

ANTI-CORRUPTION PROGRAMME
Private Joint Stock Company "DATAGROUP"
(new edition)

PREAMBLE

With this Anti-Corruption Programme, Datagroup Private Joint Stock Company (hereinafter referred to as the Company) declares that all its employees, officials, manager (General Director), participants, shareholders, as well as all employees, officials, managers of all business entities (separate and non-separate structural units, branches, subsidiaries) over which DATAGROUP exercises control, in their internal activities, as well as in legal relations with business partners, state authorities, local governments, shall be guided by the principle of “zero tolerance” to any manifestations of corruption and will take all measures provided by law to prevent, detect, and combat corruption and actions and practices related thereto.

With this Anti-Corruption Programme, the Company declares its principled position and condemns corruption as an illegal and unethical way of doing business.

1. GENERAL PROVISIONS

1.1. The Anti-Corruption Programme is a set of rules, standards, and procedures aimed at detecting, combating, and preventing corruption in the Company's activities, and is the Company's basic document that defines the principles and requirements aimed at preventing corruption and compliance with anti-corruption legislation by management, employees, and other persons who may act on behalf of the Company.

1.2. This Anti-Corruption Programme is developed in accordance with the requirements of the Law of Ukraine "On Prevention of Corruption" (hereinafter referred to as the Law), and based on the Standard Anti-Corruption Programme of a legal entity, approved by the Decision of the National Agency for the Prevention of Corruption and in accordance with other regulatory acts of Ukraine.

1.3. The purpose of this Anti-Corruption Programme is to ensure the functioning of an effective system for preventing and combating corruption, compliance of the Company's activities with the requirements of anti-corruption legislation, taking into account the best world practices.

1.4. Measures to prevent, identify and eliminate or minimise corruption risks are recognised as priorities in the Company's activities.

1.5. The standards and requirements established by this Anti-Corruption Programme are not lower than those established by law.

1.6. Terms in this Anti-Corruption Programme of the Company are used in the following meanings:
Anti-Corruption Programme means a set of rules, standards and procedures to identify, combat, and prevent corruption in the Company's activities;

Corruption means the use by persons working in the Company of their official powers or related opportunities to obtain an unlawful benefit, or accepting such benefit, or accepting a promise/offer of such benefit for themselves or other persons, or, respectively, a promise/offer or provision of an unlawful benefit to a person specified in part one of Article 3 of the Law or, at their request, to other individuals or legal entities in order to persuade this person to unlawfully use their official powers or related opportunities;

Anti-Corruption Policy means the activities of PJSC "DATAGROUP" aimed at creating an effective anti-corruption system in the Company;

Close persons mean family members of persons referred to in paragraph 2.1. of this Anti-Corruption Programme, as well as husband, wife, father, mother, stepfather, stepmother, son, daughter, stepson, stepdaughter, sibling and cousin, brother-in-law and sister-in-law, nephew, niece, uncle, aunt, grandfather, grandmother, great-grandfather, great-grandmother, grandchild, great-grandchild, son-in-law, daughter-in-law, mother-in-law, father-in-law, parents of a child's spouse, adoptive parent or adoptee, guardian or caretaker, person under guardianship or custody of said subject;

Whistleblower means an individual who, believing in good faith that the information is reliable, reported possible facts of corruption or corruption-related offences, other violations of the Law committed by another person, if such information became known to them in connection with their employment, professional, economic, public, scientific activities, their service or training or their participation in the procedures provided for by law, which are mandatory for the start of such activities, service, or training;

Internal channels for reporting possible facts of corruption or corruption-related offences, other violations mean a method of secure and anonymous reporting of information that is reported by the Whistleblower to the head or authorised unit (person) of the body or legal entity in which the Whistleblower works, serves, or trains or on whose order performs work;

External channels for reporting possible facts of corruption or corruption-related offences, other violations mean ways of reporting information by the Whistleblower through individuals or legal entities, including through media, journalists, public associations, trade unions, etc.;

Regular channels for reporting possible facts of corruption or corruption-related offences, other violations of this Law mean ways of secure and anonymous reporting of information by the Whistleblower to the National Agency for the Prevention of Corruption, another subject of power, which is

competent to consider and make decisions on the issues on which the relevant information is disclosed. Regular channels must be created by specially authorised entities in the field of combating corruption, pre-trial investigation bodies, bodies responsible for monitoring compliance with laws in the relevant areas, other state bodies, institutions, organisations;

Corruption offence means an act containing signs of corruption committed by a person specified in paragraph 2.1. of this Anti-Corruption Programme, for which the law establishes criminal, disciplinary, and/or civil liability;

Improper advantage shall mean cash or other property, benefits, privileges, services, intangible assets, or any other benefits of intangible or non-monetary nature, which are promised, offered, provided, or received without legal grounds;

Potential conflict of interest means a person specified in paragraph 2.1. of this Anti-Corruption Programme having a private interest in the field in which they perform their employment (functional) duties, which may affect the objectivity and impartiality of their decision-making or the performance/non-performance of actions during the fulfilment by this person of their employment (functional) duties in the Company;

Real conflict of interest means a contradiction between the private interest of a person specified in clause 2.1. of this Anti-Corruption Programme and their employment (functional) duties in the Company, which affects the objectivity and impartiality of their decision-making or the performance/non-performance of actions during the fulfilment by this person of their employment (functional) duties;

“Zero tolerance” to corruption means absolute intolerance to corruption in any of its manifestations;

Gift shall mean cash or other property, benefits, privileges, services, or intangible assets that are provided/received free of charge or at a price below the minimum market price;

Corruption-related offence means an act that does not contain signs of corruption, but violates the requirements, prohibitions, and restrictions established by the Law, committed by a person specified in paragraph 2.1. of this Anti-Corruption Programme, for which the law establishes criminal, administrative, disciplinary, and/or civil liability;

Private interest means any property or non-property interest of a person specified in paragraph 2.1. of this Anti-Corruption Programme, caused, in particular, by their personal, family, friendly, or other non-employment (non-official) relations with individuals or legal entities, in particular with related persons;

Family members mean persons who are married to a person specified in paragraph 2.1. of this Anti-Corruption Programme, and children of the specified subject until they reach adulthood, regardless of cohabitation with the subject, and any persons living together, connected by common life, having mutual rights and obligations with the person specified in paragraph 2.1. of this Anti-Corruption Programme (except for persons whose mutual rights and obligations do not have the nature of familial), including persons who live together but are not married;

Corruption prevention means the Company's activities on the implementation of anti-corruption policy aimed at identifying, studying, limiting, or eliminating the phenomena that give rise to corruption offences or contribute to their spread;

Official means a person who permanently or temporarily holds a position in the Company, and whose functions are related to the performance of organisational, administrative, or economic duties.

Organisational and administrative duties are the duties of individuals of the Company to manage the production activities of individual subdivisions and/or employees in the Company. Organisational and administrative duties are assigned, in particular to: the head of the Company, their deputies, chief accountant, chief engineer, heads of structural units (heads of departments, divisions, sectors, segments and other structural units), their deputies, persons who manage areas of work (shift seniors, foremen, etc.);

Administrative and economic duties are the duties of individuals of the Company to manage or dispose of property in the Company (establishing the procedure for its storage, processing, sale, ensuring control over these operations, etc.), in particular, heads of administrative and economic, supply, financial departments and services, heads of warehouses, their deputies, department auditors and controllers, etc.;

Anti-Corruption Programme Commissioner is an official of the Company appointed by the General Director of the Company in accordance with the legislation of Ukraine in the manner prescribed by the Anti-Corruption Programme, hereinafter referred to as the Commissioner.

1.7. This Anti-Corruption Programme is approved by the Order of the General Director (Head) of the Company after discussing it with employees and officials of the Company.

1.8 The text of this Anti-Corruption Programme is placed in permanent open access for employees, officials of the Company on the internal web resource (website) and in printed (paper) form with the Commissioner, as well as on the external web resource (website) www.datagroup.ua for business partners of the Company.

2. SCOPE OF APPLICATION, SUBJECTS COVERED BY THE ANTI-CORRUPTION PROGRAMME AND THE SCOPE OF PERSONS RESPONSIBLE FOR THE IMPLEMENTATION OF THE ANTI-CORRUPTION PROGRAMME

2.1. This Anti-Corruption Programme is mandatory for all employees of the Company, including officials of all levels, the head (General Director), participants, shareholders, as well as all employees, officials, heads of all business entities (separate and non-separate structural units, branches, subsidiaries) over which DATAGROUP exercises control.

2.2. The Anti-Corruption Programme is also applied by the Company in any of its legal relations with business partners, including state authorities and local self-government bodies, and other persons specified in part one of Article 3 of the Law.

2.3. Subjects covered by the Anti-Corruption Programme are employees of the Company who permanently or temporarily hold positions related to the performance of organisational, administrative and economic duties, or specially authorised persons to perform such duties in the Company, as well as other persons who are not officials or employees and are in employment relations with the Company

2.4. Measures for the implementation (realisation) of the Anti-Corruption Programme within their powers shall be carried out by:

- 1) participants of the Company;
- 2) General Director of the Company (hereinafter referred to as the head and/or the head of the Company);
- 3) the Company's Anti-Corruption Programme Commissioner;
- 4) officials of the Company at all levels and other employees of the Company (hereinafter referred to as employees).

3. PRINCIPLES OF THE COMPANY'S ANTI-CORRUPTION PROGRAMME

3.1. In its activities, the Company is guided by the following principles:

- 1) Compliance with the requirements of anti-corruption legislation.
- 2) "Zero tolerance" to corruption.
- 3) Priority of precautionary (preventive) measures.
- 4) Diligence in business relations.
- 5) Personal responsibility.

4. ANTI-CORRUPTION STANDARDS AND MEASURES IN THE ACTIVITIES OF THE COMPANY

4.1. The list of anti-corruption measures in the activities of the Company:

4.1.1. The Company ensures the development and implementation of measures that are necessary and sufficient to prevent, detect, and combat corruption in its activities.

4.1.2. Anti-corruption measures include:

1) Periodic assessment of corruption risks in the Company's activities. In order to identify corruption risks (assessment of the Company's activities in view of adverse consequences in the context of anti-corruption legislation) that may arise for the Company as a result of violation of anti-corruption legislation, the Company's management shall periodically conduct an audit of the Company's economic activities. The audit results make it possible to identify high-risk areas and develop an effective action plan aimed at neutralising the legal and commercial risks of the Company. Risk assessment is a continuous process with constant communication between the manager, the Commissioner and the employees of the Company.

2) Anti-corruption standards and procedures in the activities of the Company, including the development, adoption, and application of the Anti-Corruption Programme, the Code of Ethics, the Regulation on Conflict of Interest, the policy on the provision and acceptance of gifts, etc.

4.1.3. The main anti-corruption standards and procedures of the Company are:

1) Approval and strict observance of the provisions on the mandatory implementation of the Anti-Corruption Programme and other standards, procedures, policies of the Company, and the legislation of Ukraine in the field of preventing and combating corruption.

2) Familiarisation of new employees with the content of the Anti-Corruption Programme, the Code of Ethics, the Regulation on Conflict of Interest, the policy on giving and accepting gifts, etc.

3) Regular conduct of training activities on the prevention and combating of corruption.

4) Anti-corruption audits of business partners, namely:

- determination of criteria for the selection of business partners and suppliers of the Company;
- verification of new business partners and suppliers;

- periodic audits of all contractors;
- implementation of anti-corruption provisions (reservations) in templates (texts) of agreements with business partners and suppliers.

5) Restrictions on the Company's support of political parties, charitable/sponsorship activities.

6) The mechanism of reporting on detection of signs of violation of the Anti-Corruption Programme, signs of committing a corruption or corruption-related offence, as well as the confidentiality of such messages and the protection of whistleblowers (informants).

7) Implementation of functions to prevent corruption by the Commissioner and employees.

8) Procedure for consideration of reports from whistleblowers (informants), including internal investigations and disciplinary sanctions.

9) Standards of professional ethics and duties and prohibitions for employees.

10) Mechanisms for preventing and resolving conflicts of interest.

11) Restrictions on the provision and acceptance of gifts.

12) Supervision and monitoring of compliance with the requirements of the Anti-Corruption Programme.

13) Regular review of the anti-corruption policy in order to improve and bring it into line with the regulatory documents of Ukraine, etc.

4.1.4. Business partners (contractors) of the Company are selected according to the criteria based on the priority of safety, transparency of activities, competitiveness, quality of goods, works, and services, and reliability. The Company seeks to cooperate with business partners who share the same values as set forth in the Compliance Policy and the Code of Corporate Ethics. In order to implement the declared policy, the Company always informs business partners of all the requirements stipulated by the Company's compliance policy, takes into account their reputation and the availability of a system of measures aimed at preventing corruption.

4.2. Periodic assessment of corruption risks in the activities of the Company

4.2.1. At least once a year, the Company shall carry out an internal assessment of corruption risks in its activities.

4.2.2. Corruption risk is a reasonable likelihood of a corruption or corruption-related offence or violation of the requirements of the Anti-Corruption Programme.

4.2.3. Assessment of corruption risks in the Company is carried out by the Commissioner.

4.2.3.1. At the initiative of the Commissioner, during the assessment of corruption risks, other employees of the Company, as well as independent experts or experts, may be involved, while the Commissioner, in order to prevent a conflict of interest or bias in the work of persons involved in the assessment of corruption risks, takes into account the scope of their official duties in the Company when distributing functions.

4.3. Corruption risks in the Company's activities are divided into internal (A) and external (B).

A) Internal corruption risks are identified in the organisational and managerial, financial and economic, personnel, legal procedures of the Company.

B) External corruption risks are identified in the activities of business partners, including state authorities, local self-government bodies with which the Company is in business legal relations, in the activities of other persons specified in part one of Article 3 of the Law.

4.4. Based on the results of identification of corruption risks, the Commissioner shall identify and describe them, classify them by categories and types.

4.5. Based on the results of the assessment of corruption risks in the activities of the Company, the Commissioner shall prepare a written report.

4.5.1. The report is drawn up in the form and structure defined by a separate internal regulatory document of the Company.

4.5.2. The report on the results of the assessment of corruption risks shall be submitted to the head of the Company, participants of the Company and shall contain:

1) Identified corruption risks, as well as the reasons for them and the conditions that contribute to them.

2) Assessment of identified corruption risks.

3) Proposals for measures to prevent, eliminate (reduce) the level of identified corruption risks.

4.5.3. The text of the report is provided for familiarisation to the employees of the Company, by posting on the internal web resource (website) of the Company and in printed (paper) form with the Commissioner, and can be published on the external web resource (website) of the Company – www.datagroup.ua.

4.6. If, during the measures to assess corruption risks, the Commissioner finds a violation of the Anti-Corruption Programme, committing a corruption or corruption-related offence, they initiate an internal

investigation before the head of the Company in the manner prescribed by a separate internal regulatory document of the Company.

4.7. At least once every three years, the Company shall undergo an external corruption risk assessment conducted by organisations providing audit, legal or consulting services, or independent experts.

4.8. Based on the results of processing the report of internal and/or external assessment of corruption risks, the head, participants of the Company take the necessary measures to prevent, identify, and counteract corruption in the activities of the Company, including by changing existing anti-corruption standards, policies, regulations, codes, and procedures.

4.9. Description of anti-corruption standards and procedures in the activities of the Company

4.9.1. In order to form an appropriate level of anti-corruption culture, for new employees, as well as other persons acting on behalf of the Company, the Commissioner shall conduct a mandatory introductory review of the provisions of the Anti-Corruption Programme, the Code of Ethics, the Regulation on Conflict of Interest and other related documents.

4.9.2. Provisions on the obligation to comply with the Anti-Corruption Programme are included in the internal labour regulations of the Company, all labour contracts, and can also be included in contracts/agreements/deeds concluded by the Company. At the same time, typical forms of anti-corruption clauses are developed by the Commissioner, taking into account the areas of activity of the Company.

4.9.3. The Company seeks to have business relations with business partners that support the requirements of anti-corruption legislation and/or business partners who declare non-acceptance of corruption.

4.9.4. The Company selects business partners on the basis of selection, the main principles of which are to attract contractors with the best competitive prices and ensure:

- analysis of the market of offered services;
- transparency, equality, fairness, non-discrimination, and no unreasonable restrictions on competition in relation to contractors
- honest, reasonable, and understandable choice of the most desirable offers in a comprehensive analysis of benefits and costs (primarily, the price and the quality of goods/works/services);
- targeted and cost-effective spending of funds for the purchase of goods, works, services (taking into account, if necessary, the cost of the life cycle of the purchased goods/works/services) and the implementation of measures aimed at reducing the costs of the Company;
- prevention of corruption, conflict of interest, and other abuses of power.

4.9.5. The Commissioner shall conduct an anti-corruption audit of existing or potential business partners of the Company in order to assess the presence of corruption risks. At the same time, the Commissioner checks whether the business partner has the reputation of an entity whose activities are related to corruption (even in the absence of relevant court decisions), and whether the business partner will not be used as an intermediary to transfer illegal benefits to third parties (or to obtain such from third parties).

4.9.5.1. Regarding the violation of anti-corruption legislation, the Company and its business partners shall:

- immediately notify each other in writing of any violations of anti-corruption legislation;
- make it clear to all other persons in the implementation (execution) of any agreements/deeds/contracts regarding the obligation to comply with anti-corruption legislation.

4.9.5.2. If the Company has objective (reasonable and conscientious) suspicions about the facts of violation of the requirements, provisions of anti-corruption legislation by business partners (contractors), the relevant notice shall be sent to such contractor (partner) with the requirement to provide appropriate explanations within 10 (ten) days. Failure to submit sufficient evidence, which unconditionally confirms the absence of a violation of anti-corruption legislation, is a violation of the essential terms of the agreement (material violation) concluded between the Company and its business partner (contractor) and entitles the Company to terminate such agreement/deed/contract unilaterally out of court (completely refuse to perform the agreement/deed/contract), or suspend its further execution unilaterally in some part (partially refuse to perform the agreement/deed/contract) by sending a corresponding written notice to the business partner.

4.9.5.3. Anti-corruption audit is carried out in accordance with the requirements of the Anti-Corruption Programme and other related documents, as well as standards for various areas of the Company's activities developed and approved by the Commissioner. The audit materials shall be stored for at least 5 (five) years in the archival subdivision of the Company (archive).

4.9.5.4. Based on the results of the anti-corruption audit of the Company's business partner, the Commissioner makes a written recommendation to the head of the Company.

4.9.5.5. In case of a negative recommendation of the Commissioner, the head of the Company shall make an informed decision on this issue in order to continue or start legal relations with such a business partner.

4.9.5.6. The Company's management and its employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures, or other persons to commit any actions that contradict the provisions, principles, and requirements of this Anti-Corruption Programme and/or anti-corruption legislation.

4.9.5.7. Conducting training activities and informing employees on preventing and combating corruption:

- familiarisation of employees with regulatory documents regulating the issues of preventing and combating corruption in the Company;
- conducting regular training activities on the prevention and combating of corruption;
- organisation of individual counselling of employees on the application (implementation/compliance) of anti-corruption standards, policies, regulations, and procedures.

4.9.6. Ensuring compliance of the Company's internal control system with the requirements of the Company's anti-corruption policy:

- control of accounting data, availability and reliability of primary accounting documents;
- all financial transactions carried out by the Company must be reflected in accounting accurately, correctly, and with a sufficient level of detail, documented, and available for audit;
- distortion or falsification of the Company's accounting statements is strictly prohibited and is regarded as an offence.

4.9.6.1. The Participant(s), head (General Director), shareholders, as well as all other employees of the Company are strictly prohibited, directly or indirectly, personally or through third parties, to participate in corruption actions (schemes), to offer, give, promise, request, and receive bribes or make payments to simplify administrative, bureaucratic, and any other formalities in any form, including in the form of money, assets, valuables, services, or other benefits, to any persons and from any persons or organisations, including commercial organisations, authorities, and self-government, civil servants, private companies and their representatives.

4.9.7. The Company adheres to political neutrality and does not finance, support, or in any other way contribute to the activities of political parties and/or political candidates.

4.9.8. Charitable activities of the Company should be carried out (in the absence of prohibitions established by law) only through charitable organisations in accordance with the law.

4.9.8.1. Carrying out charitable activities of the Company is not allowed if:

1) its provision is a condition for the conclusion of any deed/agreement/contract, the adoption of any decision by a civil servant, a public authority, a local government body, a legal entity, regardless of ownership, etc., or is carried out in order to obtain advantages in economic activities;

2) a business partner (contractor) or a civil servant, a public authority, a local self-government body insists on carrying out a particular type of charitable activity through a certain, specific charitable organisation.

4.9.8.2. The basic document that determines the procedure for coordinating, providing, and accounting for charitable and sponsorship assistance in the Company is the Policy on Charitable and Sponsorship Assistance.

4.9.9. Policy on giving and receiving gifts:

4.9.9.1. In its activities, the Company strives to meet the highest standards of honesty and responsibility. This includes appropriate conduct with respect to gifts, hospitality, entertainment, which may be considered a bribe (commercial bribery) if offered or received with unlawful intent, i.e. for the purpose of improperly obtaining the right to carry on/continue a business or the right to manage a business or to secure other improper advantages in a business.

4.9.9.2. Employees of the Company are prohibited to demand, request, receive gifts for themselves or persons close to them directly or through other persons from legal entities or individuals in connection with the performance by such employees of activities related to the performance of their official duties in the Company;

4.9.9.3. Employees of the Company may accept gifts that meet the requirements and reservations of the Policy on Gifts and Hospitality of the Company, the generally recognised idea of hospitality, meet the requirements of the current legislation, are previously agreed and the information on them must be disclosed in the manner prescribed by the Company and if the value of such gifts does not exceed 25 percent of one minimum wage (per month), established on January 1st of the reporting tax year, once.

4.9.9.3.1. Restrictions on the value of gifts do not apply to gifts that:

- are given by close persons;
- are received as public discounts on goods, services, public winnings, prizes, premiums, bonuses.

4.9.9.4. Gifts received by officials of the Company as gifts to the Company are the property of the Company.

4.9.9.5. If a decision is made by an official of the Company in favour of a person from whom they or their close person received a gift, such decisions are considered to be made in a conflict of interest.

4.9.9.6. Gifts on behalf of the Company, its employees, and representatives to third parties in the form of money, both cash and non-cash, regardless of currency, are not allowed.

4.9.9.7. Despite private interests, in case of receiving a proposal for an improper benefit or gift, officials of the Company are obliged to immediately take the following measures:

- refuse the offer;
- if possible, try to identify the person who made the offer;
- attract witnesses, if possible, including from among the participants, managers, shareholders, other employees;

- notify in writing about the proposal to the immediate supervisor (if any) and the Commissioner, specially authorised entities in the field of combating corruption.

4.9.9.8. If a person specified in paragraph 2.1. of this Anti-Corruption Programme has doubts on the possibility of giving or receiving a gift, they have the right to apply in writing to the Commissioner for advice on this issue.

4.10. Interaction with civil servants.

4.10.1. Due to high corruption risks during interaction with civil servants, in legal relations with civil servants, state authorities, local governments, international government organisations and political parties, the Company and the persons specified in paragraph 2.1. of this Anti-Corruption Programme undertake to comply with all measures provided by law for good cooperation, as well as to prevent, detect and combat corruption and related actions and practices in accordance with this Anti-Corruption Programme and other related documents approved by the Company.

4.10.2. Employees of the Company are independently responsible for corruption manifestations in independent interaction with civil servants in accordance with the current legislation of Ukraine.

4.11. Reporting by employees of violations of the Anti-Corruption Programme.

4.11.1. The Company's employee (whistleblower) independently determines which channels to use to report possible facts of corruption or corruption-related offences, other violations of this Law, namely: internal, regular or external channels.

4.11.2. For Reports by the Company's employees of the facts of violation of the Anti-Corruption Programme, corruption or corruption-related offences, corruption incidents (hereinafter referred to as the Reports), an internal reporting channel has been created in the Company. The Commissioner places the relevant information on information stands in the premises of the Company, on internal and external web resources (websites) of the Company. The information must include:

- phone number for Reports 0 800 210 000;
- «Your Voice» compliance hotline email address – compliance@datagroup.ua.
- reception hours of the person authorised to receive oral and written Reports – from 9:00 a.m. to 6:00 p.m.

4.11.3. The standard form of the Report is developed by the Commissioner.

4.11.4. The Commissioner maintains the Register of Reports on violations of the Anti-Corruption Programme or signs of corruption or corruption-related offences, corruption incidents. The procedure for maintaining the relevant Register shall be approved by the head of the Company upon the submission of the Commissioner.

4.11.5. The procedure for consideration by the Commissioner of Notifications on the facts of violation of the Anti-Corruption Programme, committing corruption or corruption-related offences is established in the position approved by the head at the request of the Commissioner.

4.11.6. The Company ensures the confidentiality of the employee who reported the facts of violation of the Anti-Corruption Programme (whistleblower) at any stage of consideration of the relevant Report and does not disclose their name to other persons affected by such Report, even if they require the provision of this information.

5. PREVENTION OF CORRUPTION IN PROCUREMENT

5.1. Procurement means the Company's activities on the purchase of goods, works, and services.

5.2. The Company purchases goods, works, and services based on the following principles:

- 1) legality;
- 2) priority of safety which exceeds production and economic purposes;
- 2) responsibility of each employee for the safety and quality of their work;
- 3) value for money;
- 4) efficiency of the procurement process (completeness of rules, simplicity and speed of procedures).

5.3. The Company prevents corruption and contributes to reducing the level of corruption in the procurement sector, improves the efficiency of procurement by ensuring:

- 1) compliance with the requirements of the legislation in the field of procurement;
- 2) clearly formed qualification criteria for procurement participants;

3) publication of all necessary information and documents in accordance with the legislation and equal access of participants to such information, proper documentation of each stage, all decisions taken within the framework of procurement;

- 4) participation of employees from the authorised units (authorised persons) in meetings of tender committees in order to identify corruption risks and violations of anti-corruption legislation;
- 5) openness, competitiveness between the participants of the procedures, ensuring compliance with the principles of fair competition, as well as the effective use of funds during the procurement procedures;
- 6) a clear division of powers in the implementation of the procurement procedure;
- 7) making pre-threshold purchases through the use of electronic platforms;
- 8) taking all other necessary measures aimed at reducing the level of corruption in the procurement sector.

6. ETHICS OF THE COMPANY'S EMPLOYEES

6.1. In the performance of their functional duties, all employees of the Company are obliged to strictly adhere to generally recognised ethical standards of behaviour.

6.2. All employees of the Company are tolerant and respectful of the political views, ideological and religious beliefs of others, and also undertake not to use their powers in the interests of political parties and/or politicians.

6.3. All employees of the Company act objectively, regardless of personal interests, personal attitude to any persons, their political views, ideological, religious, or other personal views or beliefs.

6.4. All employees of the Company conscientiously, competently, timely, efficiently, and responsibly perform the functional duties, decisions and instructions of the bodies and officials to whom they are subordinate, accountable, or by whom they are controlled, as well as prevent abuse and inefficient use of the funds and property of the Company.

6.5. All employees of the Company undertake not to disclose or otherwise use confidential information that has become known to them in connection with the performance of their functional duties, except in cases established by law.

6.6. All employees of the Company, despite their personal interests, are obliged to refrain from executing decisions or instructions of the Company's management if they pose a threat to the legally protected rights, freedoms, or interests of individual citizens, legal entities, state or public interests or are contrary to the law.

6.7. All employees of the Company independently assess the legality of the decisions or instructions provided by the management and the possible damage that will be caused in the event of the implementation of such decisions or instructions.

6.7.1. In case of receiving for execution decisions or orders that an employee of the Company considers illegal or threatening the legally protected rights, freedoms, or interests of individual citizens, legal entities, state or public interests, they must immediately notify in writing the immediate manager, or the head of the Company and the Commissioner.

6.8. Officials of all levels, the Commissioner, employees, representatives of the Company are obliged to refrain from executing decisions or orders of management that are clearly criminal.

6.9. The official, the Commissioner, the employee may not be dismissed or forced to resign, disciplined or subjected by the management to other negative measures or the threat of such measures of influence due to refusal to execute decisions or orders that are clearly criminal.

6.10. Officials, employees of the Company, the Commissioner may not be brought to disciplinary responsibility for refusal to participate in corrupt actions, even if such refusal may lead to the loss of the Company's competitive advantage or potential benefit.

7. RIGHTS AND OBLIGATIONS OF THE PARTICIPANTS AND EMPLOYEES OF THE COMPANY (EXCEPT FOR THE COMMISSIONER)

7.1. Participants, manager, employees, shareholders and other persons acting on behalf of the Company have the right to:

- 1) provide proposals for improving the Anti-Corruption Programme;
- 2) apply to the Commissioner for consultations on the implementation of the Anti-Corruption Programme and clarifications on its provisions, other internal documents of the Company regarding the prevention of corruption, anti-corruption legislation;
- 3) receive recommendations from the Commissioner on further actions in case the planned actions or decisions (transactions) may be a source of corruption risks.

7.2. Participants, manager, employees of the Company shall:

- 1) comply with the relevant requirements of the legislation, the Anti-Corruption Programme and related internal documents, as well as ensure the practical implementation of the Anti-Corruption Programme;
- 2) perform their direct duties, taking into account the interests of the Company;

3) immediately inform the Commissioner, the head or participants of the Company about cases of violation of the requirements of the Anti-Corruption Programme (or cases of incitement to such actions), committing corruption or corruption-related offences by other employees of the Company or other individuals or legal entities with whom the Company is or plans to be in business relations;

4) immediately inform in the manner prescribed by the Anti-Corruption Programme of the occurrence of a real, potential conflict of interest;

5) refrain from behaviour that can be regarded as a willingness to commit a corruption offence related to the activities of the Company;

6) inform the Commissioner of carrying out and accepting business hospitality, of giving and receiving gifts in the manner prescribed by the Company;

7) consider and take into account the recommendations of the Commissioner;

8) not commit or participate in the commission of corruption offences related to the activities of the Company.

7.3. Employees and the head of the Company shall not:

1) use their official powers or their position and related opportunities in order to obtain unlawful benefits for themselves or other persons;

2) use any property of the Company or its funds in private interests;

3) demand or receive any material or non-material benefit (for themselves or for their close persons) in connection with the performance of their official duties, which is not provided for by an employment or other agreement between them and the Company;

4) organise, be an intermediary or personally make any cash or non-cash payments or settlements with business partners of the Company, if such payments or settlements are not provided for by the current legislation;

5) influence directly or indirectly the decisions of the Company's employees in order to obtain any material or non-material benefit for themselves or for their close persons that is not provided for by an employment or other agreement between them and the Company;

6) take actions and make decisions in the context of a real conflict of interest;

7) take any actions that directly or indirectly incite other employees, the head of the Company to violate the requirements of the Law or the Anti-Corruption Programme;

7.4. After dismissal or other termination of cooperation with the Company, a person is prohibited from disclosing or otherwise using in their own interests information (confidential) that became known to them due to the performance of their powers, contractual obligations within 3 (three) years after dismissal or other termination of cooperation with the Company, except in cases established by law.

7.5. Employees of the Company shall not – directly or through other persons – demand, request, receive gifts for themselves or their close persons from legal entities or individuals due to activities by such employees related to the performance of their official duties in the Company.

7.5.1. The employees, the manager may give and accept gifts, taking into account the provisions of the Company's Policy on Gifts and Hospitality and this Anti-Corruption Programme.

8. RIGHTS AND OBLIGATIONS OF THE COMMISSIONER AND THEIR SUBORDINATES (IF ANY)

8.1. The Commissioner of the Company is appointed by the participant(s) of the Company or its head in accordance with the labour legislation and constituent documents of the Company.

8.2. The Commissioner may be an individual who is capable of performing the relevant duties in terms of their business and moral qualities, professional level, state of health.

8.3. The following person may not be appointed as the Commissioner:

1) having an outstanding or not withdrawn in accordance with the procedure established by law conviction;

2) having been declared legally incapable or whose capacity has been limited by a court decision;

3) dismissed from positions in state bodies, authorities of the Autonomous Republic of Crimea, local self-government bodies for violation of the oath or in connection with the commission of a corruption offence or an offence related to corruption – within three years from the date of such dismissal.

8.4. Working in the positions specified in paragraph 1 of part one of Article 3 of the Law, as well as any other activity that creates a real or potential conflict of interest with the activities of the Company is incompatible with the activities of the Commissioner.

8.4.1. In case of incompatibility, the Commissioner shall, within two days from the date of occurrence of such circumstances, notify the head of the Company thereof with the simultaneous submission of an application for termination of the employment contract on their own initiative.

8.5. The Commissioner may be dismissed early in the following cases:

- 1) termination of the employment contract on the initiative of the Commissioner;
- 2) termination of the employment contract on the initiative of the head of the legal entity or its participants. A person who works as the Commissioner in the Company may be dismissed subject to the consent of the National Agency for the Prevention of Corruption;
- 3) inability to exercise their powers for health reasons in accordance with the conclusion of the medical commission established by the decision of the specially authorised central executive body that implements the state policy in the field of health care;
- 4) entry into force of a court decision declaring them incapacitated, limiting their civil capacity, declaring them missing or dead;
- 5) entry into force of a conviction against them;
- 6) death.

8.6. The head of the Company shall notify the National Agency for Prevention of Corruption in writing of the dismissal of a person from the position of the Commissioner within two working days and ensure the immediate submission of a new candidate for the specified position.

8.7. The main tasks of the Commissioner are to prepare, ensure the implementation and control over the implementation of measures to prevent, combat, and detect corruption in the Company.

8.8. The Commissioner shall exercise their rights and obligations directly. To perform their functions, the Commissioner may involve (with the consent of the head of the Company) other employees of the Company.

8.9. Participants of the Company, the head of the Company shall:

- 1) provide the Commissioner with appropriate material and organisational working conditions;
- 2) facilitate the performance of the functions provided for by the Law and the Anti-Corruption Programme by the Commissioner;
- 3) promptly respond to written and oral inquiries, proposals, and recommendations of the Commissioner provided by them within the implementation of the Anti-Corruption Programme;
- 4) at the initiative of the Commissioner, send requests to state authorities, local self-government bodies, enterprises, institutions and organisations, regardless of the form of ownership, in order to obtain from them the relevant information and materials necessary to perform the tasks assigned to the Commissioner.

8.10. The Commissioner shall perform the tasks assigned to them:

- 1) perform their functions objectively and impartially;
- 2) organise the preparation of internal documents of the Company on the formation and implementation of the Anti-Corruption Programme;
- 3) organise periodic assessment of corruption risks in the Company's activities;
- 4) develop and submit internal documents of the Company on issues provided for by the Anti-Corruption Programme for approval by the head;
- 5) ensure supervision, control, and monitoring of compliance by employees, the head of the Company with the Law and this Anti-Corruption Programme;
- 6) assess the results of the implementation of measures provided for by the Anti-Corruption Programme;
- 7) ensure the preparation of a report on the state of implementation of the Anti-Corruption Programme;
- 8) ensure cooperation with persons who report in good faith of possible facts of violation of the requirements of the Anti-Corruption Programme, corruption or corruption-related offences being committed;
- 9) ensure the preparation and submission of proposals for a plan for conducting audits of compliance with the requirements of the Anti-Corruption Programme to the head;
- 10) participate in audits and internal investigations conducted in accordance with the Anti-Corruption Programme;
- 11) participate in periodic assessment of corruption risks in the Company's activities;
- 12) improve their skills, initiate before the head of the Company the issue of undergoing their professional training (advanced training);
- 13) take measures to identify a conflict of interest and promote its settlement, inform the head of the Company about the identification of a conflict of interest and the measures taken to resolve it;
- 14) check for corruption risks and coordinate payments and expenses related to charitable and sponsorship activities, making contributions in support of political parties;
- 15) organise the work of internal channels of reporting on possible facts of corruption or corruption-related offences, other violations of the Law;
- 16) receive and organise consideration and verification of reports on possible facts of corruption or corruption-related offences, other violations of the Law;
- 17) inform the head of the Company or the founders (participants) about the facts that may indicate the commission of corruption or corruption-related offences and other violations of the requirements of the Law by members of management bodies, officials of all levels, employees, representatives of the Company;

18) cooperate with whistleblowers, ensure observance of their rights and guarantees of protection provided by the Law;

19) inform whistleblowers about their rights and obligations under the Law, as well as about the status and results of consideration, verification, and/or investigation of the information reported by them;

20) ensure the formation and maintenance of registers provided for in this Anti-Corruption Programme and/or the maintenance of which may be provided for by other internal documents of the Company on the formation and implementation of the Anti-Corruption Programme, other internal documents related to the prevention and combating of corruption:

a) employees of the Company held liable for violation of the requirements of the Anti-Corruption Programme, committing a corruption offence or an offence related to corruption;

b) charitable payments made by the Company;

c) anti-corruption audits conducted in accordance with the Anti-Corruption Programme;

d) official investigations and audits conducted in accordance with the Anti-Corruption Programme;

e) reports of a conflict of interest and violations of the requirements of the Anti-Corruption Programme, corruption or corruption-related offences committed;

21) organise and conduct anti-corruption audit of the Company's business partners;

22) ensure the confidentiality of information and protection of employees who have reported violations of the requirements of the Anti-Corruption Programme, committing a corruption offence or an offence related to corruption;

23) provide clarifications and consultations to the participants, manager, shareholders, employees of the Company related to the application of the Company's Anti-Corruption Programme;

24) participate in cooperation with public authorities, local self-government bodies, other legal entities, non-governmental and/or international organisations on the prevention of corruption;

25) organise events to improve the skills of the Company's employees on issues related to the prevention of corruption;

26) participate in the recruitment procedures of the Company;

27) ensure interaction and coordination between the structural units of the Company regarding the preparation, implementation, and control over the measures taken for the implementation of the Anti-Corruption Programme;

28) perform other duties stipulated by the Law, the Anti-Corruption Programme, and the employment contract.

8.11. The Commissioner has the right to the following to perform the tasks assigned to them:

1) receive written and oral explanations from employees, the head of the Company on issues related to the powers assigned to them (including during the periodic assessment of corruption risks, anti-corruption audits of business partners, inspections, internal investigations, and expertise);

2) receive information and materials (certified copies of financial, accounting, and legal documents, internal official correspondence) regarding the Company's activities, including documents related to holding (or participating in) the procurement of goods, works, or services, tenders, etc. from the Company's subdivisions. If necessary, the Commissioner shall be granted access to the original documents, copies of which were transferred to them. In cases where it is inappropriate to make a significant number of copies of documents, the Commissioner, upon the decision of the head of the subdivision, may receive the originals of the relevant documents to be returned by them within 5 (five) working days from the date of completion of the event for which they were requested;

3) receive drafts of financial, organisational, and administrative documents, contracts for their verification for corruption risks;

4) gain access to the warehouses, production facilities of the Company, conduct control measures in them;

5) access the electronic data storage and processing facilities available in the Company and, if necessary, require the registration of relevant data on a certified paper medium;

6) involve other employees of the Company in the performance of their functions with the consent of the head of the Company;

7) initiate sending requests to state authorities, local self-government bodies, enterprises, institutions, organisations of all forms of ownership to receive information and materials related to the activities of the Company from them;

8) initiate the issue of bringing employees, managers to responsibility, including dismissal from their positions in accordance with the law;

9) apply to the participants, the head for the implementation of their powers and duties in accordance with the provisions of the Anti-Corruption Programme;

10) process information, including personal data, in compliance with the legislation on access to personal data;

11) apply to the National Agency for the Prevention of Corruption regarding the violated rights of the whistleblower, their close persons;

12) participate in meetings of work groups and commissions of the Company on issues within the competence of the Commissioner;

13) initiate meetings on the prevention and detection of corruption, the implementation of this Anti-Corruption Programme;

14) involve employees of the Company in the performance of their powers with the consent of the head of the Company;

15) apply to the founders (participants), the head, the management bodies of the Company on the implementation of their powers and performance of official duties;

16) exercise other rights provided for by the Law, the Anti-Corruption Programme, the employment contract and the job description.

9. GUARANTEES OF THE COMMISSIONER'S INDEPENDENCE. PROCEDURE FOR REPORTING OF THE COMMISSIONER TO THE PARTICIPANTS OF THE COMPANY

9.1. The exercise of the Commissioner's functions in the Company is independent. Interference in the activities of the Commissioner by the founders (participants), the head of the Company, management bodies and members of management bodies, officials at all levels, employees, representatives, business partners of the Company, as well as other persons is not allowed.

9.2. Interference should be understood as:

1) refusal to provide the Commissioner with information, documents, access to information and documents which the Commissioner has the right to receive;

2) any influence on the adoption by the Commissioner of decisions and actions that are carried out outside the powers of the management body/person exercising influence provided for by the legislation, the charter of the Company, decisions of the management bodies or internal documents of the Company (for example, providing instructions on the content of the conclusions to be made by the Commissioner based on the results of the audit of business partners; on the scope of persons subject to declaration, reports of the facts of late submission of declarations which cannot be sent to the National Agency for the Prevention of Corruption, etc.);

3) actions/omissions that cause restriction or violation of the rights of the Commissioner (for example, unreasonable refusal to provide annual leave according to the schedule; unreasonable refusal to send for training/advanced training provided for by the relevant plan/schedule; unreasonable limitation of the amount or non-payment of incentive and compensation payments provided for by labour and collective contracts, etc.);

4) actions/omissions that impede the performance of official duties by the Commissioner (for example, sending the Commissioner unreasonably on a business trip away from the workplace; unreasonable withdrawal of the Commissioner's access to the workplace, personal computer; unreasonable seizure of documents stored by the Commissioner; failure to provide the Commissioner with the material resources necessary to perform the tasks assigned to them, failure to provide access to the Company's business system, communication means, etc.);

5) entrusting the Commissioner with duties, providing instructions on issues that do not belong to or go beyond their powers defined by the Law of Ukraine "On Prevention of Corruption" and this Anti-Corruption Programme, and limiting the performance of their official duties.

9.3. The Commissioner may not be dismissed or forced to dismiss, disciplined or subjected by the founders (participants), head, management bodies of the Company to other negative measures of influence (transfer, attestation, change of working conditions, refusal to appoint to a higher position, reduction of wages, refusal to extend the employment contract, etc.) or the threat of such measures of influence due to the implementation of anti-corruption measures, detection and reporting of possible facts of corruption or corruption-related offences, other violations of the Law of Ukraine "On Prevention of Corruption". Negative measures of influence also include formally lawful decisions and actions of the founders (participants), the head, the management bodies of the Company, which are selective in nature, in particular, do not apply to other employees, managers in similar situations and/or have not been applied to the Commissioner in similar situations (in similar circumstances) before.

9.4. In case of violation of the guarantees of independence, the Commissioner shall notify the Supervisory Board of the Company (if the Supervisory Board is formed in the Company) or the Authorised Management Body and, if necessary, the National Agency for the Prevention of Corruption.

9.5. The founders (participants), the head, the management bodies of the Company, officials of all levels of the Company shall:

1) ensure the independence of the Commissioner;

2) provide the Commissioner with proper material, organisational working conditions (a separate office, a safe for storing documents, a workplace equipped with office furniture, computer equipment and organisational equipment, access to the Internet, stationery, communication facilities, an e-mail account) and sufficient resources to perform the tasks assigned to them;

3) facilitate the performance by the Commissioner of the tasks stipulated by the Law and this Anti-Corruption Programme; at the request of the Commissioner, provide information and documents necessary for the performance of the duties assigned to them, facilitate internal investigations, ensure the involvement of employees/resources for the performance of duties by the Commissioner and employees subordinate to them;

4) respond within a reasonable time to written and oral inquiries, proposals, and recommendations of the Commissioner given by them within the framework of the implementation of this Anti-Corruption Programme.

9.6. The Commissioner shall prepare a report on the results of the implementation of the Anti-Corruption Programme (hereinafter referred to as the Report) at least once a year within the terms and in the manner determined by the participants or the head of the Company.

9.7. The Report shall include information on:

1) the status of implementation of measures defined by the Anti-Corruption Programme;

2) the results of the implementation of measures defined by the Anti-Corruption Programme;

3) revealed violations of the requirements of the Law, the Anti-Corruption Programme and measures taken to eliminate such violations;

4) the number and results of audits and internal investigations on the detection and combating of corruption;

5) facts of impeding the proper performance by the Commissioner of their functions, imposing unreasonable restrictions on them, cases of interference in their activities by any third parties;

6) available suggestions and recommendations.

9.8. If necessary, the content of the provided Report shall be additionally discussed by the Commissioner with the participants of the Company or the head of the Company.

9.9. The general results of the implementation of the Anti-Corruption Programme specified in subparagraphs 1, 2 of paragraph 2 of this Section of the Anti-Corruption Programme are posted in public open access in paper and/or electronic form, as well as on the internal web resource (website) of the Company; the report can also be published on the external web resource (website) of the Company – www.datagroup.ua.

10. PROCEDURE FOR SUPERVISION, CONTROL OVER COMPLIANCE WITH THE ANTI-CORRUPTION PROGRAMME, AS WELL AS ASSESSMENT OF THE RESULTS OF THE IMPLEMENTATION OF THE MEASURES PROVIDED FOR BY IT

10.1. The Commissioner supervises and constantly monitors the compliance of employees, the head of the Company with the Anti-Corruption Programme.

10.2. Supervision and control over compliance with the Anti-Corruption Programme shall be carried out by the Commissioner in the following forms:

1) consideration and response to reports of violations of the requirements of the Anti-Corruption Programme, committing corruption or corruption-related offences;

2) implementation of scheduled and unscheduled audits of the activities of the Company's employees on the implementation (realisation) of the Anti-Corruption Programme;

3) examination of organisational and administrative, legal, production, and financial documents, as well as their drafts.

10.3. If, during the supervision or control over the compliance with the Anti-Corruption Programme, the Commissioner finds signs of violation of the Anti-Corruption Programme or signs of committing a corruption or corruption-related offence, they initiate an internal investigation before the head in the manner prescribed by a separate internal regulatory document of the Company.

10.4. The Commissioner shall ensure the organisation of assessing the results of implementing the measures provided for by the Anti-Corruption Programme.

10.4.1. To carry out the assessment, the Commissioner has the right to receive in writing the relevant information from employees, the head of the Company on the results of the implementation of the relevant measures.

10.4.2. The results of the assessment are summarised by the Commissioner in a written report, which they draw up at least once every twelve months and transmit to the head and participants of the Company. The assessment is carried out according to the criteria defined by the Commissioner.

11. CORRUPTION RISK MANAGEMENT

11.1. To effectively prevent corruption in its activities, the Company applies a risk-oriented approach and creates a risk management system that provides for regular assessment of corruption risks that may affect the Company's activities, taking measures necessary and sufficient to eliminate or minimise them, their further monitoring and control, as well as updating existing anti-corruption measures in accordance with changes in the internal and external environment of the Company's activities.

11.2. The Company carries out periodic assessment of corruption risks in its activities, the purpose of which is:

- 1) to identify internal and external corruption risks in the Company's business processes;
- 2) to assess the sufficiency, adequacy, and effectiveness of existing measures for the proper prevention, elimination or minimisation of identified corruption risks;
- 3) to analyse and assess (determine the levels) of identified corruption risks;
- 4) to prioritise high-risk business processes, taking into account the nature and degree of vulnerability of business processes to corruption risks, levels of assessed corruption risks;
- 5) to develop measures to effectively eliminate or minimise corruption risks in the Company's activities.

11.3. The organisation of periodic assessment of corruption risks in the activities of the Company is carried out by the Commissioner.

11.4. The Company may carry out internal and/or external assessment of corruption risks. Internal assessment of corruption risks is carried out by a work group, which is formed from representatives of the structural units of the Company. External assessment of corruption risks is carried out by audit, legal, consulting companies or independent experts involved by the Company.

11.5. The Company assesses corruption risks in its activities at least once every 2 years.

11.6. The Company may decide to carry out an assessment of corruption risks according to the procedure established by law.

11.7. Based on the results of the assessment of corruption risks in the activities of the Company, a risk register is formed.

11.8. The risk register shall contain:

- 1) the identified corruption risks, areas (directions) of the Company's activities in which they are identified, their descriptions, sources, existing control measures, assessment of their sufficiency, compliance, and effectiveness;
- 2) the levels of identified corruption risks;
- 3) proposals for measures to eliminate or minimise the identified corruption risks (including updated/new anti-corruption measures at the level of the Company and/or at the level of business processes), deadlines (terms) for their implementation, responsible departments/executors, necessary resources, performance indicators).

11.9. After its execution based on the results of corruption risk assessment, the register of risks is submitted for approval to the head (executive body or supervisory board) of the Company.

11.10. The head (executive body or supervisory board) of the Company approves the risk register and ensures the adoption of the measures provided for by it, including by updating the existing anti-corruption measures, and allocates the necessary resources for this.

11.11. At the request of the participant (founder) of the Company, the register of risks is brought to their attention.

11.12. The risk register is provided for the responsible departments/executors, and can also be posted on the Company's website (if any) for familiarisation by all interested parties.

11.13. The Commissioner monitors the implementation of measures to eliminate or minimise the identified corruption risks, prepares and submits reports on the status of implementation of measures in the manner and within the time limits specified by this Anti-Corruption Programme.

12. CONFIDENTIALITY TERMS FOR THE EMPLOYEES INFORMING THE COMMISSIONER OF THE FACTS OF VIOLATIONS OF ANTI-CORRUPTION REQUIREMENTS

12.1. Employees of the Company are guaranteed the confidentiality of their reports on detected signs of violations of the Anti-Corruption Programme, corruption or corruption-related offences in the activities of other employees of the Company and reports on the facts of incitement of employees of the Company to commit corruption or corruption-related offences.

12.1.1. The Company periodically conducts training on honest and voluntary reporting of corruption, in particular:

- information campaigns aimed at forming a psychological attitude among employees on rejecting corruption as a way to solve the problem;
- raising the level of legal awareness among employees, in particular, in terms of awareness of their rights and freedoms, the mechanism for their implementation, confidentiality and legal means of protecting whistleblowers (informants);
- clarification of the most important anti-corruption measures carried out in the state, the provisions of the legislation on the prevention of corruption, in particular, in terms of determining the types and forms of corruption behaviour;
- systematic introduction of educational activities on behavioural patterns in certain situations with possible corruption risks.

12.2. Reports on detected signs of violations of the Anti-Corruption Programme, as well as reports on the facts of incitement of the Company's employees to commit corruption or corruption-related offences may be made orally or in writing, using the communication channels specified in the Anti-Corruption Programme. Reports may also be made by employees and officials of the Company's business partners.

12.2.1. The head of the Company provides round-the-clock work of the specified communication channels and their protection from external interference and leakage of information.

12.3. Submission of knowingly false reports is not allowed.

12.4. Reports of employees of the Company on the detection of signs of corruption or corruption-related offences may be anonymous, whereas reports that are made anonymously can be considered only if the information provided in such reports relates to a specific employee of the Company or business partners of the Company and contains factual data that can be verified.

12.5. Verification of the information set forth in the report is carried out by the Commissioner, and if the report relates to the actions of the Commissioner themselves – an employee determined by the participants or the head of the Company.

12.6. Any data that makes it possible to identify the person who notified the Commissioner of the facts of incitement to commit a corruption or corruption-related offence or the detection of signs of violation of the requirements of the Anti-Corruption Programme, the commission of corruption or corruption-related offences by employees or other persons, are confidential information and protected in accordance with the law.

12.6.1. The Commissioner and the persons involved in the verification of the information set forth in the report are not entitled to disclose it.

13. RIGHTS, GUARANTEES, AND PROCEDURES FOR THE PROTECTION OF EMPLOYEES WHO HAVE REPORTED INFORMATION ON CORRUPTION OR CORRUPTION-RELATED OFFENCES (WHISTLEBLOWERS)

13.1. An employee who has reported signs of violation of the requirements of the Anti-Corruption Programme, detection of signs of corruption or an offence related to corruption (hereinafter referred to as the whistleblower (informant) has rights and guarantees of protection in accordance with the Law. The rights of the whistleblower (informant) arise from the moment of reporting information about possible facts of corruption or corruption-related offences, other violations of this Law. The rights and guarantees of protection of whistleblowers (informants) apply to the close persons of the whistleblower (informant).

13.2. The Head and/or the Commissioner, within the limits of their powers, provide conditions for the protection of persons who assist in preventing, detecting, and combating corruption in the Company.

13.3. Information about the whistleblower (informant) may not be disclosed, except in cases established by law.

13.4. Protection of labour rights of whistleblowers (informants) is carried out in accordance with the Law.

13.4.1. The whistleblower (informant), their relatives may not be denied employment, they may not be dismissed or forced to resign, brought to disciplinary responsibility or subjected by the head or employer to other negative measures of influence (transfer, certification, change of working conditions, refusal to be appointed to a higher position, reduction of wages, etc.) or the threat of such measures of influence due to reporting on possible facts of corruption or corruption-related offences and/or requirements of the Anti-Corruption Programme.

13.4.2. Negative measures also include formally lawful decisions and actions of the manager or employer that are selective in nature, in particular, do not apply to other employees in similar situations and/or have not been applied to the employee in similar situations before.

13.5. It is prohibited to disclose information about the identity of the whistleblower, his family, or other data that may reveal the identity of the whistleblower, his family, third parties who are not involved in the consideration, verification and / or investigation of the facts reported, as well as persons whose actions or omissions are connected with what is being reported apart from the cases established by the law.

13.5.1. In case of leakage of confidential information about the whistleblower (informant), the head of the Company, the Commissioner at the request of such an employee or on their own initiative, must immediately take all measures to avoid the occurrence of negative consequences for the whistleblower (informant) associated with such disclosure.

13.6. Measures to protect the whistleblower (informant) are determined by the participants or the head of the Company together with the Commissioner and are implemented subject to the written consent of the employee.

13.6.1. Whistleblowers (informants) as persons who assist in preventing and combating corruption are protected by the state. If there is a threat to the life, housing, health, and property of persons who provide assistance in preventing and combating corruption, or their relatives, due to reporting on violation of the requirements of the Law and this Anti-Corruption Programme, law enforcement agencies may apply legal, organisational, technical and other measures to them aimed at protecting against unlawful encroachments provided for by the Law of Ukraine "On Ensuring the Safety of Persons Participating in Criminal Proceedings".

13.7. In case of confirmation of the information on violation of the requirements of the Law and this Anti-Corruption Programme in the Report, the head of the Company takes measures to stop the detected violation, eliminate its consequences, and bring the guilty persons to disciplinary responsibility, and in cases of detection of signs of a criminal or administrative offence, also informs specially authorised entities in the field of combating corruption.

13.7.1. The head of the Company, in case of detection of a corruption or corruption-related offence or receipt of information about the commission of such an offence by employees of the Company, is obliged, within the limits of their powers, to take measures to stop such an offence and notify a specially authorised entity in the field of combating corruption of its commission.

14. SETTLEMENT OF CONFLICT OF INTEREST IN THE ACTIVITIES OF THE COMPANY 'S EMPLOYEES

14.1. The procedure for settling a conflict of interest in the activities of the Company's employees is regulated by certain internal regulatory documents of the Company.

15. PROCEDURE FOR PROVIDING EMPLOYEES WITH EXPLANATIONS AND CONSULTATIONS BY THE COMMISSIONER

15.1. If there are questions regarding the interpretation of certain provisions of the Anti-Corruption Programme, the need for clarification and consulting assistance on the prevention and settlement of conflicts of interest, prevention and detection of corruption in the Company, the Company participants, the head, employees of the Company may contact the Commissioner during working hours for an oral or written clarification.

15.2. The essence of the inquiry regarding the interpretation of the Anti-Corruption Programme, obtaining clarifications and consulting assistance on the prevention and settlement of conflicts of interest, prevention and detection of corruption in the Company is set out directly to the Commissioner (in the receiving days and hours determined by the Commissioner) or by sending an official note to their name or sending a written inquiry to their e-mail address in any form.

15.3. The Commissioner shall provide an oral explanation during a personal appointment or in writing – no later than 10 working days from the date of receiving the inquiry. The Commissioner may extend the period of consideration of the inquiry, but no more than 10 working days, which shall be notified in writing to the person who applied for clarification.

15.4. If, during the provision of clarification, the Commissioner finds signs of violation of the Anti-Corruption Programme or signs of committing a corruption or corruption-related offence, they initiate an internal investigation before the head in the manner prescribed by a separate internal regulatory document of the Company.

16. PROCEDURE FOR PERIODIC ADVANCED TRAINING OF EMPLOYEES IN THE FIELD OF PREVENTION AND DETECTION OF CORRUPTION IN THE COMPANY

16.1. Advanced training of the Company's employees in the field of prevention and detection of corruption is carried out in order to provide basic knowledge on anti-corruption legislation, increase the level of compliance with the requirements of the Anti-Corruption Programme, form an anti-corruption culture, as well as foster intolerance to corruption.

16.2. Advanced training is carried out in accordance with the thematic schedule for each half-year, which is prepared by the Commissioner, whereas the advanced training may include both measures for all

employees of the Company, and separate measures for the head of the Company and/or participants, shareholders of the Company.

16.3. The subject and form of events (seminars, lectures, workshops, trainings, webinars, etc.) for advanced training are determined by the Commissioner, taking into account:

1) proposals of the head of the Company, participants of the Company, heads of structural subdivisions of the Company;

2) the results of assessing the implementation of the measures for the Anti-Corruption Programme;

3) the results of periodic assessment of corruption risks in the Company's activities;

4) the results of official investigations on the detection and combating of corruption;

5) the Report of the Commissioner to the participants.

16.4. The time spent on advanced training in the field of prevention and detection of corruption shall be at least 1% of the total amount of working time for half a year.

16.5. The account of the measures taken to improve skills in the field of prevention and detection of corruption, as well as the accounting of persons present at such events, is carried out by the Commissioner.

16.6. In case of revealing the facts of corruption offences in the activities of the Company, the Commissioner forms a list of employees involved in the implementation of high-risk business processes and must undergo mandatory extraordinary training, as well as forms and implements an appropriate training programme.

16.7. Training is completed by testing its participants for the level of assimilation of educational information or other method of initial knowledge control.

17. APPLYING DISCIPLINARY MEASURES TO PERSONS WHO VIOLATE THE PROVISIONS OF THE ANTI-CORRUPTION PROGRAMME

17.1. If there is information indicating signs of violation by employees of the requirements of the Anti-Corruption Programme, the following measures are taken:

1) an internal investigation is appointed in accordance with the procedure established by a separate internal regulatory document of the Company in order to confirm or refute information on an alleged violation;

2) if there are sufficient grounds in the results of the official investigation, the head imposes a disciplinary sanction in accordance with the law.

17.2. The Head of the Company and employees of all divisions of the Company, regardless of their position, are liable under the current legislation of Ukraine for compliance with the principles and requirements of this Anti-Corruption Programme, as well as the Law for actions (inaction) of persons subordinate to them who violate these principles, policies, and requirements.

17.3. Disciplinary penalties are imposed on the head and employees of the Company in accordance with the norms of labour legislation.

17.4. The Company declares and guarantees that no employee will be subject to sanctions (including: dismissal, demotion, deprivation of bonus) if they reported an alleged fact of corruption, refused to give or receive a bribe, carry out commercial bribery, provide mediation in bribery, including if as a result of such refusal the Company has lost profit or commercial and competitive advantages have not been gained.

18. PROCEDURE FOR OFFICIAL INVESTIGATIONS, INSPECTIONS IN CASE OF DETECTION OF SIGNS OF VIOLATION OF THE COMPANY'S ANTI-CORRUPTION PROGRAMME OR SIGNS OF CORRUPTION OFFENCES OR CORRUPTION-RELATED OFFENCES AND CORRUPTION INCIDENTS

18.1. The procedure for conducting official investigations, audits in case of revealing signs of violation of the Company's Anti-Corruption Programme or signs of committing corruption offences or offences related to corruption and corruption incidents is regulated by certain internal regulatory documents of the Company.

19. PROCEDURE FOR AMENDING THE ANTI-CORRUPTION PROGRAMME

19.1. The head of the Company shall ensure the organisation of feedback mechanisms and other internal processes aimed at support and continuous improvement of this Anti-Corruption Programme.

19.2. The content of the Anti-Corruption Programme may be revised based on the results of:

1) the Report on the assessment of corruption risks in the Company's activities;

2) supervision and control over compliance with the Anti-Corruption Programme, as well as assessing the results of the implementation of the measures provided for by it;

3) the analysis of the Commissioner's performance of their official duties;

4) conducting surveys, questionnaires, discussions, and consultations with employees, the head of the Company, participants of the Company, as well as with business partners of the Company on improving this Anti-Corruption Programme by the Commissioner;

5) in the event of amendments to the legislation, including anti-corruption, that affect the activities of the Company.

19.3. Amendments to the Anti-Corruption Programme may be initiated by the Commissioner, as well as participants of the Company, shareholders, head, and employees of the Company.

19.4. Proposals for amendments to the Anti-Corruption Programme are submitted to the Commissioner who studies and systematises them. Once a year, the Commissioner shall provide the head of the Company with a summary of proposals for amendments to the Anti-Corruption Programme that have been received and provide their recommendations for their consideration or rejection, whereas changes to the Anti-Corruption Programme may not establish standards, regulations, policies, procedures and requirements lower than those provided for by the Law and the Anti-Corruption Programme, the Code of Ethics, the Regulation on Conflict of Interest, policies for the provision and acceptance of gifts, etc.

19.5. The head, having received from the Commissioner a summary of proposals for amendments to the Anti-Corruption Programme, initiates an open discussion between the labour collective and the participants of the Company.

19.5.1. In cases where the participants of the Company or the Commissioner insist on urgent introduction of certain changes to the Anti-Corruption Programme, the head shall initiate the relevant discussion as soon as possible, but no later than 10 (ten) days from the date of receiving such proposals.

19.6. As a result of the approval of the proposals by the participants and employees (labour collective) of the Company, the head approves the relevant changes to the Anti-Corruption Programme by their order, and they shall be an integral part of it.

19.7. Amendments to this Anti-Corruption Programme may not set standards and requirements lower than those stipulated by the Law of Ukraine "On Prevention of Corruption" and the Model Anti-Corruption Programme of a legal entity approved by the order of the National Agency for the Prevention of Corruption.

20. LIABILITY FOR FAILURE TO COMPLY WITH THE REQUIREMENTS OF THE ANTI-CORRUPTION PROGRAMME

20.1. All employees of the Company are personally liable for violation of the requirements of this Programme.

20.2. Responsibility is also borne by those employees who were aware of the corruption offence committed or being prepared and who did not take measures to report such actions, and those who took any measures of coercion against persons who reported on the corruption offence committed or being prepared.

20.3. If, as a result of an internal investigation, an employee is found to have violated the requirements of this Programme, disciplinary measures provided for by law or other types of liability may be applied to them in accordance with the provisions of the current legislation and/or internal regulatory documents of DATAGROUP.

21. FINAL PROVISIONS

21.1. This Anti-Corruption Programme is an integral part of the internal labour regulations of the Company.

21.2. The Anti-Corruption Programme is indefinite and is regularly reviewed in order to bring it in line with the requirements of anti-corruption legislation in a timely manner and improve the system of internal control and mechanisms aimed at preventing and combating corruption.