

## CODE OF ETHICS

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## INTRODUCTION

The Code of Ethics of Private Joint-Stock Company "DATAGROUP" (hereinafter referred to as DATAGROUP) is based on the values of DATAGROUP. The greatest value for DATAGROUP is its employees who adhere to the basic, defined principles, namely: efficiency, responsibility, customer-oriented approach, constructive interaction and professionalism.

DATAGROUP cultivates and rewards initiative, dedication and hard work. Politeness, good communication and employment relations at all levels and in all divisions of DATAGROUP are the key to success.

DATAGROUP team works according to corporate values and measures its success by the success of customers and partners with whom it cooperates.

This Code of Ethics aims at ensuring the work and activities of all employees, managers and administrative staff of DATAGROUP in compliance with these values and principles. The Code of Ethics is created to provide a clear understanding of the expected behaviour of all employees in all areas of DATAGROUP activity. The Code of Ethics defines ethical standards of professional conduct and responsibility, which should become a model guide for all employees of DATAGROUP in their relations with business partners, customers, colleagues.

Each employee of DATAGROUP shall adhere to this Code of Ethics and ensure its observance by others by disseminating and promoting the corporate ethics, which is the foundation of reputation of DATAGROUP.

## OUR PRINCIPLES

The Code of Ethics (hereinafter referred to as the Code) is the basis that shall be followed when making decisions.

The Code consists of categories that contain basic principles, such as:

- Reliability and convenience;
- Customer-oriented approach and relevance;
- Effectiveness;
- Responsibility;
- Constructive interaction;
- Professionalism.

### Reliability and convenience

The daily activities of DATAGROUP are built on the continuous provision of services and ensuring the highest quality of interaction with customers and partners. DATAGROUP is a technology company, so it guarantees reliable and high-quality operation of all products and services offered to customers and partners, as well as prompt and complete solution of possible problems.

Our customers have the most convenient channels of interaction and communication, as well as a transparent and clear feedback system.

Our customers are secured against surprises.

### Customer-oriented approach and relevance

Each DATAGROUP customer is special. Identifying his/her needs, DATAGROUP offers optimal solutions and opportunities providing ease of choice and timeliness in providing relevant services, products, solutions that meet the interests and wishes of each customer. That is, DATAGROUP employees apply an individual approach to the customer and make him/her feel special. They also follow the rule: "Your team is the most important customers", which means nothing more than respect for each employee, interest in his/her work within the team. Respect is the basic principle on which relations within DATAGROUP team and work with customers and partners are built.

### Effectiveness

DATAGROUP achieves the best results by planning clearly its activities and using resources properly.

That is, employees in their activities offer solutions only after assessing their impact on the result over the long term, plan and prioritize, analyse the progress of the plan on a daily basis, seek a non-standard approach to solve problems. Time is also valued as the most valuable resource that is used most efficiently.

DATAGROUP is responsible not only for the results, but also for the choice of the way in which they are achieved.

### Responsibility

DATAGROUP is collectively responsible for any actions taken by the team.

Every action and decision have consequences. DATAGROUP is responsible for them to customers, colleagues, company and partners. The responsibility of DATAGROUP is to conduct business according to the strictest professional and ethical standards and accepted norms, closing the door on misconduct.

Responsibility of DATAGROUP is not in words, but in actions.

### Constructive interaction

DATAGROUP interacts through a constructive dialogue, focusing on a common goal to achieve the result. It is understood that every employee of DATAGROUP shows respect for others, regardless of

status and beliefs, they focus on a common goal in any situation, explain in layman's terms and talk simply about the difficult things.

Establishing constructive interaction between different departments and teams is one of the focuses and priorities of DATAGROUP.

### **Professionalism**

Constantly developing and learning new things, we gain practical experience and deep knowledge, which we want to share.

DATAGROUP helps its employees to develop and grow, both personally and professionally. DATAGROUP rewards professionalism and strives for creating optimal conditions necessary for employees to perform their duties at the highest level. Continuous training and development help employees to become experts, which makes DATAGROUP an expert in providing telecommunications services, accordingly.

## **GENERAL PART**

### **Human rights**

DATAGROUP respects cultural differences and prevent discrimination against any employee by his/her race, colour, nationality, religion, gender, age, sexual orientation, disability, etc.

The working hours of employees should not exceed the time established by the relevant regulations. Overtime should be voluntary and paid.

DATAGROUP exclude situations in which the honour, dignity and business reputation of employees would be degraded.

### **Gender equality**

DATAGROUP supports absolutely gender equality – equal legal status of women and men and equal opportunities for its implementation, which allows individuals of both sexes to participate equally in all spheres of society.

DATAGROUP creates conditions that would allow women and men to work on an equal basis; provides women and men with the opportunity to combine work with family obligations; provides equal pay for women and men with equal qualifications and working conditions; takes measures to create safe working and living conditions, as well as to prevent and protect against sexual harassment and other forms of gender-based violence.

DATAGROUP should adhere to the principle of equal pay for men and women with equal qualifications and equal working conditions, as well as provides equal opportunities for professional development: access to education, trainings, professional development for all employees (men and women).

### **Right to respect for private life**

Every DATAGROUP employee has the right to respect for his/her family and personal life. All employees, customers, partners with whom DATAGROUP has business relations have the right to privacy.

DATAGROUP and its employees should adhere to all rules of conduct with business partners, suppliers and colleagues, as well as respect their personal integrity and private life.

### **Prohibition of child labour**

DATAGROUP definitely prohibits and condemns child labour – it is primarily a labour that deprives children of their childhood, their potential and their dignity, and harms their physical and mental development. According to the standards of the International Labour Organization (hereinafter referred to as the "ILO"), DATAGROUP defines child labour as:

- Work that is mentally, physically, socially or morally dangerous and harmful;
- Work that does not take into account compulsory schooling;
- Work that prevents children from attending school;
- Work that requires children to leave school early;
- Work that requires children to combine school attendance with long and hard work.

DATAGROUP sets age limits to prevent the employment of children – work cannot be performed by persons under the age of 18 years.

### **Conflict of interest**

A potential conflict of interest is when a person has a private interest in the area in which he/she exercises his/her official or representative powers, which may affect the objectivity or impartiality of his/her decisions, or the commission or omission when exercising such powers.

At the same time, the private interest means any property or non-property interest of a person, including due to personal, family, friendly or other out-of-office relations with individuals or legal entities.

DATAGROUP employees should avoid situations that could lead to a conflict of interest between DATAGROUP and a certain employee. Under no circumstances should employees seek their own benefit by using their position, property or information obtained while working for DATAGROUP.

If there is a conflict of interest, the employee cannot make the decision, but should consult with his/her manager and obtain prior consent.

### **Gifts and signs of hospitality**

DATAGROUP aims for meeting the highest standards of honesty and responsibility in its activities. This includes proper conduct in respect of gifts, hospitality, entertainment, which may be treated as a bribe (commercial bribery) if they are offered or obtained with unlawful intent, that is for obtaining illegally the right to conduct/continue business or the right to control business activities or providing other illegal advantages in economic activities.

DATAGROUP recognizes that gifts, hospitality and entertainment, if they do not pass all reasons, correspond to the level of economic (commercial) activities and are legally offered, are an important part of standard business practice, for example, to comply with the common decencies or to create reputation, in particular, in connection with special events or for strengthening business relations. Under no circumstances should gifts, hospitality or entertainment influence the appropriate business decisions or be perceived as an attempt to do so.

### **Corruption, bribery and money laundering**

DATAGROUP complies with all current anti-corruption regulations of Ukraine, in particular, it is prohibited to try to gain an undue preference by promising, offering or providing values to any public official, business partner or any third party, or to participate in any other form of corruption, extortion, embezzlement or fraud aiming at gaining benefits dishonestly or otherwise affect the result of commercial relations.

### **Transparent business**

DATAGROUP operates based on the principles of transparency and openness, adhering to the law and ethical rules on non-disclosure of confidential information.

### **Confidentiality of information**

"Confidential information" means any financial, commercial or technical information which may be disclosed and which may be reproduced both in writing and orally, or in the form of samples, models or otherwise.

DATAGROUP adheres to a clear regime of confidential information.

## **FINAL PROVISIONS**

Revision, amendments to the Code are made as and when necessary.

The values and principles that DATAGROUP seeks to establish through this Code will be communicated to DATAGROUP employees to ensure that the content of the Code is understood and maintained, as well as to provide the necessary tools to understand and apply ethical principles in certain day-to-day activities.

DATAGROUP employees may be subject to disciplinary measures or other types of liability according to provisions of the current legislation and/or internal regulations of DATAGROUP for violation of the principles and norms of ethics set forth herein.

DATAGROUP is responsible for adhering to these principles in our corporate environment, including when working with our partners and customers.