

## **Anti-Bribery and Corruption Policy**

The PLP Law Group's anti-corruption policy (hereinafter referred to as "the Firm") is aimed at conducting business on the basis of fair and ethical conduct in the relations with the employees and the third parties. Thus, the Firm implements a policy of absolute intolerance for bribery and corruption and strives to act professionally, responsibly and honestly in all business relations and spheres of the Firm's practice, observing and providing the effective mechanisms for prevention of corruption and bribery.

The firm follows all anti-bribery and corruption regulations both in Ukraine (the Anti-corruption Act of Ukraine) and in other jurisdictions it operates in (US FCPA, UK Bribery Act and others).

In this policy the term "Third Party" means any individual or entity we involve for the provision of the services and business management, and includes existing and potential customers and clients, resellers, suppliers, contractors, agents, consultants, as well as government institutions and organizations, local authorities, including their representatives and officials, politicians and political parties.

This policy applies to all employees of the Firm at all levels, including the partners, directors, advisers, lawyers and other employees (whether on a permanent or temporary basis or part-time), consultants, contractors, interns, volunteers, agents, or any other persons related the Firm (hereinafter together referred to as "the Employees").

### **Anti-bribery policy**

Bribe (unlawful benefits) is the money, material things, benefits, services, intangible assets being offered, given without legitimate reason to a person having specific powers to stimulate him by using such powers to act in the interests of the person who transmits or offers such a bribe. Bribery is a criminal offense and consists of offering or giving a bribe, receiving or requesting/demanding a bribe.

The Firm is aware of its responsibility in combating corruption and bribery and the risks associated with the possible involvement of the employees in such unlawful activities.

### **Gifts and hospitality**

This policy does not prohibit normal ethical conduct that involves appropriate hospitality, friendliness, courtesy, including in the matter of handing over and receiving gifts, treating and providing free services. However, we do have internal policies and procedures that provide employees with a correct and unambiguous understanding of what should be considered normal ethical behavior, subject to the financial constraints and principles outlined below (basic principles), namely that any gifts:

- must not be made for the purpose of encouraging certain acts or omissions, or would lead to benefits or bias, or could be regarded as an undue gain;
- must comply with local legislation, business etiquette;
- must be donated on behalf of the organization and not on behalf of the individual;
- must not be in cash or other cash equivalent;
- be appropriate under the circumstances;
- must follow the generally accepted understanding (not to surprise) about the characteristics of such gifts, incl. its value, the reason for the gift;
- should be presented openly, not secretly.

In any case, the gifts should not be offered or accepted by the persons empowered by the public authorities or local governments, their representatives, or politicians or political parties.

A gift or hospitality should be considered in the context of circumstances taking into account appropriateness and justification. The true intentions of giving or showing hospitality should also be evaluated and taken into account.

The following is unacceptable to any employee (or a person acting on his/her behalf):

- to convey, promise to convey, or offer money, a gift, or show excessive hospitality with the expectation or hope that this will give preference or because such preference has already been given;

- to hand over, promise to transfer, or offer money, a gift, or show excessive hospitality to the government officials, authorities, or their representatives for "facilitating" or expediting routine procedures;
- to accept a payment from the third party when it is known or reasonably foreseeable that such payment provides for benefits;
- to accept a gift from the third party when it is known or reasonably foreseeable that the gift is offered with the expectation that the Firm will give some benefit to such a party on an indefinite basis;
- to threaten or harass an employee who has refused to participate in bribery, or has disclosed the fact of such bribery, or has expressed concern about compliance with the requirements of this policy;
- to participate in any activity that may violate this policy.

### **Promotional Fees**

We do not pay or accept payments for the facilitation of formalities, the unofficial speeding up of formal procedures in any form, including in the form of payments to affiliated third parties.

### **Donations**

The Firm can make donations and charitable contributions in accordance with local laws and moral principles.

### **Duties and responsibilities**

All persons employed by us or controlled by us are responsible for bribery, corruption and other forms of corruption. The employees should avoid any activity that may violate this policy.

The employee is obliged to inform the Firm as soon as possible if he/she believes that a situation that does not comply with this policy arises or may arise in the future, if he/she is required to bribe or offer a bribe, or he/she believes that he/she is involved in another type of illegal activity.

The employee who violates this policy may be the subject to disciplinary action which may result in his or her dismissal. We reserve the right to terminate our contractual relations with the third parties if their actions have a corruption component and may damage the Firm's business reputation.

If any person becomes aware of circumstances regarding the actions of our Employees or the activities of the third parties who show signs of corruption or breach of this policy, they may report such facts directly to one of the Firm's Partners.

### **Trainings and communications**

The group trainings and individual work have been implemented for all employees to ensure that this policy is properly adhered to and in accordance with its requirements. We also bring to the notice of the third parties the use of approaches that imply absolute intolerance of bribery and corruption.

### **Monitoring and control**

The Firm continually monitors and controls the implementation of this policy at regular intervals, analyzing its application for relevance, adequacy and effectiveness. Internal control systems and procedures are also subject to regular review to ensure that they are effective in combating bribery and corruption. All our employees are aware that they are responsible for successful implementation of this policy and should use it to unmask and fight corruption.