



# Code of business ethics of the Company “IT-Integrator”

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## Introductory. How it works

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### Our commitment to lawful and ethical business

#### How to use these rules

Terms of Business Ethics "IT-Integrator" apply to employees and third parties acting on behalf of "IT-Integrator." These rules contain the information necessary for understanding of the duties involved in the conduct of business.

Rules are presented in the following format: (1) the wording of the rules, (2) an explanation of the meaning of Rule (3) examples of situations to avoid, to fulfill the rules. This manual also contains information about who to contact for an explanation and how to report a violation of the rules of business ethics.

#### Requires on these rules

Terms of business ethics help to apply a uniform approach to the key issues of compliance. Employees and managers must understand the requirements of the law and these regulations that apply to their work, and to report any suspected violations of law or these rules.

Terms of Business Ethics "IT-Integrator" are applicable to all employees of the company. These rules apply to all situations of doing business by "IT-Integrator".

#### From employees' "IT-Integrator"

Each employee "IT-Integrator" shall do following:

- Read the introductory sections of this manual to know what is required and how the program works compliance.
- Know the problems described by all the rules of business ethics.
- Clearly understand the rules of business ethics related to official duties. The employee is not required to memorize all the details, but he has to know the rules that apply to their work well enough to understand when and where to refer for further details.
- Use all available resources of the company, including the manual and responsible for business ethics Counsel when assistance is required in determining the applicability of the rules of business ethics or laws, and the fact that they require.
- Know the different ways of allegations of violations of the rules of business ethics, which should read the section of this manual "How to report a suspicion or evidence of violation of these rules."
- Be aware of the possibility of anonymous reports of suspected violations of the rules or business ethics.
- Know that the company prohibits retaliation against a person who reported their suspicions of violating the rules of business ethics or contribute to the investigation.

- Know that the company expects that all employees will report any violation of legal requirements and the Code of Business Ethics.
- Facilitate the implementation of this program and provide any necessary assistance to the companies in the investigation of possible violations of the law and the Code of Business Ethics.
- At the request of the company must sign a declaration stating that the employee is familiar with the rules of business ethics of "IT Integrator" and undertakes to comply with the law and these rules.
- periodically review the rules of business ethics "IT Integrator" to refresh their memory and to know the latest rule changes.

## Other persons acting on behalf of the "IT-Integrator"

All business units of "IT-Integrator" must require that any third party acting on behalf of the "IT-Integrator", such as a consultant or contractor to comply with applicable rules of "IT-Integrator". Managers and employees of "IT-Integrator" must:

- Require third-party compliance with the relevant rules of "IT-Integrator" and provide them with training to third parties understand the requirements of the regulations.
- Monitor the work of a third party and to take the necessary measures, including the termination of the use of the company "IT-Integrator" third party if that party violates the agreement on compliance with the rules of "IT-Integrator."

## From management "IT- Integrator"

All managers of "IT-Integrator" have additional responsibilities with respect to employees and third parties acting on behalf of the "IT-Integrator".

Executives of "IT-Integrator" up to the director and other members of senior management, must:

- Ensure that every person within their area of responsibility, understands and complies with the requirements of laws and regulations of "IT-Integrator".
- Create working environment in which employees and persons acting on behalf of the "IT-Integrator", understand that the leaders believe in the value and respect the rules of "IT- Integrator", and not just declare their commitment to them.
- Demonstrate continuous model behavior. Every leader should set an example by their behavior and contribute to this in others.
- Take steps to prevent violations of the law and regulations of "IT-Integrator", focusing on areas where there is a risk of violation of laws and rules of business ethics, as well as provide appropriate training for compliance with these requirements.
- Identify violations of the law and regulations in "IT-Integrator" and report them.

- Take timely and appropriate measures in case of violations, to eliminate the shortcomings of business processes that lead to violations.
- Provide protection from retaliation of any person reporting the suspected abuse or contribute to an ongoing investigation of the company.

## As these rules are executed

Commission on business ethics, consisting of several senior executives and chaired by the head of the legal department, is responsible for implementing and monitoring the implementation of the Program of legal compliance and ethics. Commission on business ethics reports to the Board of Directors of "IT-Integrator".

For the implementation of the program of the relevant commission on business ethics asserts the responsible official - hereinafter referred to as "responsible counsel."

Responsible counsel engaged in the development and implementation of strategic, systematic and operational components of the compliance program. He is concentrating its efforts on initiatives of the Commission on business ethics in such areas as the development of regulations, risk analysis, training, information dissemination and familiarization with the program, coordination of investigations and continuous improvement of processes in accordance with accepted business ethics.

## If you suspect or have information about a violation of business ethics

Implementation of the rules of business ethics and conservation values of "IT-Integrator" is the duty of every person acting on behalf of the "IT-Integrator". Also, all are required to promptly inform the suspicions regarding possible violations of the rules of "IT-Integrator" or laws. It is important to resolve problems in a timely manner, while they are still small and easy to handle. When growing over small problems in large, the latter can lead to damage, fines, penalties and loss of confidence in the company's "IT-Integrator".

## Where to request

Written rules can not cover all possible situations and circumstances to which they may be applicable. "IT-Integrator" offers several sources of information to which the parties may contact if there are questions about the rules of business ethics of "IT-Integrator":

- The head
- Legal department - to the head, or to account for business ethics Counsel (email: [compliance@itintegrator.com.ua](mailto:compliance@itintegrator.com.ua)) Phone: 0445380081)

## How do I inform about suspicious violation of these rules

No company even has a better Code of business ethics or compliance program and corporate culture - should not rely on the fact that she will never have any problems with the violation of the law or ethical standards. A sign of a good company and a good compliance program is rapid detection of problems and eliminate them before they had time to grow. Best for "IT-Integrator" method of early detection of potential violations is to support its employees.

Practice and post-Soviet culture relations show that many people are reluctant to report suspected violations by their colleagues. To overcome this reluctance, "IT-Integrator" has a strict policy of revenge ban anyone who reports a violation or suspected. Employees and third parties acting on behalf of the "IT-Integrator" who report suspected violations, doing the right thing, because every violation of the law or regulations of "IT-Integrator" poses a danger to employees of the company, customers and the communities in which it operates "IT-Integrator."

An employee may use one of several ways to express their concerns or to report a violation of the rules of business ethics or law. This can be done orally or in writing to:

- Head - both directly and to the head of a higher rank
- In the Legal Department - to the head, or to account for business ethics Counsel (e-mail: [compliance@itintegrator.com.ua](mailto:compliance@itintegrator.com.ua)); phone: 0445380081)
- If an employee wishes to send information anonymously, you can do so by writing to the mailboxes of anonymous addresses. Using letters allow to remain anonymous, but in this case the employee will not be able to get an answer
- To the Head of Human Resources (if the situation applies to disrespectful or discriminatory against any employee, injustices on the part of management or personal conflicts between employees)

## How "IT-Integrator" responds to the message

In the case of reports of suspected abuse, "IT-Integrator" shall appoint an official to investigate the information submitted and to take appropriate measures in order to prevent any violations of the rules of business and as a result will inform msg. If the situation arises that the suspicions are not eliminated, you must apply to the other above-mentioned authority.

"IT-Integrator" prohibits retaliation against any person, report the suspected violation of the rules of business ethics or laws, or facilitate the investigation

## TERMS OF BUSINESS ETHICS

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### 1. Legal and ethical business

The basis of the Code of Business Ethics "IT-Integrator" is the recognition and execution of each employee the following rule: *we will do business legally and ethically in all aspects of our business.*

Rules contained in this section describe the requirement that employees of "IT-Integrator" and others acting on behalf of the "IT-Integrator" must always comply with the requirements of the law and the rules of corporate business ethics.

### The wording of the rules

Doing business "IT-Integrator" uses a single set of rules of business ethics that applies to all aspects of the work. These universal rules provide a framework of legal and ethical business practices. "IT-Integrator" requires its employees and other persons acting on behalf of the company, strict compliance with all laws and regulations of doing business "IT-Integrator".

As a Ukrainian company, participating in international projects, with partners and customers among international companies and organizations "IT-Integrator" also falls under the control of local and international laws, including laws against corruption. Therefore, employees must comply not only the rules of business ethics of "IT-Integrator" that are related to "IT-Integrator", but also the requirements of all applicable laws in force in the place of residence or work.

## Penalties for violations

Employees who violate the law or the rules of business ethics "IT-Integrator" subjected to punishment provided for, up to and including dismissal. Shall be punished as employees who:

- Do not seek legal advice from legal counsel responsible "IT-Integrator"
- Act in a manner that is contrary to the advice of the Legal Adviser
- Took revenge on the person who reports suspected abuse

Reaction of "IT-Integrator" on violations or other actions contrary to these rules, will be based on the individual circumstances in each situation.

Employees and others acting on behalf of the "IT-Integrator" that violate the rules of the company, can automatically break the law, thereby exposing themselves and "IT-Integrator" danger of foreclosure significant fines, imprisonment, and for damages in the civil courts, in accordance with national and local laws around the world.

## Ethical business guidelines

If you are faced with a situation or problem that is not covered in this manual, you should take proper and ethical decision that will positively influence on you and the company "IT-Integrator." In this case, your actions should be determined by the company's core values - honesty and integrity, honesty, respect for others, and personal responsibility.

Ethical decision-making requires evaluating alternatives and conduct a thorough review in the light of these corporate standards:

- Accept the rule of law in any case
- Demonstrate honesty, integrity and honesty
- Avoid conflicts of interest between work and private life
- Be a supporter of fair competition
- Anti-Corruption and Bribery

- Respect and appreciate the person, be a supporter of a strong culture of relations
- Be responsible to society

## Adoption of ethical decisions

Before performing any action on behalf of the "IT-Integrator" you must answer "yes" to the following questions.

- This action is consistent with the laws and such corporate values "IT-Integrator" as honesty and integrity?
- This action can not be convicted at a public hearing?
- This action will protect the reputation of the "IT-Integrator" as an ethical company?

If you can not answer "yes" to all three questions, but still believe the proposed action is lawful and ethical, you should discuss it with your supervisor or the responsible legal counsel "IT-Integrator", because there is a risk that this action may do not meet your interests or the interests of the "IT-Integrator".

## 2. The rules regarding business gifts and entertainment

### The wording of the rules

The company's reputation is earned every day - in all projects and transactions, all employees. Reputation - the result that the quality of products, solutions and services to the statements, the result of the promises given by customers, partners, the result of compliance with financial and business integrity.

The term "business gift" in the context of these rules includes the concept of "business entertainment" and material gifts. Business gifts - a common way to strengthen business relationships with some limitations such business practice is acceptable and legitimate. According to the rules, "IT-Integrator", employees can give and receive relevant business gifts related to their work in "IT-Integrator" under the following conditions:

- Recipients and donors should be commercial customers or partners (rather than government).
- Gifts should be a reasonable value.
- Giving or accepting gifts should not be used to influence the process of making the recipient of the business decisions should not be construed as imposing obligations on the other party or implied by them.

It is forbidden to give gifts to public officials. This can be regarded as an illegal action regardless of whose funds are paid Gifts - means "IT-Integrator" or personal.

Any business gift, donated or hired employees' "IT-Integrator" shall have a reasonable value, quantity and frequency. Never accept or give gifts in the form of cash or cash equivalents, such as gift certificates. Never accept a gift that could be perceived as inappropriate valuable.

### Employees should observe the following rules

- Employees have the right to give and receive gifts that are prohibited by law and these rules.

- Any business gift should have a reasonable cost, quantity and frequency and does not harm the reputation of the "IT-Integrator" in the case of publicity and public investigation.
- Gifts in the form of products, services, companies "IT-Integrator", as well as products with advertising symbols "IT-Integrator" are generally acceptable.
- Determining the appropriateness of giving or accepting business gifts, keep in mind as a gift is related to the common practice of giving in our culture, the value of the gift, the appropriateness of a gift given your position in the "IT-Integrator", the influence of a gift for creating a good business relationship with the recipient, perception gift from the side.
- If you plan to make or accept a business gift that has great value, you must inform this fact and agree with your supervisor.
- Consult with legal counsel before donation responsible business gifts to employees of any government, and especially from the legislative or judicial power.
- Coffee, soft drinks and similar low-cost products are not considered gifts under the rules of gift giving. Therefore, these types of inexpensive products can be provided to customers, partners and employees of the executive branch. Note that if these persons will offer or try to recover the cost, you should take a charge.

## Employees should be avoided

- transfer or receive money as a business gift.
- Giving gifts of any value to any government employee without consulting legal counsel.
- Giving or accepting gifts that are too large or the cost is too frequent.
- Giving or accepting a gift, capable or able to influence the apparent business decision.
- Offers a gift if you know that its adoption would violate the rules of the recipient.
- Giving or accepting invitations to activities such as football tickets, if a company representative offering such a gift, the gift recipient does not accompany this event.

## 3. The rules relating to conflict of interest

### Policy Statement

Employees and any person acting on behalf of the company, should be free from any conflicts of interest that could adversely influence their judgment or objectivity. The Company recognizes that employees may participate in legitimate financial, business, charitable and other activities outside of work in "IT- Integrator", but the information about the possibility of a conflict of interest in connection with such activities should be brought to the attention of management.

## Employees should observe the following rules

- Ask your supervisor to approve such aspects of the activities, financial interests or relationships that may pose an actual or potential conflict of interest.
- Avoid actions or relationships that might conflict or appear to conflict with your job responsibilities or the interests of the "IT-Integrator".
- Prior to the management bodies of charitable, educational, or any other nonprofit organization, you should consult with your supervisor or with the head of staff or the responsible legal counsel.

## Employee should avoid

- Do not related to your job responsibilities in a company that competes with any activity "IT-Integrator".
- there is a direct or indirect participation in the profits of the company, competitor, supplier and buyer "IT-Integrator" (except for minor possession package freely tradable shares).
- participating in any business decision "IT-Integrator" associated with the company, which employs your husband / wife or any other family member.
- Having a second job, if your second employer is a direct or indirect competitor, supplier or customer "IT-Integrator".
- Having a second job or consulting relationship that affect your ability to satisfactorily perform your duties in the "IT-Integrator".
- The use of inside information "IT-Integrator" for personal interests or the interests of the other party.
- Obtaining reach all employees "IT-Integrator" personal discounts or other benefits from suppliers of products or services, as well as customers.
- Receiving personal honoraria for services you provide, which are closely related to your work in "IT-Integrator". Your boss must approve periodic fees paid, for example, lectures, seminars or trainings.
- «close" relationship between employees "IT-Integrator" in the presence among them of direct or indirect subordination, if these relationships can lead to a loss of faith in the objectivity of the head.

## 4. The rules relating to electronic resources

### Policy Statement

Electronic resources companies "IT-Integrator" provide many tools to share information. Electronic resources of the company include computers, computer software and data, telephones and various networks. Effective use of electronic resources help companies achieve success in business. According to the rules, "IT-Integrator" electronic resources companies can not be used in ways that violate the law or the rules of business ethics "IT-Integrator".

## Employees should observe the following rules

- How to use company computers allow only a limited and reasonable use of electronic company resources for personal purposes, that does not interfere with the normal operation and performance of your official duties.
- Do not use the electronic resources of the company to access, receive, store, use or disclosure in violation of the rules of "IT- Integrator", or laws are not valid in the business environment.
- Use only licensed copies of computer software. Do not copy or use the licensed software if the license does not permit such copying or use.
- Remember that the company reserves the right to access to computers of employees, computer networks, software and data, as well as monitoring of these resources.

## Employees should avoid

- Use of electronic resources in a manner that leads to a violation of the law or the rules of business ethics of the company.
- Use of electronic company resources for personal purposes, except for the limited use of reasonable, which does not interfere with the normal execution of your work.
- Use of electronic resources for political, social and religious activities.

## 5. The rules regarding information security and confidential information

Company Information is a valuable asset to her. In the course of doing business, we must regularly exchange information with colleagues both inside and outside the company. The protection of our ideas, technologies, processes, plans and other information belonging to the company, is an important element of business, maintain a competitive edge and meet certain regulatory requirements.

Information security includes protection of confidential information, the protection of electronic resources, physical security, access to company information, if necessary, and to prevent its accidental or deliberate distortion.

Specific examples of confidential information: financial data, process and technical documentation, information about employees, customers or suppliers; information about the salaries of employees, investment plans, a description of the production processes; information on prices and profits; information about changes in leadership.

## Policy Statement

Employees and others acting on behalf of the "IT-Integrator", are responsible for protecting confidential information from unauthorized disclosure - internal or external, deliberate or accidental. Employees and others acting on behalf of the "IT-Integrator" need to know:

- The classification and concept of confidential information "IT-Integrator," which employees create or to which access.
- What security measures are needed to protect information "IT-Integrator".
- How long to keep information "IT-Integrator" and how to properly dispose of it.

"IT-Integrator" looks forward to maintaining the confidentiality of your information to other parties and preserves the privacy of others. According to the rules, "IT-Integrator" uses only legal and ethical means to collect and use business and market information necessary for a better understanding of markets, customers and competitors. "IT-Integrator" does not collect sensitive information without the permission of the other side of the hand.

## Employees should observe the following rules

- Protect confidential information no matter in what medium it contains (eg, printed documents, electronic files, e-mail and oral conversations).
- Protect confidential information throughout the entire period of its existence - the creation, storage, use, transfer, storage.
- If an employee needs help in determining whether a particular confidential information, contact the responsible legal counsel.
- transfer electronic information within the "IT- Integrator" Only those persons who need this information to perform their duties.
- Prior to the disclosure of confidential information to the party outside the company, make sure you have signed a confidentiality agreement with this partner.
- If the employee knows or suspects unauthorized access to the information system or network of "IT-Integrator", or information "IT-Integrator", must be reported to the following instances: supervisor, Department of Information Technology, responsible Counsel.
- Do not take other's confidential information without the agreement of the disclosure of confidential information.

## Employees should avoid

- Discussions of confidential information "IT-Integrator" with friends and family.
- Talk about confidential information in public places where you may be overheard, such as elevators, airplanes or restaurants.
- Uncontrolled leaving confidential information on your desktop, in the premises of the company in public places, etc.
- Disclosure of confidential company information wrong person, not sign a confidentiality agreement, to protect this information, or any employee of the "IT-Integrator", which does not need to know this information.
- The use of confidential information of a third party, which was obtained illegally or unethically.

## 6. Rules to protect the company's assets

Assets "IT-Integrator" as financial and material, as well as intellectual property, may have significant value and are intended to achieve the goals and objectives of the company "IT-Integrator".

These assets must be protected to preserve their value.

All employees have the opportunity to use the company's assets for the performance of their duties. All employees are personally responsible for the protection and the feasibility of using the company's assets. The structure of the assets consist of jobs, equipment, tools, supplies, communications, funds, accounts, computer programs, information, technology, know-how, data, patents, trademarks, copyrights, time, and any other resources or property of the company.

### Policy Statement

Employees are obligated to protect the company's assets from waste, loss, damage, misuse, theft, misappropriation or infringement and take responsibility for their use.

The law requires to maintain accurate, reliable and timely records and documents, including those related to expenses incurred by employees in the performance of the Company's behalf. This documentation is important for the decision-making process of the company and the proper performance of its financial, legal and reporting obligations. Falsification of records of assets and distortion of the facts can be regarded as fraud and will result in civil or criminal liability for the individual and for the company.

The company "IT-Integrator" respects the material and intellectual assets of third parties. Accordingly, the company expects that employees and contractors never knowingly inflict damage or illegally appropriated by tangible assets belonging to a third party; does not infringe on existing patents, trademarks and copyrights of a third party; not possess illegal confidential information; not disclose confidential information to a third party, without being authorized, respectively. The company expects from a third party such as respect for the material and intellectual assets of the company "IT-Integrator".

### Employees should observe the following rules

- Take care of all the physical, financial, informational and other company assets.
- Use only the company's assets for their intended purpose.
- Take measures to prevent waste, loss, damage, misuse, theft, misappropriation or infringement of the company's assets.
- In case of granting you the right to approve expenditures, use it, just making sure that these costs correspond to the corporate rules.
- Ask to reimburse only those expenses which are incurred for the benefit of the company.
- Prepare, conduct and provide accurate reports on the use of the company's assets in accordance with applicable laws, external requirements and company procedures.
- Respect and protect the intellectual property rights - both its own and of others.

- familiarize, sign and follow all the documents specified by the company as mandatory.
- In the event of a third party into the allegations that the products or activities of the company violates the intellectual property rights of third parties, or if the employee believes that someone else violates the rights of the company, he should contact the Legal Department.

Employees should be avoided

- Use of assets, funds or property "IT-Integrator" illegal, inappropriate or unethical purposes.
- Copy, use and distribution of copyrighted material without permission.
- Instructions purposes costs vary.
- You can not hide, alter, destroy or in any other way modify the records or documents of the company, except when the employee is authorized to do so in accordance with approved guidelines and standards.

## 7. Rules of documentation and financial statements

### Policy Statement

The company provides the accuracy, reliability and completeness of the data recorded in the accounting and reporting, in strict accordance with national and international law and the principles established by the rules of business ethics, applicable accounting standards, laws and regulatory requirements.

According to the rules of the company, employees and others acting on behalf of the "IT-Integrator", responsible for the accuracy, thoroughness and timeliness of financial information for the correctness of information disclosure for the preservation of documents. The company enforces these rules by monitoring the correctness of financial management and reporting.

### Employees should observe the following rules

- The employee is responsible for maintaining accurate, complete and reliable instruments to ensure timely and correct reflection of the company's transactions in its financial statements.
- The company organized the correct procedures of accounting and reporting.
- The company provides proper accounting and custody of the documents according to the internal regulations and rules.
- Provide a complete, correct, accurate, timely and understandable financial and other information in internal reports and any other reports that may be used in press releases or documents filed in any state bodies.
- Employees must provide full support and provide accurate financial information to internal and external auditors of the company conducting the audit or evaluation of financial performance.
- If an employee has information about the violation of the principles of accounting and reporting, or has doubts as to the legality of any action, you must notify the immediate supervisor or the responsible legal counsel.

## Employees should be avoided

- Financial statements are not true indicators.
- Inaccurate financial records, such as inflated travel costs and living expenses, incorrect statements of expenditure.
- Failure to avoid or approval procedures.
- Do not have to take direct or indirect actions, which may affect mislead or deceive the company's auditors.

## 8. Corporate culture - Respect for employees

The company's staff is its main and most valuable resource. The company strives to create an environment that will facilitate the disclosure of the best professional and personal qualities of employees.

The company ensures the equality of employees who are given equal opportunities to realize their labor and creativity. The company eliminated discrimination based on gender, age, nationality, religion, political beliefs, etc.

The company values the individual, capable of achieving great results, rewards initiative seeks to attract and retain talented people, respects the privacy and protects the health and safety. The company expects employees following the rules and goals, commitment to values.

A special role is assigned to managers at all levels in the company. The company expects them to model behavior - every leader must not only ensure the implementation of and compliance with all the rules herein, but also to set an example to their ethical behavior.

### Policy Statement

According to the rules of the company, employees and others acting on behalf of the "IT-Integrator" are entitled to respectful treatment.

Respectful treatment is fair and professional treatment, the ability to appreciate the talents, results and prospects. Respect in the workplace - this is not only compliance with laws but also prevent any inappropriate behavior, harassment or discrimination related to age, disability, marital status, ethnicity, religion, gender, political preferences, experience.

The company requires managers to continuous exemplary conduct. Every leader should set an example to their ethical behavior, and emphasize its facilitate this in others.

Relationship managers and subordinates based on the principles of respect, discipline and good performance of official duties.

### Employees should observe the following rules

- respectful to every employee, regardless of nationality, sex, age, political affiliation or experience.

- Remember that actions affect the reputation and may affect the company's reputation. Think about how others may perceive your actions. If a person does not complain to you, it does not mean that he does not object to your behavior.
- upbeat positive comments about the shortcomings in the work. Recognize that measures respectful superiors associated with operating problems are necessary and appropriate responses to the quality of work.
- If someone has offended you, tell the person that this will not happen again. If you have offended someone, understand perceptions that person, apologize and do not let repeated insults.
- If you notice any behavior that may violate these rules, report it to your supervisor or the Department of Human Resources.
- Continuously improve their skills, learn new abilities and skills, acquire the necessary professional knowledge.
- Strive to improve the quality of the results of your work efficiency.
- Create and maintain a friendly psychological climate in the team.
- Always look for new opportunities in their activities, share your expertise with employees, spread best practice.
- Work as a team to achieve goals. At the same time carry personal responsibility for the results of their joint activities and, if necessary, and help team members.
- If you can not select the correct position in the team, do not know how to behave in a particular situation, contact your supervisor or the Department of Human Resources.

## Employees should avoid

- Any unprofessional or disrespectful behavior, or such conduct has the purpose or consequence of which is the persecution of any person.
- Do not allow discrimination against other employees on the grounds of nationality, religion, sex, age, marital status, political preferences. Harassment of any kind, including sexual, are not allowed.
- It is unacceptable to behave in relation to other employees aggressive or insulting.
- Any retaliation person who reported a possible violation of this rule.
- Missed opportunities respectfully tell another person that you believe his or her behavior offensive.
- Failure to report violations of this rule.

## 9. Environment and Health

### Policy Statement

"IT-Integrator" cares about the environment, health and safety in relation to processes, performance, jobs and personnel. "IT-Integrator" provides its employees with secure jobs that do not endanger the health, also seeks to minimize the impact of manufacturing processes on the environment.

Employees and others acting on behalf of the "IT-Integrator" are required to know and comply with all laws and regulations in the field of environmental protection, occupational safety and health, as well as the relevant rules, regulations of the company.

The company's management is also obliged to ensure familiarization with these laws and regulations of all employees. Professionals responsible for environmental protection, for the protection of health and safety, provide assistance and advice on these issues.

The company implemented the ISO 14000 standard, confirming the environmental performance of the company's processes, compliance with environmental legislation, reporting, and management and staff involvement in the environmental management system "IT-Integrator".

## Employees should observe the following rules

- Comply with all applicable laws, rules and regulations governing "IT-Integrator", relating to environmental protection and occupational safety.
- Use your knowledge of the rules of environmental protection and labor when performing your daily duties and management decisions.
- Implement processes in a safe manner.
- Keep your knowledge in these areas, participating in the planning of educational programs.
- Inform the management of the conditions and situations that you think are dangerous for labor or harmful to the environment, and to discontinue any operations performed in dangerous to life and health conditions.
- Responds to express colleagues, customers, partners, comments on the environmental, health or safety.
- Protect natural resources through recycling and other methods.
- Increase energy efficiency, ensure its sustainable use.

## Employees should be avoided

- Non-compliance with laws and internal regulations of the company in the field of environmental protection, occupational health and safety.
- Failure of the dangers to the environment and accidents.
- Missed opportunities to prevent pollution and reduce waste.
- Missed opportunities to improve energy efficiency.
- Hazardous actions and conditions in the workplace.

- Cooperation with contractors and suppliers who do not share values "IT-Integrator" in the field of environmental protection, occupational health and safety.

## 10. Relationships with government agencies and non-governmental organizations

### Policy Statement

The company adheres to the principle of transparency of information about their work, committed to building and maintaining a sustainable, constructive relations with public authorities.

Its activities the company is building in strict compliance with laws and regulations.

The company is committed to building and maintaining a constructive and open, excluding conflict of interest, relationships with government agencies, officials and other representatives of the government on a legal basis.

The company allows its employees participate in political processes, public organizations, when it is not contrary to the laws. In this case, the employee can not call himself a representative of the company "IT-Integrator", his participation is only possible after hours and without the use of company resources to this participation was not seen as its political or social position.

The Company may engage in charitable activities in accordance with the requirements of Ukrainian legislation.

### Employees should observe the following rules

- Follow all laws and standards of conduct applicable to the company.
- Interacting with the public authorities, is expressed only officially formulated position of the company in the prescribed manner.
- In case of a request from the government or other regulatory authorities in accordance with the company in order to provide complete and accurate information about the company, and, if necessary, to carry out other support activities of state bodies.
- Any donation, use of resources and assets to support any non-profit organizations, should be tested and be consistent with the responsible legal counsel.
- If you plan to employment in "IT-Integrator" of the former government official, you must avoid the risk of the impact of his work in his new position on decision-making by public authorities in favor of the company. This rule is valid for one year from the date of dismissal, resignation or retirement of the employee from the civil service.
- If the employee is unable to assess the correctness of their actions in relation to the public authorities need to go to your supervisor and to the responsible legal counsel.

### Employees should avoid

- interaction with public authorities, if it is not included in the duties or the employee is not authorized to do so.

- As an attempt to illegal means to influence the decisions of public bodies or their representatives.
- Misleading those leading the investigation and other officials of the state or other regulatory authorities.
- Directly or indirectly hinder the collection of information, data, testimony or records by authorized officials of the state or other regulatory authorities.
- Conceal, change, or delete the documents, information or accounts that are the subject of an investigation or issuance upon request by government or other regulatory bodies.
- Use company resources (eg, e-mail, phone), your work time, name of the company for personal participation in the political and social processes.
- Do not funding charity and sponsorship projects in order to obtain commercial advantages in specific projects of the company.

## 11. Relationship with business partners and compliance with the rules of fair competition

### Policy Statement

The Company believes that the long-term, mutually beneficial relationships with customers and suppliers, having a high reputation, is an important condition for business efficiency. The company has always fulfilled its obligations and expects the commitments of its business partners. Relationships with business partners based on respect, trust, honesty and fairness.

The Company seeks to do business with those business partners who have a good reputation, engaged in legitimate business activities and comply with the principles set out in these rules of business ethics. To implement this rule, Legal Department conducts compliance monitoring key business partners highest standards of business ethics.

The Company strives to ensure that its business partners also maintain high standards of ethics, confirmed its willingness to act in accordance with accepted policies and procedures of the company and not to violate the general principles and values. The company advises partners and promotes the adoption of the highest values and principles of ethical business behavior.

The company stands for fair competition and compliance with all applicable competition laws. Relationships with competitors the company builds on the principles of honesty and mutual respect. In case of disputes and disputes in the competition gives priority to negotiate and find a compromise.

"Business Partner" - a natural or legal person with whom the company "IT-Integrator" engaged in commercial activity. It includes without limitation the following persons or entities that collaborate with the company and act on its behalf.

- Customers
- Suppliers

- Distributors
- Consultants
- Contractors
- Competitors

## Employees should observe the following rules

- Make every effort to conscientious fulfillment of its obligations to business partners.
- value the reputation of the company, strictly abide by the laws and rules of business ethics.
- In relations with business partners to act solely in the interests of the company.
- To build and develop relationships with business partners on the principles of equality of the parties and mutual respect.
- In case of doubt, as far as relationships with business partners of the company comply with the requirements of this Code, please refer to the immediate supervisor or the responsible legal counsel.
- In the case of relations of any of the employees of the company with partners, contrary to the requirements of the Code, you should notify your supervisor and / or the responsible legal counsel.
- All key partners should be informed that the company adopted rules of business ethics and the conduct of its operations, the company seeks to fulfill them.

## Employees should be avoided

- concealment and distortion of the information provided, malpractice, the assumptions of conflict of interest, doing business in respect of any business partners of bad faith.
- Use any proprietary or non-public information about competitors or business partners, if it is suspected that it was ill-gotten gains or employee mistakenly sent.
- Allow disclosure of business partners, except when it is carried out in accordance with the laws or the terms of the contract.
- Take in connection with the performance of their duties bribe (gifts, services, payment for entertainment and recreation, money and other remuneration and any other benefits that can affect your impartiality and independence of the execution of their duties by you, and to make decisions that do not conform interests of the company and obtaining any information the disclosure of which could harm the interests of the company). In case of doubt whether a reasonable and customary gift for a business relationship, you should consult with your supervisor and / or contact the responsible legal counsel.
- Employees are prohibited to collude with other market participants to manipulate pricing, delivery or any other element of the effectiveness of the competitive market.

## 12. Anti-corruption and anti-bribery

### Policy Statement

"IT-Integrator" doing business primarily in the market of Ukraine, in their work should be based on international rules and laws, as has suppliers, customers and competitors in Europe and the US, as taking part in national projects funded by international financial institutions. For "IT-Integrator" is vital to comply with all applicable laws and regulatory requirements that affect our business operations.

The world's best practice of building anti-corruption systems in enterprises based on 2 of the Act:

- 1) of the US Foreign Corrupt Practices Act (FCPA), which prohibits corruption against public officials.
- 2) Law of the UK Bribery Act, which prohibits any corruption in respect of both public officials and private individuals, and includes the prohibition of financial incentives and payments for assisting in government.

Rules of "IT-Integrator" on countering corruption and bribery are in compliance with applicable laws to combat corruption, including those listed above, as well as the existing anti-corruption laws of Ukraine. These rules prohibit all forms of corruption, bribery and actions aimed at unfair advantage.

According to the company's policy to comply with these laws and regulations have all employees and partners, representing and acting on behalf of "IT-Integrator".

The company "IT-Integrator" controls and checks their units for potential corrupt activities and associated risks, as well as ensures the correct management of the accounting records.

Certain actions in relation to public servants, such as providing or offering gifts, donations, organizing entertainment for travel or payment for assistance - can be regarded as a violation of the law on combating corruption. Corruption within the commercial non-governmental organizations are also consistent with the policies of corporate behavior of "IT-Integrator".

### Definitions

"Bribe" - a direct or indirect offer, discussion, and the promise of giving a gift, payment or other value to a public official or other person in order to obtain or retain business or an unfair advantage. This concept also includes financial incentives and payments for assisting in government.

"Unfair advantage" in the broad sense is what the company does not have explicit rights, such as undue influence on the decision to acquire products and solutions "IT Integrator" in a public institution or commercial enterprise, a preferential selection of product specifications, contract, granting a permit to operate, favorable court decision or settlement of the dispute on the payment of taxes.

According to this rule, all employees and business partners of the company "IT-Integrator" must:

- Do not participate in the acts or omissions involving offering or giving of any person or simulate offer bribes, authorization or transfer of bribes.

- Take appropriate measures to prevent the participation of persons directly or indirectly involved in business relations with government officials or by any other means acting on behalf of the company, in a sentence or receiving bribes.
- Comply with all requirements for storage of documents and rules of accounting and financial accounting and control in order to prove compliance with all of the company's anti-corruption laws.
- Immediately inform the manager or legal counsel on all alleged violations of these rules in the company or persons acting on its behalf.

## Employees should never be

- Directly or indirectly, to provide cash and valuables to public officials or business partners to obtain unfair advantage.
- Take the cash and valuables from another person or company seeking to enter into business relations with the company "IT-Integrator".
- Allow or provide paid trip, gifts, entertainment, political support and donations in favor of a public official or a business partner without mandatory internal review and approval for the lack of influence on decision-recipient business decisions.
- Offer financial incentives or authorize payments and for assisting in government.