

**STAR
LIGHT
Media**

STARLIGHTMEDIA GROUP CODE OF ETHICS



Table of Contents

| | |
|----|---|
| 3 | Introduction to the Code |
| 4 | Our values |
| 5 | Code-mandated obligations |
| 5 | Employee obligations |
| 5 | Manager obligations |
| 7 | Relationship with counterparties |
| 8 | Sustainability |
| 10 | Workplace relations equality |
| 11 | Inclusion |
| 12 | Occupational health and safety |
| 13 | Religious and political life |
| 14 | Public relations |
| 16 | Use of SLM resources |
| 17 | Intellectual property |
| 18 | Information security |
| 19 | Personal data protection |
| 20 | Confidentiality |
| 22 | Fraud and corruption |
| 23 | Gifts and business hospitality |
| 26 | Conflict of interests |
| 28 | Code Violation Notice |
| 29 | Sanctions for violations of the Code requirements |
| 30 | Contact details |





Introduction to the Code

StarLightMedia Group¹ (hereinafter referred to as SLM) is the leading media group in Ukraine. We deeply respect the country in which we do business, its laws, sovereignty, history, traditions, as well as our viewers, partners, and customers.

THE CODE APPLIES TO ALL SLM EMPLOYEES, REGARDLESS OF THEIR POSITION OR FUNCTIONAL RESPONSIBILITIES.

SLM is focused on sustainability goals in improving its business. As a market leader, the Group shares the responsibility that all business has to effect the positive changes that must occur for the development and sustainable future of our society and the planet as a whole. To that end, SLM is implementing a sustainability strategy and has prioritized areas in which it facilitates progress as a business, an employer, and a media leader. The goals that the Group has chosen: health and well-being, gender equality, decent employment and economic growth, conscientious consumption and production, as well as partnership for sustainable growth.

The Code is a fundamental document of the corporate strategy. It brings together the basic ethical values and principles of SLM and the employees. Why do our employees need to know and understand the requirements of the Code? For them all to make sound business decisions and prevent things that harm SLM's reputation.

The Code serves as the underlying document for the development of SLM's compliance system. Compliance is an element of the management / control system. Its function is to keep an eye on the company's activities to make sure they're in line with legal requirements, internal policies, and business ethics. Countering corruption, fraud, managing conflict of interest risks, and adhering to international sanctions regimes are usually the compliance responsibilities.

¹ StarLightMedia Group is a group of companies that share a common owner Starlight Media LLC (Cyprus) in the ownership chain and are part of the StarLightMedia Group.



2

Our values

We improve ourselves, our team, and our community by adhering to the SLM values such as:

Proactivity:

- suggest new and out-of-the-box solutions to current issues, suggest ways to improve processes and products;
- eliminate losses in business processes;
- look for ways to get around roadblocks on the way to the goal set.

Effectiveness:

- organize the work ahead of time, consistently and without rushes;
- use and allocate resources in a rational manner according to priorities;
- focus on finding a solution rather than the issue;
- maintain productivity in the face of uncertainty or multitasking.

Partnership:

- giving a helping hand to colleagues by going above and beyond one's duties, if necessary;
- share experience and knowledge with colleagues and subordinates;
- join teams in solving common challenges;
- in work situations, pay attention to what others have to say and try to reach a trade-off.

Chargeability:

- think through the implications of one's actions and decisions;
- adhere to procedures and regulations in one's work;
- assume responsibility for one's decisions and not pass it on to others;
- address issues ahead of time, without waiting for severe complications and disruptions in performance.

3

Code-mandated obligations

Employee obligations

Employees are SLM's most valuable asset, as they shape the company's deliverables and image. That is why everyone, regardless of their position, accepts responsibility for their actions, pledges to follow the rules, and treats SLM's reputation with care.

Each employee is required to:

- know and comply with the requirements of the law and the Code;
- receive mandatory training as required by the Code¹;
- if you have any questions regarding the Code, contact your immediate manager and the employees of the Internal Audit and Compliance Department;
- never harass / judge / pressure employees who report violations of the Code;
- assist any SLM's employee in investigating violations of the Code;
- build a welcoming team climate.

Manager obligations

Managers at all levels are leaders in building an ethical culture within SLM, so in addition to their employee obligations, they are required to:

- make sure that your team complies with the laws of Ukraine and the Code;
- be a model of adherence to the Code in both words and deeds;
- encourage employees to behave ethically;
- care for a welcoming team climate that encourages employees to develop their talents;
- give everyone in the team an awareness of their personal responsibility to abide by the Code;
- create an environment in which everyone can openly report a Code violation without fear of prosecution;
- never encourage a team to violate the requirements of the Code in the pursuit of business excellence.

¹ Mandatory e-learning from the Human Capital Department and/or mandatory training organized by employees of the Internal Audit and Compliance Department or the Human Capital Department.



NOT SURE YOU'RE ACTING UP TO THE CODE? ASK YOURSELF THIS:

- Is what I am doing legal?
- Is what I'm doing in line with the Code's principles and the SLM's in-house documents' requirements?
- Am I acting in the best interests of SLM?
- Have I considered the risks and possible effects that my decision may carry?
- Will I be at ease if the public learns about my decision?
- Am I sure that my actions do not cause reputational and/or financial damage to SLM?

Can't give an affirmative answer to any of the questions? Seek advice from your immediate manager and the Internal Audit and Compliance Department.

4 Relationship with counterparties

SLM cultivates relationships with counterparties¹ based on the principles such as transparency, equality, legality, and economic viability to foster long-term and mutually beneficial cooperation. We uphold open and fair competition, so we provide equitable competitive terms for cooperation to all counterparties. We protect confidential information, trade secrets, and intellectual property that became known in the cooperative process.

EMPLOYEES ARE EXPECTED TO BE FAIR, HONEST, AND COURTEOUS IN THEIR INTERACTIONS WITH COUNTERPARTIES.

Moreover, they should:

- abide by all relevant laws and business ethics guidelines applicable to SLM;
- never create obstacles for counterparties or give them an unfair advantage when a business relationship is being initiated or practiced;
- act solely in the SLM's best interests whenever they interact with counterparties.

SLM also has the right to refuse to cooperate with counterparties in the manner prescribed by law. Non-compliance with the Code's principles or violations of legal requirements to ensure human rights, compliance with occupational safety rules, anti-corruption, etc., may be among the reasons for such refusal.



¹ A counterparty is a party to a civil legal relationship's contract (supplier, customer, partner, etc.).

5 Sustainability

SLM has become the first Ukrainian media group that is focused on improving its business according to the Sustainable Development Goals of the United Nations. Top executives and employees jointly identified five sustainability goals that the Group will strive to achieve as it goes forward. They are mirrored in corporate programs and policies, partnerships, and SLM media projects.

The sustainability goals SLM has chosen for its growth:

- decent work and economic growth;
- responsible consumption and production;
- gender equality;
- health and well-being;
- partnership for sustainable development.

Our employees are key ambassadors for the sustainable development goals, and SLM encourages their initiatives to make progress on social and economic issues as well as preserve the planet's resources.

SLM joins its efforts with international and public associations to make progress in sustainable development: it collaborates with the UN Global Compact, UN Women, the UN Population Fund, the National Democratic Institute, the Corporate Social Responsibility Development Center, and other related associations.

Also, SLM is the first Ukrainian company to join the implementation of [the Women's Empowerment Principles](#) (hereinafter, the WEPs), the international principles for businesses that seek to ensure equal rights and opportunities for their employees, promote the economic and political growth of women, and address violence and discrimination.

As part of its efforts to advance gender equality, SLM implements a policy of non-discrimination and equal opportunities, implements a corporate paternity program, a gender-balanced recruiting system, a corporate program to counter domestic violence, and monitors gender balance in the Group in general and in career appointments in particular.

SLM supports public forums and initiatives on equality and human rights, developing partnerships and in-house initiatives to advance the five sustainable development goals.

SLM publishes an annual report for all interested parties on its progress in gender equality and campaigns for WEPs among Ukrainian businesses.

We expect our employees to adhere to WEPs principles when organizing in-house corporate events, giving corporate gifts on behalf of SLM to employees (for example, New Year's gifts and the like), and business communications. Such events, gifts, and communications should all be gender neutral.

SLM keeps being responsible for the development of the community and the state, in particular, when it:

- develops the industry and sub-industries that contribute to the national economy's growth;
- places a special emphasis on using an age-rating system to minimize the risks of potentially harmful content for underage viewers;
- regulates content in a proactive manner to improve its quality;
- ensures that social advertising is distributed and important public initiatives are supported.

ALL OF SLM'S SUSTAINABILITY ACTIVITIES TAKE PLACE WITHIN THE "IMPROVE YOURSELF, THE COMPANY, AND THE COMMUNITY" PARADIGM.



6 Workplace relations equality

SLM treats people in the workplace and community fairly and impartially. People are all not the same. Understanding, valuing, and effectively managing these differences can help people be more engaged and achieve success as individuals, teams, company and community members.

WE STAND FOR EQUAL OPPORTUNITIES. WE REVIEW SLM POLICIES AND FUNCTIONS FOR THEIR ALIGNMENT WITH EQUALITY PRINCIPLES AND MONITOR THE PROGRESS OF THE DIVERSITY AND INCLUSION ACTION PLAN.

We value the unique ideas and skills of our employees regardless of their nationality, citizenship, race, color, gender, age, sexual orientation, gender identity, marital, property or financial status, physical appearance, health, religious or political affiliations, language or impairments. We're all about comfort at SLM, so we provide equal employment and career opportunities for everyone. We uphold workplace standards of conduct and prevent discrimination, prejudice, harassment, or aggressive language among employees and counterparties.

SLM has a zero-tolerance policy toward all forms of violence, discrimination, and harassment. Direct or indirect coercion to engage in sexual activity with coworkers or counterparties is prohibited. Along with direct coercion, such behavior may include unwanted touching, pressing, gestures and movements, suggestions of an intimate nature, sexually offensive comments and jokes, unwanted discussions of sexual topics, questions, stories, or showing sexual images. Safe spaces for people, self-actualization, and the creation of new ideas are important for SLM to maintain.

Therefore, we expect that our workers will:

- understand and respect other people, adhere to honesty and equality;
- make business decisions based on the professional qualities of employees;
- know the difference between acceptable and unacceptable behavior;
- eliminate barriers and correct imbalances created by prejudice and inequality;
- not insult, intimidate, or humiliate other people; and
- report any bullying, stalking, harassment, or violence toward SLM employees they observe.



Inclusion

Our focus is on the possibilities, not the limitations. We understand the existence of health impairments, not flaws. We recognize that disabled people face difficulties at work not on account of physical, mental, or sensory impairments, but on account of social, physical, and behavioral barriers in the society.

We are committed to identifying and eliminating such barriers for our employees and counterparties. We assure interviews for candidates with disabilities who meet the basic requirements of the job on offer, adapt the workplace to meet their needs, and help with professional advancement.

7 Occupational health and safety

Workplace safety is an important part of employee's comfort.

SLM complies with the requirements of Ukrainian legislation on occupational safety and health aspects and ensures:

- procedures and tools for safe operation that can be accessed and understood;
- continuous improvement of the SLM occupational safety system;
- conducting training on occupational safety and health topics.

Workplace safety is everyone's responsibility, which is why employees are required to:

- know and comply with the requirements of in-house regulatory documents on occupational safety and health;
- facilitate the creation of a safe working environment;
- identify workplace hazards and eliminate them in the prescribed manner;
- report any emergency incidents to the SLM Occupational Safety and Health and Fire Safety Department.





8

Religious and political life

SLM embraces freedom of worldview and religion.

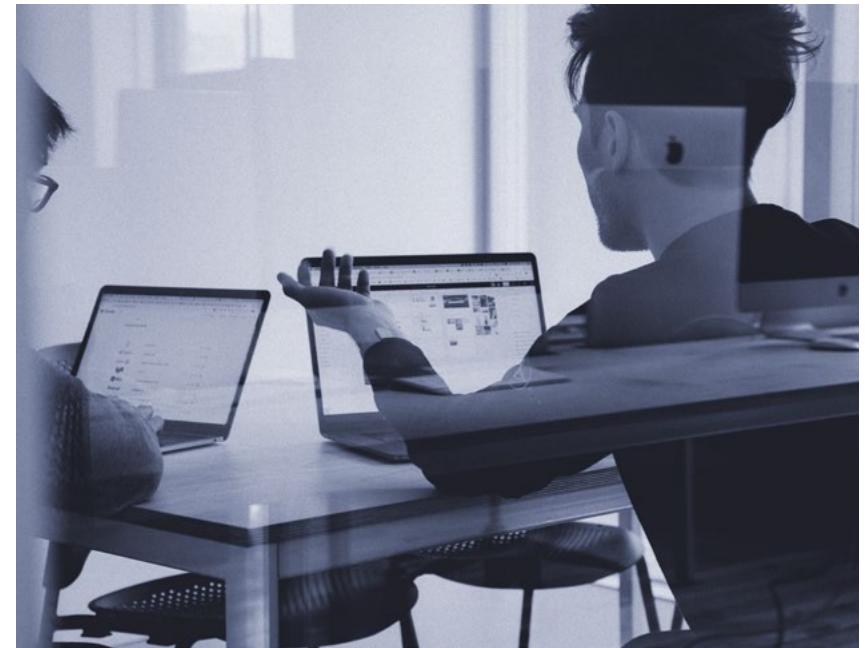
We strongly advise our employees to be careful in expressing their political views and not to impose them, given the advantages of working in the media industry, so as not to cast doubt on SLM's impartiality and independence.

Employees may not express support or commitment to any political force or policy on behalf of SLM, nor may they use their relationship with SLM in their political life or for political campaigning.

9 Public relations

SML employees surely have their private lives, interests, hobbies, and beliefs out of their workplace. Not a single clause in the Code is intended to limit these rights. It should be born in mind, however, that anything that employees publish or discuss publicly, or their judgments may affect SLM in a harmful way. As such, employees should make sure that none of these out-of-work activities will create a conflict of interest, compromise our editorial integrity, or cast a shadow over SLM's transparency.

To mitigate reputational risks, communication regarding SLM and its business should show reality, be made by authorized employees on the SLM speaker list, and not conflict with the SLM's stance. The basic rules are governed by the SLM Communications Policy.



To prevent the risk of interpreting the personal opinions of individuals as the official SLM's stance:

- Employees who use social media to discuss political and social issues should remember that a meaningful discussion is based on facts rather than emotion or judgment, and make it clear that any thought expressed on social media is the employee's personal opinion and does not reflect the SLM's official stance.
- It is important that the employees exercise caution when making public appearances and refrain from making comments that would go beyond what they would write in their pieces or say on our ether.
- Employees should be mindful of protecting SLM's and counterparties' confidential information on the Internet.

Respect for human honor and dignity, the territorial, political, and cultural integrity of the country are undeniable SLM values.

In public communication and actions, SLM employees always avoid:

- Calls for violent change of the constitutional system of Ukraine, unleashing or propaganda of aggressive war, inciting national, racial, or religious hatred.
- Statements aimed at polarizing society, having signs of separatism, or discriminating against citizens on the grounds of place of birth, nationality, political or religious affiliation.
- Propaganda of the aggressor state, state bodies, or separate actions that justify the occupation of the territory of Ukraine or recognize it as legitimate.
- Statements, appeals, or suggestions opposing the equality of human rights. Do not discriminate people by sex, sexual orientation, or physical or mental health.
- Violent assertion of one's political views, denial of freedom of choice, or disregard for the choices of other citizens.

SLM respects the history of Ukraine, its heroes, victims of disasters, tragedies, and repressions. That is why SLM employees do not question the appropriateness of declaring mourning (grief, remembrance) days or celebrating days of remembrance in television programs.

10 Use of SLM resources

SLM resources that we use in an efficient and appropriate manner for operational activities:

- physical assets: real estate, furniture, equipment, decorations, vehicles, etc.;
- technology assets: PCs and telephone equipment, software, information systems;
- financial assets: money, securities, bank cards, or accounts;
- information assets: intellectual property, mail and voice messages, computer files and programs, information that is created, sent, received, downloaded, or stored using SLM assets;
- SLM name, logo, brand.

SML resources should be used to meet SML needs.

We have the right to monitor the intended use of SLM resources, and employees, in turn, should:

- use SLM resources according to the requirements of in-house regulatory documents;
- make use of SLM resources in a responsible and prudent way for personal (non-commercial) purposes, as long as this does not conflict with SLM's interests or harm the productivity of other employees. Prudent use is understood as such use

- that is not essential to SLM such as printing personal small documents, using the corporate cell phone for personal calls (within the package limit), and the like. We hope that our employees will be able to assess the balance of what is reasonable while operating SLM resources on a case-by-case basis;
- refrain from misusing, selling, stealing, fictitiously writing off, or dekitting SLM resources.

HAVE ANY DOUBTS AS TO THE LAWFULNESS OF THE USE OF SLM RESOURCES? CONTACT YOUR IMMEDIATE MANAGER.

11

Intellectual property

The Code defines intellectual property as photo, video, audio content, article / news texts, or drawings created by SLM as well as patents and trademarks owned by SLM. Any property that employees create in their work is SLM's intellectual property.

We hope that our employees, counterparties, and any other third parties will respect the intellectual property rights legislation of Ukraine. SLM protects its intellectual property and takes appropriate action against those who use it without the appropriate permission. We do not permit copying or sharing of any SLM copyrighted content unless required by law or authorized by SLM.

Employees may post items of intellectual property or portions thereof (e.g., videos, news texts, etc.) after they have been officially made public, with mandatory reference to official sources. Posting of intellectual property items before they are officially made public is possible only with the written consent of SLM.

SLM is the anti-piracy leader. As a matter of principle, we do not cooperate with pirates¹ and people who facilitate piracy.

Unless SLM has given prior written approval to do so, our employees are prohibited to:

- use SLM intellectual property for personal purposes;
- use SLM intellectual property after dismissal;
- use the intellectual property of third parties in the SLM interests contrary to the intellectual property rights legislation of Ukraine.

DO YOU HAVE AN INTELLECTUAL PROPERTY RIGHTS INFRINGEMENT QUESTION? CONTACT THE SLM LEGAL DEPARTMENT FOR ADVICE.

¹ Persons who commit intentional unlawful acts aimed at unlawful use of intellectual property items of other persons for the purpose of gaining material benefit.

12 Information security

We protect our information, as well as the information of our employees and counterparties, to the appropriate level of confidentiality, integrity, and availability.

Every employee bears responsibility for information security. SLM employees should act in compliance with in-house regulations and adhere to the underlying rules such as:

- notify the Department of Information Security of emergency incidents occurring or suspected of occurring;
- never share information system passwords with third parties (colleagues, support staff, management, etc.);
- never download files from unknown recipients, open suspicious emails, or run software attached to emails;
- never use unsecured email services or personal email for work;
- never use untested storage media (flash drives, SD cards, etc.);
- never download or install third-party software¹ to work computers without prior approval from the Information Security Department;
- never leave working documents on your desktop. Lock work computers when you are not in the office;
- never disclose confidential information;
- never collect or duplicate information for personal benefit;
- never collect, process, store, or share the personal data of employees, counterparties, and other persons unless they give their prior consent.

¹ Software that the IT Department does not install.

13 Personal data protection

Personal data is information or a set of information about an individual who is identified or can be specifically identified (e.g., name, phone number, address, passport series and number and identification code, payment card data, photos, etc.).

SLM complies with Ukrainian legislation on the personal data protection. We take all the steps appropriate to protect the personal data of our employees, contractors, shooting participants, etc.

For this reason, SLM employees should strictly comply with the requirements of Ukrainian legislation and in-house regulations and are obliged to:

- comply with the applicable personal data processing rules;
- comply with the principles of lawful processing, accuracy and up-to-date data, data minimization, confidentiality and security of data storage, etc;
- verify the availability of legitimate grounds for the consent of the personal data subject and the appropriate authority of the recipient whenever there is a business need to share personal data.



14 Confidentiality

Employees may, during the performance of their duties and within their competence, receive restricted-access information such as confidential information and trade secrets of SLM (hereinafter referred to as the restricted-access information).

Confidential information is the information to which access is limited by SLM and which can be shared with the consent of SLM under certain procedures according to the stipulated terms and in the cases prescribed by law. Confidential information may relate to SLM, employees, counterparties, shooting participants, etc.

THE DISCLOSURE OF RESTRICTED-ACCESS INFORMATION IS PROHIBITED.

A trade secret is classified information that is unknown to and hard to access by persons who would normally interact with such data. It has commercial value and requires secrecy unless otherwise determined by the person who lawfully controls it.

The examples of restricted-access information include unpublished financial results, financial projections, strategic plans, information about potential and existing commercial contracts entered into by SLM, information about possible new creative projects, personnel changes in the SLM management (until SLM makes an official announcement to that effect), and other information the access to which is restricted by SLM. A detailed (but non-exhaustive) list of restricted-access information is given in Appendix 1 to the SLM Regulation on Restricted-Access Information.

The disclosure of restricted-access information that became known in the performance of official duties or in any other way is prohibited. A disclosure means the communication of information in written, electronic, or verbal form to anyone other than those who have an access right to such information.

Use restricted-access information solely for work purposes, subject to certain confidentiality requirements. Do not use such information for personal purposes or discuss it in public spaces like social networks and other web-based resources. Take



care when discussing restricted-access information outside the office and the meeting room as this may result in leaks (even within the office limits when you are in an elevator).

Restricted-access information in electronic form should be easy to recover. Before you send emails, make sure that any confidential data is not shared with unauthorized/third-party recipients.

Do you handle restricted-access information? Stick to the “need to know” principle. Share information with other employees only if and to the extent that there is a justified business need. If you need to share such information outside the company, be sure the recipient signs a confidentiality / non-disclosure agreement. Remember that it is your responsibility not to disclose any restricted-access information that you become aware of, even after your employment with SLM ends.

THE BASIC RULES FOR HANDLING RESTRICTED-ACCESS INFORMATION CAN BE FOUND IN THE SLM’S RESTRICTED-ACCESS INFORMATION POLICY.

15

Fraud and corruption

SLM adheres to the zero tolerance principle for any form of fraud¹ and corruption². We take the measures appropriate to prevent our employees from committing fraud and corruption in the course of their duties. Employees will be subject to disciplinary, administrative, and criminal liability for committing such offenses as required by law and by SLM's in-house regulatory documents.

Employees and counterparties acting for or on behalf of SLM should act in good faith under all circumstances in business. SLM adheres strictly to the anti-corruption laws that apply to it and fights corruption in line with the best global practices. Violation of applicable laws may result in loss of goodwill, fines, and personal administrative or criminal liability for SLM employees.

Regardless of their position and functional duties, all employees are required to:

- refrain from any acts of corruption or similar practices;
- refrain from making facilitation payments;
- consider carefully the possibility of offering gifts to or inviting public officials to entertainment events and to do so only as required by applicable law and SLM's in-house regulatory documents.

SLM prohibits any manifestation of corruption. Please remember that a bribe may take more than just monetary form, but can also be a gift or travel, a political contribution, a TV promotion of a person or brand, a charitable contribution, a job offer, etc.

¹ For the purposes of the Code, "fraud" means theft, extortion, forgery of documents, forgery of tender results (in particular, fictitious supplies of goods, works/services), delivery or acceptance of products/equipment having qualitative or quantitative characteristics that do not agree with those specified in the documents, unlawful collection and distribution of restricted-access information, cyberattacks on SLM information systems, social engineering, etc.

² Corruption is the use by a person of their official powers and opportunities to obtain an improper advantage, acceptance of a promise/offer of such an advantage for themselves or other persons, respectively, the promise/offer or provision of an improper advantage to such person or at their request to other individuals or legal entities with the aim of inducing that person to make an improper use of the official powers and related opportunities granted to them.

16

Gifts and business hospitality

Exchanging gifts and showing business hospitality between business partners is a common business practice not only in Ukraine but across the world. However, it poses certain risks to SLM as it may be seen as somewhat unethical or unlawful even if the exchange of gifts or hospitality was not intended to violate the law.

A gift can be any valuable thing in any form, whether tangible (money, money certificates, jewelry, works of art, alcohol, watches, telephones, computer equipment, etc.) or intangible (discounts, services, loans, and any benefits unavailable to the general public). Business breakfasts, business lunches, dinners, treats, trips, use of recreation homes, corporate, sporting, or other events that counterparties, government officials, or other third parties offer to SLM employees and vice versa with the aim of initiating and maintaining business relationships are examples of manifestations of business hospitality.

SLM employees are prohibited from soliciting gifts from natural or legal persons who have a business relationship with SLM or attempt to do so, as well as from giving or receiving such gifts in these forms:

- money and monetary equivalents (gift certificates, lottery tickets, vouchers, loans, securities, etc.);
- trips / travel packages¹.

SLM employees are prohibited from accepting gifts and showing / receiving business hospitality in these cases:

- these may affect a person's fairness, independence, and impartiality, even if the value of the gift / business hospitality does not exceed the SLM's set limits;
- they come from an existing or potential counterparty, if the employee is a participant in the procurement procedure, i.e., interacts with the counterparty or decides whether to agree or disagree on cooperation with the counterparty;
- they are prohibited by law or generally unacceptable (e.g., weapons or drugs).

¹ Except for paid business trips to offices/enterprises by counterparties (if this is the case, you need to proceed based on the trip cost and seek approval from the Internal Audit and Compliance Department for exceeding the limits).

SLM employees are prohibited from violating counterparty gift policies (e.g., giving / receiving gifts that are prohibited by counterparty policies) if employees have been notified of the existence of such policies in whatever form.

To minimize risks, SLM has set a limit on the value of gifts / hospitality that can be given (to counterparties) or received (from counterparties)² with no special approval:

- to receive a gift / hospitality: UAH 3,000 from one person / group of persons once and / or cumulatively during the year;
- to give a gift / hospitality: UAH 3,000 to one person once and / or cumulatively during the year.

Give gifts / show business hospitality with special care when interacting with public officials³. The cost of such a single gesture may not exceed one subsistence minimum per able-bodied person established as of the date of making such gesture. Accordingly, the cumulative value of gestures to a public official during the year may not exceed two subsistence minimums per able-bodied person established as of January 1 of the current year.



SLM employees are required to report⁴ gifts / business hospitality to their immediate manager and to the Internal Audit and Compliance Department (compliance@slm.ua) in these cases:

- if the value exceeds the SLM set limits;
- if a gift is in the form of individual discounts, as well as free services provided for personal use⁵; and
- if a gift / business hospitality of any value is made to a public official.

An employee may not give or receive such a gift / business hospitality unless an appropriate approval has been given by the Internal Audit and Compliance Department.

ANY DOUBTS ABOUT RECEIVING OR GIVING GIFTS / SHOWING BUSINESS HOSPITALITY?

Please contact the Internal Audit and Compliance Department. Have you received an offer of a gift or business hospitality that the Code requirements do not allow you to receive? Decline the gift politely and return it within three business days of receipt.

² This refers to the giving/receiving of gifts on behalf of SLM and by an SLM employee.

³ A public official is a citizen of Ukraine who holds a position as a public official in a public body, in another state body, its apparatus (secretariat) (hereinafter referred to as the "public body"), is paid from the state budget, and exercises the powers prescribed for such position that are directly related to the performance of tasks and functions of such public body, as well as adheres to the public service principles. For purposes of the Code, the public official list includes, but is not limited to:

- persons authorized to perform the functions of the state or local government (President of Ukraine, Chairman of the VRU, Prime Minister and ministers, etc.);
- people's deputies of Ukraine, deputies of the Verkhovna Rada of the Autonomous Republic of Crimea, deputies of local councils, village, settlement, and city mayors;
- public officials, local government officials;
- judges and members of the High Qualifications Commission of Judges, the High Council of Justice;
- employees of the Security Service of Ukraine (SBU), Ministry of Internal Affairs (MIA), the National Agency for the Prevention of Corruption (NAPC), the National Anti-Corruption Bureau of Ukraine (NABU), the Specialized Anti-Corruption Prosecution Service (SAP), the State Bureau of Investigation (SBI), the State Fiscal Service (SFS), the State Border Guard Service (BGS), the Prosecutor's Office, the National Bank of Ukraine (NBU), and the Central Election Commission (CEC) at any level;
- military officials of the Armed Forces of Ukraine and other military formations established under the laws, other than those serving in fixed-term military service, cadets of higher military educational institutions, cadets of the higher educational institutions that include military institutes, cadets of military training faculties, departments, and divisions;
- members of state collegiate bodies;
- officials of state-owned/state-controlled legal entities;
- officials of international organizations, political parties.

⁴ By sending an email to Compliance@slm.ua with the following information: date of the gift / business hospitality; description of the gift / business hospitality; value of the gift / business hospitality; name of the giver and the receiver; name of the counterparty that such person represents; name of the company that such person represents for SLM.

⁵ This clause applies to relations with existing and potential counterparties and does not apply to corporate programs, bonuses, or discounts that SLM employees may use.

17

Conflict of interests

A conflict of interest is a situation in which an employee's personal interest may affect the impartiality of their business decision-making in the performance of their job duties. Conflicts of interest may cause employees to act improperly and harm the SLM standing and the team climate.

Make business decisions solely in the best interest of SLM and follow these principles:

- avoid conflict of interest situations in your activities;
- report a conflict of interest situation to your immediate manager, the Internal Audit and Compliance Department;
- refrain from making business decisions in a conflict of interest situation until you have received advice from the Internal Audit and Compliance Department on how to handle the situation.

SLM employees who may be biased toward the people or events described in the story should disclose this to the editor so that a decision can be made to manage the conflict of interest.

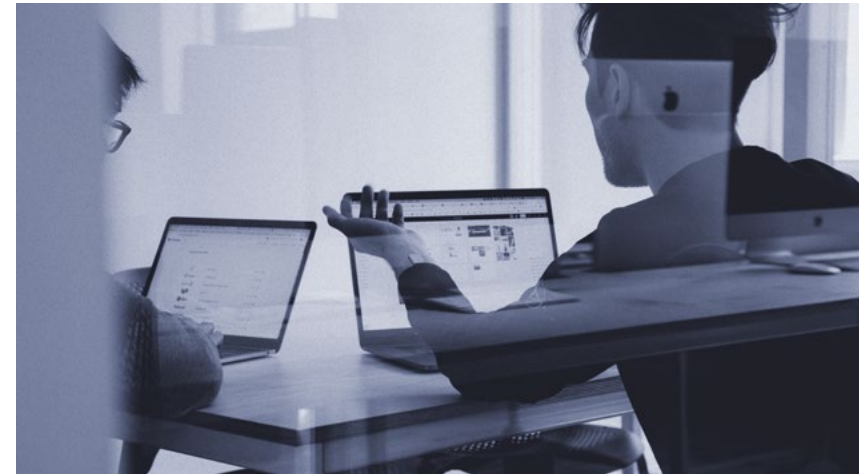
The most typical conflict of interest situations:

- affiliates' work under direct or indirect (through the next nearest link) administrative subordination;
- affiliates work under direct functional subordination;
- involvement in the process of setting affiliates' annual goals and assessing the success thereof;
- involvement in decisions on employment, promotions, transfers, higher wages or bonuses for affiliates;
- exercising control functions over affiliates;
- involvement in the investigation of a violation in which affiliates were implicated;
- an employee or their affiliate is an employee of an existing SLM counterparty who is responsible for selling goods / works / services to SLM, with whom the employee may interact or is interacting as part of their job duties;
- an employee or their affiliate is an employee of an existing SLM counterparty who is responsible for the purchase of goods / works / services from SLM, with whom the employee may interact or is interacting as part of their job duties;
- a member of the Tender Committee has an interest in the share capital of a legal entity that supplies goods / provides services / works to the SLM counterparty with which they interact as part of their job duties (e.g., procurement procedure);

- an employee or their affiliate has an interest² in the capital of a competitor of an SLM company in which they are employed, or a potential or existing counterparty of the SLM company in which they are employed;
- an employee or their affiliate is a member of the governing body of a competitor³ of the SLM company in which they are employed, or a potential or existing counterparty of the SLM company in which they are employed;
- an employee or their affiliate listed as a sole proprietor competes with the activities of the SLM company in which they are employed;
- an employee or their affiliate listed as a sole proprietor is a potential or existing counterparty of the SLM company in which they are employed;
- other situations as required by the SLM Conflict of Interest Risk Management Procedure.

The conflict of interest management process is outlined in more detail in the SLM Conflict of Interest Risk Management Procedure.

Identify conflict of interest situations in a timely manner and contact the Internal Audit and Compliance Department to resolve them. Any exceptions may only be made with the prior written approval by the Internal Audit and Compliance Department.



¹ Affiliates::

- persons who are recognized as such under the Law of Ukraine "On Joint Stock Companies" (including spouses, parents, adoptive parents, guardians (custodians), brothers, sisters, children, and their husbands (wives));
- ex-spouses / common-law spouses, stepchildren, stepbrothers/sisters, siblings of wife/husband, brother of mother/father, sisters of mother/father, mother/father of spouse, nephews, grandfathers, grandmothers, grandchildren, godchildren, godparents, godfathers of children;
- other persons of the Candidate/employee with respect to whom the Candidate/employee may be biased in their business decision-making and on whom they wish to report (e.g., close friends, etc.)

² The amount of which is stipulated by other SLM's in-house regulations.

³ A competitor is an entity that does business in an area of activity that corresponds to a respective SLM company.

18 Code Violation Notice

The [SLM Trustline](#) is an electronic tool, an important aspect of transparency and accountability of the company that enables employees and third parties to report violations of the law, non-compliance with the rules and standards of corporate ethics.

SLM ENSURES THAT APPLICANTS ARE KEPT CONFIDENTIAL AND PROTECTED.

When contacting the Trustline, please give us your contact information - this will enable us to communicate further, speed up the investigation and make it more effective. Not wishing to give us your contact information? Contact the Line anonymously and do not discuss the subject of the message with anyone for maximum privacy.

Make sure you do not knowingly disseminate false information, intimidate, humiliate, or persecute employees (in the form of layoffs, pay cuts, loss of bonuses, psychological pressure, changes in job tasks, or the like) who, in good faith, report Code violations or help investigate what others have reported.

Have you found any Code violations by other employees, counterparties, or third parties? Contact your immediate manager or the Trustline, either through the online form or by sending an email to trustline@slm.ua. All violation communications duly filed will be investigated in the prescribed manner, and appropriate decisions will be made based on the findings of the investigations.

The Group has an Ethics Committee to react promptly to ethical business violations and make informed decisions consistent with SLM values.

The Ethics Committee is chaired by the CEO of SLM.



19

Sanctions for violations of the Code requirements

If an SLM employee violates any of the Code requirements, they may be subject to disciplinary penalties and other sanctions under the law.

20

Contact details

If you have any questions on the Code, please contact the Internal Audit and Compliance Department at compliance@slm.ua.

To report a Code violation, fill out the [electronic form](#) or send an email to: trustline@slm.ua.



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