

*Enforced by the Board of the Global Business for Ukraine Association
on 14 October 2022*

THE GLOBAL BUSINESS FOR UKRAINE ASSOCIATION CODE OF CONDUCT

INTRODUCTION & PURPOSE

The Global Business for Ukraine Association (hereinafter – the GB4U or the Association) has adopted the following Code of Conduct for application and implementation by its members.

The aim of this Code of Conduct is to provide a framework for members' ethical behavior in their daily activities. The Code sets expectations of best practices in doing business and determines guiding principles for the GB4U members regarding their professional behavior in their capacity as stakeholders of the GB4U.

Notwithstanding anything else set out in this Code of Conduct, the GB4U Board of Directors retains the right to amend this Code of Conduct at its sole discretion.

If members are in doubt as to any provision of this Code of Conduct, they may contact the GB4U at office@gb4u.org for further information and clarifications.

APPLICABILITY AND ENFORCEMENT

As an organization committed to high standards of conducting business, collaboration, and professional behavior, the GB4U requires adherence to this Code of Conduct as a prerequisite for membership in the Association.

Each member is expected to comply with this Code of Conduct at all times and shall be responsible for ensuring that its organization is aware of and complies with the rules set hereinafter.

A lack of awareness or a misunderstanding of the Code's provisions is not by itself a defense to a charge of unethical conduct.

In case any GB4U member violates any principles/rules stipulated in this Code of Conduct, the GB4U Board of Directors shall be entitled to review the membership of the respective company in the Association and shall be entitled to take appropriate measures, including the exclusion of the respective member from the Association.

CONDUCT REQUIRED

As a member of the GB4U, the company shall commit to the following, as set forth in this Code of Conduct:

Standard of Conduct

We believe that it is important to promote the best business practices with respect for human rights and employees' interests, including maintaining professional conduct in interactions with other members of the Association and all external parties.

Members shall not gain advantage through illegal means or unethical behavior and shall respect the legitimate interests of those with whom companies have relationships.

When it comes to competition the GB4U members will conduct their operations in accordance with the principles of fair and transparent competition and all applicable regulations. Our community is

committed not to performing any coordinated actions, which may limit the competition between the GB4U members.

Bribery and corruption

With our business community, we strive to contribute to fighting against corruption. Members shall refrain from any bribery (direct or indirect) or corruption-related activities or any other activities that constitute a violation of applicable anti-corruption legislation.

A culture of zero-tolerance to corruption shall be cultivated among employees of member companies with a clear understanding that corruption is unacceptable and that all those responsible should be made accountable. It means that any demand for, or offer of, a bribe must be rejected and reported to the management of a certain company.

Obeying the law

All members are required to comply with the laws and regulations of the countries in which they operate. The following business principles are shared by our members:

- *respect and comply with property rights*
- *respect and make every effort not to infringe upon the intellectual property rights of others*
- *respect the privacy of information about the GB4U, its personnel, and other member companies and apply measures for proper use of such information*
- *use and collect data shall be done in line with applicable laws and with respect for privacy as a human right*
- *ensure that business is conducted in a manner that does not violate EU, US, UN, UK, or Ukraine sanctions*
- *ensure that the company is not involved in any money laundering or terrorist financing activities*

Employees

We believe in a working environment where there is respect for employees' rights, including but not limited to rights to a safe, secure, and healthy workplace, no discrimination in hiring and employment practices, and where there are equal opportunities at work for promotion based on qualifications and abilities needed for the work to be executed. Members will not use or allow to use verbal or physical harassment or abuse to discipline personnel.

Professional development is recognized as an important prerequisite for economic growth. To this end, members strive to undertake actions to create favorable conditions for their employees to improve a broad variety of skills.

Employees are not subject to forced, compulsory, trafficked, or child labor.

Public Activities and Communities

The GB4U together with its members seeks to develop constructive relations with state and local government bodies.

Our members are doing business with proper respect for local communities and strive to promote the development of law-based society.

Respecting people

Members of the GB4U should avoid acts that in any way harm the reputation of the GB4U or compromise the GB4U's purposes. Members shall maintain a respectful and polite tone in oral communication and written correspondence with the GB4U Board of Directors, GB4U executive office, and other GB4U members.

Maintaining a respectful and polite tone in communication with guest speakers at all events organized or co-organized by the GB4U is important. Where relevant, members shall recognize that it is preferable to address questions to guest speakers in writing, especially if these questions concern

specific areas of interest to the company and/or to the GB4U members in general, as answers may need special preparation in advance of a respective event (meeting).

Respectful attitude to our planet

We understand how important nowadays to promote environmental care, increase understanding of environmental issues and disseminate good practices. Member companies as socially responsible corporate citizens will strive to comply with applicable environmental regulations.

Business partners and suppliers

In business dealings, our members strive to promote the application of these principles/rules by those with whom the GB4U members do business. On the other hand, it is important to respect and comply with the policies and commitments of third parties.