

CODE OF ETHICS

for the conduct of employees, partners and subcontractors of
DATECS Ltd.

This Code of Ethics sets the standards and norms of conduct to be observed by ourselves and our partners and subcontractors. We declare that we shall adhere to this Code of Ethics.

This Code contains guiding principles for appropriate conduct and standards that the entire company management, all our employees, partners and subcontractors will observe at their places of work.

- We shall be an ethical company that abides by all domestic and international laws and regulations by applying fair and transparent management methods.
- We shall make every effort to satisfy our customers by meeting their needs and expectations.
- We shall strive for maximum corporate growth through fair and effective management.
- We shall fulfil our public duties and responsibilities by working for the benefit of our community and contributing to the development of our society and nation.
- We shall work for the establishment of a transparent corporate culture through fair practices of trade and competition.
- We shall strive to be a company with human resources of the highest quality, offering our employees equal opportunities in a safe and healthy working environment.
- We shall protect the interests and security of our customers.
- We shall select our partner companies through fair competition.
- We shall not abuse the market position of our Company to induce unjustified behaviour or exercise unacceptable influence.
- We shall strive to establish fair and transparent business practices based on mutual trust and cooperation.
- As part of the national and international community, we shall abide by all domestic and international laws as well as by any and all universal human principles and accepted norms.
- We shall contribute to the development of the national economy and our community by improving our productivity, creating jobs, paying our taxes, etc.
- We shall work to protect and maintain a clean environment and shall abide by all rules and regulations in that respect.
- We recognize the immutable value of all our employees and respect their personal human dignity and individual rights.

- We shall provide equal opportunities to all our employees and shall promote their talents by assigning tasks impartially, solely on the basis of their abilities.
- We shall not discriminate against our employees on the basis of gender, ethnicity, religion, educational status, social origin, age or any other factors whatsoever unrelated to their duties.
- We shall respect the independent thinking and creative approach of our employees and shall support their career advancement.
- All employees shall fulfil their obligations based upon any and all rules and regulations that concern them and are associated with the business policy of the Company.
- All employees shall observe at all times the kind of professional and ethical conduct that corresponds to their personal human dignity.
- All employees shall be clearly aware of the responsibilities assigned and the powers delegated to them. All of their decisions and actions shall be aligned with the goals of the Company and this Code.
- All employees shall avoid conflicts of interest. All business gifts shall be forbidden save for those that are allowed by law and socially acceptable.
- All employees shall be made aware that sexual harassment at the workplace is illegal. No employee shall be allowed to commit acts constituting sexual harassment.
- All employees shall protect at all times the assets of the Company and shall not use Company property for personal gain.
- All employees shall protect at all times any confidential corporate information and company documents they may have access to. Confidential corporate information shall only be made available to authorized personnel and shall under no circumstances be disclosed to unauthorized parties.
- All employees shall keep safe and convenient their work environment and shall be responsible for preventing any work-related incidents at the workplace.

To abide by the above listed principles, all our employees, partners and subcontractors must observe the following norms of conduct:

1. Avoid unlawful or suspicious gifts or services.

- It is impermissible to accept financial gifts from business partners (customers, suppliers, competitors), including cash, debt repayment, vouchers or any other cash equivalent, irrespective of the amount involved.
- It is impermissible to accept from business partners goods, paid membership cards, hotel vouchers or admission tickets to mass events.

- Employees are allowed to receive from business partners promotional items or souvenirs bearing the logo of the respective company.
- It is impermissible to require from a business partner to cover the meal expenses during business meetings of an employee or his/her department.
- It is impermissible for employees to visit disreputable entertainment venues or engage in gambling while in company of by business partners.
- It is impermissible for employees to accept or request unacceptable services from customers, suppliers, or actual or potential competitors.
- It is impermissible for employees to accept or request from business partners to share their costs or provide sponsorship for events that are not jointly organized by the parties.
- It is impermissible for employees to accept transportation or accommodation from customers, suppliers, or actual or potential competitors. If they are forced to accept transportation or accommodation from any of the parties listed above in the course of performing their professional duties, the employees involved must report that fact to the company management.
- Employees are forbidden to inform their business partners of happy or mournful events in their lives for personal gain.

2. Avoid conflicts of interest

- According to our standards, a conflict of interest is defined as any relationship, influence or action that may affect or seem likely to affect your ability to make the right decision while performing your duties of service to the Company.

- If you find yourself in a situation of conflict of interest, report immediately to the Managing Director or your supervisor.

- A conflict of interest may include, without limitation, the following situations:

- Engaging in business operations with an entity owned or managed by and employee and/or his/her family (except where the aim is to invest in a company listed on the stock exchange);

- Engaging in business operations with an entity in which a member of the family of an employee holds a managerial position;

- A personal interest on the part of an employee in a supplier or competitor.

3. Reporting violations and prevention of retaliation

All employees are obligated to bring without delay to the attention of the Managing Director any violation of this Code. If an employee is found to have violated the Code of Ethics, said employee shall be

subjected without delay to a disciplinary procedure.

Employees are strictly forbidden to resort to retaliation or engage in repressive action or any other form of harassment or abuse against an employee who has reported in good faith any problems associated with compliance with this Code of Ethics. Any employee involved in such repressive action (dismissal, demotion, suspension, threats, harassment or any other unacceptable acts or discrimination against a person who has reported in good faith a violation of this Code) shall immediately become subject to a disciplinary sanction, which may include dismissal. Any instances of retaliation, repressive action or harassment in respect of reporting employees must be brought to the attention of the Managing Director. The Managing Director must investigate the case and order appropriate corrective action or impose penalties upon the guilty parties.

This Code of Ethics enters into force as from 18 October 2017.