



Anti-corruption Policy

GENERAL PROVISIONS

This Anti-Corruption Policy (hereinafter referred to as the “Policy”) is an in-house regulation of the LeverX Group (hereinafter referred to as the “Company”) and regulates relations within the Company, as well as between the Company and third parties in terms of combating corruption.

This Policy is part of the Company’s framework of in-house policies and procedures aimed at ensuring compliance with the requirements of the law and bylaws.

The Policy has been prepared in accordance with:

- the U.S. Foreign Corrupt Practices Act;
- United Nations Convention against Corruption
- Resolution (97) 24 on The Twenty Guiding Principles for the Fight against Corruption
- and all applicable other foreign anti-bribery laws, including without limitation the UK Bribery Act 2010

GOALS AND OBJECTIVES

The key goals of the Policy include:

- Prevention of corruption: limitation of prerequisites for and the possibility

of corruption.

- Facilitation of anti-corruption activities within the competence of the Company. Guaranteed inevitability of punishment for corruption.
- Creation of anti-corruption mindset among the employees of the Company and its contractors.

The key objectives of the Policy include:

- Creation of the uniform understanding of the Company's antagonism to corruption in all forms and manifestations among the employees.
- Enforcement of an obligation among the employees to know and comply with the key provisions of anti-corruption legislation and this Policy.
- Minimization of the risk of involvement of the Company's employees in corrupt activities.
- Guaranteed liability of the employees for corruption.
- Monitoring of the effectiveness of implemented anti-corruption measures (standards, procedures, etc.)

BASIC ANTI-CORRUPTION PRINCIPLES

1. The principle of compliance with the law and generally accepted norms

Compliance of the implemented anti-corruption measures with the local legislation applicable to the Company subject to the location of its offices (the United States of America, the Republic of Lithuania, the Republic of Poland, the Republic of Uzbekistan, Germany and other states where the Company operates (hereinafter certain country shall be referred as "Country")), international treaties concluded by the government of the Country.

2. The principle of leadership by example

The leader of the organization plays the key role in the evolvement of a culture hostile to corruption and in the creation of an in-house system for preventing and combating corruption.

3. The principle of employee engagement

Awareness of employees about the provisions of anti-corruption legislation and their active participation in the formation and implementation of anti-corruption

standards and procedures.

4. The principle of proportionality of anti-corruption procedures to the risk of corruption

A set of measures to reduce the likelihood of an organization, its manager and employees being involved in corrupt activities shall be developed and implemented with due regard to the corruption risks inherent in the activities of the organization.

5. The principle of efficient anti-corruption procedures

The use of cost-effective anti-corruption measures facilitates implementation thereof and guarantees impressive results.

6. Principle of responsibility and inevitability of punishment

The inevitability of punishment for employees, regardless of their position, length of service or other circumstances, in case they commit corruption offences within the performance of their employment duties, as well as the personal liability of management for the implementation of the in-house anti-corruption policy.

7. The principle of transparent operations

Keeping counterparties, partners updated.

8. The principle of continuous control and regular monitoring

Regular monitoring of the efficiency of the implemented anti-corruption standards and procedures, as well as control over compliance therewith.

TERMS AND DEFINITIONS¹

The term **"bribe"** means the bestowing of a benefit in order to unduly influence an action or decision; the acceptance of benefits by an official for themselves or for their family members offered to them in connection with their official position for patronage or connivance in service, facilitation in solving certain problems within their competence or the performance or non-performance of any action in favour of the bribe giver or persons they represent, using their official powers. The "benefit" in bribery can be virtually any inducement: money and valuables, company shares, inside information, sexual or other favours, entertainment, employment or, indeed, the mere promise of incentives. The benefit may be passed directly or indirectly to the person bribed, or to a third party, such as a friend, relative, associ

¹ Definitions vary from country to country in accordance with cultural, legal or other factors and the nature of the problem as it appears in each country.

ate, favourite charity, private business, political party or election campaign. The conduct for which the bribe is paid can be active: the exertion of administrative or political influence, or it can be passive: the overlooking of some offence or obligation. Bribes can be paid individually on a case-by-case basis or as part of a continuing relationship in which officials receive regular benefits in exchange for regular favours.

The term **“commercial bribery”** means the bestowing of a benefit in order to unduly influence an action or decision; the receipt of benefits by an employee of an individual entrepreneur or a legal entity who is not an official or by a person performing works for or providing services to an individual entrepreneur or legal entity under a civil law contract, for actions (omissions) in favour of the bribe giver connected with the work performed or the service provided by this person and undoubtedly capable of causing harm to the interests of the owner or their customers, or the provision of such assets or benefits.

The term **“compliance manager”** means an official of the Company who performs internal control, including over the implementation hereof.

The term **“conflict of interests”** means a situation in which the personal interests of an employee, their spouse or relatives by blood or marriage affect or may affect the proper performance of their employment duties when they make a decision or participate in making a decision or performing other actions at work.

The term **“corruption”** means an intentional use by a public official, a person of equal status or a foreign official of their official position and related opportunities for illegal obtaining of benefits in the form of works, services, patronage, promise of benefits for themselves or for third parties, as well as bribery of a government official, a person of equal status or a foreign official by providing them with property or other benefits in the form of works, services, patronage, promise of benefits for themselves or for third parties in exchange for this public official, a person of equal status or a foreign official committing or avoiding certain actions within the performance of their official (employment) duties, as well as the commission of such actions on behalf of or in the interests of a legal entity, including a foreign one.

The term **“personal interest of an employee (representative) of an enterprise”** means an interest of the employee (representative) of the enterprise related to the possibility for the employee (representative) of the enterprise to receive income in the form of money, valuables, other property or monetized services, other property rights for themselves or for third parties within the performance of their official duties.

The term “**anti-corruption**” means the activities of an organization aimed at prevention, detection and suppression of offences that create conditions for corruption, corruption offences, elimination of the consequences thereof through a comprehensive application of the following measures:

- Planning and coordinating the anti-corruption activities in organizations;
- Setting limits, as well as special requirements aimed at ensuring financial control over the public officials and persons of equal status in order to prevent corruption and detect it;
- Ensuring legal regulation of the activities of state bodies and other organizations, state and public control, as well as supervision of such activities;
- Improving the system of state bodies, HR relations and the procedures for resolving issues related to the protection of the rights, freedoms and legitimate interests of individuals and legal entities;
- Arranging for the awareness-raising events for the population that contribute to intolerance to corruption (anti-corruption education and upbringing);
- Establishment of legal prohibitions for the purpose of differentiating official (employment) duties from the personal, group and other non-employment interests of public officials and persons of equal status;
- Use of procedures for recruitment, selection, training, promotion of public officials in accordance with the principles of efficiency of their activities and fairness;
- Prevention of financing or providing other forms of material support for the activities of state bodies and other organizations from the sources or in the manner not provided for by legislative acts;
- Combining the fight against corruption with the creation of economic and social prerequisites for eliminating the causes thereof.

RESPONSIBLE PERSONS AND THEIR RESPONSIBILITIES

The persons responsible for the implementation of the Policy in the Company include:

CEO of the Company:

- Determines the areas of anti-corruption activities, appropriate improvement of processes and functions in the Company, approval of the Policy and any changes hereto.

- Performs general management and control over the compliance of the Company's employees with the requirements hereof.

Compliance manager:

- Organizes anti-corruption trainings, as well as individual counselling for the employees; performs continuous monitoring over the compliance of the Company's employees with the Policy and anti-corruption legislation.
- Takes steps to combat corruption, makes proposals to improve the Policy and other in-house policies and procedures of the Company.
- Assesses the results of anti-corruption efforts and prepares relevant reporting materials for the CEO (annually); collects and reviews reports regarding preparations to commit or committed corruption offences by the employees, counterparties of the Company or other persons.
- Sends reports to the competent law enforcement agencies regarding the detected corruption offences.
- Provides assistance to the authorized representatives of control and supervisory law enforcement agencies during inspections and other events aimed to suppress or investigate corruption crimes, including criminal intelligence operations activities.

The employees of the Company:

- Comply with the requirements hereof.
- Make proposals to improve the Policy and other in-house policies and procedures of the Company.
- File reports about preparations to commit or committed corruption offences by employees, counterparties of the Company or other persons.
- Provide assistance to the authorized representatives of control and supervisory law enforcement agencies during inspections and other events aimed to suppress or investigate corruption crimes, including criminal intelligence operations activities.

CORRUPTION RISK ASSESSMENT

The purpose of the corruption risk assessment is to identify the processes and operations of the Company that give space to corruption offences both for personal benefit and for the benefit of the Company.

Corruption risk assessment aims to:

- Define the specific types of possible corruption offences that can be committed in the course of the Company's activities, as well as the ways of committing them; describe possible steps to prepare for them and to commit them.
- Determine the likelihood of committing such offences.
- Describe the Company's strengths and weaknesses in terms of combating corruption.
- Determine of the list of positions in the Company, as well as contractors of the Company who might participate in corrupt activities, preparation to and commission of corruption offences.
- Determine the consequences of committing such offences for the Company.
- Develop solutions to improve the anti-corruption activities of the Company and make appropriate amendments hereto.

The corruption risk assessment ensures accord between the implemented anti-corruption measures and the Company's activities and allows organizing an efficient anti-corruption process at the Company level.

The corruption risks are assessed by the compliance manager of the Company on an ongoing basis. The results of the assessment, together with proposals regarding the improvement of anti-corruption activities of the Company, are submitted to the CEO of the Company annually for consideration and making appropriate decisions.

The Company categorizes the following areas of its activities as the ones where the corruption offences are possible:

- Participation of the Company in tenders and procedures for the purchase of goods, works and services.
- Purchase of third-party goods works and services by the Company for their subsequent use in its business activities.
- Interaction with state authorities regarding the Company's activities.
- The following persons might be involved in corrupt activities in the Company:
 - Officials representing the Company in procurement procedures (tenders).
 - Officials and employees of the Company responsible for the purchase of goods, works and services for the Company.
 - Officials and employees of the Company who interact with state bodies and organizations by virtue of their official duties.

According to the Company, the risks of the Company to be involved in corrupt activities are minimal.

The consequences of committing corruption offences are as follows:

- Termination of labour relations with employees and officials involved in corruption offences.
- Loss of the opportunity to establish business relations with new customers, termination of business relations with current customers.
- Damage to the image and reputation of the Company, its employees, officials, trademarks, which may also affect the activities of other companies operating under the same trademark.

GENERAL OBLIGATIONS OF THE COMPANY, ITS EMPLOYEES AND OFFICIALS

The employees and officials of the Company shall avoid engaging contractors, partners, intermediaries, agents, joint ventures and/or other persons to perform any actions that violate the provisions of the Policy or the anti-corruption legislation of the Country.

Within the performance of their labour (employment) duties, the employees and officials of the Company shall neither participate, directly or indirectly, in person or through third parties, in corrupt practices nor offer, give, promise, solicit and receive bribes, make payments to facilitate any administrative and other procedures and formalities in any form, including cash, valuables, services or other benefits, in favour of any persons, including commercial organizations, governments and self-governing bodies, government officials, private companies and representatives thereof.

The employees and officials of the Company shall refrain from actions that may be interpreted by others as willingness to commit or participate in the commission of a corruption offence in favour or on behalf of the Company.

Unless otherwise specified in the Gifts and Sponsorship section of the LeverX Group Code of Business Conduct, no cash or non-cash gifts on behalf of the Company shall be allowed.

The gifts that the employees may give to other persons and organizations (counterparties) on behalf of the Company or may receive from other persons and organizations (counterparties) in connection with their work in the Company, as well as entertainment expenses, including expenses for business entertainment and Company promotions that may be covered on behalf of the Company, shall meet all the following criteria:

- Be directly related to the legitimate objectives of the Company or to national holidays, memorable dates, anniversaries.
- Be justified.
- Not constitute a hidden reward for a service, action, omission, connivance, patronage, provision of rights, making certain decisions regarding a transaction, agreement, licence, permit, etc., or an attempt to affect the actions of the recipient for any other illegal or unethical purpose.
- Not create a reputational risk for the Company, its employees and other persons in case of disclosure of information about such gifts or entertainment expenses.
- Not contradict the provisions of the legislation of the Country, this Policy, other in-house policies, and procedures of the Company.

The Company shall not finance charitable and sponsorship projects to obtain commercial advantages in its specific projects.

The Company shall not finance political parties, organizations and movements. The Company shall refrain from covering any expenses incurred by civil servants (except for the cases described in the in-house policies and procedures of the Company), members of their families and close relatives (or in their interests) in order to obtain commercial advantages in specific projects implemented by the Company, including expenses for transport, accommodation, meals, entertainment, PR campaigns, etc., or any other benefits.

The CEO of the Company, the compliance manager and other officials of the Company shall develop and maintain high ethical standards, an uncompromising attitude towards any forms and manifestations of corruption at all levels, set a good example and take measures to inform the employees of the Company about the provisions of the Policy.

In case an employee of the Company or other person is abetted to commit corruption offences or receives information about the commission of corruption offences or violation hereof (preparations to violate) by other employees, counterparties of the Company or other persons, they shall immediately inform their line manager, as

well as the compliance manager of the Company. The line manager and the compliance manager of the Company shall provide such employee with recommendations and explanations regarding the current situation and notify the CEO of the Company about the incident.

ANTI-CORRUPTION MEASURES

In order to prevent and combat corruption, the compliance manager of the Company shall take the following measures:

- 1.** Develop and implement in-house anti-corruption policies and procedures in addition to this Policy;
- 2.** Bring the Company's in-house policies and procedures in line with the provisions of the Policy, including amendment of the employment contracts concluded with employees and the internal code of labour conduct;
- 3.** Training of employees and provision of relevant information;
- 4.** The compliance manager of the Company shall organize annual awareness-raising sessions for the employees on the risks of committing corruption offences, as well as inform the employees about their obligations in accordance with this Policy;

The compliance manager shall conduct annual anti-corruption training of persons who might be involved in corrupt activities in the Company;

- 5.** The CEO and the compliance manager shall monitor the compliance with the requirements of this Policy on an ongoing basis.

As part thereof, the compliance manager shall have the right to request any documents and information from any division of the Company, including accounting department and persons responsible for the purchase of goods, works, services or the sale of services and products of the Company.

The compliance manager shall have the right to access the business correspondence of these persons in order to control their compliance with the requirements of this Policy;

- 6.** Carry out an annual efficiency assessment of the anti-corruption activities deployed in the Company. Prepare a relevant report for the CEO of the Company, as well as proposals regarding further improvement of anti-corruption measures taken by the Company.

LIABILITY FOR VIOLATION OF THE POLICY

The Employees and officials of the Company, regardless of their position, shall be liable for compliance with the principles and norms of the Policy and applicable law, as well as for the actions (omissions) of their subordinates who violate such principles and norms.

The Company may take disciplinary actions against the employees who violate the requirements of the Policy and applicable law, including dismissal, such employees may also lose their bonuses.

In case an employee/official of the Company prepares to commit, commits or participates in committing corruption offences, they shall be liable to criminal proceedings in the manner determined by the applicable legislation of the Country.

The Company shall immediately terminate any business relations with counterparties and partners whose employees and/or officials, in accordance with a court decision, were found guilty of committing corruption crimes in the interests of such counterparties or partners.

The Company shall have the right to carry out internal audits in case of a reasonable suspicion or established fact of corruption within the limits set by the legislation of the Country.