ERIELL GROUP
International oilfield services

CODE OF BUSINESS CONDUCT AND ETHICS

Eriell Group

(Version 1.0)

2024

Dear Colleagues!

We are pleased to present you with the Code of Business Conduct and Ethics of the Eriell Group of companies, developed in strict accordance with global best practices and international standards. This Code reflects our commitment to the highest standards of corporate behavior, integrity, and responsible approach in all aspects of our activities.

Following the principles of transparency, fairness, and respect, we strive to create a work environment where each employee feels responsible for adhering to ethical standards and ready to contribute to maintaining our company's reputation on an international level. The Code will serve as your reliable guide when making decisions, helping to avoid situations that could negatively affect the company's image or its relationships with partners.

We are convinced that adherence to standards of integrity and ethical behavior is the foundation for success for each of us and for Eriell as a whole.

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ABOUT THE CODE

The Code of Business Conduct and Ethics (the Code) is the primary document establishing corporate values, principles, and standards of behavior for employees of the Eriell Group ("Company", "Eriell Group"), including Stellar Holding Limited and all its subsidiaries. The Code applies to all members of the Eriell team, regardless of position or level of responsibility.

Our Code is the calling card of the company's reputation, symbolizing a responsible approach to the rules of business conduct. It is a document that not only regulates employee behavior but also serves as a basic assurance for all persons who engage with Eriell in any interaction that the Group operates in accordance with international, generally accepted standards of business ethics and compliance. The Code aims to protect the interests of our stakeholders and ensure honest and fair relationships with: participants, investors, employees, clients, partners, counterparties, the state, and the local community.

The Code will guide us on the path to making the right decisions, help us avoid committing impermissible actions, erroneous acts that could have serious negative consequences for our Group, as well as for our partners and other persons with whom we interact.

We expect that every employee of our large community shares and follows the rules of behavior and adheres to the principles established in the Code. It is important to understand that the Code is not just a set of rules; the essence of the Code is that each of us should think about our actions, take a reasonable approach to making decisions related to ethical choices.

The Code is based on generally recognized rules of business ethics, as well as applicable legal norms. Eriell expects partners and counterparties to follow the ethical norms and rules established by this Code.

OUR VALUES

Values shape our behavior, which is why we define them in our Code:

1. Effectiveness:

- We strive to achieve high efficiency in all aspects of our activities.
- We recognize the importance of process optimization, cost reduction, productivity improvement, and achievement of set goals.
- We encourage innovative approaches, continuous improvement, and use of best practices to achieve optimal results.

2. Team:

- We believe in the power of collective effort and collaboration.
- We value the diversification of opinions and experience, and therefore create strong teams where each member can make their unique contribution.
- We encourage open communication, mutual support, and respect to achieve established goals and form a unified team.

3. Responsibility:

- We follow established corporate rules, which are the same for everyone without exception.
- We recognize our responsibility to our stakeholders, the environment, and society as a whole.
- We act in good faith and consider the consequences of our decisions and actions.
- We take responsibility for our actions, comply with legislation and business ethics norms, and strive for sustainable development, taking into account economic, social, and environmental aspects.

These values form the foundation of our corporate culture and indicate how we interact with each other and with all our stakeholders. We strive to be effective in achieving our goals, work as a team, and maintain an open and responsible atmosphere in all areas of our activities.

ETHICAL BEHAVIOR

We are interested in strong personnel, so we invite into our professional community staff based exclusively on the competencies, experience, and expertise of candidates.

Respect for differences and inclusivity are key factors for successful work in a multinational and multicultural environment.

In all companies of our Group, we are free from any discrimination against our colleagues in any form and treat every employee of our large team with equal respect. We strive to create a safe and tolerant work environment where no one is subject to stereotypes or prejudices, so that each employee feels accepted, respected, and involved.

We value traditions and accept the religious beliefs of our colleagues, are tolerant of political views, but do not allow political, religious aspects, personal lives of employees, or national traditions of our or another country to prevail over work relationships in any way, influence, or impose any restrictions on employment.

Respect and goodwill are the main cultural qualities we strive to maintain and develop within our corporate culture.

Regardless of whom we interact with, we do not accept and do not allow:

- × Raised tone and obscene language: we encourage polite, respectful, and constructive communication; the use of raised tone, rude expressions, or obscene language, impolite communication, both with each other and with subordinates and any stakeholders, is not allowed;
- × Any manifestations of disrespect:
  - Disrespectful treatment or behavior that diminishes dignity or creates a hostile atmosphere, including condescending attitudes toward junior staff and younger employees;
  - Discussion of colleagues, insults, public condemnation, including of professional behavior;
  - Belittling an employee's professional qualities based on gender (discrimination against women), other discrimination based on race, gender, age, religion, nationality, health, position, and other characteristics;
  - Unethical behavior: ignoring appeals, suggestions, requests, or problems; loud conversations, music, laughter, or other noise creating inconvenience for surrounding employees.
- × Anti-social and indecent behavior, violations of moral and ethical norms of behavior, including during non-working hours;
- × Negative public statements: about the political system, state and other languages, state symbols, traditions, and customs of all countries, including abroad (for example, if you are on a business trip); negative and offensive statements directed at any stakeholders, including those distributed on social networks and messengers;
- × Exerting psychological and physical influence:
  - Threats, coercion, bullying, humiliation, intimidation, etc.
  - Physical violence, assault;
  - Excessive attention, sexual harassment, comments, gestures, jokes, any other actions or statements that can be regarded as harassment.

DECENT WORKING CONDITIONS

Since we are interested in attracting highly competitive and valuable personnel, we strive to meet the expectations of our employees – to live up to the reputation of a worthy employer, which is manifested in ensuring equality in hiring, providing decent working conditions, and encouraging professional development of employees.

We strive to ensure equal opportunities for everyone who works in the Group in terms of:

- Organizing safe and comfortable working conditions;
- Professional realization, development, and improvement of skills;
- Competitive and timely compensation and remuneration, compliance with labor legislation norms in all countries of our presence;
- Necessary help and support on personal issues.

It is important to us that our people are engaged in their work, fulfill themselves, show initiative, can freely express their opinions, try, and even make mistakes to find the best solution.

The Group expects from each employee:

- Performance of their duties professionally, commitment to our corporate values and principles;
- Actions in the interest of the Group, protection of its interests;
- Elimination of situations where decisions are made based on subjective assessment, stereotypes, and prejudices;
- Immediate reporting of any apparent or possible violations, including of labor legislation.

ETHICAL BEHAVIOR AND LEADERSHIP RESPONSIBILITY

Each manager is the face of Eriell and an example for other employees. In their role, they must be fair and objective in relationships with employees.

Our expectations from managers:

- × Making decisions regarding hiring, recognition, promotion, remuneration, advancement of personnel based on principles of reliable assessment, qualification level, achievements of a specific employee;
- × Not abusing their official position to employ close or familiar persons;
- × Acting as an ethical leader for their subordinates;
- × Sharing information with employees about the current situation in the company, decisions of senior management, tasks and goals, external events affecting its activities;
- × Being clear and open in their communications, ensuring clarity and objectivity of information transmitted to employees;
- × Using constructive criticism, politely responding to appeals from their employees; being accessible and ready to listen to opinions, ideas, and problems of employees;
- × Informing about decisions of senior management and current tasks;
- × Providing feedback on the current work of employees;
- × Prioritizing personal communication with their employees and colleagues;
- × Being flexible in relationships with subordinates, striving for compromise solutions, considering their interests, maintaining dialogue, meeting halfway.

Before responding or making a decision, think about whether you would want the same treatment for yourself.

We are confident that these principles create and maintain a culture of ethical behavior, an atmosphere of mutual respect and cooperation, which contributes to efficient teamwork and increases the level of employee satisfaction and motivation.

CONFLICT OF INTEREST

In our work, we must act in the interests of our Group and not seek to use our position to satisfy and achieve our personal needs and goals. If you understand that your decision is based on personal interest, with the aim of obtaining your own benefit, and not in favor of the company, this is a conflict of interest.

Possible conflict of interest situations are quite common, even natural, but it's important to be able to identify them in order to resolve them in time. Remember that the situation of conflict itself is not a violation; the violation would be not reporting it.

We expect that all Eriell employees act in good faith towards their company and do not seek to derive their own benefit from such situations. Nevertheless, so that none of us finds ourselves in a situation of real conflict of interest, which may arise due to circumstances, we must be aware of such cases and notify our employer.

Our expectations from job applicants and employees:

- × Job applicants and employees must inform the HR manager or compliance officer about participation in the authorized capital, management, or work in other organizations.
- × Employees must inform the compliance officer about the interest of themselves and their relatives, and controlled organizations in transactions with any of the Group's assets. Interest is determined in accordance with applicable legislation and local acts.
- × Potential and current employees must inform their employer about the presence of family ties with officials and civil servants.

The company allows relatives to work and does not interfere with personal relationships if such relationships arise between colleagues. However, close relationships between subordinates can lead to biased decisions. Such a situation will create a conflict of interest, so it should be reported to the supervisor to remove employees from the same management vertical.

Even if you are not sure that your situation is a conflict of interest, we encourage you to report it. Your openness strengthens the company's trust in you. All such situations that become known to the company will be resolved.

RULES FOR EMPLOYEE PRESENCE IN THE OFFICE

Appearance

We try to show respect in all relationships with each other, including appearance. Our company adopts a business style in clothing, a more relaxed office style (smart-casual) is allowed on Fridays, as well as clothing elements dictated by religious traditions. While in the office, please avoid torn, worn, very short, transparent items, bright colors, large jewelry, and strong perfume in your appearance.

Smoking

Smoking (including tobacco heating systems, electronic cigarettes, vapes, etc.) is allowed only in strictly designated areas, outside office and production buildings.

Alcohol and Drug Use

The use of alcoholic beverages and narcotic substances on the employer's territory is strictly prohibited.

Eating

Eating is carried out in designated areas (office kitchens, cafeteria). Eating at workplaces is prohibited. Clean up after yourself, do not leave dirty dishes or food remains.

Work Interaction

Use the meeting room booking system and "planning assistant" to choose a time convenient for all participants of the meeting. Do not occupy meeting rooms or kitchens for private conversations.

Do not interrupt colleagues if they are having a conversation; inquire about a possible time when you can address them with a question.

Corporate Communications

Use only corporate means of communication to discuss work issues. Do not discuss work issues or exchange files on other platforms, applications, or social networks.

Responsibility for Task Execution and Discipline

If you have been assigned a task, strive to complete it on time or request an extension in a timely manner.

Respond to a letter or request within the day. If the task cannot be completed promptly, inform the addressee that time is needed for a response.

If you are out of the office – business trip \ working meeting \ remote work, inform colleagues \ management about this so that there is information on how to contact you.

Your Presence at the Workplace

Do not allow loud conversations, do not turn on music in the workspace, use headphones.

Maintain order at workplaces, including not leaving documents on desks when you finish work.

RESPONSIBLE USE OF PROPERTY AND RESOURCES

The company provides all necessary resources for the continuous work of employees. Working to achieve the business goals of our Group, each of us should take care to preserve property and strive for the careful expenditure of any resources, both monetary and any production means and other assets. Think twice when you are about to print a document.

Any expenses and purchases must be economically justified, agreed upon, and commensurate with the approved budget. All expenses must be properly documented, have supporting documentation, and be reflected in accounting records. This ensures order and control over the conduct of monetary payments and transactions, which allows identifying and preventing improper payments, misuse of company funds, inappropriate use of company assets, and unjustified expenses.

Follow simple rules:

- When you leave, do not leave your laptop or computer turned on;
- Turn off lights and electrical appliances if you are the last to leave the office;
- Use unnecessary and extra printed sheets of paper for the printer;
- When possible, work with documents in electronic rather than paper form;
- You can use company resources for personal needs, for example, to print or photocopy documents, use mobile communications for personal calls, but reasonably, and so that it does not constitute additional expenses for the company.

If you have information about irrational, inappropriate expenditure of any funds and resources, facts of theft, stealing, or damage to Company property, please report this to your immediate supervisor, security service, or write to the hotline.

INFORMATION PROTECTION

Information is one of the most valuable resources and intangible assets of an organization. Knowledge of information security rules concerns absolutely every employee, because any of us is at risk of disseminating information constituting a trade secret, other confidential information, including the leakage of personal data.

We require all employees to make commitments not to disclose information regarding any organization of the Group that has commercial value due to its unknown nature to third parties. Similar requirements apply to information received by us on the principles of confidentiality from partners, investors, clients, and other counterparties.

Please follow these rules when handling work information to which you gain access as part of your job duties:

- × Confidential information, as well as information constituting a trade secret, can be transmitted only if you have the authority to do so, in a protected and secure manner (only through corporate communication networks), agreed upon with the administrators of information systems in advance;
- × Disclosure of confidential information to any external persons is allowed only when signing a non-disclosure agreement with them;
- × Make sure that information containing personal data or other restricted access information is not left in open access, which should not be accessible to other employees;
- × Do not share passwords from your computers, laptops, and accesses to corporate systems with other employees or other third parties; do not leave passwords at workplaces or on stickers;
- × Do not follow links or open attached files of incoming electronic messages received from unknown senders;
- × Do not use your email address to sign up for periodic distribution of materials from the Internet that are not related to the performance of official duties.

Remember that the Company reserves the right to access employees' electronic messages for the purpose of archiving and centralized storage, as well as monitoring compliance with requirements.

Disclosure of confidential information is a serious violation of labor, civil, and sometimes criminal law. To combat illegal disclosure or use of confidential information and personal data, we use all means available by law.

Information protection primarily depends on our actions, not control systems or programs.

ANTI-CORRUPTION

Anti-corruption behavior and prevention of corrupt actions is a key international principle of doing business, shared by companies and enterprises in many countries around the world. Before entering into any business relationship with a new organization, serious and responsible market players always assess its reliability, and, mainly, the effectiveness of anti-corruption measures taken.

For our Group, corruption is an unacceptable way of doing business, in any form of its manifestation, in the form of exerting any influence on any person in order to obtain illegal benefits or advantages for the Company, including the abuse of personal connections for these purposes.

Building its anti-corruption program, our Group of companies is guided by international standards, legislation, both local and applicable to the jurisdiction where we have an interest, or which is applicable to our partners, as well as local requirements for combating corruption, including the Anti-Corruption Charter of Business of Uzbekistan.

The most important condition for a reliable system to prevent corruption is the knowledge of our employees and awareness when working with counterparties. Therefore, we devote the necessary time and resources to proper training of our personnel, which is mandatory for everyone so that they have a clear understanding of possible corruption risks, rules of behavior, and limitations in such situations.

We expect all persons with whom we enter into or are in business relationships – employees, clients, suppliers, other partners – to comply with the relevant anti-corruption obligations.

RELATIONS WITH GOVERNMENT OFFICIALS

Interaction with government officials on behalf of the Group requires increased caution and adherence to certain restrictions that most companies adhere to. In many countries, interaction with government officials is strictly regulated by legislation, including in the Republic of Uzbekistan. Sometimes ignorance of the rules of conduct with such persons and unconscious actions or gestures of attention towards them can be perceived as exerting influence in order to obtain advantages for the Company's business, which they can provide by virtue of their official position and powers.

The legislation of the Republic of Uzbekistan provides for the concepts of civil servants and officials:

Explanations:

Employee of a state body, organization with state participation, or citizen self-government body: a person carrying out labor activities on the basis of an employment or civil law contract, not possessing the characteristics of an official.

Official: a person appointed or elected permanently, temporarily, or by special authority, performing functions of a representative of power or carrying out organizational-administrative, administrative-economic functions in state bodies, citizen self-government bodies, at enterprises, institutions, organizations, regardless of forms of ownership, and authorized to perform legally significant actions, as well as a person performing these functions in an international organization or in the legislative, executive, administrative, or judicial body of a foreign state.

Foreign companies with which we plan to enter into business relationships always pay increased attention to the interaction of their partners with such persons. Therefore, we must also be guided by these requirements in working with our counterparties.

The Code and other separate internal regulations in the Group companies define the framework of employee behavior to prevent attempts to induce government officials to perform actions that may violate the principles of conduct of a civil servant.

Contacts with such persons should be carried out strictly in accordance with the legislation of the Republic of Uzbekistan, established rules of the Company, only by authorized persons.

All employees and persons acting on behalf of Eriell must refrain from actions (inaction) that may undermine the authority of a civil servant and state body, may prevent them from conscientiously performing their official duties, including compliance with the rules of ethical behavior of civil servants.

Examples of such actions may be:

- Providing gifts to officials or otherwise influencing them in order to obtain a positive decision/conclusion in favor of the Company (for example, during an inspection by a supervisory regulatory body, when obtaining permitting documentation, during participation in a tender, etc.).
- Payment of expenses of officials, as well as their relatives in the form of transport services, accommodation, compensation for travel tickets, entertainment events, etc.
- Providing charitable assistance both to an official and to an organization in respect of which such person exercises control, supervision, has influence or interest, and within the framework of their powers can make decisions in favor of the Group companies.

Eriell refrains from participating in and financing the activities of parties and organizations. Employees participating in political, religious, or other social activities during non-working hours must act in these cases only as private individuals, not as representatives of the Group. Agitation in favor of any political party or candidate, as well as the spread of religious views and beliefs by Employees, is not allowed on the territory of the Group companies. All Group Employees are prohibited from presenting gifts, making contributions for political purposes, or organizing entertainment events for political parties or candidates for political office on behalf of the latter.

RELATIONS WITH COUNTERPARTIES

We take the selection of our partners seriously and choose for cooperation only those counterparties who have a good business reputation and engage in legitimate business activities. We work with organizations and individuals who share our values and adhere to high ethical standards.

Eriell necessarily checks its counterparties to ensure their reliability, and at the same time implements a compliance system to meet the compliance requirements of partners, as we bear equal responsibility to each other.

We:

- Do not accept any illegal or unethical actions to achieve any agreements or anti-competitive agreements for the purposes of our companies;
- Build honest relationships with business partners;
- Conduct procurement on a competitive basis;
- Do not allow collusion, concerted actions;
- Do not collect or use confidential information to gain an advantage over others, including any anti-competitive agreements with government bodies aimed at obtaining preferences or ensuring victory when participating in government tenders.

Whatever sector our client represents (individuals, legal entities, state companies), we do not seek to maintain our relationships in any unethical way. We intend to obtain new contracts due to our expertise, services offered, without participating in illegal collusions, agreements, and similar proposals, as we consider such behavior unprofessional.

INTERNATIONAL SANCTIONS AND EXPORT CONTROL

Conducting international oilfield service business in multiple jurisdictions obliges the Eriell Group to comply with all applicable trade restrictions and foreign trade legislation.

When concluding contracts with suppliers or entering into commercial relationships, moving goods, technologies, or services across state borders (both physically and electronically), you should be aware of and follow applicable foreign trade rules or trade restrictions.

Additional information can be found in the Eriell Group's Sanctions Policy.

GIFT EXCHANGE CULTURE

We respect the traditions of maintaining healthy partnerships with clients and counterparties and allow the exchange of corporate gifts that conform to generally accepted business practices.

We do not use gifts as a way to influence or impress the recipient, but only as a gesture of showing attention in connection with festive or ceremonial events.

Business meetings and events – an integral part of business communication – cannot go beyond the limits established by internal criteria and rules of business ethics. Before accepting an invitation or gift or inviting outside persons to a meeting, it is necessary to familiarize yourself with the separate provisions adopted in each company of the Group in order to observe restrictions and not put your counterparty in an awkward position.

Gifts accepted or offered by employees should be symbolic, of small value. Gifts that exceed reasonable limits of value should be rejected.

We also expect our partners and counterparties to respect the norms of decency when presenting gifts and inviting to events.

What to do if you are given a gift that you cannot accept according to company rules?

- Inform your manager and compliance officer about it;
- Transfer it to the company.

BUSINESS TRANSPARENCY

In our desire to attract foreign partners and technologies, investments, participate in international projects, as well as to occupy leading positions in the country, we realize that the achievability of these tasks is impossible without maximum openness and transparency of our multifaceted activities.

As a socially significant company, we fulfill bank requirements for reporting on asset activities according to international format, to make it easier to build relationships with potential partners and investors, especially foreign ones, to inspire confidence in our reliability, attract interest in us, and increase our investment attractiveness. We fully comply with the requirements of local legislation imposed on reporting.

Basic principles of ensuring business transparency:

- Consistency and classification of all transactions and accounts;
- Making decisions based on complete, objective, and accurate financial data, excluding and prohibiting any distortion thereof (including not understating expenses and liabilities, not overstating assets and income);
- Maintaining complete and accurate documentation of all business operations, transactions, accounts, etc., ensuring the storage of primary documentation for payments made, transactions, etc.;
- Excluding double accounting, hidden records, and illegal financial operations;
- Excluding attempts to somehow hide or mask any officially unsanctioned payments and transactions;
- Immediate response when detecting violations, signs of dishonest activity.

ENVIRONMENTAL CARE, SAFETY, CULTURAL HERITAGE PRESERVATION

We implement major projects of national significance that could potentially harm the environment. This imposes additional obligations on the Group in terms of nature conservation, environmental care, and ensuring a high level of production culture and safety at production facilities. We carry out measures to minimize environmental impact, reduce carbon footprint, and improve energy efficiency of production.

The Group strives to ensure the following principles and rules:

- Labor safety is the main priority;
- Full compliance with environmental and nature protection legislation of the Republic of Uzbekistan and the laws of other countries in which the Group implements projects;
- Creation of environmental protection departments that ensure compliance with the requirements of environmental legislation of the Republic of Uzbekistan, provide environmental support for pre-project and project documentation, and supervise strict compliance with the requirements and recommendations set out in the Conclusions of the State Environmental Expertise on project implementation;
- Consistently and regularly plan and implement measures in terms of environmental protection, carbon footprint minimization, energy efficiency improvement, support and development of a high level of production culture, protection and preservation of cultural heritage;
- Manage risks and respond immediately to all actual and potential incidents that may pose a threat to environmental safety.

Employees are obliged to:

- Follow the rules and requirements of labor protection and safety;
- When receiving information about possible risks and potential incidents at industrial facilities of the Group, immediately report this to higher management. Remember that other people's lives and well-being may depend on your actions;
- When planning and implementing production projects, assess (including in calculations) possible potential harm and measures to minimize it.

CHARITABLE ACTIVITIES AND SOCIAL PROJECTS

Basic principles for implementing charitable and social projects:

- A conscious approach to selecting possible directions for charitable projects to address real needs of a specific target group or solve a specific problem;
- Careful control over the implementation of social and charitable projects to exclude risks of misuse or expenditure of funds, and in no way use such projects to exert undue influence in the interests of the general business of assets;
- Any charitable assistance or donations must be carried out openly and transparently, in accordance with the legislation of the Republic of Uzbekistan;
- Direct donations or grants to individuals are excluded;
- The Group does not make donations to or sponsor organizations that apply discriminatory practices or any other organizations potentially endangering our image and reputation.

PUBLIC COMMUNICATIONS AND MEDIA RELATIONS

The Department of Corporate Communications is responsible for interaction with the media, as well as any official communications.

Our principles of public communications:

- Transparency and openness: We strive to maintain open and transparent relationships with the media and the public. This includes providing accurate and reliable information about the Group, its activities, projects, sponsorship, and charity.
- Ethical behavior: we follow high standards of ethics and professionalism when interacting with the media and the public. This means that we avoid lies and manipulations, respect competitors, do not disclose confidential information, and correctly cover sensitive topics.
- Respect for press freedom: we respect freedom of the press, do not interfere in the editorial decisions of journalists, do not exert pressure on the media with the aim of manipulating information.
- Corporate social responsibility: we strive to conduct business taking into account the interests of the wider public, and actively participate in socially significant initiatives.
- Crisis communications: if crisis situations arise, we strive to promptly and honestly inform the media and the public about what is happening.

General rules for public communications:

- Group employees cannot independently contact media representatives, initiate participation in TV programs, radio broadcasts, podcasts, and any other external communications, speak on behalf of the Company or Group, give official comments without coordination with the Department of Corporate Communications; such actions can be performed by a limited circle of authorized officials (speakers);
- Group employees can participate as speakers at business events (conferences, forums, round tables, other) only with the prior approval of the manager and coordination of presentation materials by the head of the Department of Corporate Communications;
- Any request from the media, including a question at external events, should be redirected to the Department of Corporate Communications;
- We welcome publications in employees' personal accounts about corporate events and news, only in compliance with the principles of information ethics according to our information policy; this also applies to comments under other people's posts regarding the company and the Group.

REPORTING MISCONDUCT AND VIOLATIONS, RESPONSIBILITY FOR CODE COMPLIANCE

Compliance with ethical principles and standards laid down in the Code is an integral part of our activities. We strive to ensure that every employee, partner, investor, client, and other counterparty adheres to high standards of ethical behavior.

If you feel uncertainty or doubt whether you can act one way or another, check the admissibility of your actions by asking yourself:

- Will my act, decision, or action violate legislation, our Code, or other Company rules?
- Am I acting in the interests of the Company?
- Will my actions have a negative effect on the Company's reputation?
- Do I have the authority to make such a decision?
- Am I ready to bear responsibility for committing this act and will I not regret it if others find out about it?

Under any circumstances, it is necessary to apply common sense and a responsible attitude to reputation when making decisions.

Each of us acts on behalf of the Company, and a wrong step can result in a mistake made by the Company. We all bear responsibility for compliance with business conduct and ethics norms, and should not ignore situations if someone violates the Code. If you become aware of such cases, have suspicions that there is an abuse of authority, unauthorized actions are being committed, we expect you to report this to your immediate supervisor, compliance officer, General Director, or to the hotline through the following channels:

- Website: www.speakup.eriell.com
- Telegram bot: @SpeakUpEriellTestBot
- By email: compliance@eriell.com

Each message will be checked and an investigation will be conducted if necessary. Eriell guarantees protection to every person who in good faith reports a violation or suspected violation. Anyone outside the perimeter of Eriell can also report. The message can be sent anonymously.

Please note that the hotline channels are intended for messages about situations and behavior that violate the provisions of the Code, legislation, and business ethics. Abuse of the hotline for the purpose of providing knowingly false information will be considered unethical behavior.

The Code is a mandatory document for execution. For violation of the provisions of the Code, employees may be subject to disciplinary measures, an internal investigation may be initiated, which may lead to dismissal; confirmed facts about an employee or representative of the Company committing a disciplinary offense that led to a crime or other illegal actions may be transferred to law enforcement agencies.

The Group pays attention to making the Code understandable, accessible, and relevant. We conduct training and information campaigns to ensure understanding and awareness of ethical principles and rules of conduct by each employee. We also encourage open communication and reporting to encourage employees to report violations and ethical problems.

COMPLIANCE OFFICER

To ensure effective implementation and compliance with the principles and norms set forth in this Code, a Compliance Officer is appointed in the Eriell Group.

The Compliance Officer is an independent official reporting directly to the General Director of the Group. Their main functions are:

- Development and updating of the Code of Business Conduct and Ethics, policies, and procedures in the field of compliance;
- Advising employees on the application of the Code and resolving potential conflicts of interest;
- Organization of training programs on ethics and compliance for employees;
- Review of reports on potential violations of the Code and organization of internal investigations on such facts;
- Interaction with government bodies on issues of compliance with applicable legislation;
- Monitoring and evaluating the effectiveness of the compliance system in the Group;
- Preparation of periodic reports for management on the status of the compliance program.

The Compliance Officer has sufficient powers and resources to perform their functions. All Group employees are obliged to assist the Compliance Officer in their activities and provide requested information.

The Compliance Officer has the right to directly access any manager, up to the General Director, to convey information about serious risks or violations in the field of compliance.

CODE FAMILIARIZATION AND TRAINING

The Eriell Group considers it extremely important that all employees are familiar with the provisions of this Code of Business Conduct and Ethics and understand the importance of its compliance.

All newly hired employees must undergo mandatory introductory instruction/training on the Code during the first month of work.

For existing employees, annual mandatory training programs are organized in the form of trainings, seminars, webinars, and other formats in order to remind the key provisions of the Code and consider practical cases.

Training on the Code is mandatory for all employees, regardless of position. Following the training, employees take a test to verify the assimilation of the material.

Failure to undergo training without valid reasons will be regarded as a violation of labor discipline and will be grounds for applying disciplinary measures.

Managers at all levels should set an example of ethical behavior, follow the principles of the Code, and ensure the creation of an ethical work environment in their divisions.

The company's Compliance Officer is responsible for developing training programs on the Code and their updating.

The Human Resources Management Department carries out familiarization and ensures that employees undergo the above training, and also monitors the timely completion of training by employees.

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