

TRADINTEK PJSC BUSINESS ETHICS ASSURANCE INSTRUCTIONS AND PROCEDURES

Personal commitment of TRADINTEK PJSC employee

ALL EMPLOYEES will be asked to confirm that they are informed that each TRADINTEK PJSC employee must follow the PRINCIPLES OF THE FAIRNESS POLICY OF TRADINTEK PJSC and express concern about possible violations of the law or policy to the TRADINTEK PJSC business ethics assurance manager or the company's management.

Who has to follow the fairness policy of TRADINTEK PJSC?

1. All employees of TRADINTEK PJSC.
2. SUBSIDIARIES AND CONTROLLED RELATED ENTITIES, COMPANIES IN WHICH TRADINTEK PJSC owns a share of equity and has voting rights or has the right to control the company, must approve and follow the PRINCIPLES OF TRADINTEK PJSC FAIRNESS POLICY.
3. THIRD PARTIES: TRADINTEK PJSC PROXIES, SALES AGENTS, AND REPRESENTATIVES.

TRADINTEK PJSC must:

- Require these parties to undertake to comply with all relevant aspects of business ethics assurance policy of TRADINTEK PJSC.
- Provide training and information on policy requirements to these parties.
- Take action (even such as termination of the agreement) if they become aware that a third party has violated the PRINCIPLES OF FAIRNESS AND BUSINESS ETHICS POLICY OF TRADINTEK PJSC.

What must be done by TRADINTEK PJSC employees?

All employees must foster the culture of ensuring the business ethics of TRADINTEK PJSC and understand the FAIRNESS PRINCIPLES OF TRADINTEK PJSC, as well as react in such a way as to ensure compliance and avoid violations.

The employee has the

following obligations:

UNDERSTAND THE POLICY

- Gain a general understanding of the policy requirements, the summary of which is included in this brochure.
- Familiarize oneself thoroughly with the policy related to your work.
- Contact your manager, business ethics assurance manager, or company management if you have questions about the policy.

EXPRESS CONCERNS

- Immediately express any concerns about possible violations of the policy of TRADINTEK PJSC.
- Understand the different channels through which any concerns can be raised: Your manager, business ethics assurance manager, and company management.
- Cooperate with TRADINTEK PJSC when conducting investigation related to issues of fairness.

What must the MANAGERS do?

The manager must:

Create a culture of business ethics where employees understand their obligations and feel good about expressing concerns without fear of retaliation;

Encourage ethical conduct and compliance with the law and lead personally in efforts to ensure compliance;

Take into account efforts to ensure the principles of business ethics when evaluating employees and rewarding them;

ensure that employees understand that business results will never be more important than ethical behaviour and compliance with the policy of TRADINTEK PJSC.

In addition, managers must take steps to create an infrastructure that prevents occurrence, identifies, and responds to business ethics issues:

PREVENTION OF BUSINESS ETHICS ISSUES

- Identify business ethics risks.
- Ensure that employees are informed about the processes that control specific risk areas and the implementation of these processes.
- Organize trainings on the fairness policy of TRADINTEK PJSC and laws applicable to employees and (when necessary) third parties.
- Allocate adequate resources to the business ethics assurance program.

IDENTIFY BUSINESS ETHICS ISSUES

- Implement control measures, such as management systems and scoreboards, to identify increased compliance risks and/or breaches.
- Promote an efficient reporting system.
- Ensure periodic reviews that are conducted with the assistance of the Business Ethics Assurance Manager.

RESPOND TO BUSINESS ETHICS ISSUES

- Take immediate corrective action and correct identified deficiencies of business ethics.
- Employ appropriate disciplinary measures.

Employees of Tradintek PJSC must express concerns

Expression of concerns ensures the protection of the TRADINTEK PJSC community: our company, colleagues, and other stakeholders.

If you have any concerns regarding the compliance with the policy of TRADINTEK PJSC, you must report it.

RAISE CONCERNS EARLY

The longer you wait until you raise concerns, the worse it gets.

YOU MAY REMAIN ANONYMOUS

However, if you provide your identity, we will be able to continue the proceedings with you and provide feedback.

CONFIDENTIALITY IS ENSURED

Your identity and the information provided will only be disclosed to those responsible for addressing the relevant concern on a need-to-know basis.

RETALIATION VIOLATES BUSINESS ETHICS POLICY OF TRADINTEK PJSC

TRADINTEK PJSC categorically prohibits retaliation against any person who has raised or helped to resolve a fairness concern. Retaliation is the basis for disciplinary sanctions, the most severe of which may be dismissal.

you can express your concern orally or in writing. If you want, you can do it anonymously.

How to express a concern?

TRADINTEK PJSC offers several channels to express concerns. Use the channel that works best for you.

IN YOUR COMPANY

Your boss or manager is usually best placed to quickly resolve your concern. However, the primary manager is not the only option. Other options are:

- Head of Business Ethics Assurance,
- company management.

Discuss, ask questions, and get answers. If your concern is not addressed, voice it using other channels.

What happens when a concern about fairness and business ethics is raised?

Compliance with the principles of the fairness policy of TRADINTEK PJSC will be investigated. Stages of TRADINTEK PJSC investigation process:

1. AN INVESTIGATION WORKING GROUP IS FORMED

Objective professionals with the necessary knowledge are appointed to carry out the investigation.

2. INVESTIGATION IS CARRIED OUT

The working group establishes the facts through interviews and/or review of documents.

3. CORRECTIVE ACTIONS

If necessary, the working group recommends corrective action to be taken by the relevant managers.

4. FEEDBACK

The person who raises the concern receives feedback about results.

Sanctions for violations

Employees and managers, who violate the principles of TRADINTEK PJSC fairness policy are subject to disciplinary sanctions, the most severe of which is the termination of the employment contract. Misconduct that may be subject to disciplinary sanctions may include:

- Violation of the policy of TRADINTEK PJSC.
- Request that others would violate the policy of TRADINTEK PJSC.
- Delay in reporting of known or suspected violation of the policy of TRADINTEK PJSC.
- Refusal to cooperate with TRADINTEK PJSC in investigations related to possible policy violations.
- Retaliation against another employee for expressed fairness concern.
- Lack of leadership and diligence ensuring compliance with the principles of fairness policy of TRADINTEK PJSC and the law.

Tradintek PJSC categorically prohibits retaliation

TRADINTEK PJSC 20.4 policy explanations Unfounded payments

Unfounded payment in order to gain an advantage in any situation will never be accepted, and TRADINTEK PJSC and you may be prosecuted for it. TRADINTEK PJSC clearly prohibits unfounded payments in all business transactions, in all countries of the world, in the public and private sectors.

Unfounded payments should not be confused with reasonable and limited costs for gifts, business entertainment, and customer travel, and living expenses directly related to the promotion of products or services or the performance of the agreement. These payments are acceptable if certain TRADINTEK PJSC and business guidelines are followed.

OBLIGATIONS:

BEFORE GIVING A GIFT, arranging entertainment for the customer,

or when reimbursing the customer's travel expenses, make sure you understand the applicable legal requirements, the customer's own rules, and general and business guidelines of TRADINTEK PJSC.

MAKE SURE THESE COSTS exactly match the true nature of the transaction.

NEVER OFFER A BUSINESS INCENTIVE, such as a gift, contribution, or entertainment, where it may give the impression that this is improper.

NEVER GIVE, OFFER, PAY, OR ALLOW anything of value (such as money, goods, or services) to a government official or customer's employee in order to gain or maintain an improper advantage.

NEVER GIVE A MONETARY GIFT or any other payment to government officials or employees to expedite normal administrative procedures without disclosing this in detail to the COMPANY'S MANAGEMENT and/or the Business Ethics Manager. Some national laws that prohibit bribery also provide for an exception for "public service bribes", which expedite the administrative procedures to which a person is already entitled. These payments are often illegal under anti-corruption laws, and TRADINTEK PJSC strictly prohibits them.

NEVER ALLOCATE COMPANY FUNDS or other company assets for political purposes.

DEMAND THAT ANY PERSON OR COMPANY REPRESENTING TRADINTEK PJSC (such as consultant, agent, sales representative, distributor, or contractor) comply with this policy and related laws.

WHAT TO WATCH OUT FOR

GENERAL INFORMATION on current or potential third party representatives, mentioning:

- Allegations of unfair business practices.
- Reputation of bribery.
- Familial or other relationships that may have undue influence on the customer's decision or government official.

ANY REQUIREMENT to pay a commission before announcing the decision on the winner of the tender.

ANY OFFER to assist TRADINTEK PJSC BUSINESS through a specific representative due to "special relationships". ANY REQUEST to make a payment in a country unrelated to the transaction or to an unrelated person.

Relations with suppliers

TRADINTEK PJSC relations with suppliers are based on legal, efficient, and fair practice. We expect our suppliers to comply with laws that require them to treat employees fairly, provide a safe and healthy work environment, and protect the environment.

Adherence to the guidelines of TRADINTEK PJSC helps to ensure that maintaining the relationship with our suppliers will not damage the reputation of TRADINTEK PJSC.

OBLIGATIONS:

COMPLY WITH ALL APPLICABLE LAWS and government resolutions governing relations with suppliers.

DO BUSINESS only with suppliers who comply with local and other applicable legal requirements and INTERNATIONAL guidelines relating to work, environment, health and safety.

FOLLOW GOVERNMENT RESOLUTIONS ON PROCUREMENT when purchasing materials and services for the performance of public agreements.

PROVIDE A COMPETITIVE OPPORTUNITY for suppliers, including small businesses and companies owned by persons with disabilities, minorities, women and the disabled, to earn a share of TRADINTEK PJSC procurement volume.

PROTECT CONFIDENTIAL AND PATENT INFORMATION OF TRADINTEK PJSC with the use of confidentiality agreement and keep confidential any information provided by the supplier that is subject to a confidentiality agreement. KEEP CONFIDENTIAL ANY PERSONAL DATA received from suppliers (see "Privacy" for instructions). THINGS TO BE AWARE OF WHEN CHOOSING SUPPLIERS through a non-public tender.

POSSIBLE CONFLICTS OF INTEREST when choosing a supplier, such as accepting unfounded gifts or other valuables.

COOPERATE WITH A SUPPLIER whose owner or manager is a relative or close friend. UNSAFE infrastructure conditions of the supplier.

SUPPLIER'S EMPLOYEES who appear to be minors or exploited. CLEAR

NON-COMPLIANCE with environmental standards in the supplier's infrastructure.

ENTRUST PERSONAL DATA or confidential information to suppliers without ensuring that they have the appropriate technical, physical, and organizational means to prevent unauthorized access or use.

International commerce control

International Commerce Control (ICC) laws affect the cross-border supply of goods, services, and technology.

For the exchange of information across national borders, including when it is accessible by e-mail and internet, commerce control measures apply.

It is important that we carefully follow the laws of the ICC that govern this activity.

OBLIGATIONS:

FOLLOW THE RELEVANT ICC RULES that apply in all countries in which you operate and your company's ICC procedures for the import and export of goods, technology, software, services, and financial transactions.

COMMUNICATE ALL THE RELEVANT INFORMATION to your import manager to ensure that comprehensive import declarations are accurate. Ensure that TRADINTEK PJSC or its representative provides accurate and complete information to the authorities.

CHECK THE EXPORT CLASSIFICATION of the product, technology or software, and determine if a special permit is required.

REVIEW YOUR TRANSACTIONS in accordance with all applicable rules that restrict transactions with certain countries, individuals, and prohibited end users.

EXAMINE YOUR BUSINESS PARTNERS, suppliers, and countries participating in your international transactions according to the monitoring lists provided by the government. Follow your company's "know your customer" procedures.

DO NOT PARTICIPATE IN ANY COMMERCE RESTRICTION ACTIVITIES and do not boycott if prohibited by EU or Lithuanian legislation.

CONSULT YOUR MANAGER if there are any discrepancies between EU (Lithuanian) legislation and applicable local laws, such as the laws of Canada, Mexico and some other countries.

WHAT TO WATCH OUT FOR

ANY FACTS, THAT ARE SOMETIMES CALLED “WARNING SIGNS” that indicate that the customer may be attempting to circumvent ICC laws (a comprehensive list of warning signs is available on the International Law and Policy website such as integrity.ge.com).

AVOIDANCE, RELUCTANTLY PROVIDED OR OTHERWISE UNSATISFACTORY RESPONSES BY A CUSTOMER to a question about end use, user, delivery dates or locations.

RELATIONS WITH PARTIES OR PARTICIPATION IN ACTIVITIES, which may be connected with the development of a biological, chemical or nuclear weapon, or ballistic missiles.

TRANSACTIONS RELATED TO A COUNTRY SUBJECT TO AN EMBARGO, a citizen or representative of such country, a natural or legal person subject to State Sanctions.

INVOICES FOR IMPORTED GOODS where the price indicated does not correspond to the value of the goods, the description of the goods is incomplete, or the country of origin is indicated incorrectly.

ANY PAYMENT TO OR IN FAVOR OF THE EXPORTER that is not provided for in the invoice or otherwise accounted for.

TRANSFER PRICES between related parties that do not cover eligible costs and profits.

USE THE IMPORT TARIFF CLASSIFICATION if it appears to inaccurately describe the imported goods.

GOODS IMPORTED UNDER THE PREFERENTIAL DUTIES PROGRAM (GSP, NAFTA, etc.) without auxiliary procedures ensuring the compliance with the requirements of the program.

Prevention of money laundering

People involved in criminal activities such as terrorism, drug trafficking, bribery, and fraud may try to launder the proceeds of their crimes, hide them or make them look legal. More than 100 countries have anti-money laundering laws prohibiting Transactions that use the proceeds of crime. A related concern is the possibility of using legally obtained funds to finance terrorist activities - sometimes referred to as “reverse” money laundering.

TRADINTEK PJSC is committed to complying with all global anti-money laundering and terrorism prevention laws. TRADINTEK PJSC will do business only with reputable customers, who participate in legal business activities and whose funds have been received from legal sources. Each TRADINTEK PJSC company is required to implement due diligence

“know your customer” procedures based on risk management principles, adapted based on the relevant risk factors, and to take reasonable measures to identify unacceptable and suspicious forms of payments. Failure to establish relationships with customers and transactions that endanger TRADINTEK PJSC may cause significant damage to the reliability and reputation of TRADINTEK PJSC.

OBLIGATIONS

TO COMPLY WITH ALL APPLICABLE LAWS and other legislation prohibiting money laundering and support for terrorism financing and requiring the reporting of Cash Transactions or Suspicious Transactions. Understand how these laws apply to your business.

FOLLOW THE “KNOW YOUR PARTNER” PROCEDURES. Collect and understand documents about prospective customers, agents, and business partners to ensure that they are engaged in legitimate business activities and that their funds have been obtained from legitimate sources.

FOLLOW THE RULES governing an acceptable form of payment. Find out what types of payments are associated with money laundering (e.g., high volume of money orders or traveller cheques or cheques issued by an unknown third party on behalf of a customer).

IF YOU HAVE NOTICED WARNING SIGNS, before entering into a transaction, point out concerns to your TRADINTEK PJSC money laundering prevention compliance specialist or the company’s lawyer, and make sure that they are investigated immediately. Ensure that the ruling is properly documented.

WHAT TO WATCH OUT FOR

A CUSTOMER, REPRESENTATIVE, OR BUSINESS PARTNER, who is reluctant to provide detailed information, provides insufficient, incomplete or suspicious information, or makes an effort to avoid reporting or accounting requirements.

PAYMENTS with monetary instruments that appear to have no identifiable link to the customer or have been identified as money laundering mechanisms.

Attempt by the CUSTOMER or the proposed business partner to pay in cash.

ORDERS, PURCHASES, OR PAYMENTS that are unusual or inconsistent with the nature of the customer’s trade or business.

UNUSUALLY COMPLEX STRUCTURES OF TRANSACTIONS or payment schemes, which do not reflect any real business objective or unusually favorable terms of payment.

UNUSUAL TRANSFER OF FUNDS to or from foreign companies not involved in the transaction, or an illogical transfer of such funds to or from the customer.

TRANSACTIONS USING FICTITIOUS OR OFFSHORE BANKS, unlicensed money sellers or currency exchangers, or non-bank financial intermediaries.

TRANSACTION STRUCTURES INTENDED TO AVOID ACCOUNTING OR reporting requirements (for example, several TRANSACTIONS with a value below the reporting amount).

REQUESTS TO TRANSFER MONEY or refund the security to a third party or to an unknown or unidentified account.

Privacy

More and more countries are tightening regulations on the collection and use of consumers' personal data (name, home and office contact information, and other data). Also, many countries regulate the use of personal data by business representatives in transactions between business entities. Some countries even regulate the privacy of company information. TRADINTEK PJSC is committed to responsible processing of personal data and compliance with all applicable privacy laws that are in force.

OBLIGATIONS:

BECOME AWARE OF AND COMPLY WITH the following personal data requirements:

- Applicable laws and regulations in the jurisdictions in which personal data is collected, processed, or used.
- TRADINTEK PJSC business ethics policy.
- Any applicable contractual obligations.

USE ANONYMOUS DATA (names and last names removed and not identifiable) or "aggregate" data (aggregated in such a way that they cannot be identified by a natural person) instead of personal data where appropriate or required.

RESTRICT ACCESS to personal data and provide it only to those who need it for legitimate business needs.

CAREFULLY ENSURE that personal data processed cannot be accessed without authorization and that they are not lost or destroyed inadvertently.

IF YOU BECOME AWARE THAT PERSONAL DATA IS BEING USED in violation of this policy or your company's privacy procedures, or that the security system of any system or device containing personal data is breached, notify your manager, the specialist of the company responsible, or a lawyer of the company.

WHAT TO WATCH OUT FOR

INAPPROPRIATE CONTROL MEASURES FOR ACCESS TO PERSONAL DATA OR CONTROLS THEREOF, such as the sending of personal data by e-mail to a group larger than is legitimately necessary, leaving of documents with personal data that can be seen by others in a printer, copier or fax machine.

SHARING OF PERSONAL DATA with unrelated parties, such as vendors or suppliers, that do not have adequate security measures or restrictions on the use of the information.

TRANSFER OF PERSONAL DATA between states without the regard for applicable legal requirements.

“KNOW YOUR PARTNER” PROCEDURES.

Each TRADINTEK PJSC partner (sub-distributor, representative, dealer, subcontractor, etc.) must be evaluated according to the following procedure:

1. In the case of a government agreement or the case of a “first for the country” partner, order a due diligence on the part of the partner from a reputable local law firm.
2. Interview the partner, fill out the partner application form, get a bank recommendation.
3. Get TRADINTEK PJSC principles of fairness policy signed by the partner’s authorized manager.
4. Analyze the compliance risks associated with the Partner in TRADINTEK PJSC Business Ethics Assurance Committee, which is comprised of the Director, the Business Ethics Assurance Manager, the Sales Manager, and other members.
5. If the result is positive, sign a commercial agreement with the partner. It must include the principles of the fairness policy of Tradintek PJSC, specified in the mandatory annex to the agreement.