

Appendix 1
to Order # 84-II made by Telko, LLC “About Approval and
Putting into Effect the Code of the Employees Conduct
at Telko, Limited Liability Company”
on June 25, 2020

Telko, Limited Liability Company (Telko, LLC)

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APPROVED BY
Order # 84-II made by Telko, LLC,
on June 25, 2020

**CODE OF THE EMPLOYEES CONDUCT
AT TELKO, LIMITED LIABILITY COMPANY**

1. GENERAL PROVISIONS

The Code of the Employees Conduct at Telko, Limited Liability Company (hereinafter referred to as the Code of Conduct) explains the conduct standards to be kept by the employees of Telko, LLC, (hereinafter referred to as the Company, Aspo Group or Aspo) in the course of their obligations performing. It provides recommendations for the situations when employees have to make personal or ethical decisions. This Code of Conduct covers all Aspo Group employees and operations types.

2. OUR COMMITMENT TO PROFESSIONAL ETHICS STANDARDS

We in Aspo Group think that to act fairly and responsibly is not only the right thing in whole but it is also correct for the business we are making. The Code of Conduct is the base for the proper structure of business making.

We comply with all respective laws, regulations and standards in all kinds of our operations. In our case the business ethics starts from our Code of Conduct and day-to-day work practice.

The Code of Conduct contains the principles that help us make ethically sound decisions. We all shall know the Code of Conduct, act properly and realize the importance of such behavior.

Making the right choice we fight for the values we are creating in Aspo every day. Showing ethical conduct we are creating the image of a reliable partner, supplier, customer and employer.

Being the party to the United Nations Global Compact, we appreciate its ten principles referring to human rights, labor, environment and anticorruption efforts.

Being Aspo employees, we shall:

- Study, understand and comply with our Code of Conduct.
- Share our concerns in case we suspect any improper behavior.
- When you are not sure if you are acting properly, you shall seek the advice of your supervisor or Aspo Legal Department that is responsible for compliance with rules and regulations.

Besides, the Company’s managers shall:

- Set the example
- Get our guidance for compliance with formalities across to their employees and take the time to discuss how we can apply them to our own team.
- Build the environment where our team members may freely share their concerns
- Hear out all concerns that their team members have and inform the senior staff of any suspicions of misbehavior they have learnt about
- Ensure counseling and support for their employees to response to the mentioned expectations.

3. OUR EMPLOYEES AND BUSINESS OPERATIONS

3.1. Respecting Employees and Observing Human Rights

Aspo is striving to observe human rights subject to the UN Guiding Principles governing entrepreneurial activities as regards to human rights. We provide decent working environment. We fight against forced or child labor whatever the circumstances may be.

Non-Discriminatory Treatment, Diversity and Inclusion

Aspo holds everyone in respect and admission. All our employees shall respect every person's right to freedom of thought, belief, freedom of speech, confession and right to gather peacefully. We prevent any form of discrimination as to education level, personal skills, position, personality, way of life, work experience, ethnic background, religion, sex, sexual identity, age, national origin, abilities or other employee's characteristics. It refers to all employees, including temporary employees, migrants, students, personnel with an employment contract, regular workers and all other employees or office seekers.

Aspo respects diversity and tries to create accepting working environment free from any harassment.

Welfare, Occupational Health and Safety

Aspo takes care of its employees' welfare and health. We never accept a compromise when the safety is concerned and cooperate only with the partners who share our devotion to the safety and occupational health issues. We are held liable for labor safety each and every moment and we shall comply with all relevant laws regarding occupational health and safety and put into practice our company's safety rules and standards. Our managers' duties include briefing, supervising and supporting their employees for ensure labor safety.

3.2. Responsible Attitude to the Environment and Products Safety

Aspo takes good care of the environment and strives to minimize its operations environmental impact. We are held liable for our products to be safe when used as intended and comply with the regulatory requirements made to them.

4. PROFESSIONAL ETHICS

4.1. Corruption and Bribery Intolerance

We are intolerant to any form of corruption or bribery. We neither suggest nor ever pay bribes nor permit any bribes to government officials or individuals; we neither ever ask nor accept

any bribes ourselves.

As a matter of fact, we shall never give or suggest anything of value to improperly affect any business decision to make any transaction, to preserve a transaction or receive any unfair advantage. We may not do it either directly or indirectly via any third party acting on Aspo's behalf. Besides, we shall neither directly nor indirectly ask nor accept anything of value that may affect or appear to affect our ability to keep an open mind in our business decisions. Term "anything of value" shall be interpreted broadly: it includes any payments, loans, discounts, contributions to political or charity goals, expenses reimbursement, any gifts, gift cards, catering services, entertainments, trips, employment or probation, business opportunities, services or other advantages.

We always make sure that any gifts or hospitality correspond to any particular business goal, are properly registered, have fair value and comply with the business relations nature. Any requests or offers of any improper payments, benefits, gifts or hospitality shall be declined. The facts thereof shall be immediately brought to the attention of the Aspo employee responsible for compliance ensuring.

We are actively competing in the scope of the relevant competition law, acting fairly and ethically. Each Aspo employee shall comply with the competition law and our standards and internal regulations.

4.2. Protection of the Company's Assets and Information

Tangible and Intangible Assets

In our day-to-day operations we are liable for Aspo's and its business partners' assets, for example, for facilities, equipment, raw materials, vehicles, information and mobile devices, monetary funds, intellectual property and information. We shall treat them with care and protect from any damages, losses, theft and improper use.

All our employees shall take all proper measures to protect our company's and our business partners' confidential information. We treat as strictly confidential all proprietary information and transfer it only to those having the right to access to such information and who need thereof to do their job.

We follow our corporate policies and procedures to protect our data from any threats and unauthorized or illegal use. We respect the personal privacy of our colleagues, stakeholders and their representatives since we process their personal data as provided by the current law and the company's policy.

Information disclosing and Confidential Information

Being a public company, we shall comply with all current laws and stock exchange regulations when disclosing Aspo information. Only specially designated company's employees may make public statements on Aspo company's behalf in mass media. We are striving to comply with the rules and regulations referring to abuse at the market and by proprietary information such as trading constraints and information disclosing.

Decisions Making and Documents Execution

Our decisions shall be made in Aspo's best interests. The procedures for legal and financial approval are used throughout all our company, and we commit ourselves to comply with them. Such procedures include authorized persons appointment, monetary restrictions setting and duties separation.

All business transactions shall be accurately and reliably recorded in our account books and statements. Accurate records and statements help us comply with our legal and regulatory

requirements, for example, regarding taxation.

4.3. How Can We Avoid the Conflict of Interests

Each of us shall act in Aspo's best interests. It means that each of us shall among other things avoid the conflict of interests. The conflict of interests arises when your personal interests come into conflict with Aspo's interests. Even such conflict of interests arising may damage the company and our goodwill.

5. OUR STAKEHOLDERS

Business Partners

We are striving to build fruitful, ethical and transparent relations with our suppliers, agents, distributors, customers and contractors. We expect our partners to comply with all relevant laws, regulations and standards and respect our Code of Conduct for Suppliers.

Ensuring Compliance in the Sphere of Commerce and Anti-Money Laundering

We are conducting operations in the international trading environment implying import and export of products, other goods, services and information from one country to another.

We comply with all respective laws, regulations and standards influencing our operations. Such regulations and standards include inter alia all embargo and sanctions, customs import and export regulations, export control, customs valuation, country of origin and trading preferential terms.

We never make any transactions violating the current law regarding anti-money laundering and terrorism financing and financial crimes.

6. EVERYONE SHALL COMPLY WITH RULES AND REGULATIONS

Each of us is responsible for complying with Aspo's common ethical standards. If we have any suspicions as to improper behavior, we shall tell about them and hear out concerns stated by others. We shall never suppose that someone has already told about the risk or challenge.

Option to Share Your Concerns - to Inform of Any Illegal Activity

We support the culture when everyone has the right to the freedom of speech. We provide to our employees a safe, reliable and confidential way to express their concerns and ask their questions in the cases when usual channels are not available or fail to fit in the situation.

All employees shall immediately inform of any violations of law, this Code of Conduct, our guidance for compliance with formalities or other Aspo policies that they suspect or have evidenced,

- their supervisors or the Company's Chief Operations Officer,
- a representative of the Legal Service, HR office or a representative of Aspo's Internal Audit Department or
- use Aspo's Channel for messages about any facts of illegal activity by e-mail address secretary.board@aspo.com.

It helps us to settle and resolve any challenges in a timely manner preventing their happening again in the same or some other corporate unit.

We carefully review all reports about any improper behavior, duly process personal data and keep such reports confidential to the fullest extent possible.

We never initiate mobbing of any person having shared with us his or her suspicions of improper behavior in good faith or participating in the investigation to eliminate such suspicion of improper behavior. Mobbing examples include downgrading, dismissal, refusal to promote, salary lowering and any kinds of threats, mockery or harassment. Disciplinary sanctions will be taken regarding any person making punitive actions resulting from any notices of violation irrespective of the position or office he or she is holding.

Violation of our Code of Conduct including an undue notice sending about any discovered violations of the Code of Conduct or a false report of violation may result in disciplinary sanctions up to dismissal.

7. MISCELLANEOUS

The Code of Conduct outlines in general the principal requirements to making business in the Company. The Code of Conduct is approved by the Company's Chief Operations Officer, and each Company's employee is responsible for its actions compliance with such Code of Conduct. The Company's managers and Company's units' managers are held liable for keeping the employees informed, supervising them and their actions compliance with the Code of Conduct.