

CODE OF ETHICS



OBJECTIVES AND TASKS OF THE CODE OF ETHICS

The reputation and future success of Loftice LLC (hereinafter Loftice) largely depend on compliance not only with the requirements of the law, but also with high ethical standards. This code (hereinafter Code) is evidence of our commitment to the principles of civilized business. Reputation is the most valuable asset of Loftice. And like any asset, it must be developed and protected. The Code of Ethics is a way to preserve and develop a positive reputation for Loftice. The code of ethics is based on the core business principles: Responsibility, Respect, Openness and Honesty. It gives not only general concepts regarding how we should behave, but also describes situations where our actions can have a critical impact on the Loftice reputation. The code is consistent with laws and regulations for all types of our business. He demonstrates our determination to act ethically and honestly in every situation and at the same time to respect human rights. We expect this behavior from every employee, anywhere, every day. We also expect a similar attitude from our business partners. High standards of our relations are a guarantee of our successful and long work. We want Loftice to be a recognized leader in all areas of its activities, and employees proud of their involvement in Loftice.



Tatiana Orlova
General Director, Loftice

I urge you to carefully read the Code and work in such a way that the high standards of the Code are implemented by each of you. If you are in doubt about how to act in a given situation, immediately contact your manager, the personnel department of the company or directly to me, the General Director of Loftice.

Thank you for your personal contribution to meeting the Loftice business ethics requirements and honesty in everything we do.

CODE OF ETHICS

Loftice is committed to build relationships with its employees, customers, providers, contractors and other business partners on the principles of respect, responsibility and excellent work, while being aware of their responsibilities in the social and ethical fields. Loftice undertakes to comply with all requirements of the current legislation of the Russian Federation and regulatory acts. The Code of Conduct formulates standards for the professional behavior of a Loftice employee in relationships with clients, colleagues, providers, contractors and business partners.

These standards relate to:

- Labor safety and workplace standards
- Personal behavior of employees
- Business practice
- Compliance with the laws of competition
- Combating Corruption and Bribery
- Respect for human rights
- Privacy Policy

The standards of conduct established by this Code express the goals and standards of quality professional behavior of Loftice employees in everyday life, which are agreed, accepted and shared by all Loftice employees.

LABOR SAFETY AND HEALTH



Loftice actively seeks to provide a working environment that is safe for the life and health of its employees, visitors, suppliers, contractors and business partners.

Loftice complies with all applicable laws in the field of labor protection, Loftice requires employees to responsibly approach the performance of work and comply with safety regulations. It is the responsibility of all employees without exception to follow the company's policies and procedures in the area of labor protection.

Loftice does not use forced or bonded labor.

In accordance with the international conventions in force, Loftice does not recruit children.

Loftice employees are trained both before starting work and in the course of their work activity.

All workers are given the opportunity for career growth in Loftice without distinction of gender, marital status, ethnic origin and citizenship, sexual orientation, religion, political views, age (taking into account the retirement age under the contract) and disability.

Loftice undertakes to pay fair wages and allowances in accordance with current legislation.

Loftice respects the privacy of the employees and makes every effort to protect it.

PERSONAL BEHAVIOR OF EMPLOYEES

Loftice employees are required to behave correctly towards customers, business partners, providers, suppliers and colleagues, respecting their personal integrity and privacy.

All employees are obliged to act openly, honestly and with respect to each other, to interact when solving any issues.

Company employees are obliged to treat each other, partners and clients applying the principle of equality, regardless of gender, age, religion, sexual orientation, physical disabilities and ethnic origin. Harassment and discrimination in no case should occur; any attempt to discriminate against employees or third parties, as well as, defamation, direct or indirect, will be considered as a reason for disciplinary action.

The company and its employees respect the traditions and customs of representatives of other states, taking into account the provisions of international law.

Loftice employees must comply with the laws of the Russian Federation.

Work under the influence of alcohol or drugs is strictly prohibited in Loftice.

If an employee doubts how to act in a given situation and if the Code of Ethics does not regulate a controversial situation, the employee should consult with the immediate supervisor.

BUSINESS PRACTICE

Loftice has a policy of honest and open-minded attitude to all its customers, providers, suppliers and business partners in the present and future.

Loftice avoids dishonest or manipulative work practices by honestly and openly providing its services.

Loftice requires that all employees, regardless of the nature of work, rank and position, comply with the following business and personal ethics when performing their tasks and duties:

- Loftice employees are required to be honest and decent in all aspects of relationships with other employees, customers, suppliers, other business partners, the local public and authorities.
- Loftice employees should not make illegal and improper payments and give bribes; they must refrain from participating in any unfair business practices.
- Loftice employees should avoid situations in which their personal, family or financial interests may conflict with the interests of Loftice. If a conflict of interests appears to be possible, the employee must report it and contact Loftice management for a decision.

Loftice seeks to familiarize its customers, providers, suppliers and business partners with the Loftice Code of Ethics.

COMPLIANCE WITH COMPETITION LAWS



Loftice competes in business on fair terms and on the basis of the benefits of its services.

Loftice does not enter in price collusions, does not distribute services and does not share the market with competitors.

Loftice does not enter into an agreement on tender issues with competitors and does not discuss issues of pricing, discounts, sales conditions with competitors.

Loftice never discusses the quality of work of competitors without having a solid basis for such statements.

COUNTERACTION TO CORRUPTION AND BRIBERY



Loftice actively opposes any form of corruption and bribery and is committed to combating such practices.

Neither Loftice nor any of its employees have the right to accept from third parties monetary amounts, gifts, or other types of remuneration that can influence, or create the impression of influence on their objectivity in making business decisions.

RESPECT FOR HUMAN RIGHTS



Loftice respects fundamental human rights and is guided in its work by the provisions of the UN Universal Declaration of Human Rights.

Loftice resolutely excludes the possibility of forced labor or child labor and considers the protection of human rights to be one of the fundamental criteria when choosing suppliers, contractors, business partners and establishing relationships with them.

SANCTIONS FOR VIOLATION OF THE CODE



Each employee is responsible for ensuring full compliance of his behavior, as well as the behavior of all his subordinates, with the laws in force, this Code, and the rules of the company.

Loftice seeks to prevent cases of behavior that do not comply with the Code, and to prevent such behavior as soon as possible after its detection. Loftice employees who violate the Loftice Code of Ethics and other business rules may be subject to disciplinary action, including termination of employment. All actions related to disciplinary action will be based on the principles of justice.

PRIVACY POLICY



In its activities, Loftice is guided by federal laws, government decrees and presidential decrees regarding usage of confidential data and the protection of personal data of its employees.

None of the Loftice employees may, without proper permission, view, change, disclose or use the confidential information of organizations or individuals for any purpose other than those permitted by law.

APPLICATION AREA



All managers Loftice are responsible for the ongoing implementation of this Code, including its dissemination among employees in order to familiarize and ensure its observance.

This Code applies to all Loftice employees, regardless of the nature of their work, rank or position.

Loftice requires all persons acting on its behalf to observe equivalent standards of behavior.

The practical application of this Code is subject to regular monitoring and update.

VIOLATIONS REPORTING

The standards discussed in this Code reflect the Loftice basic culture and its values. Compliance with these standards is a prerequisite, and each employee is responsible for maintaining these principles.

All Loftice employees must report suspicious cases or actual violations of the law, this Code, as well as cases when they are requested to take any action that may constitute a violation. Such messages should be brought to the attention of the immediate supervisor, General Director or to the hotline address help@loftice.ru.

Employees can report possible violations anonymously using the help@loftice.ru hotline using a third-party email account that does not disclose the sender's name. It should be remembered, however, that the investigation and taking action on anonymous messages can be difficult.

Confidentiality will be maintained as much as possible.

Failure to assist in the investigation of a violation or potential violation is also a violation of this Code.