

## **ADDWISE CLEINTS & SUPPLIERS CODE OF CONDUCT**

Addwise (“Company” or “we”) is committed to the highest standards of ethics, integrity and compliance in the business that we conduct, as well as the integration of environmental performance, social responsibility and governance practices.

Our Values – Ensure High professional standards, Focus on Results, We are one team, Respect and value each individual, Act with Integrity & Ethics –are what guide us.

These Values set the standards for how we interact with our business partners, our employees and our communities.

They are outlined in the Addwise Code of Ethics, which Clients & Suppliers (“Partners”) are encouraged to read.

The Addwise Code of Ethics uses our Values as the backbone of our expectations for our relationships with clients & suppliers.

This Code of Conduct (“The Code”) sets out those principles and core values. We expect our Clients & Suppliers to uphold the standards and expectations set forth in this Code within their own business operations. Equally important to applying the Code of Conduct at their own workplace is for our Partners to cascade it down through their own contractors or vendors that interact with Addwise and impact our mutual activities.

### **Compliance with Laws and Regulations**

Comply with all applicable legislative and regulatory requirements in the provision of services & goods in the countries that they operate in, including but not limited to laws on discrimination and human rights, privacy and personal information rights, and fair competition and antitrust laws. Where local laws or standards differ from this Code, we expect our Partners to comply with the more stringent standards and principles.

## Maintain Accurate Records

Honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Create, retain, and dispose of business records in full compliance with all applicable legal, regulatory and contractual requirements.

## Trading Restrictions

Partners may not use material non-public information relating to the Company obtained in the course of business dealings with the Company as a basis for trading or enabling others to trade.

## Conflicts of Interest

**In order to be a trusted advisor to our clients, we must act in a trustworthy manner.** That means avoiding conflicts of interests, or even the appearance of a conflict. A conflict of interest arises when our interests, relationships or activities may be inconsistent with our values and responsibilities to our clients. They may be personal in nature or they may relate to other relationships with individuals or businesses.

We seek to ensure that our interests and those of our families do not improperly or unduly influence decisions we make or advice we provide to our clients. In any situation where our personal interests or our loyalties to friends or family could even appear to influence our decisions, we must disclose those interests and seek guidance before taking action, and inform our clients so they can do the same. Even the appearance of a conflict of interest could put our reputation and business relationships at risk.

We never put the interests of one client before the interests of another or engage in projects with multiple clients which could create an actual or apparent conflict of interest. We also do not use the information or opportunities we discover as part of our work for personal gain.

Above all, we rely on our good judgment and common sense to lead us. If a business relationship might involve even a perceived potential conflict of interest, consult the Legal Department for advice on how to proceed.

Our Partners should avoid any engagement with the Company's employees that may conflict, or appear to conflict, with the Partner's personal or business relations and interests.

## Protect Client & Partner Information

We protect client information under our care from unauthorized access and misuse. We can only serve as a trusted advisor to clients when we are able to clearly demonstrate our conscientious handling of confidential information consistent with our values and the expectations of our clients who trust us with their information.

We carefully manage and protect our robust intellectual assets and personal information, on which our business thrives. Our confidential information, intellectual property and innovative ideas constitute our collective expertise, which we leverage on behalf of our clients. Our expertise is our greatest asset and gives us our competitive advantage, so acquiring, creating, storing and protecting our intellectual property and personal information from misuse are urgent responsibilities for all of us at Addwise.

We are also mindful of our involvement in sensitive business relationships between employers and employees and that this is a position of privilege. We explain our role on behalf of our clients and ensure that even our smallest interactions are carefully considered and respectful. We are conscious of our clients' employer brand and strive for our work on their behalf to enhance perceptions of that brand in the eyes of existing and prospective employees.

So, we expect the same in return from our Partners

## Intellectual Property Rights

Recognize and respect the Company's and other owners' intellectual property rights in their trademarks, copyright, design and patents.

## Anti-corruption, Anti-Money Laundering, Counter-Terrorist Financing and Anti-Bribery

- Comply with all applicable anti-corruption, anti-money laundering, counter-terrorist financing and anti-bribery legislation and regulations in the provision of the goods and/or services.
- Have in place policies and procedures to ensure that all relevant individuals associated with the Company and the Partners will
  - i) avoid all forms of bribery, corrupt or fraudulent practices, and
  - ii) not contravene such legislation and regulations.

## **Sanctions, Export and Trade Control**

- Comply with applicable trade control regulations and sanctions related requirements.
- Promptly inform Company if any products or technologies that Supplier provides are subject to export control restrictions.

## **Supplier Diversity**

Addwise believes an ethical, diverse supply chain is a vital part of our business. We expect Partners to work cooperatively with diverse suppliers and to develop and utilize diverse suppliers of their own while performing work on our behalf. Each Partners must meet the following diversity requirements:

- comply with any applicable law and regulation targeted towards suppliers to governmental entities;
- use reasonable efforts to engage various diversity business, incl. small businesses.

Report to Addwise on a regular basis the amount of spend with qualified diverse companies that can be contributed as part of purchases made by Addwise.

## **Gifts and Entertainment**

- **We do not offer or accept inappropriate gifts to secure advantages or influence business decisions.** We believe our business will prosper in the long term when our success is based solely on the merits of our professionals, our services and the satisfaction of our clients. We do not allow gifts to compromise our ability to make objective business decisions. In addition, if we are involved in vendor selection or procurement, we remain impartial and avoid accepting any gifts and business courtesies that could create even the appearance of an improper inducement.

We understand that complex rules apply to the giving of gifts and other business courtesies to government officials. Before considering the offer of gifts to government representatives, we require all employees to seek advice and approval from the Legal Department.

- Partners must use good judgment when exchanging business courtesies, and never give anything to gain an improper business advantage.
- Gifts and entertainment perks given to Addwise employees, if permitted at all, should be modest and infrequent.

## **Confidentiality, Data Privacy and Security**

- Comply with all applicable privacy and data protection laws and contractual requirements in respect of the confidential or proprietary information and personal data obtained from the Company in the provision of goods/services (in particular, the collection, storage, processing and transmission of such information).
- Protect such data and information from theft, fraud, improper access and disclosure, and misuse. In the event of any unauthorized access or disclosure, the Partner shall promptly notify the Company.

## **Protection of Identity and Non-Retaliation**

Have in place mechanisms by which employees can anonymously and confidentially report workplace grievances and/or alleged improper conducts without fear of retaliation.

## **Protection of the Environment**

The Company & Partners must comply with all environmental laws and regulations where our business is conducted. All sides are also expected to look to conserve resources and protect the communities and environment that surround them. All sides are encouraged to minimize the use of non-renewable resources, reduce and recycle waste, and minimize the environmental impact of their operations where possible. All sides sourcing products should present environmentally preferable options and ensure that materials are disposed of in an environmentally responsible manner.

All sides are expected to establish targets and be transparent in their progress toward those environmental goals. Measures and progress should include measuring, reporting and reducing their carbon emissions, transport footprints, the use of materials and resources, water use, wastes, and other emissions.



All sides shall report any violations or suspected violations of applicable laws, regulations and this Code to the Company by contacting us at [addwise@addwise.ru](mailto:addwise@addwise.ru) for more information. The Company, or an appointed third party, has the right to assess and monitor compliance with this Code by requesting the provision of relevant information and documentation for such audit purposes. Addwise will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Code of Conduct. This Code may be updated from time to time.