

# Corporate Ethics and Compliance Code





Dear colleagues,

The success of a company is the success of each of its employees. Thank you very much for your commitment to work, for upholding our reputation at the highest level in any situation.

We value the reverence of our employees to the company's image and, in turn, we take deep care of them. Business ethics is an integral part of the modern business community. Much of our success is owed to the values and principles on which we have built our company.

Our creed is honesty, fairness, and care about the well-being of others. I ask each of you to study this document with great attention. Remember that a company's image is shaped by the behavior and actions of its employees. I am sure that we will be able to preserve Noventiq's decades-long ethical heritage.

**Respectfully yours,**  
**Sergey Chernovolenko**  
**Global CEO**



Dear friends,

Customer trust in the company directly depends on its business reputation, which, in turn, is created by the actions of each employee. The writer Josh Billings had an apt saying: "A ruined reputation is like a broken vase – it can be glued, but always has a noticeable damaged area."

We take our image very seriously. An Ethics and Compliance Code is aimed to help employees harmonize their actions with the company's ethics, maintaining Noventiq's flawless reputation. Strict observance of norms and rules will allow us to build long-term relations with customers, suppliers, and other contractors.

The essential point to remember is that the overall success depends on our image, and the welfare of every corporate employee depends on our common success.

**Respectfully yours,**  
**Gareth Tipton**  
**Global CCO**

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## Why do we have an Ethics Code?

We help our customers develop their businesses through digital transformation based on advanced information technologies and cybersecurity tools. Noventiq is a trusted partner and a reliable solution and service provider all over the world.

The key to business success lies in trust between the company and its clients and employees. Noventiq's reputation is our main asset and competitive edge. Our common task is to uphold it every day with impeccable and ethical behavior.

It takes years to build trust and business reputation, and this long-standing effort can be derailed by unethical behavior in an instant.

The primary purpose of this document is to articulate Noventiq's values and reflect our unwavering commitment to business ethics and legal compliance.

The Corporate Ethics and Compliance Code is specifically designed to ensure that every employee of the Company and every business partner act in accordance with the values that have helped Noventiq achieve outstanding business results. Only unanimous endorsement of common values will allow us to develop and maintain our status as one of the most promising and successful IT companies.

## Does everyone have to comply with the Ethics and Compliance Code?

As members of the Noventiq team, we are all bound by the rules of this Code, regardless of our status or position. The Code shall apply to all business units of the Company, regardless of their function, geographic location, or other factors.

The business success depends on the actions of each employee, be it a shareholder, a member of the board, a top manager, a department head, a manager, or any other employee. The rules set out in this document assume that each of us must observe and respect the Company's rules and values.

Shareholders, board members, and top managers have a special role. They should serve as a model of impeccable behavior for the Company's employees, encourage ethical and prevent improper actions, and flawlessly represent the Company in external relations.

Any employee who violates the provisions of this Code must understand that they may be subject to disciplinary action up to dismissal.

Moreover, some of the Code's requirements overlap with legal requirements, so the company may make a claim against a dishonest employee for the losses incurred, and the competent authorities may impose administrative and criminal liability on such an employee.

It is crucial to remember that when we perform our duties, we act on behalf of the entire Company. As a result of our injudicious and unethical actions, authorities may impose penalties on Noventiq, initiate investigations, or file lawsuits against the company. Any form of unethical behavior may cause irreparable damage to the Company's business reputation and market capitalization.

The Code can be complemented by other, more detailed Noventiq policies and documents, but the Code shall prevail over them in any case.

## **We must:**

- Realize the principles set forth in this Code at all times and in all situations and demonstrate a continuing commitment to them.
- Comply with Noventiq policies and other internal documents that complement this Code, applicable laws, and standards.
- Follow the specific explanations from the Ethics and Compliance Department and common sense when facing issues not governed by the Code or applicable law.
- Report any violations of this Code and applicable law that have occurred or are likely to occur to the Compliance Service.

## **What to do in situations when the Code does not contain an answer or the case is not obvious?**

The world around us is a multifaceted, rapidly changing, and quickly evolving environment, so it is impossible to foresee all possible situations and ethical dilemmas. The main purpose of the Code is to help employees make decisions based on Noventiq values.

If you do not find an answer in this Code, or if you are unsure of the decision correctness, ask yourself a few questions before taking it:

- Is this action lawful?
- Is this action ethical?
- Would I like the media or close relatives to know about this?
- If I do this, will Noventiq's business reputation suffer?

If the answer to any of the questions is negative, give up your intentions!



### **Important!**

In the course of business, you may face situations where things are not so clear. In such a case, it is necessary to use your best judgment, act honestly and fairly, and do no harm to others.

Are you unsure? Ask your manager or compliance officer for advice: they are always willing to consult you.

We guarantee you protection against any kind of harassment if you act honestly, fairly, and without harm to others, even if it may negatively affect the corporate business.

## **Our ethical values**

### **1. Honesty**

- We always act according to our conscience.
- We DO NOT breach our commitments.

Noventiq is a responsible employer with a transparent and clear motivation system. We DO NOT deceive or mislead our business partners. We DO NOT provide contradictory or ambiguous information.

### **2. Fairness**

- We are free from prejudice.
- We are objective in our views, opinions, actions, and decisions.

We judge the actions and decisions of others based on objective data. We are responsible for ensuring that our actions and decisions do not obfuscate reality. We support equal opportunities and total non-discrimination.

### **3. Well-being of others**

- We strive to make the world a better place through digital transformation.
- We are responsible for our actions and decisions to the entire society.

We DO NOT do things that may be permitted by law but are unfair to others. We make decisions and act NOT only according to our interests; we also take into account the interests of others.

## **Important!**

Ethical behavior means honest and fair actions or decisions that do no harm to others.

# Corporate values

## 1. Leadership

- We strive to be No.1 in the key lines of our business.
- We bear responsibility for our promises and deeds.

We love what we do. We are curious, assertive, and we never stop developing. Our confidence is based on practical experience, and it enables us to take on firm commitments and bear the responsibility for the result.

## 2. Customer centricity

We listen to our customers and hear them, and we create business value for them. We are interested in understanding and solving the tasks of our customers.

We aim to build long-term trust-based relations with customers and always deliver on our promises. We offer a variety of options to find the most effective solution for every task. As a result, we can effectively collaborate in workgroups and improve together with our customers and partners.

## 3. The team is the core of our business

- Team success is everyone's success!
- We are one global team!

Our company adheres to the principle of trust-based and honest partnership with its employees. We appreciate the contribution of every employee, their professionalism and loyalty to the common cause. The members of the Noventiq team respect each other and also revere the culture and rules of each country of our presence. We help our employees to grow and develop. We facilitate learning not only by courses and standard programs but also by the support of experienced colleagues, an internal knowledge base, and the opportunity to participate in various projects, including international ones.



## 4. Innovations

- We know and anticipate market development trends.
- We focus on finding growth opportunities.
- We make substantial investments in and pay much attention to cutting-edge technologies and innovative projects.

We never stop tracking the latest trends and technologies, integrating the best approaches and solutions to our portfolio. We actively develop proprietary products and services.

Everything changes, and so we do. We are keen on learning and self-improvement. We take matters into our hands and shape the future with our customers and partners.

## 5. Responsible business

- We support the sustainable use of resources and a healthy lifestyle.
- We observe the legislation and business ethics.
- We respect the traditions of all countries.

We conduct our business in strict compliance with the laws of the countries of our presence and international regulations. The Company respects national traditions of different states, their cultural values, and adopted norms. We encourage sustainable use of resources, participate in charity campaigns, support sports initiatives, and programs promoting a healthy lifestyle.

## Non-discrimination

We praise diversity and individuality. We try to create an environment that offers equal opportunities for all. Our working atmosphere promotes mutual respect and protects personal dignity. Every employee has equal opportunities for career development. Unlawful discriminatory practices, including harassment, are strictly prohibited.

We DO NOT tolerate any discrimination on the basis of ethnicity or nationality, gender, religion, belief, age, disability, sexual orientation, color, political views, social origin, or other legally protected grounds.

Selection, recruitment, and further career development of our employees is based solely on their competencies and capabilities.

### Important!

We are free from prejudices and do not tolerate discriminatory actions.

# Zero tolerance to harassment and sexual misconduct

Sexual harassment constitutes discrimination and is illegal under the law. Sexual misconduct can include a number of barely noticeable and highly visible acts aimed at persons of the same or another gender.

## Depending on the circumstances, such behavior may include:

- unwanted sexual advances or requests for sexual intimacy;
- sexual offense, comments about the individual's body, sexuality, or sexual flaws, jokes about sex, and sexual insinuations;
- inappropriate smirks, whistles, or touches;
- offensive or indecent remarks or gestures;
- putting sexually suggestive objects or pictures in the workplace or distributing them;
- other physical, verbal, or visual acts of a sexual nature.

We live in a civilized society and do not tolerate actions that could be interpreted as sexual harassment.

## Conflict of interest

We respect the privacy of our employees. However, we need to prevent situations where personal interests contradict business interests. We find it unacceptable when decisions are based not only on business expediency but also on the reasons influenced by the personal interest of the Company's managers or employees.

Such reasons include the conflict of interest associated with the participation of Noventiq employees in the work of other organizations, as well as the impact of family relationships.

### **Important!**

Conflict of interest is a situation when activities and relationships interfere (or may be perceived to interfere) with your ability to act objectively and fairly.

### Important!

We DO NOT accept situations where personal relationships influence the objectivity and fairness of our decisions. We DO NOT conceal any existing or potential conflict of interest and honestly report about it.

## Working together with relatives

Your relatives are your spouse, parents, siblings, grandparents, children, grandchildren, parents of the spouse, or cohabiting partners. Relatives also include any member of your family who lives with you or is otherwise financially dependent on you.

However, when dealing with family members who are not included in the above list, please make sure that your relationship does not interfere with (and cannot be considered interfering with) your ability to act objectively and fairly.

Some of your friends may be an employee or shareholder of our customer or vendor. When working with such customers or vendors, make sure that your friendship does not impair your ability to act objectively and fairly and cannot be considered to affect your relationship with this vendor or customer.

We DO NOT approve the joint work of relatives directly or indirectly subordinated to (or being influenced by) one another, as this creates the following problems:

- Decisions made by superior relatives in relation to their subordinate relatives may be biased or perceived as biased by other employees of the Company and/or third parties, including shareholders, counterparties, the government and state authorities, trade unions, professional associations, or securities market participants.
- A similar situation may arise when relative employees collaborate on one business process, if the decision of one relative affects the performance of the job duties of another relative.

We limit the number of family members working together and have the right to send a refusal to any applicant for any position in the Company if they have family relations with the currently employed staff or can influence them. We do not accept nepotism in any form.

We DO NOT tolerate situations where a superior relative has a subordinate relative directly or indirectly subordinated to (or influenced by) the former. However, the joint work of relatives who are not directly or indirectly subordinate to (influencing) each other can be allowed subject to approval by top management of the Company.

## Entrepreneurial activity

According to our policy, our employees must openly declare their participation in other areas of business. We are interested in full employment and maximum involvement of our employees.

It is undesirable for our company to employ employees that have their own business, which may distract them from their duties. However, the Company's employees are allowed to participate in the capital of other organizations by holding shares and bonds. As an exception, it is possible for employees to participate in the authorized capital of organizations that generate revenue for the Company or offer it quality services at a price lower than the market price.

Employees are NOT RECOMMENDED to establish or manage organizations whose field of activity does not match with that of Noventiq.

Employees are PROHIBITED to establish or manage organizations whose field of activity matches with that of Noventiq.

## Human rights and the prohibition of forced and child labor

We respect the regulations on the protection of human rights and child rights. These are fundamental norms for us, and we observe them without any exceptions.

We reject all forms of forced or child labor, as well as contemporary slavery and human trafficking. This position applies not only to our company but also to our business partners.

Forced labor is any work or service that a person is forced to perform against their will under threat of punishment, or labor for which the person has not given voluntary consent.

When hiring an employee, we must comply with local regulations regarding the employment age and keep in mind the restrictions associated with the participation of minors in especially dangerous jobs and facilities. In addition, all levels of management and HR staff must ensure that the employee chooses our company of their own free will and may at any time resign from it in accordance with applicable law.

### Important!

Working for our company is allowed only by mutual agreement. We DO NOT hire employees who have not yet reached legal working age.

## Occupational health and safety

We take great care of the safety and health of our employees. We provide workplaces and offices that comply with all applicable health and safety requirements. The health and safety of our employees are a priority for our company.

We continuously improve and optimize labor conditions to reduce the number of occupational injuries, improve employee productivity, and make the workspaces more comfortable. We encourage and promote a healthy lifestyle, sports activities, and breaking bad habits.

### Important!

We work in a comfortable environment that ensures the safety and security of our health. We inform the employer about possible dangers and disadvantages of our office space.

## Protection of trade secret and intellectual property

Trade secret and intellectual property owned by the Company on any legal basis constitute one of its most important assets. We guard our trade secret and intellectual property heavily.

We create intellectual property every working day. Everything we do together, whether we have a patent or a trademark for it or not, is our intellectual property and trade secret.

## Information Systems

We use information systems within reasonable limits. If the user's actions may be related to Noventiq, our rules must be strictly observed both within and outside the Company's information systems, even with regard to personal data. For example, this means that we shall not use the Company's information systems to send or receive personal (and any other) information inconsistent with our Ethics and Compliance Code (or any other applicable policies) for any deliberately false, improper, or otherwise inadmissible purposes.

When we access the Company's information systems, we take the necessary precautions, including password protection and other authentication methods, to prevent unauthorized access to these systems.

We use software in full compliance with license agreements and perform the following actions only subject to prior consent by the Company:

- install any software on the Company-owned computer equipment;
- install Company-owned software on any computer equipment not owned by the Company;
- provide someone with copies of Company-owned or licensed software.

## Intellectual Property

The intellectual property rights of our Company are high-value assets that must be safeguarded by all employees. We also have great respect for other people's intellectual property rights. Intellectual property includes, but is not limited to, patents, trademarks, service marks, domain names, and copyrights including software copyrights, industrial property rights, database access rights, rights to know-how or other confidential information (sometimes referred to as "trade secret" or "proprietary information"), and rights under intellectual property agreements.

The results of the employees' work also constitute the property of the company. Their use for non-work-related purposes is only possible subject to prior approval from the Company's Security Department.

We DO NOT violate the applicable intellectual property rights when using the Company's systems. We do not allow illegal or unauthorized copying or distribution of content subject to intellectual property rights.

# Confidential Information

We define "confidential information" as follows: "Information shall be deemed confidential if it has personal nature (be it information about an employee or any other person); if it has commercial significance; if it has been provided on a confidential basis; if the unauthorized disclosure of this information could have negative consequences for Noventiq, its partners, and clients."

## Examples of information that we do not disclose:

- Personal files of employees and other personal data.
- Data constituting a trade secret.
- Identifiers and passwords of information system users; numbers of documents issued by social security authorities; contacts within the Company; banking and financial information; medical information and information on health status, disability status, or special needs; information on insurance and benefits received, as well as employee salaries.
- Information about Noventiq that has not been made publicly available or authorized to be disclosed, including, but not limited to, information regarding budget, financial matters, negotiations, tenders, and other data.
- Results of meetings or negotiations between two or more employees (clients, partners) concerning clients (or partners). Discussion of this information with people who do not work in Noventiq is possible only subject to prior consent of the client (partner) to the disclosure of this information. It is also prohibited to discuss that the above information with managers and other employees of the company, whose job duties or areas of responsibility are not related to this information.
- Information described as confidential under any other Noventiq policy, rule, or regulation.
- Other information and documents that the employee must not disclose according to their duties.

## The protection of confidential data involves the following measures in relation to the above information:

- Proper storage of materials, including confidential information, in a place with the access level required by the Company, established on a case-by-case basis.
- Compliance with internal rules for handling paper documents containing confidential information so as to avoid the risk of disclosure.
- Clean Desktop policy: in the event of an assumed prolonged absence from the workplace, the employee removes the documents from the desk. When an employee leaves the workplace, the computer is locked.
- Mandatory authorization at login to the information system.



- Using private folders with restricted access when storing and transferring confidential information.
- Compliance with internal rules when sending confidential information by e-mail, copying, sending faxes, etc.
- Attentiveness and personal responsibility of employees in any act of confidential information transfer, including verbal transfer.
- Creation of copies and duplicates of materials containing confidential information in case of force majeure circumstances when these materials may be affected.

### **Important!**

We DO NOT share information that has not been made publicly available with others. We carefully protect our intellectual property and trade secret.

We DO NOT use unverified or unofficial information.

## **Environment protection**

We set ourselves an ambitious goal—minimizing the negative impact of the Company's activities on the environment. This applies to both short- and long-term periods.

We select areas of activity, methods of work, and types of resources that have a minimal harmful impact on the environment. In addition, we help our customers and partners implement best practices and technologies that reduce resource consumption and the adverse impact of business on the environment.

### **Important!**

We are respectful to the environment. We use resources sustainably in the course of our activities.

## Right to speak up

We all want to work in a favorable environment, make honest and fair decisions, stay safe, and be confident in what we do. We adhere to high ethical standards and think not only about ourselves but also about the interests of others.

We want to maintain the established comfortable environment in the company, so if we encounter conduct that raises doubts about whether it is fair, honest and does not infringe on the interests of others, we will report it to our manager or the Compliance Service (Compliance@Noventiq.com).

If you believe that the conduct you witnessed violates this Code, you should also contact the Compliance Service (Compliance@Noventiq.com).

We must remember that timely reporting will allow the Company to pay attention to the situation and remedy it before a breach of the law occurs, the reputation of the Company is damaged, or other negative consequences occur. The Company undertakes a commitment to maintain your anonymity and to conduct a full and thorough investigation of the incident.

During internal investigations, employees are obliged to help the Company, answer questions quickly, honestly, and in as much detail as possible.

For each case of violation of the Code, the measure of liability is determined according to the nature of the violation and the presence of mitigating or aggravating circumstances.

We deeply appreciate the contribution of our employees who help to improve the atmosphere in the Company by timely reporting potential issues to be addressed. We protect such employees from any harassment. The fact that an employee has made an honest report or participated in an investigation cannot entail any negative consequences for their work, including dismissal, demotion, temporary suspension from office, loss of benefits, threats, harassment, or discrimination.

If one of our colleagues makes a report or provides the necessary information to the Company, we treat them with even greater respect as they have found the courage to point out the problem.

**If you encounter harassment, report it!**

### **Important!**

We speak up boldly and openly about problems to prevent negative consequences. By saying this, we help the Company to improve. The company guarantees your anonymity and protection from harassment.

# Anti-corruption practices

We firmly believe that bribery and corruption distort the market and hinder fair competition. We declare zero tolerance for all forms of corruption.

We will NOT attempt to influence decision-making by promising, offering, giving or transferring material or other values in any form or by any means (directly or indirectly) to a government official, an employee of any government agency, employees of state-owned companies or other persons who are in any way related to the government.

We DO NOT demand facilitation payments or resort to commercial bribery in the form of any material or other values.

We DO NOT misuse charitable donations to influence the customer's purchasing decisions.

We make business hospitality expenditures in strict compliance with applicable law, and such expenditures must be reasonable and aimed exclusively for business purposes.

We DO NOT make the above actions regardless of whether Noventiq's funds are used or whether bribes are given or offered directly or indirectly through third parties (such as agents, consultants, sales managers, distributors, resellers, and subcontractors).

## **For the purpose of this document, "public official" shall mean:**

- a public official;
- an elected official;
- an official or employee of a state authority and/or local government body, including educational institutions, healthcare institutions, military institutions, law enforcement and customs authorities, tax and migration services, organizations issuing state licenses, sanctions, permits, etc.;
- an official or employee of a company, enterprise, commercial organization, or structure that is wholly or partly owned by the State;
- an official or employee of international organizations such as the United Nations, the International Olympic Committee, the International Committee of the Red Cross and Red Crescent and others;
- a leader or activist of a political party;
- a candidate for any political office.

### **Important!**

The transfer of material or other values to children, spouses, or other close relatives of a public official is considered equivalent to the transfer of material or other values to the public official.

### **For the purpose of this document, "material or other values" shall mean:**

- money;
- gifts;
- entertainment expenses;
- employment offers (including offers for relatives of government officials);
- promises of future employment;
- providing discounts on products that are not available to ordinary customers;
- payment for transportation, accommodation, and hospitality expenses;
- personal services;
- political donations;
- donations to charity.

### **I have been asked to make an improper payment. What should I do?**

- Refuse to pay and explain that Noventiq does not make such payments, as this violates the provisions of applicable law and is prohibited by Noventiq's Corporate Ethics and Compliance Code.
- Explain that the rejection is ultimate.
- Never use non-verbal means of communication, including gestures, postures, and hints of implicit understanding; give no cause to suspect even the slightest suggestion of actions violating the company's Anti-Corruption Policy.
- When working with joint venture partners or Noventiq representatives, explain to them that they are not authorized to make payments on behalf of Noventiq and that the Company will be forced to terminate its relationship with them should such payments take place.

### Important!

We DO NOT promise, offer, give, present, or transfer, directly or through third parties, any material or other values (regardless of their source of funding) for the purpose of influencing decision-making to public officials, employees of any government agency, employees of a state-owned company, or other persons who are in any way related to the government.

We immediately report corruption cases that have learned about to the Compliance Service.

## Compliance with trade and export restrictions

We pay particular attention to trade restrictions imposed by the laws of the countries in whose jurisdictions our deals take place. We make special emphasis on compliance with applicable prohibitions and restrictions, in particular: observing special requirements when doing business with subjects of sanctions, as well as respecting direct prohibitions on any deals with subjects of sanctions.

We strictly follow the procedures for screening individual business partners for sanctions and export restrictions. We DO NOT provide inaccurate or incomplete information about deals falling under sanctions. In doubt, we consult with competent employees.

"Sanctions Legislation" shall mean any laws, regulations, and embargoes that govern economic, sectoral, financial, or trade sanctions imposed or applied by any source of sanctions.

"Source of Sanctions" shall mean the United States of America; the United Nations; the European Union (or the United Kingdom, Italy, Austria, Germany, and France); the Hong Kong Monetary Authority; the World Bank; the Swiss State Secretariat for Economic Affairs (SECO); relevant government agencies and institutions of the above countries and organizations, including OFAC, the US Department of State, the US Department of Commerce, and Her Majesty's Treasury; any other government, national, or supranational authority.

### **Sanctioned legal entity or individual:**

- Is a person that owns or controls, directly or indirectly (defined in accordance with Sanctions Legislation or application guidelines for such legislation) or a person from the list of individuals and legal entities (as amended and supplemented) published by the source of sanctions and currently in force;
- Is located within the sanctioned country, established under its law, or associated with the government of the sanctioned country or territory;
- Is the purpose or object of the Sanctions Legislation;
- Acts or attempts to act on behalf of any of the above entities.

## Resources to check:

US Specially Designated Nationals and Blocked Persons List (SDN):

<https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

US Sectoral Sanctions Identification List (SSI) (an up-to-date list can be found on the OFAC website):

<https://sanctionssearch.ofac.treas.gov>

List of areas subject to US sanctions:

<https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

US BIS Consolidated Screening List:

<https://legacy.export.gov/csl-search#>

EU Asset Freeze list (an up-to-date list of all parties subject to EU asset freeze sanctions can be found on the EEAS website:

[http://eeas.europa.eu/cfsp/sanctions/consollist/index\\_en.htm](http://eeas.europa.eu/cfsp/sanctions/consollist/index_en.htm)

List of EU sectoral sanctions:

<http://eurlex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32014R0833>

### **Important!**

We screen our business partners for sanction and export risks. We DO NOT enter into transactions whose terms violate applicable sanctions or export restrictions. We report any known violations of restrictions.

## Fair competition

We stand for free market competition. Free market competition is the driver of development and progress. We only compete on the basis of our real values. We act in strict compliance with antitrust regulations and use objective criteria to select our suppliers.

We DO NOT tolerate situations when we hire former public officials or their relatives for the purpose of establishing contact or getting preferences of any kind.

We use ONLY legal and ethical methods to gather information about our competitors.

We DO NOT enter into any collusions with our competitors regarding pricing policies, market sharing, or customer distribution.

We DO NOT set unreasonably high or unreasonably low prices.

We DO NOT negotiate with our customers prior to bidding procedures, always participate in them on a general basis, and DO NOT use confidential information to restrict competition.

We DO NOT encourage and DO NOT support the practices of enticing employees or customers of competing companies by non-market or non-ethical means.

### **Important!**

We DO NOT use illegal or unethical methods to gather information about our competitors. We DO NOT enter into various types of collusions or preliminary arrangements with our competitors and customers. We DO NOT use confidential information to gain an unfair advantage. We report cases of unfair competition that become known to us.

## Countering money laundering and terrorism financing

We take all possible measures to prevent deals and transactions that are directly or indirectly related to the laundering of proceeds of crime, as well as to exclude transactions related to the financing of terrorist activities.

We scrutinize our clients, business partners, and other parties we do business with. We only maintain business relations with partners doing business in full compliance with the requirements of applicable law and ethical standards and using only money of legitimate origin.



We know our business partners, and we make sure that all cash flows are transparent and open. All payments are at all times linked to the respective contracts and are made exclusively to bank accounts.

We have implemented a framework of anti-money laundering and anti-terrorism financing mechanisms that complies with applicable law and best practices, including FATF recommendations. The framework effectiveness is ensured by the due performance of the programs and procedures and by constant updating of their scope and content.

Analysis of the relevance and sufficiency of existing control methods and procedures is carried out by the Company on a continuous basis as new methods of money laundering emerge and spread, legislation changes, and international experience is disseminated.

### **Important!**

We scrutinize our business partners and know our clients. We closely monitor all payments, paying special attention to abnormal settlement methods and substantiating documents. We report suspicious transactions that have become known to us.

## **Privacy and personal data protection**

We pay special attention to the confidentiality and protection of personal data of our customers, business partners, employees, and other persons whose personal data we process. Personal data includes but is not limited to name, surname, patronymic, address of residence, driver's license number, passport number, telephone number, etc.

- We process personal data in accordance with the principles and rules prescribed by international regulations and local laws of the country of our presence in terms of personal data processing and protection.
- We DO NOT disclose or share personal data with third parties/countries without the consent of the data subject unless otherwise required by international regulations and local laws of the country of our presence in terms of personal data processing and protection.

- We will only process personal data subject to one of the following conditions:
  - the data subject has given consent to the processing of their personal data for one or more specific purposes;
  - data processing is necessary for the performance of the contract, the party to which is the personal data processing subject, or before the conclusion of such contract at the request of the personal data processing subject;
  - data processing is necessary to comply with the respective obligations of the person performing it;
  - data processing is necessary for the protection of fundamental interests of the data subject or other individual;
  - data processing is necessary for the performance of certain tasks and is carried out in the public interest or for the performance of the functions of the person performing it;
  - data processing is necessary to safeguard the legitimate interests of the person carrying it out or of a third party unless such interests contradict the interests of the data subject, for example, when the data subject is a child.
- We take all necessary measures to ensure that the data subject can exercise their legal rights.
- We take all necessary legal, organizational, and technical measures to protect personal data from illegal or accidental processing, including disclosure or other illegal activities.
- We only process personal information of data subjects if the processing purpose cannot be reasonably achieved by other means.

We process and store personal data of subjects in accordance with the requirements of applicable rules and for a term no longer than required according to the purpose of personal data processing. The personal data processing is organized both by automation means and in a non-automated manner.

We DO NOT process personal data of persons under the age of 16 without the permission and consent of their legal representative. If it is discovered that personal data of a person under the age of 16 are processed without due consent, this processing is immediately stopped and personal data are deleted.

We DO NOT request data relating to the subject's health. We ARE NOT entitled to receive and process personal data about a subject's political, religious, philosophical, or other beliefs or private life without written consent.

## Rights of the personal data subject

- The data subject may withdraw consent to the processing of their personal information at any time.
- Upon request, we will provide the information relating to the data subject in clear and written form within a maximum of twenty-five days from receipt of the relevant request.

- The data subject may request to update their personal information if it is inaccurate, incomplete, or obsolete.
- The data subject may request the deletion of their personal data.
- The data subject may request restricting the processing of personal information.
- The data subject may request that his personal data be moved, provided that their processing is based on the data subject's consent or the performance of the contract, and is carried out by automatic means.
- If the data subject objects to the processing of the data related to him, we must examine the reason for the objection as soon as possible (within fifteen days) and then notify the data subject of the decision in writing.
- The personal data subject has the right to claim compensation and damage recovery, should their rights be violated.
- The personal data subject may file a lawsuit in court for violation of their rights.
- If there are any problems related to the personal data processing terms, the data subject may also make a claim to the supervisory authority responsible for personal data protection.

### **Important!**

We take all necessary measures to protect the confidentiality of personal data we receive.

We DO NOT process personal data without the consent of the person whose personal data is to be processed. We report cases of unauthorized personal data processing that become known to us.

## **Counterparty integrity assessment**

We use a risk-based approach to perform comprehensive due diligence of our business partners. The depth and scope of the audit depend on potential risks and other factors. We only enter into a business relationship with our counterparties when the audit result is positive.

We perform a multi-stage comprehensive audit, which includes legal, financial, and security audits.

To avoid legal, financial and reputational risks, Noventiq Legal Department starts with assessing the history of court cases, registration documents, publications in the mass media, information on organizational changes and insolvency, etc. The second stage is financial audit: scrutiny of financial statements, state of settlements with the budget, level of financial stability, and other indicators. The Security Service checks the reputation

of both the legal entity itself and its top managers. It also checks the enforcement proceedings, criminal and administrative cases in which the counterparty is involved.

Based on the information obtained in the course of legal, financial, and reputational audits, the Compliance Department makes an opinion on the possibility of doing business with this partner. Due diligence provides reasonable assurance that our business partners share the values that guide the way we do business.

### **Important!**

We always perform a due diligence audit of business partners based on a risk-oriented approach. We DO NOT cooperate with business partners who have received an adverse opinion or who have not yet passed a due diligence audit.

## **Accuracy and completeness of financial statements**

We strictly observe the established accounting and reporting procedures, accurately reflect each transaction, and maintain an internal accounting control system. The requirement for fair and accurate transaction recording applies to all source documents, including invoices, receipts, and issue documents, not only to general ledgers. We post all transactions and related data in exactly the same manner as it is reflected in all documents.

Careful bookkeeping helps prevent the concealment of improper payments, distortion of financial results, and corporate fraud. We do not tolerate persons who achieve results through dishonest actions that violate proper accounting policies. We guarantee full support to any employee who refuses to participate in the distortion of financial statements.

### **Important!**

We DO NOT misinterpret and DO NOT conceal any data to be reported or recorded. We keep ONLY accurate financial statements based on official documents. We report instances of misstatement or inaccuracy of the information contained in the reports that become known to us.

# Corporate social responsibility

Our focus is long-term social responsibility and corporate volunteering projects that address the most acute social issues. The Company's priority in terms of external social responsibility projects is given to child protection, assistance to disabled children, and health promotion initiatives.

We actively participate in charity campaigns to support the most socially vulnerable citizens.

We participate in projects and programs to find and attract talented young specialists to the Company.

We promote a healthy lifestyle among our employees.

We provide additional aid to those employees who find themselves in difficult situations.

We always recognize the merits of our employees, provide them with professional growth and career development opportunities, and build an inclusive environment.

## **Important!**

We actively contribute to the life of society, take part in various charity events, and engage in corporate volunteering projects. We foster and develop young talents, taking deep care of the health and comfort of our employees.