

Anti-Bribery and Anti-Corruption Policy

Envoys Vision Digital Exchange OJSC

1. Introduction

1.1 Envoys Vision Digital Exchange OJSC (hereinafter referred to as the Company) is firmly committed to the principles of honest, ethical and law-abiding business conduct in the provision of services. The Company is aware of the risks that bribery and corruption pose to its reputation, financial position, relationships with customers and partners, as well as sustainable development in the long term.

1.2 This Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as the "Policy") sets out the Company's intransigent position in relation to any form of corrupt practices. It is aimed at protecting the Company, its employees and business partners from involvement in illegal corrupt activities.

1.3 The Policy defines mandatory standards of conduct, obligations, as well as procedures to prevent, detect and respond to cases of bribery and corruption that may be encountered by employees of the Company or third parties when carrying out activities on its behalf.

1.4 Violation of this Policy may result in serious consequences for both the Company and those involved. Potential risks include substantial financial penalties, civil and criminal litigation, loss of business reputation and trust of customers, partners and regulators. Therefore, strict compliance with this Policy is critical.

2. Definitions

2.1 **Bribery** is the offering, promising, giving, authorizing, demanding, or accepting monetary or other consideration for the purpose of obtaining or retaining an undue business advantage. It may be carried out either directly or indirectly through intermediaries or third parties acting on behalf of or for the benefit of the Company.

2.2 **Corruption** is the abuse of official position, authority, power or trust for personal gain for oneself or third parties. It does not necessarily involve monetary payments or rewards.

2.3 **Improper benefit** is any unlawful, unethical or improper incentive in the form of money, valuables, services, preferences or other benefits that is offered, given, accepted or expected in connection with the Company's business operations. This includes gifts, entertainment, discounts, benefits, loans, commissions and payment of expenses in excess of the established norms.

3. Scope

3.1 This Policy is mandatory for all employees of the Company, including senior executives, directors, managers, employees, interns and temporary workers.

3.2 The provisions of the Policy apply to all employees regardless of their position, functions, duration of work in the Company or place of work.

3.3 The Policy also applies to third parties acting as representatives, agents, consultants, contractors, suppliers and other business partners acting on behalf of, on behalf of or in the interests of the Company.

3.4 Each employee and the relevant third party must carefully read the Policy, undergo mandatory training and strictly follow its provisions in their activities.

3.5 Violation of the Policy cannot be justified by reference to the actions of competitors, local customs, personal connections or external pressure.

4. Obligations

4.1 Envoys Vision Digital Exchange OJSC adheres to the principle of zero tolerance for any form of bribery and corruption in the conduct of its activities. These illegal practices are strictly prohibited regardless of their purpose, the parties involved, the form of manifestation, the amount or value of the reward.

4.2 It is strictly forbidden for employees and representatives of the Company to offer, promise, give, authorize, demand or accept bribes, as well as any other illegal monetary or non-monetary rewards, directly or through intermediaries.

4.3 Facilitation payments to public officials are prohibited as they are a form of bribery.

4.4 Corrupt practices that are not related to monetary payments are prohibited, such as:

- Providing illegal benefits or privileges;
- Protectionism and favoritism on the grounds of kinship, personal ties;
- Conflict of interest and concealment of information;
- Other abuse of official position for mercenary purposes.

4.5 The Company prohibits the use of third parties as intermediaries to commit actions that violate this Policy.

4.6 These prohibitions apply to the public and private sectors, customers, counterparties, regulators and any other third parties.

5. Gifts, representation expenses and charity

5.1 The Company acknowledges that moderate exchange of business gifts and reasonable representation expenses may be allowed, provided that they comply with ethical standards and the Company's internal rules to prevent conflicts of interest and corruption.

5.2 Gifts and entertainment expenses must strictly comply with the following principles:

- Have a legitimate business purpose;
- Be reasonable, modest in cost, and appropriate;
- Not to create the impression of undue influence on the recipient;
- Comply with generally accepted standards of hospitality and business etiquette;
- Be provided for significant festive events (New Year, March 8, February 23, professional holidays)
- Comply with applicable laws and policies of the recipient company.

5.3 Public servants are subject to special restrictions on the value, nature and frequency of allowable gifts and hospitality expenses, as well as prior approval requirements.

5.4 Charitable donations and sponsorship agreements should only be concluded on legal grounds and in compliance with internal procedures. They should be transparent, justified and not create the appearance of undue influence.

5.5 Donations or sponsorship with the aim of obtaining an undue advantage for the Company or exerting undue influence are prohibited.

6. Accounting and reporting

6.1 The Company is required to maintain fair financial statements in accordance with applicable accounting standards and internal control rules.

6.2 All financial transactions must be duly authorized, accurately and timely recorded in the records, indicating their true nature and purpose.

6.3 Any unaccounted funds, assets, income or expenses are prohibited.

6.4 Falsification, concealment or destruction of accounting documents is a serious violation of this Policy.

7. Training and communication

7.1 The Company provides regular anti-corruption training for employees, taking into account the specifics of their duties and risks. Particular attention is paid to high-risk functions.

7.2 All new employees shall undergo an induction training on the provisions of the Policy and applicable procedures when signing an employment or other Agreement.

7.3 When interacting with third parties, the Company informs them of the requirements of the Policy and the standards of conduct of business partners.

7.4 Communication channels shall be provided for clarifications, reporting of problems and potential violations.

8. Supervision, Audit and Investigations

8.1 The Company properly monitors compliance with the Policy, especially in risky areas of activity.

8.2 The Audit Commission and the Compliance Control Service regularly assess the adequacy of anti-corruption procedures and test control systems.

8.3 If information about violations is revealed, the Company initiates an impartial investigation to establish the circumstances of the case.

8.4 In case of confirmation of violations, disciplinary measures are taken up to dismissal and transfer of materials to law enforcement agencies. Procedures are being reviewed to prevent the recurrence of incidents.

9. Risk assessment and verification procedures

9.1 The Company regularly assesses the risks of bribery and corruption in its activities to identify vulnerable areas and respond in a timely manner.

9.2 To minimize the risks of involvement in corruption, compliance procedures are applied for existing and potential partners, agents and intermediaries.

9.3 Procedures include the collection and analysis of information on reputation, beneficiaries, public relations, court cases and other risk factors.

9.4 Based on the results of the audit, the Company decides on cooperation, refusal or additional measures to reduce risks.

9.5 More thorough checks are applied to counterparties from countries with a high level of corruption and to high-risk transactions.

10. Communication procedures and confidentiality

10.1 The Company encourages employees and partners to report any suspicions of bribery and corruption.

10.2 For this purpose, special confidential channels have been created: phone, instant messengers, e-mail, anonymous appeals, informing the compliance control service or management, etc.

10.3 The Company guarantees confidentiality and protection of bona fide employees who report violations from harassment and retaliation.

10.4 Persons who make false accusations may be held liable.

10.5 The Company takes any information about potential violations seriously and ensures that they are dealt with promptly and impartially.

11. Liability and Measures of Influence

11.1 Compliance with this Anti-Corruption Policy and procedures is mandatory for all employees, regardless of position.

11.2 Managers have a special responsibility for the conduct of subordinates and the demonstration of commitment to the principles of rejection of corruption.

11.3 Disciplinary measures are applied to employees who violate the law, up to and including dismissal.

11.4 Cooperation with business partners involved in bribery or corruption may be terminated unilaterally.

11.5 The Company reserves the right to transfer materials about violations to law enforcement agencies.

12. Policy Revision

12.1 These Policies and Procedures are regularly reviewed and updated as necessary.

12.2 Changes in legislation, industry trends and best anti-corruption practices are taken into account.

12.3 Suggestions for improvements to the Policy may be made by stakeholders through the appropriate feedback channels.

13. Final provisions

13.1. The Company will conduct regular monitoring and audits to ensure compliance with this Policy. All staff members must cooperate fully in the event that such activities take place.

13.2. Continuous improvement - The Company will continuously review and improve its anti-bribery and anti-corruption procedures and control systems, taking into account changing risks, legal requirements and best practices.

13.3. Training and Communication - Regular anti-corruption training is mandatory for all employees. The Company will ensure that employees are properly informed of all changes to the Policy.

13.4. Reporting and Monitoring - Compliance will be reported annually by management to the Company's Board of Directors. Board of Directors undertakes to ensure that they are properly monitored.

13.5. Disciplinary Action - Violation of this Policy is serious misconduct and may result in disciplinary action, up to and including termination, as well as possible civil and criminal liability.

13.6. Confidentiality - The Company will ensure confidentiality when dealing with reports of possible violations and will protect bona fide whistleblowers from retaliation.