

**ANTI-CORRUPTION POLICY**

**OF DATABURO UKRAINE LLC**

**2023**

## **THE SCOPE OF THE ANTI-CORRUPTION PROGRAM AND THE CIRCLE OF PERSONS TO WHOM ITS PROVISIONS APPLY.**

1. The anti-corruption program is developed to protect the rights and freedoms of citizens and ensure law and order and public safety. It is the essential document of Databuro Ukraine LLC (hereinafter referred to as the Company), which 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 and behalf of the Company.
2. The anti-corruption program of Databuro Ukraine LLC is developed by the Law of Ukraine “On the Principles of State Anti-Corruption Policy in Ukraine (Anti-Corruption Strategy) for 2014–2017”, the Law of Ukraine “On Prevention of Corruption”, the Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine on the Implementation of the Action Plan on Liberalization of the Visa Regime for Ukraine by the European Union concerning the Liability of Legal Entities”.
3. Anti-corruption measures of Databuro Ukraine LLC are aimed at:
  - prevention of corruption, including the identification and elimination of the causes of corruption (corruption prevention);
  - detection of corruption offenses, disclosure and investigation of corruption offenses;
  - minimizing and eliminating the consequences of corruption offenses.

## **TERMS USED IN THIS ANTI-CORRUPTION PROGRAM**

The following key terms are used for the purposes of the Program:

- anti-corruption program of the Company – a set of rules, standards and procedures for detecting, combating and preventing corruption in the company’s activities, hereinafter referred to as the anti-corruption program;
- corruption – the use by persons employed by the Company of their official powers or related opportunities to obtain an unlawful benefit or acceptance of such benefit or acceptance of a promise/offer of such benefit for themselves or other persons, or, accordingly, a promise/offer or provision of an unlawful benefit to a person, referred to in part one of Article 3 of the Law “On Prevention of Corruption”, or at his/her request to other individuals or legal entities in order to induce this person to unlawfully use his/her official powers or related opportunities;
- anti-corruption policy – the Company’s activities aimed at creating an effective system of combating corruption;
- corruption offense – an act containing signs of corruption committed by a person referred to in part one of Article 3 of the Law of Ukraine “On Prevention of Corruption”, for which the law establishes criminal, disciplinary and/or civil liability;
- unlawful benefit – money or other property, advantages, benefits, services, intangible assets, any other benefits of an intangible or non-monetary nature that are promised, offered, provided or received without legal grounds;
- potential conflict of interest – a person’s private interest in the area in which he or she exercises his or her official or representative powers, which may affect the objectivity or impartiality of his or her decision-making, or the performance or non-performance of actions in the exercise of these powers;
- gift – money or other property, advantages, benefits, services, intangible assets provided/received free of charge or at a price lower than the minimum market price;
- corruption-related offense – an act that does not contain signs of corruption, but violates the requirements, prohibitions and restrictions established by the Law of Ukraine “On Prevention of Corruption”, committed by a person referred to in part one of Article 3 of the Law of Ukraine “On Prevention of Corruption”, for which the law establishes criminal, administrative, disciplinary and/or civil liability;
- private interest – any property or non-property interest of a person, including those caused by personal, family, friendly or other off-duty relations with individuals or legal entities,

including those arising from membership or activities in public, political, religious or other organizations;

- a real conflict of interest is a conflict between a person's private interest and his/her official or representative powers, which affects the objectivity or impartiality of decision-making, or the performance or non-performance of actions in the exercise of these powers;
- Declaring entities – persons specified in clause 1, subclause “a” of clause 2 of part one of Article 3 of the Law of Ukraine “On Prevention of Corruption”, other persons who are obliged to file a declaration in accordance with this Law;
- family members – persons who are married, as well as their children, including adults, parents, persons under guardianship and custody, other persons who live together, are connected by common life, have mutual rights and obligations (except for persons whose mutual rights and obligations are not of a family nature), including persons who live together but are not married;
- prevention of corruption – the Company's activities aimed at implementing an anti-corruption policy aimed at identifying, studying, limiting or eliminating phenomena that give rise to corruption offenses or contribute to their spread;
- official – a person who permanently or temporarily holds a position in the Company and whose functions are related to the performance of organizational, administrative or administrative and economic duties.
- organizational and administrative duties – the duties of certain persons of the Company to manage the production activities of individual employees at the enterprise, in particular, the head of the Company, his/her deputies, chief accountant, chief engineer, heads of structural units (heads of departments, laboratories, divisions), their deputies.
- administrative and economic duties – the duties of certain individuals of the Company to manage or dispose of state, collective or private property in the Company (establishing the procedure for its storage, sale, ensuring control over these operations, etc.), in particular, heads of planning, supply, financial departments and services, warehouse manager, etc.
- Authorized Representative of the Anti-Corruption Program shall mean an official of the Company appointed in accordance with the labor legislation by the Director of the Company in accordance with the procedure provided for by the approved anti-corruption program, hereinafter referred to as the Authorized Representative.

## **1. THE PURPOSE OF THE ANTI-CORRUPTION PROGRAM**

- 1.1. The anti-corruption program of Databuro Ukraine LLC reflects support for the anti-corruption strategy of the state, which is confirmed by the use of ethical standards and principles of providing information on the performance of works and services, and indicates the Company's desire to improve the corporate culture, maintain the Company's business reputation at the proper level.
- 1.2. The Company sets the following goals:
  - to minimize the risks of involvement of the organization – management and employees, regardless of their position – in corruption activities;
  - to form (nurture) a holistic unified awareness and understanding of the company's anti-corruption program among contractors, employees and other persons about the rejection of corruption in any form;
  - summarize and explain the main provisions of the anti-corruption legislation of Ukraine;
  - to include in the obligation of the company's employees to know and comply with the principles and requirements of this anti-corruption program, the main provisions of anti-corruption legislation, as well as adequate measures to prevent corruption.

## **2. PRINCIPLES OF THE ANTI-CORRUPTION PROGRAM**

- 2.1. The Company's Director and heads of structural divisions form an ethical standard of negative attitude to any manifestations of corruption, setting an example by their own behavior and

familiarizing all employees and contractors with anti-corruption legislation.

- 2.2. The Director of the Company is responsible for organizing all measures aimed at implementing the principles and requirements of the anti-corruption program, including the appointment of persons responsible for the development of anti-corruption measures, their implementation/realization and control.
- 2.3. All employees of the Company shall be guided by the current legislation and the anti-corruption program, adhere to the principles and requirements of this program.
- 2.4. The principles and requirements of the anti-corruption program shall apply to the Company's contractors and representatives, as well as to other persons in cases where the relevant obligations are set forth in contracts, in their internal documents, or directly provided for by law.
- 2.5. The system of anti-corruption measures shall be based on the following key principles:
  - 2.5.1. The principle of compliance of the Company's operations with the applicable laws and generally accepted standards. The implemented anti-corruption measures shall comply with the Constitution of Ukraine, the legislation of Ukraine and other regulatory legal acts applicable to the Company.
  - 2.5.2. The principle of personal example of the Company's management. The key role of the Company's management in creating a culture of intolerance to corruption and in creating an internal organizational system for preventing and combating corruption.
  - 2.5.3. The principle of involvement of the Company's employees. Awareness of the Company's employees about the provisions of anti-corruption legislation and their active participation in the development and implementation of anti-corruption standards and procedures.
  - 2.5.4. The principle of proportionality of anti-corruption procedures to the risk of corruption. The development and implementation of a set of measures that reduce the likelihood of involvement of the Company's employees and its manager in corruption activities and is carried out taking into account the existing corruption risks in the company's activities.
  - 2.5.5. The principle of effectiveness of anti-corruption procedures. The Company shall apply anti-corruption measures that are low in cost, easy to implement and bring significant results.
  - 2.5.6. The principle of responsibility and inevitability of punishment. The inevitability of punishment for employees of the company, regardless of their position, length of service and other conditions, in case of committing corruption offenses related to the performance of labor duties, as well as personal responsibility of the company's management for the implementation of the internal organizational anti-corruption policy.
  - 2.5.7. The principle of continuous control and regular monitoring. Regular monitoring of the effectiveness of the implemented anti-corruption standards and procedures, as well as control over their implementation.
  - 2.5.8. The principle of anti-corruption legislation. All employees shall comply with the provisions of the Constitution of Ukraine, Ukrainian anti-corruption legislation established, in particular, by the Criminal Code of Ukraine, the Code of Administrative Offenses of Ukraine, the Law of Ukraine "On Prevention of Corruption", this anti-corruption program, international treaties ratified by the Verkhovna Rada of Ukraine and other regulations, the main requirements of which are the prohibition of bribery, prohibition of receiving bribes, prohibition of commercial bribery and prohibition of mediation in bribery.

### **3. SUBJECTS COVERED BY THE ANTI-CORRUPTION PROGRAM**

- 3.1. The entities covered by the anti-corruption program are the Company's employees who permanently or temporarily hold positions related to the performance of organizational, administrative or administrative and economic duties, or specially authorized persons to perform such duties in the Company, as well as other persons who are not officials or officers and are in an employment relationship with the company.

#### **4. ANTI-CORRUPTION MEASURES TAKEN BY THE COMPANY IN THE COURSE OF ITS BUSINESS ACTIVITIES**

- 4.1. The Authorized Representative in accordance with the anti-corruption program of Databuro Ukraine LLC develops a specific list and description of anti-corruption measures to be implemented in order to prevent and combat corruption in the company.
- 4.1.1. Audit of the Company's business activities to identify corruption risks (assessment of the Company's activities in terms of adverse consequences in the context of anti-corruption legislation). To identify the risks that the Company may face as a result of violations of anti-corruption legislation, the Company's management should periodically audit the Company's business activities. The results of the audit allow identifying high-risk areas and developing an effective action plan aimed at neutralizing the Company's legal and commercial risks. Risk assessment is a continuous process with constant communication between the Director, the Authorized Representative and the Company's employees.
- 4.1.2. Monitoring of business partners (audit of new business partners and suppliers, regular checks of counterparties, etc.)
- 4.1.3. When working with counterparties, it is necessary to carry out:
- Audit of new business partners and suppliers;
  - regular checks of all counterparties;
  - implementation of anti-corruption provisions in agreements with business partners and suppliers.
- 4.1.4. The Company's management and its employees are prohibited from engaging or using intermediaries, partners, agents, joint ventures or other persons to perform any actions that contradict the principles and requirements of this anti-corruption program or the norms of applicable anti-corruption legislation.
- 4.1.5. The Company shall select counterparties to provide it with works and services on the basis of a tender (auction, bidding, other procurement methods), the main principles of which shall be selection of a counterparty at the best competitive prices, which shall establish
- analysis of the market for the services offered;
  - equality, fairness, absence of discrimination and no unreasonable restrictions on competition in relation to counterparties
  - honest and reasonable selection of the most desirable offers based on a comprehensive analysis of benefits and costs (primarily the price and quality of products);
  - targeted and cost-effective spending of funds for the purchase of goods, works, services (taking into account, if necessary, the life cycle cost of the purchased products) and implementation of measures aimed at reducing the company's costs;
  - no restrictions on access to participation in procurement by setting excessive requirements for the counterparty;
  - prevention of corruption, conflict of interest and other abuse of power.
- 4.1.6. The Company seeks to have business relations with counterparties that support the requirements of anti-corruption legislation and/or counterparties that declare their rejection of corruption.
- 4.1.7. The Company declares that it refuses to incentivize counterparty employees in any way, including by providing monetary amounts, gifts, free performance of works (services) to them and other methods not listed above, which makes the counterparty employee dependent and aimed at ensuring that this employee performs any actions in favor of the Company.
- 4.1.8. The Company shall make every effort to minimize the risks of business relations with counterparties that may be involved in corrupt activities, for which purpose it shall check the counterparties' tolerance to bribery, including checking whether they have their own anti-corruption programs, their readiness to comply with the requirements of this anti-corruption program and include anti-corruption conditions (reservations) in contracts, as well as provide mutual assistance for ethical business conduct and prevention of corruption.

- 4.1.9. In case of violation of the anti-corruption legislation, the Company and its contractors (partners) shall be obliged to:
- Immediately notify each other in writing of any cases of violation of anti-corruption legislation;
  - make it clear to other persons in the course of implementation (execution) of any agreements (contracts) regarding the obligation to comply with anti-corruption legislation.
- 4.1.10. If the Company has objective (reasonable and bona fide) facts of violation of anti-corruption legislation by its counterparties, a notice shall be sent to such counterparty (partners) with a request to provide appropriate explanations within 10 days. Failure to provide sufficient evidence to unconditionally confirm the absence of a violation of anti-corruption legislation is a violation of the essential terms of the agreement (material breach) concluded between the company and its counterparty and entitles the company to terminate such agreement unilaterally out of court (completely refuse to perform the agreement), or suspend its further performance unilaterally in some part of it (partially refuse to perform the agreement) by sending a written notice.
- 4.2. Regulatory support, consolidation of standards of behavior and declaration of intentions:
- development and adoption of a code of ethics and official behavior for the Company's employees;
  - development and adoption of a regulation on conflict of interest;
  - introduction of a standard anti-corruption notice (warning of violation of anti-corruption legislation) in newly concluded contracts related to the Company's business activities;
- 4.3. Development and implementation of special anti-corruption procedures:
- Introduction of a procedure for informing the employer by employees about cases of inducing them to commit corruption violations;
  - introduction of a procedure for informing the employer of information that the employee has learned about cases of corruption offenses committed by other employees, contractors of the enterprise or other persons;
- 4.4. Training and informing employees:
- familiarizing employees against their signature with the regulatory documents governing the prevention and combating of corruption at the enterprise;
  - conducting training activities on prevention and combating corruption;
  - organization of individual counseling of employees on the application (compliance) with anti-corruption standards and procedures;
- 4.5. Ensuring compliance of the company's internal control system with the requirements of the anti-corruption policy:
- control of accounting data, availability and reliability of primary accounting documents;
  - all financial transactions carried out by the company must be accurately, correctly and with a sufficient level of detail reflected in the accounting records, documented and available for verification;
  - misrepresentation or falsification of the company's financial statements is strictly prohibited and is considered an offense.
- 4.6. All employees of the Company are strictly prohibited from directly or indirectly, personally or through third parties, engaging in corrupt practices, offering, giving, promising, requesting and receiving bribes or making payments to facilitate administrative, bureaucratic and other formalities in any form, including in the form of money, valuables, services or other benefits, to and from any persons or organizations, including commercial organizations, government and self-government authorities, civil servants, private companies
- 4.7. Gifts.
- 4.7.1. Employees of the Company are prohibited, directly or through other persons, from demanding, requesting, or receiving gifts for themselves or their close persons from legal entities or individuals:
- in connection with the performance by such persons of activities related to the performance of their official duties at the Company;

- if the person who makes the gift is subordinate to such person.
- 4.7.2. Employees of the Company may accept gifts that meet the generally accepted notions of hospitality, except as specified in clause 4.7.1. if the value of such gifts does not exceed one minimum wage established on the day of acceptance of the gift, once, and the total value of such gifts received from one source during the year does not exceed two subsistence minimums established for an able-bodied person as of January 1 of the current year.

The restriction on the value of gifts does not apply to gifts that:

- are given by close persons;
  - Received as public discounts on goods, services, public winnings, prizes, bonuses, bonuses.
- 4.7.3. If a decision is made by an official of the Company in favor of a person from whom he or she or his or her close relatives received a gift, it shall be considered to be made in conditions of a conflict of interest.

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

4.7.5. The Company's officials, in case of receipt of an offer of an unlawful benefit or gift, regardless of private interests, shall immediately take the following measures

- refuse the offer;
- if possible, identify the person who made the offer;
- Involve witnesses, if possible, including employees;
- notify in writing the immediate supervisor (if any) or the Commissioner, specially authorized entities in the field of anti-corruption of the offer.

If a person who is subject to restrictions on receiving gifts has discovered in his/her office or received property that may be an improper benefit or a gift, he/she shall immediately, but not later than one business day, notify his/her immediate supervisor or the Commissioner in writing of this fact.

An act on the discovery of property that may be an improper benefit or a gift shall be drawn up and signed by the person who has discovered the improper benefit or gift and his/her immediate supervisor or the Authorized Representative.

If the property that may constitute an improper benefit or a gift is discovered by the director of the company, the act on the discovery of the property that may constitute an improper benefit or a gift shall be signed by this person and the Commissioner.

The objects of undue advantage, as well as received or detected gifts, shall be stored in the Company until they are transferred to specially authorized entities in the field of combating corruption.

If an official of the Company has any doubts about the possibility of receiving a gift, he/she has the right to apply in writing to the Commissioner or a territorial body of the National Agency for advice on this issue, which shall provide an appropriate explanation.

4.8. Interaction with government officials.

4.8.1. The Company's management shall not pay any expenses (monetary remuneration, loans, services, entertainment, recreation, transportation costs and other remuneration) for public officials and their close relatives (or in their interests) on its own or through its employees in order to obtain or maintain an advantage for the Company in commercial activities.

4.8.2. Employees of the Company shall be solely responsible for corruption in their independent interaction with public officials in accordance with the current legislation of Ukraine.

## **5. NORMS OF PROFESSIONAL ETHICS OF EMPLOYEES OF « DATABURO UKRAINE» LLC**

5.1. In the performance of their duties, employees of the Company are obliged to comply with the standards established by the Code of Ethics of Databuro Ukraine LLC, in particular

- employees of the Company must perform their official duties in good faith, show initiative and creativity, constantly improve their professional qualifications and improve the organization

of their work, not provide any preferences or show favoritism to individuals and legal entities, political parties, strongly oppose anti-state manifestations and forces that threaten public order or the safety of citizens, adhere to a high culture of communication, respectfully treat citizens, managers and employees, other persons;

- in the performance of their duties, the Company's employees are obliged to use the material and financial resources entrusted to them carefully (rationally, efficiently and economically).
- the Company's employees shall make decisions within their respective competence and assignments on the basis of available relevant information, regardless of their own interests and solely in the interests of the company.
- All statements made by the Company's employees on behalf of the company must be true and complete.

## **6. RESPONSIBILITIES OF THE COMPANY'S EMPLOYEES IN CONNECTION WITH PREVENTING AND COMBATING CORRUPTION IN THE COMPANY'S ACTIVITIES**

- 6.1. Duties of the Company's employees related to prevention and counteraction to corruption:
- refrain from committing and (or) participating in the commission of corruption offenses in the interests or on behalf of the Company;
  - refrain from behavior that may be interpreted by others as a willingness to commit or participate in committing a corruption offense in the interests or on behalf of the Company;
  - immediately inform the immediate supervisor or the person responsible for compliance with the anti-corruption program – the Commissioner or the management about cases of employee's involvement in corruption offenses;
  - immediately inform the immediate supervisor or the person responsible for compliance with the anti-corruption program – the Commissioner or the management about the information about cases of corruption offenses committed by other employees, contractors of the enterprise or other persons that became known to the employee;
  - notify the immediate supervisor or the person responsible for compliance with the anti-corruption program – the Commissioner of the possibility of a conflict of interest or the employee's conflict of interest;

## **7. LEGAL STATUS, RIGHTS AND DUTIES OF THE COMMISSIONER AS AN OFFICIAL RESPONSIBLE FOR PREVENTING CORRUPTION**

7.1. Legal status of the Commissioner.

7.1.1. The Authorized Representative is appointed by the order of Databuro Ukraine LLC.

The Authorized Representative may be an individual not younger than thirty years of age, who has a complete higher education and who is able to perform the relevant duties by his/her business and moral qualities, professional level, and health condition.

7.1.2. No person may be appointed to the position of the Commissioner who:

- has an unspent or unexpunged criminal record in accordance with the procedure established by law;
- has been declared incapacitated or whose legal capacity is limited by a court decision;
- 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 offense or an offense related to corruption – within three years from the date of such dismissal.

7.1.3. The work in the positions specified in clause 1, subclause «a» of clause 2 of part one of Article 3 of the Law of Ukraine «On Prevention of Corruption», as well as any other activity that creates a real or potential conflict of interest with the activities of a legal entity, shall be incompatible with the activities of the Commissioner.

7.1.4. In case of incompatibility circumstances, the Commissioner shall notify the director of the enterprise within two days from the date of occurrence of such circumstances and



simultaneously submit an application for termination of the employment contract on his/her own initiative.

7.1.5. The Authorized Representative may be dismissed from the position ahead of schedule in case of:

- termination of the employment agreement at the initiative of the Commissioner;
- termination of the employment contract at the initiative of the Company's Director;
- inability to perform his/her duties for health reasons in accordance with the conclusion of the medical commission established by the decision of a specially authorized central executive body implementing the state policy in the field of health care;
- entry into force of a court decision declaring him/her incapacitated or restricting his/her civil capacity, declaring him/her missing or declaring him/her dead;
- entry into force of a court verdict of guilty against him/her;
- death.

7.2. The Authorized Representative shall be subordinate and accountable only to the Director of Databuro Ukraine LLC.

7.3. The Commissioner's salary shall provide sufficient material conditions for proper performance of his/her duties, taking into account the nature, intensity and danger of work, stimulate achievement of high results in activity, and compensate for his/her intellectual expenses.

7.4. Rights and obligations of the Commissioner.

7.4.1 In the course of performing the tasks assigned to him/her, the Commissioner shall have the following rights and obligations

- Receive information from individuals and legal entities on violations of the requirements of the current legislation in the field of combating corruption, conduct on his/her own initiative an inspection of possible facts of violation of the said requirements;
- conduct inspections of the organization of work on preventing and detecting corruption in the Company's divisions;
- monitor and control the implementation of legislation on ethical behavior, prevention and settlement of conflicts of interest in the activities of the Company's employees;
- Receive written explanations from the Company's employees regarding circumstances that may indicate a violation of the rules of ethical behavior, prevention and settlement of conflicts of interest, other requirements and restrictions provided for by applicable law and the anti-corruption program;
- Initiate an internal investigation, take measures to bring to justice persons guilty of committing corruption or corruption-related offenses;
- once a year (in the first decade of December) prepare and submit to the director of the enterprise a report on the implementation of the principles of the anti-corruption program;
- to cooperate with persons who report in good faith possible facts of corruption or corruption-related offenses;
- take measures for legal and other protection of persons who report in good faith possible facts of corruption or corruption-related offenses;
- to provide explanations, methodological and consulting assistance on ethical behavior, prevention and settlement of conflicts of interest, prevention and detection of corruption in the company's divisions and contractors. For this purpose, the interested person may personally apply to the Commissioner during business hours or send a written request to the Commissioner, including by e-mail.

In case of detection of signs of a corruption or corruption-related offense or receipt of a report of a corruption violation, the Commissioner initiates an internal investigation. The Commissioner shall report the materials obtained during the investigation to the Director of the Company, who shall take measures to bring the perpetrators to disciplinary responsibility, and in cases of detection of signs of a criminal or administrative offense, shall also inform specially authorized entities in the field of combating corruption.

## **8. MONITORING AND CONTROL OVER COMPLIANCE WITH THE ANTI-CORRUPTION PROGRAM**

8.1. Due to possible changes over time in corruption risks and other factors affecting the business activities of the enterprise, Databuro Ukraine LLC monitors the implemented adequate measures to prevent corruption, controls their compliance, and, if necessary, revises and improves them.

## **9. CONDITIONS OF CONFIDENTIALITY OF INFORMING THE AUTHORIZED PERSON BY EMPLOYEES ABOUT THE FACTS OF INCITEMENT TO COMMIT A CORRUPTION OFFENSE OR ABOUT CORRUPTION OR CORRUPTION-RELATED OFFENSES COMMITTED BY OTHER EMPLOYEES OR PERSONS. PROTECTION OF EMPLOYEES WHO ASSIST IN PREVENTING AND COMBATING CORRUPTION**

9.1. Databuro Ukraine LLC requires its employees to comply with this anti-corruption program, informing them of the key principles, requirements and sanctions for violations.

9.2. The Company organizes safe, confidential and accessible means of informing the Company's management, the Authorized Representative (written statement addressed to the Director or Authorized Representative or personal appeal; telephone or fax messages; e-mail, etc.) about the facts of bribery by persons providing services in the interests of a commercial organization or on its behalf. The Director of the Company or the Commissioner may receive proposals for improving anti-corruption measures and control, as well as requests from employees and third parties.

9.3. The Company constantly conducts training on the issues of honest reporting of corruption, in particular

- regular information campaigns aimed at forming a psychological attitude among employees not to perceive corruption as a way to solve a problem;
- Raising the level of legal awareness of employees, in particular, in terms of awareness of their rights and freedoms, the mechanism for their implementation, confidentiality and legal ways to protect whistleblowers;
- explanation of the most important anti-corruption measures implemented in the country, provisions of the legislation on prevention of corruption, in particular, in terms of defining types and forms of corrupt behavior;
- systematic introduction of educational activities on behavioral models in certain situations with possible corruption risks.

11.4. The Company implements confidentiality conditions, namely:

- information about a whistleblower (a person who provides assistance in preventing and combating corruption) may be disclosed only with his/her consent, except in cases established by law;
- a report on violation of the requirements of the Law of Ukraine «On Prevention of Corruption» may be made by an employee of the company without attribution (anonymously);
- all information about whistleblowers and corrupt practices of officials received from employees of the company or other persons is recognized as confidential;
- consideration of reports on corrupt practices of officials is carried out in accordance with the provisions of Article 53 of the Law of Ukraine «On Prevention of Corruption»;
- an anonymous report on violation of the requirements of the Law of Ukraine «On Prevention of Corruption» shall be considered if the information provided therein relates to a specific person and contains factual data that can be verified;
- an anonymous report of violation of the Law of Ukraine «On Prevention of Corruption» shall be subject to verification within fifteen days from the date of its receipt. If the information contained in the report is verified within the specified period.

9.5. Persons providing assistance in preventing and combating corruption shall be protected by the state. If there is a threat to the life, housing, health and property of persons providing

assistance in preventing and combating corruption, or their close relatives, in connection with the report of violation of the requirements of the Law «On Prevention of Corruption» and this anti-corruption program, law enforcement agencies may apply legal, organizational, technical and other measures aimed at protecting them from unlawful attacks provided for by the Law of Ukraine «On Ensuring the Security of Persons Participating in Criminal Proceedings».

A person or a member of his/her family may not be dismissed or forced to resign, disciplined or subjected to negative measures of influence (transfer, certification, change of working conditions, refusal to appoint to a higher position, reduction of salary, etc.) or threat of such measures of influence by the Company's director in connection with the notification of violation of the Law on Prevention of Corruption and this anti-corruption program by another person.

In case of confirmation of the information contained in the notification on violation of the Law «and this anti-corruption program, the Director of the Company shall take measures to stop the violation, eliminate its consequences and bring the perpetrators to disciplinary responsibility, and in cases of detection of signs of a criminal or administrative offense, shall also inform specially authorized entities in the field of combating corruption.

In case of detection of a corruption or corruption-related offense or receipt of information about the commission of such an offense by the Company's employees, the Director of the Company shall, within his/her authority, take measures to stop such an offense and immediately notify the specially authorized entity in the field of combating corruption in writing.

## **10. INFORMING THE AUTHORIZED REPRESENTATIVE OF THE COMPANY ABOUT THE OCCURRENCE OF A REAL OR POTENTIAL CONFLICT OF INTEREST, THE PROCEDURE FOR RESOLVING THE IDENTIFIED CONFLICT OF INTEREST**

10.1. Employees of the Company in the event of a real or potential conflict of interest shall notify the Authorized Person no later than the next business day from the date when they learned or should have learned about the existence of a real or potential conflict of interest, shall not take actions or make decisions in the conditions of a real conflict of interest and shall take measures to resolve a real or potential conflict of interest.

10.2. Measures for external and independent settlement of conflicts of interest

10.2.1. External settlement of a conflict of interest is carried out by:

- removing a person from performing a task, taking actions, making a decision or participating in its adoption in conditions of a real or potential conflict of interest;
- applying external control over the person's performance of the relevant task, taking certain actions or making decisions;
- limiting a person's access to certain information;
- reviewing the scope of a person's official powers;
- transfer of a person to another position;
- dismissal of a person.

10.2.2. Employees of the Company shall resolve conflicts of interest by themselves by eliminating the relevant private interest and providing the documents confirming this to the Authorized Person.

## **11. PROVIDING INDIVIDUAL COUNSELING TO THE AUTHORIZED REPRESENTATIVES OF DATABURO UKRAINE LLC ON ANTI-CORRUPTION STANDARDS AND PROCEDURES, CONDUCTING ADVANCED TRAINING OF EMPLOYEES IN THE FIELD OF PREVENTION AND COUNTERACTION TO CORRUPTION**

11.1. Employees of the Company may apply to the Authorized Person during working hours or send a written request to the Authorized Person for clarification and consulting assistance on the prevention and settlement of conflicts of interest, prevention and detection of corruption in the company

- 11.2. In order to form an appropriate level of anti–corruption culture, new employees shall be given an introductory briefing on this anti–corruption program and related documents, and periodic information events shall be held for the Company’s existing employees.
- 11.3. Compliance by the Company’s employees with the principles and requirements of this anti–corruption program shall be taken into account when forming a personnel reserve for promotion to higher positions, as well as when imposing disciplinary sanctions.
- 11.4. Informing and training
  - 11.4.1. Professional development of the Company’s employees shall be carried out in order to form basic knowledge of anti–corruption legislation, overcome legal nihilism and improve the legal culture of the Company’s employees.
  - 11.4.2. The Company promotes the level of anti–corruption culture by informing and systematically training employees in order to maintain their awareness of the Company’s anti–corruption policy and to master the methods and techniques of applying the anti–corruption policy in practice. In this regard, the Company provides ongoing training of employees on anti–corruption legislation.
  - 11.4.3. Databuro Ukraine LLC places the current anti–corruption program in free access on the official website of the Company on the Internet, openly declares its rejection of corruption, welcomes and encourages compliance with the principles and requirements of this anti–corruption program by all contractors, its employees and other persons.

**12. TAKING MEASURES TO RESPOND TO THE IDENTIFIED FACTS OF CORRUPTION OR CORRUPTION–RELATED OFFENSES IN THE COMPANY**

- 12.1 Responsibility for failure to implement (improper implementation of) the anti–corruption program.
  - 12.1.1. The Director and employees of all divisions of the Company, regardless of their position, shall be liable under the current legislation of Ukraine for compliance with the principles and requirements of this anti–corruption program, as well as the Law of Ukraine «On Prevention of Corruption», and for actions (inaction) of their subordinates that violate these principles and requirements.
  - 12.1.2 Persons guilty of violating the requirements of this anti–corruption program, as well as the Law of Ukraine «On Principles of Prevention of Corruption» may be brought to disciplinary, administrative, civil or criminal liability at the initiative of the director of the enterprise, law enforcement agencies or other persons in the manner and on the grounds provided for by the legislation of Ukraine, special regulations and employment contracts.
  - 12.1.3 Databuro Ukraine LLC declares that no employee will be subjected to sanctions (including dismissal, demotion, deprivation of a bonus) if he or she reports an alleged fact of corruption, refuses to give or receive a bribe, commit commercial bribery, or provide mediation in bribery, including if, as a result of such refusal, the Company has lost profits or has not received commercial and competitive advantages.
  - 12.1.4. A person who has committed a corruption offense or an offense related to corruption, but the court has not imposed a penalty or penalty in the form of deprivation of the right to hold certain positions or engage in certain activities related to the performance of state or local government functions or activities equivalent to such activities, shall be subject to disciplinary action. In order to identify the causes and conditions that contributed to the commission of a corruption or corruption–related offense or failure to comply with the requirements of the anti–corruption program, as well as the Law of Ukraine «On Prevention of Corruption» in any other way, an internal investigation shall be conducted against the person who committed such an offense by the decision of the director of the enterprise.  
 A person against whom a report on an administrative offense related to corruption has been drawn up, unless otherwise provided by the Constitution and laws of Ukraine, may be suspended from performing his or her official duties by a decision of the Company’s director

until the end of the court proceedings.

If the proceedings on an administrative offense related to corruption are closed due to the absence of an event or elements of an administrative offense, the person suspended from performing official duties shall be reimbursed for the average salary for the period of forced absenteeism related to such suspension.

12.2. Cooperation with law enforcement agencies in the field of combating corruption.

12.2.1. Cooperation with law enforcement agencies is an important indicator of Databuro Ukraine LLC's real commitment to the declared anti-corruption standards of behavior. This cooperation may take various forms:

- reporting to the relevant law enforcement agencies of cases of corruption offenses that have become known to the company;
- providing assistance to authorized representatives of controlling and supervisory and law enforcement agencies in conducting inspections of the company's activities on preventing and combating corruption;
- Assist authorized representatives of law enforcement agencies in carrying out measures to stop or investigate corruption crimes, including operational and investigative measures;
- the Company's management and employees should not allow interference in the performance of official duties by officials of judicial or law enforcement agencies.

### **13. PROCEDURE FOR AMENDING THE ANTI-CORRUPTION PROGRAM**

13.1. If the provisions of this anti-corruption program or related anti-corruption measures of the Company are found to be insufficiently effective, or if the requirements of the current legislation of Ukraine in the field of anti-corruption policy change, the Director of the Company shall organize the development and implementation of an action plan for revising and amending this anti-corruption program and/or anti-corruption measures.

13.2. The anti-corruption program and amendments thereto shall be approved by the Director of the Company and put into effect by order of the Director of the Company after discussion with the employees of the Company. After its approval, the text of the anti-corruption program shall be published on the official website of the Company in free access.

13.3. Amendments to the anti-corruption program shall be included in the Collective Agreement, internal labor regulations of the Company, and may also be included in agreements concluded by the Company with other legal entities.