

Approved by the Order No. 17-9 dd. 22 June 2021
Of the Director of FE TELKO SOLUTION LLC

1. OUR COMMITMENT TO PROFESSIONAL ETHICS STANDARDS

The Code of Conduct clarifies the standards of conduct that employees of FE TELKO SOLUTION LLC (hereinafter referred to as the "Company") shall adhere to in the course of performing their duties. It provides recommendations in situations where employees have to make personal and ethical decisions. This Code of Conduct applies to all employees and all activities of the company.

In our company, we believe that acting ethically and responsibly is not only the right thing to do in general, but also the right thing to do for our business. The Company's Code of Conduct (the "Code") is the foundation for the proper organization of business.

We comply with all applicable laws and regulations in all our activities. For us, business ethics begins with our Code of Conduct and everyday working methods.

The Code of Conduct describes the principles that help us make ethically impeccable decisions. We all need to know the Code of Conduct, act correctly and understand the importance of this.

By making the right choice, we protect the value that we create in the company every day. By demonstrating ethical behaviour, we build our reputation as a reliable partner, supplier, customer and employer.

As a member of the United Nations Global Compact, we value its ten principles that relate to human rights, labour, environment and the fight against corruption.

As employees of the company, we must:

- Read, understand and comply with our Code of Conduct.
- Report our concerns if we suspect inappropriate behaviour.
- When you are not sure of correctness of your actions, you must consult with the CEO, heads of directions or legal department (if any) of the company, which is responsible for compliance with regulatory requirements.

Besides, the company's managers must:

- Set an example.
- Communicate our guidelines on compliance with regulatory requirements and company policies to their employees and take the time to discuss how they apply to our team.
- Create environment where our team members can freely express their concerns.

- Listen to concerns of team members and report any suspicions of inappropriate behaviour that they become aware of.
- Provide mentoring and support to their employees to meet the above expectations.

2. OUR EMPLOYEES AND OPERATIONAL ACTIVITIES

2.1 Respect for employees and human rights The Company strives to respect human rights in accordance with the UN Guidelines on Business Activities in Human Rights Aspect. We provide decent working conditions. We do not accept the use of forced or child labor under any circumstances.

Non-discrimination, socio-cultural diversity and equal opportunities

The company treats everyone with respect and recognition. All our employees must respect the right of every person to freedom of thought, belief, the right to freedom of speech, religion and the right to peaceful assembly. We do not allow any discrimination based on education, personal skills, position, personality, lifestyle, work experience, ethnicity, religion, gender, sexual orientation, age, national origin, abilities or other characteristics of an employee. This applies to all employees, including temporary employees, migrants, students, employees employed on a contractual basis, direct employees and all other employees or candidates for a position. The company respects sociocultural diversity and strives to create a welcoming and harassment-free working environment.

Well-being, occupational health and safety

The company cares about the well-being and health of its employees. We never compromise on safety issues and work only with partners who share our commitment to occupational safety and health. We are responsible for occupational safety at all times, and we must comply with the relevant occupational safety and health laws, as well as our company's safety rules and standards. The duties of managers include instructing, monitoring and supporting their employees to ensure occupational safety.

2.2 Responsible attitude to environment and product safety

The company takes care of the environment and strives to minimize environmental impact of its activities. We are responsible for ensuring that our products are safe for their intended use and comply with the regulatory requirements imposed on them.

3. PROFESSIONAL ETHICS

3.1 Intolerance to corruption and bribery

We do not accept any form of *corruption* or *bribery*. We never offer or pay bribes and do not allow bribes to government officials or private individuals, and we also never ask or accept bribes.

In particular, we must not give or offer anything of value for the purpose of improperly influencing a business decision to conclude a transaction, retain a transaction or gain an unfair advantage. We may not do this directly or indirectly, that is, through a third party acting on behalf of the Company. In addition, we should not directly or indirectly ask for or accept anything of value that may affect or appear to affect our ability to maintain objectivity in our business decisions. The term "something of value" should be understood in a broad sense: it includes any payments, loans, discounts, contributions for political or charitable purposes, reimbursement of

expenses, gifts, gift certificates, food services, entertainment, travel, employment or internships, commercial opportunities, services or other benefits.

We make sure that gifts and hospitality signs always correspond to a clear business goal, are accurately registered, have a reasonable cost and correspond to the nature of business relations. Any requests and offers of any improper payments, benefits, gifts or hospitality must be rejected. They should also be immediately reported to the person responsible for ensuring regulatory compliance of the company.

We actively compete within the framework of applicable *competition law*, in a fair and ethical manner. Every employee of the company must comply with the laws, regulations and internal rules in the field of competition protection.

3.2 Protection of company assets and information

Tangible and intangible assets

In our daily work, we are responsible for the assets of the company and its business partners, for example, machinery, equipment, raw materials, vehicles, information and mobile devices, cash, intellectual property and information. We must handle them carefully and protect them from *damage, loss, theft and improper use*.

All our employees must take appropriate measures to protect confidential information of our company and our business partners. We are careful about confidential information and disclose it only to those who have the right to access the information and who need it to perform their work.

We follow our corporate policies and procedures to protect data from threats and unauthorized and illegal use. We respect *privacy* of our colleagues, stakeholders and their representatives, as we handle their personal data in accordance with the current legislation and company policy.

Disclosure of information and confidential information

As a public company, we must comply with applicable laws and regulations of the stock exchange when disclosing company information. Only specially appointed employees of the company can make public statements in the media on behalf of the company. We strive to comply with the rules and regulations regarding market abuse and proprietary information, such as restrictions on trading and disclosure of information.

Decision-making and documenting

Our decisions must be made in the best interests of the company. Legal and financial approval procedures are used throughout our organization, and we are committed to following them. These procedures include appointment of authorized persons, establishment of monetary restrictions and division of responsibilities.

All business transactions must be accurately and reliably recorded in our accounting books and reports. Accurate accounting and reporting help us comply with our legal and regulatory requirements, for example, with regard to taxation.

3.3 How to avoid conflicts of interest

Each of us must act in the interests of the company. This means that each of us should, among other things,

avoid conflicts of interest. A conflict of interest arises when your personal interests conflict with interests of the company. Even occurrence of a conflict of interest can damage the company and our reputation.

4. OUR STAKEHOLDERS

Business partners

We strive for fruitful, ethical and transparent relationships with our suppliers, agents, distributors, customers and contractors. We expect our partners to comply with all applicable laws and regulations and comply with our Supplier Code of Conduct.

Ensuring regulatory compliance in the field of trade and countering money laundering

We operate in an international trading environment, which implies import and export of products, other goods, services and information from one country to another.

We comply with all applicable laws and regulations that affect our operations. Regulatory acts include, without limitation, *embargoes and sanctions, customs rules of import and export, export control, customs assessment, country of origin and preferential terms of trade.*

We do not conduct activities in violation of the current *legislation on combating money laundering, terrorism and financial crimes.*

5. COMPLIANCE WITH REGULATORY REQUIREMENTS CONCERNS EVERYONE

Each of us is responsible for compliance with the company's uniform ethical standards. If we suspect inappropriate behavior, we should report it, as well as listen to the concerns expressed by others. It should not be assumed that someone has already reported a risk or problem.

An opportunity to express your concerns - Reporting the facts of illegal activity

We support a culture where everyone has the right to freedom of speech. We provide employees with a safe, reliable and confidential way to express their concerns and voice their questions in cases where the usual channels are unavailable or do not correspond to the situation.

All employees must immediately report any violations of the law, this Code of Conduct, our regulatory compliance guidelines or other company policies that they suspect or witness, to

- their supervisors or the Managing Director of the company,
- a representative of the Legal Department, HR Department or Internal Audit Department of the company or
- use the company's Channel to report facts of illegal activity by e-mail: secretary.board@aspo.com.

This allows us to solve and fix problems in a timely manner, preventing their recurrence in the same or another department of the organization.

We thoroughly check reports of inappropriate behaviour, properly process personal data and maintain

confidentiality of reports to the maximum extent possible.

We do not accept harassment against any person who in good faith reports suspected misconduct or participates in an investigation to eliminate suspicion of misconduct. Examples of harassment include: downgrading, dismissal, refusal of promotion, salary reduction and any kind of threats, bullying or pursuit. Disciplinary measures will be taken against any person who commits repressive actions for notification of a violation, regardless of his or her position.

Violations of our Code, including late reporting of a known violation of the Code or false reporting of a violation, may result in disciplinary action up to and including termination of employment.