first thing he should remember is that he should not be left alone with the dilemma. We encourage each employee to ask questions and seek help. We all have a duty to speak honestly and to report behavior that we believe is ille-

gal, dangerous, or unethical. Attention to problems protects both the holding and each of its member companies, as well as employees. There are several ways to seek help or express concern. The holding prohibits revenge on those who honestly ask questions or express concerns.

- Talk to your supervisor
- Contact the Compliance Officer
- Contact the Legal Department
- Write an email to hr@techiiia.com

9 Appendix 1. The Glossary

49

The holding is a group of companies with TECHIIA as the management company, which unites different legal entities, the ownership of which is owned by the same final beneficiaries. In the broadest sense of the word.

The company that is part of the holding is a company whose share belongs to and under control of the same beneficiaries, and which is part of the TECHIIA group of companies.

The employee is an individual who has entered into an employment contract/agreement or another civil contract with a holding company or a company that is a member of it, which provides for the personal performance of a certain function for a fee. Compliance with the terms of the Code also applies to the work of individual entrepreneurs who work for the company by contact.

Counterparty is the current or potential partner of the company (including customers, intermediaries and agents).

Family members of the employee are husband/wife, son/daughter, son-in-law/daughter-in-law, father/mother, a person under the guardianship or custody of the employee, guardian (trustee), brother/sister, other person living together or taken as living together with the Employee.

The gift is cash or other property, benefits, privileges, services, intangible assets provided/received by employees free of charge, or at a price below the minimum market in connection with the performance of their duties.

Business hospitality is the cost of social, corporate, sporting, cultural events, meals, accommodation, or entertainment for the purpose of establishing a business relationship or expressing gratitude in connection with the performance of their duties by employees.

