
ULTRA TECHNOLOGIES COMPANY ***Code of Business Ethics***

Date of issue: 02.05.2016

Revision: 001

Approved by:

A handwritten signature in blue ink, appearing to read "Abdul Gurbanov".

Abdul Gurbanov, General Director

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SCOPE

This Policy applies to:

1. all directors, officers, employees and any other person whose work is supervised by ULTRA TECHNOLOGIES COMPANY as though that person were a ULTRA TECHNOLOGIES COMPANY employee (ULTRA TECHNOLOGIES COMPANY Personnel);
2. all ULTRA TECHNOLOGIES COMPANY operations, including all legal entities and business area units, and to ULTRA TECHNOLOGIES COMPANY joint ventures over which ULTRA TECHNOLOGIES COMPANY is able to exercise control over policies and procedures. For those joint ventures over which ULTRA TECHNOLOGIES COMPANY is unable to exercise control, ULTRA TECHNOLOGIES COMPANY will endeavor to influence the joint venture's policies and practice, so that they reflect the values described in this Policy; and
3. any other person or entity to the extent that they act on behalf of ULTRA TECHNOLOGIES COMPANY in any way, including consultants, contractors, suppliers, agents or intermediaries.

INTRODUCTION: HOW IT WORKS

Our commitment to legitimate and ethical conduct of business

Using the Code

ULTRA TECHNOLOGIES COMPANY's business ethics policies apply to all employees and third parties acting on behalf of ULTRA TECHNOLOGIES COMPANY. These policies contain information necessary to understand obligations involved in the process of the Company's business conduct.

The policies are provided in the following format: (1) policy definition, (2) explanation of the policy, (3) examples of situations to avoid for ensuring compliance. These guidelines also provide information about the persons to consult and the methods of reporting violations of the Code.

Requirements of the Code

Business ethics policies help to employ a consistent approach to key aspects of compliance. Employees and directors must commit to understanding requirements of laws and this Code applicable to their work and report any suspected violations of laws or these policies.

ULTRA TECHNOLOGIES COMPANY's business ethics policies apply to all employees of the Company. These policies are applicable to all situations related to the conduct of ULTRA TECHNOLOGIES' business.

Requirements to ULTRA TECHNOLOGIES COMPANY employees

Each ULTRA TECHNOLOGIES COMPANY employee shall:

- Read the introductory clauses of these guidelines to know what he/she is expected to do and how this program of compliance with requirements works.
- Know the issues described in all business ethics policies.
- Understand clearly all business ethics policies relating to their job duties. Employees are not expected to keep in memory all details but should have a good enough knowledge of the guidelines applicable to their job to understand when and where to contact if they need further information.
- Use all available resources of the Company, including this Code and other policies of Anti-Corruption Program and Business Integrity Group (Compliance Officers), when they need help to determine applicability of business ethics policies or laws and their requirements.
- Know various methods of reporting noncompliance specified in Section “Reporting suspicions or facts of violations” of this Code as well as the Company's Whistleblowing Policy.
- Know the opportunity of anonymous reporting any suspicions or violations of the Code of Business Ethics.
- Know that the Company does not tolerate any form of retaliation with respect to a person who reports his/her suspicions of misconduct or assists in the investigation.
- Know that the Company expects its employees to report violations of any applicable legal requirements and the Code of Business Ethics.
- Contribute to the implementation of this program and assist the Company in its investigations of possible violations of any applicable legal requirements and the Code of Business Ethics.
- At the Company's request, sign an application to confirm that the employee has read and understood the business ethics policies of the Company and undertakes to comply with the requirements of these policies and legislation.
- Review periodically ULTRA TECHNOLOGIES COMPANY's Anti-Corruption Program policies to refresh their memory and to be aware of last updated policies.

Requirements to third parties acting on behalf of ULTRA TECHNOLOGIES COMPANY

All business units of ULTRA TECHNOLOGIES COMPANY shall require of all third parties acting on behalf of the Company such as consultants or contractors to comply with all applicable policies of ULTRA TECHNOLOGIES COMPANY.

Directors and employees of ULTRA TECHNOLOGIES COMPANY shall:

- Require of third parties to comply with relevant ULTRA TECHNOLOGIES COMPANY's policies and provide training to ensure that third parties understand requirements of these policies.
- Monitor third parties' operations and take appropriate measures up to and including termination of use of third party services by ULTRA TECHNOLOGIES COMPANY if such third party violates the agreement for compliance with ULTRA TECHNOLOGIES COMPANY's policies.

Requirements to ULTRA TECHNOLOGIES COMPANY management

All executives of ULTRA TECHNOLOGIES COMPANY have additional responsibility in respect of employees and third parties acting on behalf of ULTRA TECHNOLOGIES COMPANY.

Executives of ULTRA TECHNOLOGIES COMPANY including the General Director and other senior executives shall:

- Ensure that each person within the area of their responsibility understands and complies with the requirements of laws and ULTRA TECHNOLOGIES COMPANY's policies.
- Create a work environment in which employees and third parties acting on behalf of ULTRA TECHNOLOGIES COMPANY understand that their directors and supervisors believe in the values and comply with the policies of ULTRA TECHNOLOGIES COMPANY and not just proclaim their commitment.
- Always demonstrate model behavior. All directors and supervisors shall give an example by their behavior and encourage others to abide by high standards of conduct.
- Take measures to prevent violations of laws and ULTRA TECHNOLOGIES COMPANY's policies with a focus on the areas exposed to the risk of violation of laws and ULTRA TECHNOLOGIES COMPANY's policies as well as provide necessary training in compliance with these requirements.
- Detect violations of laws and ULTRA TECHNOLOGIES COMPANY's policies and report them.
- Take appropriate timely measures in case of violations and eliminate shortcomings of business processes which result in violations.
- Protect any person who reported his/her suspicions of violation or assisted in the investigation conducted by the Company against retaliation.

Enforcing policies

Application of the rules of conduct provided for by the Code is achieved by enforcing the programs, measures and processes specified in the Anti-Corruption Program.

The Business Integrity Group (BIG), a body established in the Company, consists of several senior executives and headed by the Group Leader (hereinafter referred to as the Head of Business Integrity Group) who holds responsibility for application and control of the implementation of the Anti-Corruption Program. The Group is accountable to the General Director of ULTRA TECHNOLOGIES COMPANY.

Details of processes and methods of the Code enforcement management are reflected in the Anti-Corruption Program of ULTRA TECHNOLOGIES COMPANY.

When you have suspicions or become aware of non-compliance

It is an obligation of all persons acting on behalf of ULTRA TECHNOLOGIES COMPANY to comply with business ethics policies and maintain values of ULTRA TECHNOLOGIES COMPANY. All persons acting on behalf of ULTRA TECHNOLOGIES COMPANY are also expected to timely report their suspicions of possible violation of ULTRA TECHNOLOGIES COMPANY's policies or laws. It is also important to handle problems promptly when they are slight and easily eliminable. Once developed into major problems, they can result in damage, penalties, fines and infringement of ULTRA TECHNOLOGIES COMPANY's image.

Where to get your questions answered

Written policies can't embrace all possible situations and circumstances they could apply to. ULTRA TECHNOLOGIES COMPANY offers several sources of information to refer for further information about business ethics in ULTRA TECHNOLOGIES COMPANY.

If an employee is in doubt as to whether his/her acts can violate the Code or Anti-Corruption Program provisions, he/she should refer to detailed policies and procedures on the intranet and public web-sites of the Company, ask questions via the Hotline channel (www.ultraintegrity.com), or seek guidance from his/her immediate supervisor or senior manager, the Business Integrity Group Officers or the Legal Department of the Company.

Reporting suspected violations of Company policies

Any company, even with the best Code of Business Ethics or compliance program and corporate culture, may face non-compliance problems. Prompt identification and elimination of such problems until they developed into a major concern is an attribute of good company. The best method of early identification of possible violations for ULTRA TECHNOLOGIES COMPANY is support of its employees.

As practice and the post-Soviet culture of relations show, many people are reluctant to report suspicions of their colleagues' misconduct. To overcome this reluctance, ULTRA TECHNOLOGIES COMPANY maintains the non-retaliation policy in respect of any person who reported any violations or suspicions. Employees and third parties acting on behalf of ULTRA TECHNOLOGIES COMPANY who report their suspicions of violations act in the right way because each violation of the law or ULTRA TECHNOLOGIES COMPANY's policies endangers employees, companies, clients and communities in which ULTRA TECHNOLOGIES COMPANY runs its business.

An employee or a partner can use one of several ways to voice his/her concerns or to report misconduct. For this purpose he/she can:

- Communicate or seek clarification of the situation both orally and in writing from the immediate supervisor or a senior manager.
- Address the Hotline: the electronic resource address: www.ultraintegrity.com ;
- Contact the Head of Business Integrity Group or Group Officers
- Contact the Company's Legal Department Manager
- Employees and partners can send their information anonymously (if consider it necessary) by sending an email to integrity@ultra.az from an anonymous email address
- Contact the unit HR manager (if the situation involves disrespect or discrimination against an employee, inequity on the part of the management or personal conflict between employees.)

For more details on the reporting methods please refer to the ULTRA TECHNOLOGIES COMPANY **Whistleblowing Policy**.

Reports on misconduct shall include sufficient volume of information on the violation to provide prompt investigation and appropriate remedial actions.

ULTRA TECHNOLOGIES COMPANY's response to reports

Upon receipt of a suspected violation report, ULTRA TECHNOLOGIES COMPANY shall designate an employee to investigate the information received, take appropriate measures for preventing any violations of the Code of Business Ethics and inform the reporting person about results. If such employee believes his/her suspicions have not been eliminated in the result of the investigation and taken measures, he/she shall address another instance from the above mentioned. The priority and primary of which is the Head of Business Integrity Group.

Confidentiality of reports shall be kept by the Company as far as possible according to the necessity of proper investigation. Any violation of the Code can result in a disciplinary action including dismissal whether civil or criminal proceedings were initiated or not.

The Company shall not retaliate and shall prohibit any retaliation against any person for reporting, in good faith, any potential violation of the law or Company's policies. Any person persecuting expressly or implicitly or calling others for persecuting anyone shall be subject to a disciplinary action including dismissal.

Suspected violations in the sphere of business ethics and corruption can be revealed based on the results of conducted operational audits or information received from partners or employees. To confirm such suspicions, the Company shall conduct an internal investigation.

The Company shall response to all identified violations or other activities which contravene these policies based on the current legislation of Azerbaijan and particular circumstances of each situation.

BUSINESS ETHICS POLICIES

1. LEGITIMATE AND ETHICAL CONDUCT OF BUSINESS

The key element of the Code of Business Ethics of ULTRA TECHNOLOGIES COMPANY is acknowledgment and compliance with the following rule: “We shall do business in a legitimate and ethical manner in all aspects of our activities” by all employees.

Policies contained in this section set forth a requirement according to which ULTRA TECHNOLOGIES COMPANY employees and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY should always comply with the requirements of law and corporate business ethics standards.

Policy definition

ULTRA TECHNOLOGIES COMPANY in its business uses the Code of Business Ethics applicable to all aspects of activities. These universal policies provide the basis for legitimate and ethical conduct of business. All employees of the Company and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY are expected to observe strictly all laws and conduct of business rules of ULTRA TECHNOLOGIES COMPANY.

Being an Azerbaijani company which participates in international projects and has international companies and organizations as its partners and clients, ULTRA TECHNOLOGIES COMPANY is subject to domestic and international laws including the anti-corruption laws. Employees therefore shall comply not only with ULTRA TECHNOLOGIES COMPANY's business ethics policies but also with the requirements of all applicable laws in force at the place of residence or work.

Punishment

All employees who violate the law or the business ethics policies of the ULTRA TECHNOLOGIES COMPANY shall be subject to appropriate punishment including dismissal. Punishment shall also be administered to employees who:

- Failed to report known violations or to seek legal advice from the supervisor, Head of BIG or Legal Department in case of any suspicions
- Took actions contradicting the recommendation
- Retaliate against the person who reported a suspected violation.

ULTRA TECHNOLOGIES COMPANY shall response to all identified violations or other activities which contravene these policies based on the current legislation of Azerbaijan Republic and particular circumstances of each situation.

Employees and other persons who act on behalf of ULTRA TECHNOLOGIES COMPANY and violate the Company's policies might also violate the law exposing thereby themselves and the Company to a risk of recovery of heavy penalties, imprisonment and recovery of damage on civil process in accordance with the national and local laws throughout the world.

Ethical business conduct guidelines

If you encounter a situation or problem not covered by this Code, you should make the right and ethical decision which would have a positive influence on you and ULTRA TECHNOLOGIES COMPANY. In addition, your actions should be governed by core values of the company – integrity, fair practices, due respect to other people as well as personal responsibility.

Making ethical decision requires evaluation of alternate forms of conduct and careful examination in the light of the following corporate standards:

- Acknowledge the rule of law in all spheres of the Company's activities
- Demonstrate integrity
- Avoid conflicts of interest between your work and private life
- Be committed to fair competition
- Counteract corruption and bribery
- Respect and value personalities and be committed to the high level of corporate culture
- Be socially responsible

Making ethical decisions

Act on behalf of ULTRA TECHNOLOGIES COMPANY only if you answer “Yes” to the following questions:

- Does this action comply with laws and the corporate values of ULTRA TECHNOLOGIES COMPANY such as integrity?
- Wouldn't this action be condemned in public investigation?
- Will this action protect ULTRA TECHNOLOGIES COMPANY's goodwill as an ethical company?

If you cannot answer "Yes" to all three questions, but still think the proposed action is legal and ethical, you should discuss it with the Head of Business Integrity Group, because there is a risk that your action may not meet your interests or interests of ULTRA TECHNOLOGIES COMPANY.

2. FIGHTING IMPROPER PRACTICES

Bribery and Corruption

The following definitions shall apply to the Policy:

- a) **Fraudulent practice** is any act or omission, including any misrepresentation, that knowingly misleads, or attempts to mislead, a party to obtain any financial or other advantage, or to avoid any obligation, to benefit the perpetrator or a related party.
- b) **Corrupt practice** is the offering, giving, receiving or soliciting, directly or indirectly, or attempt to do so, of anything of value to influence improperly the actions of another party.
- c) **Collusive practice** is an arrangement among two or more parties designed to achieve an improper purpose, including but not limited to, influencing improperly the actions of another party.
- d) **Coercive practice** is impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.

In the Policy, these practices will be collectively referred to as “fraud and corruption”.

Ultra Technologies Company Personnel as well as any other person or entity to the extent that they act on behalf of ULTRA TECHNOLOGIES COMPANY in any way, including consultants, contractors, suppliers, agents or intermediaries shall abide the obligations to under no circumstances, engage in, condone or facilitate, or appear to condone or facilitate, any fraud and/or corruption in the course of the activities and operations of Ultra Technologies Company

Bribery and Corruption

We will not engage in bribery or corruption in any form, whether in the private or public sector.

In all aspects of our business, ULTRA TECHNOLOGIES COMPANY employees are expected to abide by the **Anti-Bribery and Corruption Policy**. This means we must never offer, solicit, promise, give or accept a bribe, kickback or any other improper payment. We will seek to influence the policies and actions of our other business partners so that they too meet their ethical and legal responsibilities. All business partners who act on behalf of ULTRA TECHNOLOGIES COMPANY must comply with applicable bribery and corruption laws.

ULTRA TECHNOLOGIES COMPANY should abide by international standards and laws, as it has suppliers and business partners in Europe and the United States and participates in national projects funded by international financial institutions. It is vital for ULTRA TECHNOLOGIES COMPANY to comply with all applicable laws and regulatory requirements that affect our business operations.

It is widely accepted that the best global practice of building anti-corruption systems in enterprises is supported by 2 laws:

- 1) U.S. Foreign Corrupt Practices Act which prohibits corruption of public officials.
- 2) 2010 UK Bribery Act which prohibits any corruption of both public officials and individuals and includes any facilitating payments in governmental authorities.

ULTRA TECHNOLOGIES' corporate policies relating to prevention of corruption and bribery are in compliance with applicable anti-corruption laws, including those mentioned above, as well as the current anti-corruption laws of Azerbaijan Republic. These policies prohibit all forms of corruption, bribery and actions aimed at an improper advantage.

According to the Company's policy, all employees and partners who represent and act on behalf of ULTRA TECHNOLOGIES COMPANY are expected to comply with these laws and policies.

ULTRA TECHNOLOGIES COMPANY shall control and check its units for potential corrupt practices and associated risks as well as ensure proper maintenance of accounting records.

Dealing with Public Officials

A public official is an employee, official, or any individual acting on behalf of: any government bureau, department, or agency of any level; a public international organization; a political party; or any company owned or controlled in whole or in part by a government. Public officials may also include candidates for political offices.

Certain actions in respect to public officials, such as offering or providing gifts, donations, entertainments, payment for travel expenses or facilitation payments may be considered as a violation of the anti-corruption legislation.

Corruption in commercial NGOs also contravenes the corporate conduct policy of ULTRA TECHNOLOGIES COMPANY.

The definition of a “bribe”. A bribe is the direct or indirect offer, discussion, giving or promise to give a gift, payment or anything of value to a public official or other persons with the intent to obtain or retain business or gain an improper advantage. This term also implies facilitation payments for assistance in governmental authorities.

An improper advantage in a general sense means anything the company hasn't explicit rights to, such as improper influence the decision of a governmental agency or commercial enterprise to purchase ULTRA TECHNOLOGIES COMPANY's products and solutions, preferential choice of product specifications, contract award, issuance of operating permits, favorable court decision or settlement of tax disputes.

Employees shall abide by the following rules:

- Avoid participation in acts or omissions assuming an offer or giving of bribes to any persons or simulating an offer, authorization or giving bribes.
- Take appropriate measures to prevent participation of persons involved, whether directly or indirectly, in business relations with public officials or acting in any other way on behalf of the Company, in giving or accepting bribes.
- Obey the requirements for keeping of documents and accounting and financial accounting and control standards to prove compliance of the Company's activities with all anti-corruption laws.
- Report immediately all alleged violations of these policies by any employees of the Company or third parties acting on behalf of the Company to the Head of Business Integrity Group.
- Report immediately if the relationship with public officials changes such as, if a family member becomes public official, or if a public official becomes family member.

Employees shall not:

- Give cash or anything of value, whether directly or indirectly, to public officials or business partners to gain an improper advantage.
- Receive cash or anything of value from a third party or company seeking business relationships with ULTRA TECHNOLOGIES COMPANY.
- Authorize or provide paid travel, gifts, entertainment, political assistance and charitable contributions for the benefit of a public official or business partner without proper internal auditing and approval to ensure lack of influence on the decision-making process of the recipient.
- Offer or authorize facilitation payments for assistance in governmental authorities.

Dealing with Governmental Authorities and NGOs**Policy definition**

The Company adheres to the principle of transparency in its work and seeks to build and maintain stable, constructive interrelations with governmental authorities.

The Company brings its activities in line with laws and legal acts.

The Company endeavors to legally build and maintain constructive and transparent interrelations with governmental authorities, public officials and other government agents free of conflict of interest.

Political Activity and Donations

ULTRA TECHNOLOGIES COMPANY does not either engage directly in party political activities, or make any political contributions (either in cash or in kind). However the Company allows its employees to participate in political processes or NGOs unless contrary to applicable law provided that the employee doesn't identify himself/herself as a representative of ULTRA TECHNOLOGIES COMPANY and such engagement takes place outside the normal working hours and doesn't employ resources of the company so that this participation wouldn't be considered as a political or social position.

Charitable donations & sponsorships

The Company may carry out charity activities in accordance with the requirements of the applicable legislation. However, it should be taken into account that charitable donations or investment in social programs as well as sponsorship given by the company, e.g. sponsorship of events or educational grants could be used as means to make improper payments with a view to obtaining or maintaining business. The duty of the Business Integrity Group is to identify if charitable contributions are not used as a subterfuge for Misconduct. Unless secrecy or confidentiality is legally required, all charitable contributions and sponsorships should be publicly disclosed.

Arrangements with former Public officials

The conflict of interests may appear when former public servants are engaged to provide services for a public organization they worked for before, in particular when they are re-hired and engaged for the same task. They can be seen as benefitting from connections to their former colleagues. Consequently, an appropriately competitive and transparent hiring process for engaging former colleagues is critical to prevent potential or actual conflict of interests specifically, and ensure fairness of the hiring process generally.

ULTRA TECHNOLOGIES COMPANY restricts on the employment of, or other remunerative arrangements with, public officials, and with entities and persons associated or related to them, for a period of 2 years after their resignation or retirement, where such activities or employment relate directly to the functions held or supervised by those public officials during their tenure or those functions over which they were or continue to be able to exercise material influence. If the Company employs a person associated or related to a current public official, that person may not perform activities that relate directly to the functions held or supervised by that public official during his/her tenure or those functions over which he/she does or is able to exercise material influence.

Employees shall abide by the following rules:

- When dealing with public officials, represent only the official position of the Company according to the established procedure.
- In case of receiving an inquiry from any governmental or other regulatory agencies, deliver complete and true information about the Company, previously having taken advice from the Head of Business Integrity Group.
- Any charitable donation and use of the Company's resources and assets to support any NGOs shall be verified and agreed upon with the Head of Business Integrity Group.
- If an employee cannot assess the legitimacy of his/her actions in relations with governmental authorities, he/she shall seek advice from his/her immediate supervisor and the Head of Business Integrity Group.

Employees shall not:

- Interact with governmental authorities when it is outside his/her duties or he/she is unauthorized to do that.
- Attempt in any way to influence the decisions of governmental authorities or their representatives.
- Misinform persons who carry out an investigation and other officials of governmental or other regulatory agencies.
- Impede, whether directly or indirectly, collection of information, data, certificates or documents by authorized officials of governmental or other regulatory authorities.
- Conceal, alter and destroy the documents, information or accounting records that are the subject of an investigation or issue on request by governmental or other regulatory agencies.
- Use the Company's resources (for example, e-mail, phone number), spend own working hours, name of the Company for personal involvement in political and social processes.
- Provide funding for charitable and sponsor projects for the purpose of getting commercial advantage in specific projects of the Company.
- Employ former public officials to ULTRA TECHNOLOGIES COMPANY (risk of his/her job influence on making decisions by governmental authorities in favor of the Company).

Gifts and Entertainment**Policy definition**

The Company's reputation is earned every day, through all projects and transactions and by all employees. Reputation is the result of conformance of product, solutions and services quality to the stated one, the result of keeping of promises given to clients and partners, and the result of compliance with financial and business integrity standards.

The term 'business gift', for the purposes of this Code, includes 'business entertainment' as well as any tangible gifts. Business gifts are a common way to establish closer relations and such business practices is acceptable and legitimate with certain restrictions. According to the policies of ULTRA TECHNOLOGIES COMPANY, employees can give and receive appropriate business gifts related to their work in ULTRA TECHNOLOGIES COMPANY when the following conditions are met (For more details please refer to the ' Gifts and Entertainment Policy '):

- Those who receive and those who give business gift should be commercial clients or partners (not governmental).
- Gifts should be of reasonable value.
- Giving or receiving of gifts shouldn't be used for exercising influence on the business decision-making process of the recipient and shouldn't be accepted as binding or implying an obligation for the other party.

Gifts to public officials are prohibited. They can be recognized as an illegal action, whether such gifts were paid off personal funds or ULTRA TECHNOLOGIES COMPANY's resources.

Any business gift presented or received by an employee of ULTRA TECHNOLOGIES COMPANY shall be of reasonable value, quantity and periodicity. Never receive or present gifts in the form of cash or its equivalents, e.g. gift certificates. Never receive a gift which could be regarded as unreasonably valuable.

Employees shall abide by the following rules:

- Employees of the Company shall not give and receive any gifts prohibited by law or this Code.
- The cost, quantity and periodicity of any business gift should be reasonable and inflict no damage on the Company's reputation in case of disclosure and social inquiry.
- Gifts in the form of the Company's products or services as well as any items with promotional corporate symbols are acceptable.
- When determining appropriateness of a gift, its compliance with the common practice of giving gifts in our culture, cost, appropriateness considering your position in the Company, influence of the gift on the building of good business relations with the recipient and perception by others should be evaluated.
- If you plan to give or receive a valuable business gift, notify your supervisor to coordinate this fact.

Employees shall not:

- Provide or receive money as a business gift
- Present gifts of any cost to any public official
- Present or receive too expensive gifts or too often.
- Present or receive a gift that could have or appears to have influence on a business decision.
- Offer a gift when you know that receiving gifts constitutes a violation of rules for the recipient.
- Provide or receive an invitation to entertainment (e.g. football tickets) when the Company's representatives doesn't accompany the recipient during such event.

Facilitation Payments

Determining whether a payment is a facilitating one may be difficult and depend on the circumstances. The value of the payment is not immediately relevant, however the greater the value, the higher are chances that it will be a red flag for law enforcement. Small unofficial payments may present a risk of liability according to the laws of the country. Please refer to **Anti-Bribery and Corruption Policy** and consult Head of BIG if you have been asked from an official to help to expedite the progress of a service to which the Company is legally entitled. Please also note that facilitation payments are prohibited by this policy

Dealing with business partners and compliance with fair competition rules

Policy definition

The Company believes that long-term, mutually beneficial relationships with reputable clients and vendors are an important prerequisite for business efficiency. The Company always fulfills its obligations and expects the fulfillment of obligations by its business partners. Relations with the business partners are based on respect, trust, honesty and fairness.

The company endeavors to conduct business with those business partners who have a good reputation, are engaged in legitimate business activities and comply with the principles set forth in this Code of Business Ethics. To enforce this rule, the Legal Department shall monitor the compliance of business partners to the high standards of business ethics.

The company endeavors to ensure that its business partners also maintain high standards of business ethics, acknowledge its willingness to act in accordance with the policies and procedures of the Company, and does not violate the General principles and values. The company advises partners and promotes the adoption of the highest values and ethical business conduct principles.

The Company is committed to the principles of fair competition and compliance with all applicable competition laws. The Company builds relationships with its competitors on the principles of integrity and mutual respect. In case of any disagreement and disputes in competition, the Company gives priority to negotiations and seeks a compromise.

"Business partner" is a legal entity or an individual with whom ULTRA TECHNOLOGIES COMPANY is doing business. This includes without limitation the following persons or enterprises that cooperate with the company and act on its behalf.

- Clients
- Vendors
- Distributors
- Consultants
- Contractors
- Competitors

ULTRA TECHNOLOGIS COMPANY monitors the programs and performance of business partners as part of its regular review of its relationships with them.

All suppliers and customers of ULTRA TECHNOLOGIES COMPANY must pass over Partner Due Diligence Procedures before starting business relations with us. We must be sure that we carry business with properly managed and clean companies. Please reference to Due Diligence Procedure and consult Business Integrity Group for assistance on this matter

The Company has the right to add to its business contract the chapter of integrity compliance. By signing the contract, partner complies with our standards of business ethics.

Employees shall abide by the following rules:

- Expend all reasonable endeavors to ensure fulfillment in good faith of the Company's obligations towards business partners.
- Make a careful study of the Partner Due Diligence Procedure.
- Conduct properly documented, risk-based due diligence (identify any beneficial owners or other beneficiaries not on record) before entering into a relationship with a business partner, and on an ongoing basis.
- Seek reciprocal commitment to compliance from our business partners. If business partners do not have an integrity compliance program, you should encourage them to adopt a robust and effective program by reference to the activities and circumstances of those partners.
- Inform Partner of integrity compliance Program: Make our Compliance Policy known to all business partners and make it clear that we expect all activities carried out on its behalf to be compliant with its Program.
- Please make sure to add our corporate integrity web resource address (www.ultraintegrity.com) to your business card and e-mail signature.
- Value the Company's reputation and strictly abide by the laws and rules of business ethics.
- Act solely for the benefit of the Company when dealing with business partners
- Build and develop relationships with business partners based on the principles of equality of the parties and mutual respect.
- In case of doubt whether relations with business partners of the Company comply with the requirements of this Code, contact the Head of Business Integrity Group.
- Notify the Head of Business Integrity Group in case of revealing relationships between any of the Company's employees and partners which contravene the requirements of the Code.
- All key partners should be informed of the integrity compliance policies adopted in the Company and the Company's commitment to comply with them.

Employees shall not:

- Conceal or falsify information provided, misuse his/her office, tolerate arising of a conflict of interest or any wrongdoing in respect of business partners of the Company.
- Use any service or non-public information about competitors or business partners, if there are any suspicions that such information was produced using dishonest means or delivered to the employee by mistake.
- Commit disclosure of information on business partners, except as required by law or terms and conditions of a contract.
- Receive bribes (gifts, services, entertainment payments, money and other reward and any other benefits that can influence your impartiality and objectivity, discharge of your job duties as well as making decisions conflicting with the Company's interests) related to the discharge of his/her job duties. Whenever an employee has any doubt as to whether a gift is reasonable and common for business relations, he/she should seek advice from the Head of Business Integrity Group.
- Enter into collusion with other market actors to manipulate pricing, deliveries or any other elements of the competitive market efficiency.
- Avoid dealing with contractors, suppliers and other business partners known or (except in extraordinary circumstances and where appropriate mitigating actions are put in place) reasonably suspected to be engaging in Misconduct.

Conflicts of Interest**Policy definition**

Wherever possible, conflicts of interest should be avoided. Where they do or may happen, they should be disclosed to the Head of Business Integrity Group and carefully managed, to avoid even the appearance of improper behavior. ULTRA TECHNOLOGIES COMPANY Personnel are expected not to be involved in activities where their personal, social, financial or political interests interfere, or could potentially interfere, with ULTRA TECHNOLOGIES COMPANY's business interests.

However, the Company agrees that its employees have the right to participate in legitimate financial, charitable and other activities besides their work with ULTRA TECHNOLOGIES COMPANY, provided that information on possible conflicts of interest associated with such activities is brought to the notice of the General Director and Head of Business Integrity Group.

Employees shall abide by the following rules:

- Apply to General Director and Head of Business Integrity Group to approve such outside activities, financial interests or relationships that may pose an actual or potential conflict of interest.
- Avoid actions or relationships that may conflict or appear to be conflicting with his/her official duties or ULTRA TECHNOLOGIES COMPANY'S interests
- Consult with the HR Manager or Head of Business Integrity Group before starting work in a charitable, educational or other non-profit organization.
- Anything that might be construed as creating conflict between your interests and those of ULTRA TECHNOLOGIES COMPANY must be declared immediately in writing by you to the General Director and Head of Business Integrity Group.
- The express written permission from the General Director must be granted for the provision of paid work for other third parties, or for an independent business operation.

Employees shall not:

- Participate in any work not associated with your responsibilities in the Company that competes with any activity area of ULTRA TECHNOLOGIES COMPANY
- Share in the profits, whether directly or indirectly, of a company which is a competitor, vendor and purchaser of ULTRA TECHNOLOGIES COMPANY
- Participate in making any business decision of ULTRA TECHNOLOGIES COMPANY related to a company in which your spouse or any other family member works.
- Have a side job, if your second employer is a direct or indirect competitor, vendor or client of ULTRA TECHNOLOGIES COMPANY.
- Have a side job or consulting relations affecting your ability to perform adequately your job duties in ULTRA TECHNOLOGIES COMPANY.
- Use inside information of ULTRA TECHNOLOGIES COMPANY for personal purposes or interests of a third party.
- Receive personal discounts or other advantages not available to all employees of ULTRA TECHNOLOGIES COMPANY from suppliers of products or services as well as from clients.
- Get personal fees for provided services that are closely related to your work in ULTRA TECHNOLOGIES COMPANY. Your fees paid for services like lectures, seminars or training should be approved by your supervisor.
- "Close" relations between employees of ULTRA TECHNOLOGIES COMPANY with direct or indirect subordination between them, if such relationship can result in loss of confidence in impartiality of the manager.
- Engage with a customer where close relatives are employed by the customer in relevant business areas;
- Appoint a vendor or supplier to ULTRA TECHNOLOGIES COMPANY where you have a financial interest in that third party;
- Hire a relative for a position within ULTRA TECHNOLOGIES COMPANY;
- Invest in or otherwise provide a benefit to a competitor of ULTRA TECHNOLOGIES COMPANY;
- Invest in a current or prospective vendor or supplier to ULTRA TECHNOLOGIES COMPANY.

Insider Trading

ULTRA TECHNOLOGIES COMPANY prohibits Insider Trading. Insider trading occurs when any person purchases or sells a security while in possession of inside information relating to the security. Inside information is information that is considered material and non-public. Insider trading is illegal when the material information is still non-public--trading while having special knowledge is unfair to other investors who don't have access to such knowledge. Illegal insider trading therefore includes tipping others when you have any sort of non-public information. However, Insider trading can be considered legal once the material information has been made public, at which time the insider has no direct advantage over other investors. Anyway when in doubt, do not trade.

Money Laundering

ULTRA TECHNOLOGIES COMPANY will always comply with anti-money laundering laws and regulations wherever we operate. Money laundering is the process of concealing the criminal origin of money or other property and making them look as though they are legitimate. We will strive to minimize money laundering risks through our compliance measures which are designed to avoid receiving, or being involved in an arrangement or transaction that relates to funds that may have a criminal origin.

3. INFORMATION, PERSONAL DATA AND PROPRIETARY INFORMATION SECURITY POLICY

Information of the Company is its valuable asset. In the course of doing business, we should regularly exchange information with our colleagues both inside and outside the company. Protection of our ideas, technologies, processes, plans and other information owned by the company, is an important element of doing business, maintenance of a competitive advantage and compliance with specific regulatory requirements.

ULTRA TECHNOLOGIES COMPANY respects people's privacy and the confidentiality of personal information. Personal information is only acquired and kept for the purposes of operating our business effectively, or complying with the law. Once collected, personal information will be kept and processed in accordance with applicable data privacy and data protection laws.

You will be offered to sign Non-disclosure agreement with ULTRA TECHNOLOGIES COMPANY. You are expected to be familiar with confidentiality terms specified in Non-disclosure agreement. You must presume that all information made available to you in conducting business with our company is confidential. This includes information that ULTRA TECHNOLOGIES may have received from its suppliers, customers or business partners. Confidential information may only be used or disclosed for valid business purposes. You must never discuss ULTRA TECHNOLOGIES intellectual property, trade secrets, and other company confidential information on social media, including user forums, blogs, chat rooms, and bulletin boards.

Information security includes protection of proprietary information of the Company, the Company's electronic resources, physical security, access to company information if necessary, and prevention of its accidental or deliberate distortion.

Specific examples of confidential information: financial data, technological and engineering documentation, information about employees, customers or suppliers; information about salaries of employees, investment plans, production process description; information about prices and profits; information on amendments made to the manual.

Policy definition

Employees and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY shall be responsible for protecting the Company's confidential information against any unauthorized disclosure, whether external or internal, intentional or accidental. Employees and other persons acting on behalf of ULTRA TECHNOLOGIES need to know the following:

- Classification and concept of confidential information of ULTRA TECHNOLOGIES COMPANY which was created by and available to employees.
- Security measures necessary to protect information of ULTRA TECHNOLOGIES COMPANY.
- Retention period for information of ULTRA TECHNOLOGIES COMPANY and appropriate procedure of handling of such information.

ULTRA TECHNOLOGIES COMPANY expects third parties to maintain in confidence all its information and keeps confidential information of third parties. According to its policies, ULTRA TECHNOLOGIES COMPANY shall use only legal and ethical means of collection and use of business and market information necessary for better insight into markets, buyers and competitors of ULTRA TECHNOLOGIES COMPANY. ULTRA TECHNOLOGIES COMPANY shall not collect confidential information of the other party unless authorized by that party.

ULTRA TECHNOLOGIES COMPANY respects tangible and intellectual assets of third parties. Accordingly, the Company expects that its employees and contractors never inflict deliberate damage on or misappropriate tangible assets owned by a third party; never encroach on valid patents, trademarks and copyrights of a third party; gain an illegal access to confidential information; disclose confidential information of a third party unless authorized by such party. ULTRA TECHNOLOGIES COMPANY expects the same from third parties in respect of its tangible and intellectual assets.

Employees shall abide by the following rules:

- Protect proprietary information of the Company regardless of the data medium (e.g. hard copies, electronic files, e-mail and conversations).
- Protect confidential information of the Company throughout the period of its retention: at the moment of creation, accumulation, use, transfer, and storage.
- If an employee needs assistance in determining whether specific information is confidential, he/she should contact the Head of Business Integrity Group.
- Transmit electronic information within ULTRA TECHNOLOGIES COMPANY only to those persons who need such information in order to discharge their duties.
- Before you disclose any information to a third party, make sure that the confidentiality agreement with this partner is in place.
- If an employee is aware of or suspects a fact of unauthorized access to the information system or network of ULTRA TECHNOLOGIES COMPANY or to the information of ULTRA TECHNOLOGIES COMPANY, he/she should report immediately to the supervisor, IT Department and Compliance Officer.
- Employees shall not receive confidential information of third parties without a signed agreement for disclosure of sensitive information
- Communications with the public in respect of ULTRA TECHNOLOGIES COMPANY matters, such as making public statements or giving comments to the media, whether orally or in writing, should only be made by authorized personnel and through ULTRA TECHNOLOGIES COMPANY's PR/Communications Manager.
- All press and media inquiries should be referred immediately, without comment, to ULTRA TECHNOLOGIES COMPANY's PR/Communications Manager.

Employees shall not:

- Discuss confidential information of ULTRA TECHNOLOGIES COMPANY with friends and family members.
- Talk about confidential information of ULTRA TECHNOLOGIES COMPANY in a public place where you may be overheard (e.g. elevators, airplanes or restaurants).
- Leave corporate confidential information unattended on your desk, in the Company rooms, public places, etc.
- In order to secure your privacy and confidentiality of personal information you must never discuss confidential information on social media, public places and among co-workers without need for business purposes.
- Disclose corporate confidential information to a third party without an appropriate confidentiality agreement or to any employee of ULTRA TECHNOLOGIES who is not authorized to know such information.
- Use third party's confidential information received by illegal or unethical means.

4. CORPORATE ASSET PROTECTION POLICY

ULTRA TECHNOLOGIES COMPANY assets, both financial/tangible and intellectual property, may be very valuable, and are intended solely for achieving the goals and objectives of ULTRA TECHNOLOGIES COMPANY.

These assets must be protected in order to preserve their value.

All employees have an opportunity to use the Company assets to perform their duties. All employees are personally liable for the protection and reasonable use of the Company's assets. The structure of assets includes workplaces, equipment, tools, inventory, communication facilities, funds, accounts, software, information, technology, know-how, data, patents, trademarks, copyrights, time, and any other resources or property of the Company.

Policy definition

Employees shall protect the Company assets against waste, loss, damage, misuse, theft, misappropriation or encroachment, and use them responsibly.

It is legally required to keep accurate, reliable and timely accounting records and documents, including those related to any expenses incurred by staff members for performing the Company tasks. This documentation is essential for the decision-making process within the Company and proper fulfillment of its financial, legal and reporting obligations. Falsification of any records on assets and/or misrepresentation of facts can be considered as fraud and entails civil or criminal liability for both the individual and the Company.

ULTRA TECHNOLOGIES COMPANY respects tangible and intellectual assets of third parties. Accordingly, the Company expects that its employees and contractors never inflict deliberate damage on or misappropriate tangible assets owned by a third party; never encroach on valid patents, trademarks and copyrights of a third party; gain an illegal access to confidential information; disclose confidential information of a third party unless authorized by such party. ULTRA TECHNOLOGIES COMPANY expects the same from third parties in respect of its tangible and intellectual assets.

Employees shall abide by the following rules:

- Take due care of all tangible, financial, information and other assets of the Company.
- Use the Company assets solely for the intended purpose.
- Take appropriate measures to prevent waste, loss, damage, misuse, theft, misappropriation or encroachment on the Company assets.
- Use the right to approve expenses granted to you only where you are sure that such expenses comply with corporate policies.
- Seek reimbursement only for the expenses incurred for the benefit of Company.
- Prepare, keep and submit accurate reports on the use of the Company assets in accordance with applicable laws, external standards and procedures of the Company.
- Respect and protect intellectual property rights, whether your own or owned by third parties.
- Review, sign and abide by all documents determined as binding by the Company.
- If a third party discovers that any products or activities of the Company infringe the intellectual property rights of third parties, or if an employee believes that a third party has infringed the rights of the Company, he/she should contact the Legal Department of the Company.

Employees shall not:

- Use assets, funds or property of ULTRA TECHNOLOGIES COMPANY in any illegal, inappropriate or unethical purposes.
- Copy, use and distribute any materials protected by copyright without the prior permission of the copyright holder.
- Specify untrue purposes of expenditures.
- Conceal, alter, destroy or modify in any other way accounting records or documents of the Company, unless the employee is authorized to do that in accordance with approved instructions and standards.
- Company assets should not be used for personal purposes without approval from your management team.

7. CORPORATE CULTURE – RESPECT FOR EMPLOYEES

The staff of the Company is its main and most valuable asset. The Company endeavors to create an environment which would help employees to display their best professional and personal qualities.

The Company ensures equality of employees providing them with equal opportunities to develop their full professional and creative potential. The Company does not tolerate any discrimination based on gender, age, nationality, religion, political beliefs, etc.

The Company values those who is capable of achieving great results, rewards initiatives, seeks to attract and retain talent, respects privacy, and protects health and safety. The Company expects employees to abide by its rules and objectives and commit to its values.

Executives at all levels in the Company play a special role. The Company expects model behavior from its executives, each manager should not only ensure the implementation of and compliance with all policies described herein but also give an example with their ethical conduct.

ULTRA TECHNOLOGIES COMPANY Personnel are expected to conduct themselves in a professional manner. We do not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with. Intimidation, harassment, racist remarks, discriminating conduct, bad language, verbal aggression, physical aggression or threatening behavior, insult and sexual intimidation are serious misconducts warranting disciplinary action.

Policy definition

According to the Company's policies, employees and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY have the right to respectful treatment.

Respectful treatment means fair and professional treatment, the ability to appreciate talent, results and prospects. Respect at the workplace is not only compliance with laws but also prevention of any misconduct, harassment or discrimination based on age, disability, marital status, ethnic origin, religion, gender, political beliefs, and work experience.

The Company expects model behavior from its executives. Each manager must give an example for employees with his/her ethical conduct, emphasize it and help others to be on best behavior. Relationships between executives and subordinates shall be based on the principles of respect, discipline and performance of job duties in good faith.

5. ELECTRONIC RESOURCE USE POLICY

Policy definition

Electronic resources of ULTRA TECHNOLOGIES COMPANY provide a variety of tools to share information. Electronic resources include computers, software and data, phones and networks. Effective utilization of electronic resources helps the Company to run successful business. According to the rules of ULTRA TECHNOLOGIES COMPANY electronic resources may not be used in a way that violates the law or business ethics policies of ULTRA TECHNOLOGIES COMPANY.

Employees shall abide by the following rules:

- The Company allows only limited and reasonable use of the Company electronic resources for personal purposes, provided that it does not affect normal operations and fulfillment of your duties.
- Employees shall not use the Company electronic resources for access, receipt, storage, use or transfer of information that would violate laws and ULTRA TECHNOLOGIES COMPANY policies or are unacceptable in business environment.
- Use only licensed copies of software. Do not copy or use licensed software unless such copying or use are expressly authorized by the license.
- Remember that the Company reserves the right of access to computers of its employees, computer networks, software and data as well as monitoring these resources.

Employees shall not:

- Use electronic resources in a manner that violates any law or business ethics policies.
- Use electronic resources for personal purposes, except for the limited reasonable use not preventing your normal operations.
- Use electronic resources for political, social, and religious activities.

6. BOOKKEEPING AND RECORD KEEPING POLICY

Policy definition

The Company shall ensure the accuracy, authenticity and completeness of data specified in accounting and reporting records in strict compliance with national and international legislation and the principles set forth in business ethics policies, applicable accounting standards, laws and regulatory requirements.

According to the Company policies, employees and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY shall be responsible for the accuracy, completeness and timeliness of financial information, consistency of information disclosure and retention of records. The Company shall ensure compliance with this policy by monitoring of the financial management and reporting systems appropriateness.

Employees shall abide by the following rules:

- Employees shall be responsible for maintaining accurate, complete and authentic records to guarantee timely and correct disclosure of the Company's transactions in its financial statements.
- The Company has appropriate procedures for accounting and reporting.
- The Company provides adequate accounting and keeping of documents in accordance with the internal regulations and rules.
- Provide complete, correct, accurate, timely and intelligible financial and other information in internal reports and any other reports which can be used in press releases or documents filed with any public authorities.
- Employees must provide full support and provide authentic financial information to internal and external auditors of the Company who conduct audits or evaluation of the Company's financial performance.
- If an employee becomes aware of the violation of accounting and reporting principles, or he/she has doubts about the legitimacy of any action, the employee should report such information to the Head of Business Integrity Group.

Employees shall not:

- Provide financial statements not representing valid indicators.
- Provide inaccurate financial records, for example, outsized travel expenses and accommodation expenses, misleading statements of expenditure.
- Infringe or avoid approval procedures.
- Take direct or indirect actions which can affect, mislead or deceive auditors of the Company.
- Falsifying records or misrepresenting facts can never be justified. ULTRA TECHNOLOGIES COMPANY does not tolerate any form of fraud.
- Unauthorized destruction of or tampering with any records (whether written or in electronic form) is prohibited, where ULTRA TECHNOLOGIES COMPANY is required by applicable law to maintain such records or where such records may be relevant to pending or threatened investigations or disputes.
- For more details, pls. see "UT Bookkeeping and recordkeeping policy"

7. CORPORATE CULTURE – RESPECT FOR EMPLOYEES

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The Company ensures equality of employees providing them with equal opportunities to develop their full professional and creative potential. The Company does not tolerate any discrimination based on gender, age, nationality, religion, political beliefs, etc.

The Company values those who is capable of achieving great results, rewards initiatives, seeks to attract and retain talent, respects privacy, and protects health and safety. The Company expects employees to abide by its rules and objectives and commit to its values.

Executives at all levels in the Company play a special role. The Company expects model behavior from its executives, each manager should not only ensure the implementation of and compliance with all policies described herein but also give an example with their ethical conduct.

ULTRA TECHNOLOGIES COMPANY Personnel are expected to conduct themselves in a professional manner. We do not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers or anyone else we deal with. Intimidation, harassment, racist remarks, discriminating conduct, bad language, verbal aggression, physical aggression or threatening behavior, insult and sexual intimidation are serious misconducts warranting disciplinary action.

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Respectful treatment means fair and professional treatment, the ability to appreciate talent, results and prospects. Respect at the workplace is not only compliance with laws but also prevention of any misconduct, harassment or discrimination based on age, disability, marital status, ethnic origin, religion, gender, political beliefs, and work experience.

The Company expects model behavior from its executives. Each manager must give an example for employees with his/her ethical conduct, emphasize it and help others to be on best behavior.

Relationships between executives and subordinates shall be based on the principles of respect, discipline and performance of job duties in good faith.

Employees shall abide by the following rules:

- Treat each employee with respect regardless of his/her ethnicity, gender, age, political beliefs or experience.
- Remember that actions affect the reputation and may affect the Company's reputation. Think about how others perceive your actions. If a person does not complain of you, it does not mean that he/she is content with your behavior.
- Respond positively to any constructive feedback on shortcomings in work. Understand that respectful corrective actions taken by the management in respect of work problems are necessary and appropriate response to the quality of work.
- If someone insulted you, tell him/her that this shouldn't happen again. If you insulted someone, try to understand that person's position, apologize and avoid such situation in future.
- If you become aware of any conduct that may violate these rules, please notify your Group Head or HR Department.
- Constantly improve your level of proficiency, learn new skills and obtain necessary professional knowledge.
- Endeavor to improve your performance.
- Create and maintain friendly psychological climate in the team.
- Constantly look for new opportunities in your work, share experience with employees of the Company and apply best practices.
- Develop your competence in teamwork to achieve desired goals. Carry personal responsibility for the results of your own and team activities and, if necessary, help team members.
- If you cannot select the right position in the team or do not know how to behave in a particular situation, contact your Group Head or HR Department.

Employees shall not:

- Commit any unprofessional conduct or disrespect, or any actions that aimed at or result in harassment and retaliation.
- Tolerate discrimination of other employees based on their ethnicity, religion, gender, age, marital status or political beliefs. Harassment of any kind, including sexual abuse, is prohibited.
- Treat other employees in an aggressive or offensive manner.
- Retaliate against a person who has reported a possible violation of this policy.
- Fail to use the opportunity to tell another person respectfully that you think his or her behavior is offensive.
- Fail to report violations of this policy.

8. HEALTH, SAFETY and ENVIRONMENT

Policy definition

ULTRA TECHNOLOGIES COMPANY is committed to protecting health, safety and environment (HSE) in respect of its processes, work products, workplaces and personnel. ULTRA TECHNOLOGIES COMPANY provides its employees with safe workplaces free of health hazard as well as seeks to minimize the impact of production processes on the environment.

Employees and other persons acting on behalf of ULTRA TECHNOLOGIES COMPANY shall know and comply with all laws and regulations in the field of health, safety and environment as well as any relevant policies and standards of the Company.

The management of the Company also shall ensure that its employees know such laws and regulations. Specialists in charge of HSE shall provide assistance and consultations on these issues. Please refer to Instructions for safety at the workplace for office employees; Manual safety at the workplace for technical personnel; Safety instructions for assembly work; Introduction Safety Instructions – these documents are available at HR department of our Company.

All workplaces meet the regulations of Labor code of Azerbaijan Republic, please refer to the Passport certification of workplaces available at HR department of our Company.

We take care to protect the environment and respect the rights of communities where we do business. ULTRA TECHNOLOGIES COMPANY Personnel are expected to comply with and observe the prescribed personal protection equipment and safety rules. We encourage ULTRA TECHNOLOGIES COMPANY Personnel to raise safety related concerns and expect transparent reporting. Covering up incidents is considered a breach of this Code of Business Ethics.

We guarantee that we do not use child labor, forced labor, as well as physical punishments. We categorically against the use and distribution of drugs, and we do not permit consume of alcohol and smocking inside of our offices.

Employees shall abide by the following rules:

- Comply with all applicable laws regulatory instructions and policies of ULTRA TECHNOLOGIES COMPANY relating to HSE.
- Apply your knowledge of HSE policies when discharging daily job duties and making management decisions.
- Perform technological processes in a safe manner.
- Maintain your knowledge in these areas by participating in scheduled training programs.
- Communicate your concerns about conditions and situations which you believe are hazardous or harmful to the environment to your supervisor, and stop any operations which are performed in conditions dangerous to life or health.
- Respond to any comments on HSE issues made by your colleagues, clients or partners.
- Protect natural resources by recycling and other methods.
- Increase energy efficiency and ensure its rational use.

Employees shall not:

- Violate HSE-related laws and internal regulations of the Company.
- Fail to report any environmental hazards and accidents.
- Fail to use the opportunities to prevent pollution and reduce waste.
- Fail to use the opportunities to improve energy efficiency.
- Perform hazardous operations and work in hazardous conditions at the workplace.
- Drink alcohol , smocking and use other narcotic drugs at the workplace
- Cooperate with contractors and vendors who do not share the HSE-related values of ULTRA TECHNOLOGIES COMPANY.

9. FOR FURTHER INFORMATION

If you have any questions about this Policy, please contact the Head of Business Integrity Group. This Policy may be amended and updated from time to time. The latest version of this Policy can be accessed through www.ultraintegrity.com . Amendments to this Policy may be made only by the ULTRA TECHNOLOGIES COMPANY General Director.

Code of Business Ethics: www.ultraintegrity.com