



Corporate code of "OS Consulting"

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"OS Consulting"**

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## INTRODUCTION

Corporate Code - a set of rules governing the activities of employees of the Company "OS Consulting". And it is not just about relations within the enterprise. This document must regulate and external relations: interaction with clients, with competitors, with customers, with suppliers.

The Code of ethical conduct provides the need to develop a system of coordinates that employees understand the corporate ethical values. In addition, the Code of ethical conduct improves relationships with partners and investors.

This Code ensures fulfilment of all promises for partners. It provides the guaranty for investors as additional proof to invest in the Company for which honor above profits.

The presence of corporate quality standards, compliance with them in the organization, helps employees navigate in difficult situations, reducing the risk of possible violations, assists to create commitment of employees. The reputation and future success of the Limited Liability Company "OS Consulting" (the Company) is not largely dependent on the law, there is also big role of high ethical standards.

This Code of Ethics (the Code) demonstrates our commitment to the principles of civilized business.

In addition to existing in the Company of the law requirements, the Charter and internal documents, the Code sets the principles and rules of doing business, based on ethical values and professional standards.

Code is internal (local) document binding upon all members of management bodies, leaders, officials and employees.

### Tasks:

Definitions based on common values, principles and rules of business conduct and ethics, aimed at improving efficiency and culture, provision services of informatization, financial stability of the Company, strengthening of mutual confidence of market participants which providing information services;

- Development of a common corporate culture based on high ethical standards, maintenance of an atmosphere of trust, mutual respect and decency in a team;
- Identification and prevention of potential risks, solution of the problems with ethical aspects;
- Enhancing and preserving trust in the Company from the business community, strengthen the reputation of open and fair market participant.

### **1. MORAL VALUES AND CORPORATE PRINCIPLES OF THE COMPANY**

Our moral values:

Respect the client:

- Treat the customer with respect as to a partner;
- Work in order to satisfy the customer;
- Act so that the client feels happy to return.

Make responsible decision:

- Do not say "cannot", say "how";
- Offer your propositions, not just problems;
- Take responsibility for the task;
- Do not be afraid to make a mistake. Correct them and learn;
- Improve and enhance your work constantly.

Work as a team:

- Orient yourself to the result;
- Collaborate with others to achieve the results;

- Do not say: "It's not my job";
- Be open to new ideas;
- Help each other.

In keeping with our values, we support the corporate culture, which is necessary to achieve the highest level in all business endeavors.

Our values are binding upon us and proposing to everyone who cooperate with us.

Corporate principles are based on the values of the Company, law compliance, respect for the rights of employees and business partners of the Company. They are the basis for regulation of internal and external relations, including behavior in situations involving conflict of interest.

### OUR CORPORATE PRINCIPLES:

#### ENSURING PROFITABILITY AND EFFICIENCY

The Company considers the profitability and efficiency of its activity as a duty towards the owners and stakeholders, uses all available legal means to implement it.

#### COMPLIANCE WITH LAWS AND REGULATIONS

The Company strictly adheres to the requirements of Ukrainian and international legislation, sectorial and corporate rules, standards and procedures.

#### SOCIAL RESPONSIBILITY

The Company provides professional management of staff health, timely pays taxes and wages.

#### BUSINESS MANAGEMENT IN GOOD FAITH

The Company strives to provide and maintain high quality of its products and service, honestly and consistently meet contractual obligations, openly and responsibly implement corporate governance.

## RELIABILITY

The Company strives to be such partner for its clients, cooperation with whom will help for their sustainable development and achievement of goals.

## VERSATILITY

The Company is constantly improving the provision of services to ensure customers the kind and amount of services, which are necessary and the most effective. All corporate principles have equal significance for the Company. There must be a balance of all of the principles for making decision without any advantages or priority.

## 2. STANDARDS OF BUSINESS CONDUCT

Standards of business conduct for employees among themselves and between external parties.

### 2.1. General rules for interaction in the Company.

Interaction in the company is based on respect for the individual and orientation to result for solving professional tasks successfully and maintaining constructive relations in the community.

The Company supports:

- Polite and correct relations between colleagues, creating an atmosphere of mutual understanding and cooperation;
- Exchange of experience and information with colleagues, provide help to each other to achieve better results;
- Punctuality, accurate and timely fulfillment of obligations to the Company and to colleagues;
- Efficient usage of your time and time of your colleagues.

### 2.2. Mutual responsibility of the Company and its employees.

Mutual responsibility means that both the company and its employees share common basic beliefs; consciously and conscientiously perform their duties in relation to each other. The company sees its responsibility to employees to:

- Provide a stable and decent wages, working conditions that comply with legislation;
- Provide social security, medical care and other elements of corporate social responsibility within the scope of the programs implemented by the Company;
- Build relationships with employees on long-term basis, to give employees adequate confidence and ensure open dialogue;
- Develop and improve the system of education, motivation, evaluation of potential co-workers;
- Support the initiative and the desire of the staff for self-development, rising of professional competence, fulfilment of complex tasks;
- Maintain the atmosphere of cooperation, mutual understanding and stability in the Company.

The Company employees are responsible for compliance with the following requirements:

- Faithfully perform their duties;
- Take care of the reputation of the Company;
- Improve their professional knowledge and skills;
- Comply with rules of the internal working order; follow the orders and instructions of the leaders and officers of the Company;
- Observe business ethics rules established by this Code.

### 2.3. Additional rules for managers and executives of the Company.

The Company expects all managers will respect the employees and their rights. Leaders should not allow using methods that do harm to personal dignity of employees, taking unreasonable, illegal or unfair decisions in their management practice. The company also pays special attention to such duties of the leaders as:

- Guarantee of safety workplaces and the work environment of employees;
- Providing an open and constant access to information necessary for employees to perform their duties, providing opportunities for feedback;
- Accounting of individual performance of employees;
- Identify and use of new opportunities to improve efficiency and competitiveness of the Company;
- Demonstration of exemplary behavior, according to the principles and standards of the Company;

- Manifestation of professionalism, competence, initiative.

#### 2.4. Privacy Policy.

The Company protects the confidential information as one of the necessary conditions of its stability and competitiveness. Disclosure of confidential information can cause damage to the Company. The Company insists on compliance with the following rules:

- usage of confidential information is possible only within the framework of their duties. Transfer it to any other person, including colleagues whose work is not bound with its usage is allowed only with the permission of the supervisor;
- the obligation of confidentiality should continue after the completion of the employee's work within the Company (if there are no other transactions between him and the Company);
- disclosure of the information for investors and public authorities should be made only in the manner prescribed by the current legislation, the Charter and internal documents of the Company. The information must comply with all the requirements established by legislation, and does not contain statements that are untrue;
- It is necessary to respect the information that is the property of business partners, including to their intellectual property, copyright and related rights.

#### 2.5. Conflict of interest.

In the course of their business can be conflict of interest because of the contradiction between the property interests and other interests of the Company, owners of the company, its management bodies, members of management, officers, employees, creditors, contractors and other customers that may cause adverse effects for the Company and its clients, other parties of the conflict.

In order to ensure a balance of interests and minimizing the adverse effects that can be due to conflict of interest, the Company undertakes responsibility to adhere adopted policy of the Company in sphere of prevention and settlement of conflict of interest, develops and improves measures aimed at the implementation of such policy.



2.6. Corporate style.

Dress code of the Company is an important tool to achieve common goals and to realization of the objectives and should be used as efficiently as possible.

Employee of the company regardless of the level, type and mode of communication should be polite, friendly and helpful. An employee shows patience to the facts of incorrect behavior of customers, business partners and others.

Employee of The Company strictly adheres of labor discipline. The employee brings to the attention of the appropriate supervisor about certain circumstances that can lead to a breach of discipline. An employee tries to minimize the occurrence of such circumstances.

Appearance of the Company Employee should not be self-confident or careless.

2.7. Protection of property and resources of the Company.

Ownership and Company resources - is the foundation of its prosperity and long-term development. Any resources of the Company should be used only for business purposes. The Company expects from employees:

- effective usage of equipment and resources;
- careful treatment of its property and equipment;
- protection of commercial and technical information that is the intellectual property and usage it correctly;
- compliance with the instructions set forth in internal documents that help to use the equipment and resources properly.

2.8. Relations between the Company and external stakeholders.

Employees represent the interest of the company in relations with external stakeholders (government, customers etc.). Therefore, the rules in this section of the Code are equal towards to the Company and its employees.

**Clients:**

The Company in relations with customers consider itself obliged to:

- act in its work with clients respectfully, honestly and openly;
- provide services to all, business relations with whom does not create a high degree of legal and economic risks for the Company, avoiding discrimination on grounds of social, racial, national, linguistic or religious affiliation, and regardless of gender, place of residence, religion, beliefs, membership to public associations and other circumstances;
- assist in the selection of services according to the best interest of the client;
- carry out timely and quality services in the field of informatization;
- ensure compliance of provided services with legislation of Ukraine and this Code;
- charge a fee for services according with their volume, quality and complexity, to ensure confidentiality and security;
- ensure the safety and protection of the information;
- ensure confidentiality of negotiations and the conclusion of agreements;
- keep a secret of relationship with a client, disclose it only in cases and manner prescribed by law.

**Owners:**

The Company in its relations with its owners consider itself obliged to:

- guarantee the legal rights of owners, regardless of the share in capital of the enterprise according to the legislation of Ukraine and on the basis of corporate governance;
- do not allow any limitation of rights and legitimate interests of owners;
- achieve maximum transparency in the management of the Company, to create conditions for unimpeded access of the owners towards to the information of the Company in the manner and to the extent prescribed by Ukrainian law.

**Business partners:**

The Company in carrying out its activities consider itself obliged to:

- build relationships with business partners on mutual trust, respect and equality, avoiding undue criticism of their activities;
- strict compliance with the principle of assumed contractual and other obligations, arising from the business relationship or caused by them;

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- completely, timely and in strict accordance with the law to fulfill its obligations, and perform acts of judicial authorities in the event of litigation;
- behave friendly to other competitive organizations, to refrain from undue criticism of their activities and other deliberate actions that harm their business reputation;
- give priority to negotiations and compromise in case of disagreements and disputes.

**General Director**



*Ivan Shevchuk*  
signature

**Ivan Shevchuk**