



**CODE OF ETHICS
DATAGROUP/VOLIA GROUP OF COMPANIES**

Kyiv, 2024

CODE OF ETHICS
DATAGROUP/VOLIA GROUP OF COMPANIES

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CODE OF ETHICS DATAGROUP/VOLIA GROUP OF COMPANIES

PREAMBLE

The Code of Ethics of the DATAGROUP/VOLIA Group of Companies, which includes the DATAGROUP Group of Companies: DATAGROUP PJSC, DATAGROUP MEDIA LLC, TECHNICS RESOURCE LLC, IT SYSTEMS LLC, DATAGROUP DIGITAL LLC, and VOLIA Group of Companies: VOLIA-CABLE LLC, TELESVIT LLC, KYIV TELECOMMUNICATIONS NETWORKS LLC, VIA MEDIA LLC (hereinafter referred to as the Group of Companies or the Company) is based on the values of the Group of Companies. The greatest value for the Group of Companies is its employees, and the Group of Companies bears responsibility for their safety, monitors compliance with labour law, and cares about the well-being of each employee.

The Group of Companies cultivates and rewards initiative, dedication, and hard work. Civility, good communication, and labor relations at all levels and in all divisions of the Group of Companies are the key to success.

The team of the Group of Companies lives in line with corporate values and measures its success by the success of the customers and partners it cooperates with. The Group of Companies is committed to maintaining an open and inclusive work environment.

The purpose of this Code of Ethics is to ensure that the work and activities of all employees, managers, and administrative staff of the Group of Companies are carried out in accordance with these values and principles. The Code of Ethics is created to give a clear understanding of the expected behavior of all employees in all areas of the Group's activities.

The Code of Ethics defines ethical standards of professional conduct and responsibility, which should become a model guide for all employees of the Group of Companies in their relationships with business partners, clients, and colleagues.

Each employee of the Group Companies must adhere to this Code of Ethics and ensure that others comply with it by spreading and promoting corporate ethics, which is the foundation of the Group Companies' reputation.

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OUR VALUES & PRINCIPLES

The Code of Ethics (hereinafter referred to as the Code) is the basis for decision-making. The Code regulates the values and principles that should guide each employee on a daily basis, as well as behavioral indicators that assess compliance with certain values.

Efficiency

We achieve the best result by using minimal resources, looking for new ways, and improving.

Each employee of the Group of Companies plans their actions and prioritizes them while allocating the resources efficiently and using them rationally. Each employee regularly analyzes the achieved result against the defined performance criteria and improves it by correcting errors in time. To achieve the best result, we improve processes, simplify them, and look for non-standard solutions.

Customer Centricity

We focus our efforts and attention on the customers' needs, offering them optimal solutions and opportunities.

Each employee of the Group of Companies treats all customers, both external and internal, positively and respectfully, without giving preference to one over the other and without disregarding and failing to resolve any appeal of the customer. Each employee provides timely feedback and strives to satisfy each customer. We focus on the customer's needs by offering them the best solutions and using individual approaches and additional opportunities within the approved rules.

Mutual Support

We build relationships in a team based on respect, trust, and support, working together to achieve a common goal.

Each employee of the Group of Companies respects their colleagues and adheres to ethics in their communication, taking equal care of both the needs of others and their own, and can openly ask for help from their colleagues. Each employee is ready to share their experience and expertise and provide their colleagues the necessary assistance and support. We create an atmosphere of trust and mutual support, are constantly mindful of the common goal, and consider resolving common tasks a priority.

Open-Mindedness

We are open to new ideas, see opportunities in changes, and use them flexibly and proactively.

Each employee of the Group of Companies perceives innovations positively and impartially, supports new ideas from their colleagues and introduces new approaches to their work with enthusiasm. Each employee is ready to change their working behaviour quickly and flexibly to adapt to the situation and to new requirements and not to get hung up on the old inefficient work formats. We are constantly learning, gaining new knowledge and skills, contributing and testing new ideas in practice, and creating opportunities to introduce new, most useful approaches and tools.

Ambition

We have the courage to strive for high goals and achieve success, purposefully and persistently moving towards the goal.

Each employee of the Group of Companies is ready to overcome difficulties in their work and show perseverance in achieving the result. Each employee makes every effort and is enthusiastic, takes the initiative and boldly undertakes to solve complex tasks. We strive to achieve the highest goals and will not be satisfied with a mediocre result.

In addition to the values, we are always guided by certain principles of work:

- We adhere to the norms of the legislation of Ukraine, as well as the integrity and ethical conduct of business.
- We love our subscribers.
- We promote the DATAGROUP and VOLIA brands.
- We are a team.
- We always achieve more.
- We are responsible for the safety of employees and businesses.

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GENERAL PART

Human Rights

The Group of Companies shall respect cultural differences and shall not discriminate against any employee based on their race, colour, nationality, religious and political beliefs, sex, age, sexual orientation, disability, etc.

The employees' working hours shall not exceed the time established by the relevant regulations. Overtime shall be voluntary and shall be remunerated.

The Group of Companies does not allow situations in which the honour, dignity, and business reputation of employees will be degraded.

Employees of the Group of Companies have the right to express their political views on social networks in their personal profiles (pages).

Gender Equality

The Group of Companies unconditionally supports gender equality — the equal legal status of women and men and equal opportunities for its implementation, which allows people of both sexes to participate equally in all spheres of society.

The Group of Companies creates conditions that allow women and men to work on an equal basis; provides women and men with the opportunity to combine work and family responsibilities; provides equal pay for women and men with the same qualifications and working conditions; takes measures to create safe working conditions for life and health, as well as to prevent and protect against sexual harassment and other types of gender-specific violence.

The Group of Companies undertakes to adhere to the principle of equal pay for men and women with the same qualifications and working conditions, as well as provides equal opportunities for professional development: access to training, workshops, and advanced training for all employees.

Right to Respect for Privacy

Each employee of the Group of Companies has the right to respect their family and personal life. All employees, customers, and partners with whom the Group of Companies has a business relationship have the right to privacy.

The Group of Companies and its employees must comply with all rules of conduct with business partners, suppliers, and colleagues and respect their personal integrity and lives.

Prohibition of Child Labor

The Group of Companies prohibits and condemns child labour unconditionally – primarily, this work deprives children of their childhood, their potential, and their dignity and harms their physical and mental development. In accordance with International Labor Organization (ILO) standards, the Group of Companies defines child labour as:

- Work that is mentally, physically, socially, or morally dangerous and harmful;
- Work that does not take into account compulsory schooling;
- Work that prevents children from attending school;
- Work that requires children to leave school prematurely;
- Work that requires children to combine school attendance with long and hard work.

The Group of Companies sets age limits to prevent the employment of children – work may not be performed by persons under the age of 18.

Conflict of Interest

Conflict of interest is a conflict between the personal interests of an employee of the Group of Companies and their official duties. There is a potential and a real conflict of interest. Potential conflict of interest shall mean a private interest of a person in the field where they perform their official or representative powers, which affects or may affect the objectivity or impartiality of their decisions or the performance or omission to perform actions in exercising these powers.

Herein, private interest means any property or non-property interest of a person, including those arising from personal, family, friendly, or other out-of-office relations with individuals or legal entities.

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A real conflict of interest shall mean the existence of a conflict between the private interest of a person and their official duties, which affects the objectivity or impartiality of their decisions or causes actions to be taken or omitted to be taken in the exercise of their functions.

Employees of the Company must avoid situations that may lead to a conflict of interest between the Group of Companies and a particular employee. Employees should under no circumstances seek their own benefit using their position, property, or information obtained while working for the Group of Companies.

If a conflict of interest arises, the employee cannot make the decision themselves, but must consult with their supervisor and obtain prior consent in accordance with the Regulation on the Conflicts of Interest.

Gifts & Hospitality

The Group of Companies strives to meet the highest standards of honesty and responsibility in its activities. This includes appropriate conduct with respect to gifts, hospitality, and 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, the right to manage a business, or to secure other improper advantages in a business.

The Group of Companies recognizes that gifts, hospitality, and entertainment, if they are not beyond reasonable, are in line with the level of economic (commercial) activity and are offered legally, are an important part of generally accepted business practice, for example, in order to comply with the rules of etiquette or to create a reputation, in particular, when related to special events or to strengthen business relations. In no event should gifts, hospitality, and entertainment influence or be perceived as an attempt to influence proper business decisions.

Corruption, Bribery, and Money Laundering

The Group of Companies complies with all applicable anti-corruption laws and regulations of Ukraine; in particular, it is prohibited to attempt to obtain an undue advantage by promising, offering, or giving valuables to any government official, business partner, or any third party or to engage in any other form of corruption, extortion, embezzlement or fraud that aims to obtain an advantage by dishonest means or otherwise influence the results of a commercial relationship.

The Group of Companies is guided by the principle of “zero tolerance” for any manifestations of corruption. The Group of Companies appreciates the honest behavior of its employees, which, among other things, includes preventing and combating corruption and corporate fraud.

Transparent Conduct of Business and Integrity

The Group of Companies operates transparently and openly, complying with the law and ethical rules on the non-disclosure of confidential information. In its activities, the Group of Companies adheres to the current legislation of Ukraine and other countries, rules, moral values, and ethical standards without violations or dishonest actions.

Confidentiality of Information

Confidential information means any financial, commercial or technical information that may be disclosed either in writing or orally or in the form of samples, models, or otherwise.

The Group of Companies adheres to a clear regime for maintaining confidential information.

Ecology & Environment

In its activities, the Group of Companies adheres to environmentally sustainable and safe principles of rational use of natural resources and reducing waste and emissions. To do this, the Group of Companies adheres to the norms of environmental legislation and encourages each employee of the Company to respect and lean treatment of the environment.

Communication Principles

Employees of the Group of Companies of all levels must communicate in a polite, emotionally restrained, and friendly manner.

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Inquiries and Whistleblowing

For clarifications on the correct interpretation or implementation of the information set forth in this Code of Ethics, or to report violations of its requirements, please contact compliance@datagroup.ua and/or compliance@volia.com.

FINAL PROVISIONS

Revisions, amendments, and additions to the Code are carried out when necessary.

The values and principles that the Group of Companies wants to establish through this Code will be communicated to the Group of Companies' employees to ensure that the Code's content is understood and maintained and to provide the means necessary to understand and apply ethical principles in specific daily activities.

For violations of the principles and norms of ethics set out in this Code, disciplinary measures prescribed by law or other types of liability may be applied to employees of the Group of Companies in accordance with the provisions of the current legislation and/or internal regulatory documents of the Company.

The Group of Companies is responsible for adhering to these principles in our corporate environment, including when working with our partners and customers.