

CODE OF BUSINESS CONDUCT AND ETHICS TEMPLATE

1. Introduction

The Company's commitment is doing business legally, ethically and in a transparent manner.

In performing the job duties, the employees should always act lawfully, ethically, and in the best interests of the Company. This Code of Business Conduct and Ethics (the "Code of Conduct") sets out the basic guiding principles, however, does not specify in details all forms of ethical conduct expected.

2. Compliance with laws and regulations

The Company understands and complies with the legal requirements and commercial practices of the lawful business.

Employees must follow applicable laws and regulations, including the Code of Conduct at all times. Employees must ensure appropriate and lawful operation and they must complete their tasks in an accurate and honourable way.

3. Fair business conduct

The Company provides competitive business and does not allow any violence of the fairness of any tendering process in any way. The Company refrains from damaging the business competition and the reputation of any business partners and any behaviour that harms the competitor's creditability.

Employees are responsible for ensuring fair business during their job. Hence, they must be particularly careful that their commercial activities do not violate competition. It also means that employees may not discuss prices or make any formal or informal agreement with any competitor regarding prices, discounts, business terms, or operation and channels in which the Company competes, where the purpose or result of such discussion or agreement would be inconsistent with applicable competition laws.

Furthermore employees are responsible to build confidence with customers and other business partners. Customers and business partners shall be treated fairly and equally.

4. Anti-corruption

The Company is firmly opposed to all forms of corruption.

Employees have to do everything in order to prevent bribe anyone for any reason, whether in dealings with governments or the private sector. It is prohibited offering, giving or even accepting anything of value, directly or indirectly in order to obtain, retain or facilitate in any way the business.

5. Confidentiality

By providing fair business it is crucial to ensure the confidentiality of business secret, since it is an essential interest of the Company.

Employees must handle any information they come to learn while doing their job in secret and confidentiality that is not generally known or available to the public. For example, employees are not entitled to trade with shares while in possession of non-

public information or deliver non-public information to others without expressed authorization by the Company.

6. Privacy

The Company acknowledges that personal information is sensitive and customers, employees and other related natural parties need to feel confident that personal data is processed in a legitimate business way.

Employees must apply appropriate, legally compliant practices to ensure security, privacy and integrity of personal information.

7. Recordkeeping, Reporting, and Financial Integrity

The Company's books, records, accounts and financial statements must be maintained in appropriate detail, must properly reflect the Company's transactions. The Company is firmly opposed to all forms of money laundering, so business shall only be conducted with partners involved in legitimate business activities with funds derived from legitimate sources.

Employees shall follow the Company's accounting procedures to ensure that business transactions are recorded and documented in accordance with applicable rules.

8. Human rights

The Company respects personal dignity and rights of each individual whom the Company and their employees interact with, including employees of the Company, during the course of work; and shall not, in any way, cause or contribute to the violation or circumvention of human rights.

Employees should strengthen respectfulness in all their activities and treat everybody with care and dignity. Violence and threatening behaviour is not permitted.

9. Discrimination and Harassment

The Company provides equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. No direct or indirect negative discrimination shall take place based on race, colour, gender, sexual orientation, age, disability, language, religion, employee representation, political or other opinions, national or social origin, property, birth or other status.

Employees should refrain from any form of negative discrimination.

10. Working conditions

The Company does its utmost to promote equality in its employment practices. It is firmly opposed to employ or contract child labour or any form of forced or compulsory labour. The Company condemns all forms of undeclared work that distorts competition and destroys the financial basis of the national social security and the tax systems.

Employees shall act with integrity and treat their colleagues and others through the work with full respect.

11. Health, Safety and Environment

The Company provides a clean, safe and healthy work environment. Employee's security measures must be carried out regularly based on risk analysis and mitigating actions. In addition to these norms the Company is committed to minimise the impact on the environment of its operations by reducing the use of finite resources, including energy, water and harmful emissions, including waste.

Each employee has responsibility for maintaining a safe and healthy workplace by following safety and health rules and reporting accidents and unsafe conditions or behaviours. Employees must contribute to minimising harmful emissions to environment,

12. Conflicts of Interest

The Company's decisions are based on objective and fair assessments avoiding the possibility of any influence. The Company does not allow their managers, representatives and employees to use the Company's assets, information, personal data for their own benefit, obtain personal advantages from their position or compete with the Company.

In performing their job duties, employees are expected to use their judgments to act, at all times and in all ways, in the best interests of the Company. A "conflict of interest" exists when an employee's personal interest (that can be linked to friends or family as well) interferes or potentially interferes with the best interests of the Company.

13. Questions; Reporting Violations

The Company is open to any questions at any time and will not allow punishment against any employee for reporting misconduct by others in good faith. Failure to follow the Code of Conduct can result in disciplinary action, including termination of employment.

Employees shall speak up with the relevant people e.g. the owner, their legal representatives or anyone in their management chain, when they have a question about the application of the Code of Conduct or when in doubt about how to properly act in a particular situation. Employees must cooperate in internal investigations of potential or alleged misconduct. Employees shall also report any suspected non-compliance.