

Digmatix Code of Conduct (Extract)

Introduction

At the heart of our organization lies a strong belief that conducting business sustainably, with focus on accountability, collaboration, and professional development, isn't just a strategic theme—it is our compass, guiding us daily toward our goals. Here is why it matters:

- **Long-Term Vision:** Sustainability is not a short-term trend; it is the foundation of long-lasting success. By integrating ethical practices, we not only secure financial returns but also shape a legacy that resonates with our values.
- **Guiding Prospects:** Our commitment to sustainability sends a clear message to potential employees, partners, and clients. It defines who we are and what we stand for. It makes us carefully select organizations aligned with our ethical worldview to collaborate with.
- **Mutually Beneficial Partnerships:** Our collaboration is built on shared principles. We seek partners who embrace ethical conduct, transparency, and growth mindset. Together, we tackle professionally challenging projects, delivering measurable business benefits.

Our commitment to ethical and responsible practices is instrumental to our strategy. It is not just a checkbox; it is essential for our business success, and deeply rooted in the belief that our company's growth and value hinge on consistently doing what is right.

Purpose of the Code of Conduct

This Code of Conduct outlines the principles guiding our everyday decisions toward ethical sustainability. We uphold international standards and local regulations in regard to employment practices, business transparency, anti-corruption, and environmental responsibility. Our commitment lies in honest and sustainable business practices across all our operations.

Compliance with the Code of Conduct is essential to our business success. Every employee of our company is expected to adhere to these principles. This also applies to all our sub-contractors and business partners.

Digmatix Core values

Our core values define how we behave, interact, make decisions, and contribute to our organization. Their impact extends beyond personal conduct; they set the standard for everyone around us. When each team member embraces these principles, the entire organization benefits.

OWNERSHIP

Individual ownership embodies the unwavering commitment of each team member to their duties and tasks, ensuring accountability and personal responsibility within a collaborative environment. This concept emphasizes that everyone is responsible for owning their decisions, contributions and outcomes.

COLLABORATION

We believe that **collaboration**, as an intentional practice of results-oriented individuals working together, enables achieving ambitious goals. It involves combining diverse skills, aiming for open communication, and actively seeking win-win interactions. By fostering collaboration, we create outcomes greater than the sum of individual efforts and facilitate continuous personal growth.

CONTINUOUS DEVELOPMENT

Continuous Development is our commitment to ongoing organizational learning, improvement, and innovation. We embrace opportunities for professional growth, foster a culture of constructive feedback, and encourage creative thinking. By regularly refining processes, investing in new technologies, and focusing on technology development, we strive for excellence in all areas of work.

PERSONAL GROWTH

We value **personal growth** as an ongoing commitment to self-improvement, continuous learning, and the development of skills and abilities. By fostering an environment that encourages individual growth, we empower our team members to reach their full potential and contribute effectively to our organization. Moreover, as individuals invest in their own growth, they gain confidence, resilience, and a sense of fulfilment, both personally and professionally.

Sustainable business practices

Legality of operations

We are committed to adhering to all applicable laws, regulations, and official guidelines in our day-to-day business operations. Our responsibility extends to our business, investors, clients, and employees. We maintain transparency, honesty, and accuracy in reporting our business performance. Rigorous record-keeping safeguards our reputation.

We do not engage in any business relationships or transactions with individuals or entities that are listed on country of our operations or international sanction lists.

We respect third-party rights, such as patents, licences, trademarks and other intellectual property rights, and we require the same of our subcontractor and partners.

Customer value and quality of service

As active participants in the market, we focus on fulfilling customer needs by offering products and services that provide added value. By carefully considering customer requirements, we create positive customer experiences and establish a solid foundation for financially successful operations. Our overarching goal is to cultivate strong partnerships with our customers by consistently delivering high levels of customer satisfaction.

In our operations, we diligently adhere to the requirements and guidelines set forth by the ISO 9001 quality management system, which undergoes regular audits. Our quality policy ensures that everyone is aligned with the standards for product and service development, project assignments, and support functions.

Fair competition

We consistently engage in fair and professional competition. Our interactions with competitors, customers, suppliers, and other partners adhere to relevant competition laws.

We actively avoid any arrangements that might hinder fair competition, like illegal agreements aimed at manipulating prices or promoting unfair trading practices.

Additionally, we refrain from making public comments about our competitors' activities.

Anti-corruption policy

In line with our commitment to conduct business in an ethical and transparent manner, our anti-corruption policy sets out standards for preventing all forms of bribery and corruption, and outlines the procedures that must be followed to ensure compliance with relevant laws and regulations.

We unequivocally condemn all forms of bribery, corruption, and blackmail. Our unwavering commitment ensures that:

- **Compliance with Laws:** We meticulously adhere to applicable anti-bribery laws.
- **Zero Tolerance:** Our zero-tolerance policy extends to all partners, including subcontractors. We expect them to uphold the same anti-corruption standards.
- **No Expectations or Influence:** We neither solicit nor accept benefits that hint at reciprocal business advantages. Client and partner officials receive no special treatment, and we refrain from offering them any valuable items.
- **No Facilitation Payments:** Our company does not condone the payment of facilitation payments.
- **Transparent Gift Policy:** Our employees accept only modest gifts or hospitality of symbolic and non-material value, that are offered openly and transparently, with no expectation of return favour or preferential treatment, both in terms of receiving and giving.
- **No Involvement with political parties:** Our company does not support any political parties, political organizations or politicians.
- **Due Diligence:** Our company will undertake appropriate due diligence on all new and existing business relationships, including suppliers and partners, to ensure that they comply with this anti-corruption policy in a manner that is appropriate for our size and resources.
- **Reporting Suspected Corruption:** Any employee, contractor, supplier, or partner who suspects or becomes aware of any act of corruption or bribery must report it immediately to their manager or the company's designated compliance officer.
- **Consequences of Non-Compliance:** Any individual found to be in breach of this anti-corruption policy may face disciplinary action, up to and including termination of employment or business relationship.
- **Employee Training:** We actively educate our team members on combating bribery and corruption. Internally, we maintain a robust policy to uphold these principles.

Avoidance of conflict of interest and no nepotism

We are conscious that conflicts of interest can arise in all aspects of our work. We actively identify situations where conflicts of interest might occur and do our utmost to prevent them. As such, employees should refrain from handling or influencing any matter in which they or their relatives have a direct or indirect financial or personal interest. Leaders and managers at the company, should not directly or indirectly supervise, or use influence to favour anyone with whom they have a family or close personal relationship.

Environmental responsibility

We are committed to minimizing the environmental impact of all our activities, and will comply with the laws and regulations for environmental protection in all countries we operate in. Such commitment and compliance with it are required from all employees of the company.

We evaluate the environmental aspects of our activities continuously to deliver services with no undue environmental impact. As an IT consulting business, we do our best in caring for the environment by choosing sustainable offices, by working digitally and encouraging our customers and suppliers do the same, by not using plastic dishes and cutlery in our offices, and by collecting and disposing the e-waste properly. Starting from 2025, we will track our greenhouse gas emissions and implement a set of measures to reduce the carbon footprint throughout our entire value chain.

Healthy work environment

Health, safety, and environmental considerations are integral to our collective operations. Our employees share the responsibility for maintaining safe working conditions that protect individuals and the environment. We expect all employees, to prioritize on-the-job safety. The designated safety role within the company ensures that employees receive proper health and safety information and training, including procedures on proper handling of equipment and, for employees using the office environment, on evacuation from office premises.

Equal opportunities

We recruit, hire, employ, train, promote, and compensate individuals based on job-related qualifications, abilities, and **merit**. Personal characteristics such as gender, race, ethnicity, marital status, sexual orientation, and religious beliefs do not impact an employee's career progression.

We focus on skills, capabilities, and performance to promote equal opportunity and fairness in the workplace. Employee compensations principles are designed to be both clear and equitable, ensuring that every employee is compensated justly and without bias.

Anti-mobbing and anti-harassment

We have a zero-tolerance policy for harassment, mobbing, bullying, and any other form of abuse, including acts of violence, racism, and inappropriate punishment. Harassment includes any unwanted behaviour that violates an individual's dignity or creates an offensive or hostile environment.

Every employee has the right to work in an environment free from harassment and intimidation. Any incidents of harassment or inappropriate behaviour should be reported.

Information security

As part of our core business operations, we handle personal and confidential information related to our employees, job candidates, and clients daily. We recognize the critical importance of respecting this information and ensuring its protection. Our commitment extends to handling it responsibly and using it solely for the intended purposes.

We comply with the ISO 27001 standard for information management and personal data protection. This ensures robust security practices and reinforces our commitment to safeguarding sensitive information.

Ethical use of AI

Our company is committed to the ethical use of AI tools. We ensure that all AI technologies we utilize are employed responsibly, with a focus on fairness, transparency, and accountability. We carefully select and monitor these tools to prevent bias and discrimination, and we respect the privacy and rights of all individuals affected by our use of AI. Additionally, we comply with all relevant laws and regulations governing AI usage and take proactive steps to prevent any potential harm or misuse in our operations.