OUR BUSINESS CONDUCT
IS ZERO TOLERANCE FOR CORRUPTION

CODE

OF ETHICS AND BUSINESS CONDUCT OF JSC “UKRPOSHTA”

CITY OF KYIV 2022

TABLE OF CONTENTS

SPEECH BY DIRECTOR GENERAL

INTRODUCTION

1. MISSION
2. VISION
3. CORPORATE VALUES
4. PRINCIPLES OF ETHICS AND BUSINESS CONDUCT
5. ECOLOGY AND ENVIRONMENT
6. HUMAN RIGHTS
7. HEALTHCARE
8. LABOUR PROTECTION
9. LABOUR RELATIONS
10. IMPROPER CONDUCT
11. PRINCIPLES OF COMMUNICATION
12. OVERALLS AND APPEARANCE
13. CONFLICT OF INTEREST
14. USAGE OF UKRPOSHTA'S ASSETS
15. 1ANTI-CORRUPTION
16. ANTI-MONEY LAUNDERING
17. BUSINESS GIFTS AND BUSINESS HOSPITALITY
18. RELATIONSHIPS WITH COUNTERPARTIES
19. COMPETITION AND RELATIONSHIPS WITH RIVALS
20. INTERACTION WITH PUBLIC AUTHORITIES
21. MASS MEDIA
22. CONDUCT IN SOCIAL MEDIA
23. PROTECTION OF INFORMATION AND PERSONAL DATA
24. TRUE ACCOUNTING AND REPORTING
25. POLITICAL AND RELIGIOUS ACTIVITIES
26. LIABILITY FOR FAILURE TO COMPLY WITH THE CODE
27. SEEKING ADVICE AND REPORTING VIOLATIONS

SPEECH BY DIRECTOR GENERAL

Dear employees,

In today's world reputation, both of a person and of a company, is one of the most valuable assets. Reputation is gained over the years and can be damaged in a minute. Our company is gradually transforming and adopting modern workplace policies. The Code of Ethics and Business Conduct is an important part of such modern rules. In this Code you will find the answers to the major questions: what is allowed and what is not allowed while working at Ukrposhta: from whether it is possible to accept gifts to whether you can work together with family members or participate in political activities. I am sure that the vast majority of you already follow these rules, even if they haven't been formally approved. Thus I hope that this Code will become a moral compass for all Ukrposhta employees and will allow us to achieve the goals that we set together.

Ihor Smelyansky,
Director General
JSC "Ukrposhta"

INTRODUCTION

The Code of Ethics and Business Conduct of Joint Stock Company "Ukrposhta" or the Code is an inexhaustible set of values, principles, ethical norms of business Conduct that determine the way of forming the relationship among employees, between employees and management on the one hand, and between employees and customers and management and customers on the other hand, as well as any persons acting in the name of and/or for the benefit of JSC "Ukrposhta" (hereinafter - Ukrposhta). The Code is directly related to the corporate culture of Ukrposhta, is the basis and the tool for the dissemination, maintenance and implementation of corporate values in Ukrposhta.

The purpose of the Code is to promote corporate values, principles and ethical norms of business Conduct which allow to form the corporate culture of Ukrposhta, and compliance with the provisions of the Code is one of the most important factors to build trust and maintain a positive image of Ukrposhta within the industry and society as a whole.

1. MISSION

To ensure reliable and inclusive access to essential goods and services for people in every community—across Ukraine and around the world, no matter the circumstances.

2. VISION

To build a reliable postal, retail and financial services ecosystem for individuals and businesses.

3. VALUES



ACCESSIBILITY AND INCLUSION

We serve all people. Our goal is to make our services available and accessible to everyone, everywhere.



QUALITY AND RELIABILITY

We are committed to delivering reliable, high-quality service to every customer, regardless of the circumstances.



INTEGRITY AND TRUST

We act fairly and responsibly toward our customers, partners and employees – earning their trust over time and at every interaction.



CONVENIENCE

We make things simple. We design our products, services and processes to be intuitive and user-friendly for our customers and employees.



TEAM SYNERGY

We believe in the power of teamwork—mutual support, shared responsibility, and collective growth.



POSITIVITY IN CHALLENGES

We face challenges with a positive attitude—always treating everyone with dignity, empathy, and respect.



DRIVE FOR RESULTS

Each of us is striving for success on every level —personal, team, corporate, and national.

4. PRINCIPLES OF ETHICS AND BUSINESS CONDUCT

We act ethically and responsibly. This is our fundamental principle regardless of time and space. We are in constant interaction with our customers, members of the Universal Postal Union, partners and rivals. We strive to ensure that cooperation is based on the principles of mutual respect, balance of interests, intolerance for corruption and compliance with the law.

The Code of Ethics and Business Conduct applies to all Ukrposhta employees, including officials, when performing their duties (including Supervisory Board members), individuals and legal entities acting in the name of and/or for the benefit of Ukrposhta (hereinafter referred to as the Employees). Managers of all levels must show and spread the Ukrposhta values to their team within their work and be a role model with respect to compliance with the ethics and business conduct principles.

Any persons acting in the name of and/or for the benefit of Ukrposhta must be aware of and strictly adhere to the provisions of this Code.
The provisions of this Code contain the basic principles of Conduct which are not exhaustive and do not cover all the possible cases and events. If any cases or events not covered by the Code emerge, it is necessary to be guided by the general principles of the Code and generally accepted approaches in Ukrposhta to the relevant case or event. For Ukrposhta, not only the achievement of results matters, but also the way in which such results were achieved.

5. ECOLOGY AND ENVIRONMENT

We understand the importance of preventing the negative impact of our activities on the environment and the responsibility for it to the present and future generations. In its activities Ukrposhta adheres to environmentally sustainable and safe principles of rational use of natural resources and reduction of waste and emissions. **For these reasons we:**

- √ *comply with the norms of environmental legislation;*
- √ *encourage every employee to respectful and careful attitude towards environment;*
- √ *are open to cooperation with public authorities and public organizations in order to promote the environmental protection;*
- √ *during the operation of existing facilities and the design of new ones, we ensure the control of emissions and waste to bring them to a safe level;*
- √ *promote research and analysis of the impact of Ukrposhta's activities on the environment in order to ensure that Ukrposhta's activities meet the needs of environmental protection.*

6. HUMAN RIGHTS

Human rights are fundamental human rights and freedoms, including the right to life and health, the right to work, the prohibition of forced labour, dignity, equality and respect, etc.

Ukrposhta as a national postal operator undertakes to respect and protect human rights.
In its activities, Ukrposhta is guided by the principles of the Universal Declaration of Human Rights, International Labour Organization conventions (Conventions № 29, 87, 98, 100, 105, 111, 138, 182), the UN Global Compact 1999, and national human rights legislation.

7. HEALTHCARE

We understand that human health is one of the most important values. The basis of Ukrposhta's activity is to ensure the compliance with the requirements of the legislation on protection and healthcare of employees, in this connection we:

- ✓ determine the employees' ability to perform their work due to their state of health without undue risk to themselves or others when hiring;
- ✓ ensure all the necessary conditions to provide emergency medical aid in the workplace;
- ✓ run voluntary programs to improve employees' health by vaccinating against acute respiratory diseases.



In the event of acute epidemiological situations we provide employees with appropriate individual means of protection and hygiene.

8. LABOUR PROTECTION

Ukrposhta adheres to the legislation, standards and rules in the sphere of labour protection.

For the implementation of the abovementioned Ukrposhta is guided by the principles:

- ✓ *Responsibility and leadership to ensure labour protection.*
- ✓ *Detecting hazards and risks - systematic identification of hazards and risks, assessments of risks and analysis of accidents and professional illnesses.*
- ✓ *Defining goals for the labour protection (priority risks and goals of prevention programs).*
- ✓ *Creating a safe system for safety and labour hygiene.*
- ✓ *Usage of safe and serviceable technical devices, equipment, vehicles.*
- ✓ *Advanced training.*
- ✓ *Investment in staff - motivating the employees to form and effectively operate a labour protection management system, changing the role of employees from passive to active, laying an incentive basis for safe Conduct.*

Employees:

- ✓ *understand the responsibility for their own safety and consciously follow the rules of labour protection of Ukrposhta;*
- ✓ *In the event of health or safety hazard, employees who are aware of this should immediately report the existing situation to their immediate supervisor and the relevant labour protection department.*

9. LABOUR RELATIONS

The right to work is a fundamental human right. We build labour relations on democratic principles:

- ✓ *Freedom of assembly and collective bargaining. Each employee has a right to choose and join trade unions or other organizations to represent his interests.*
- ✓ *Creating safe and healthy working conditions in accordance with the work performed;*
- ✓ *Realization of the employees' right to rest by providing the breaks for a rest and meals, providing days of weekly rest, as well as paid annual leave, establishing a shortened working day for certain professions;*

- ✓ *Prohibition of coercion to work or use of child labour. Recruitment of persons under the age of 18 (performance of their duties is allowed only in cases, in the manner and under the conditions specified by law).*

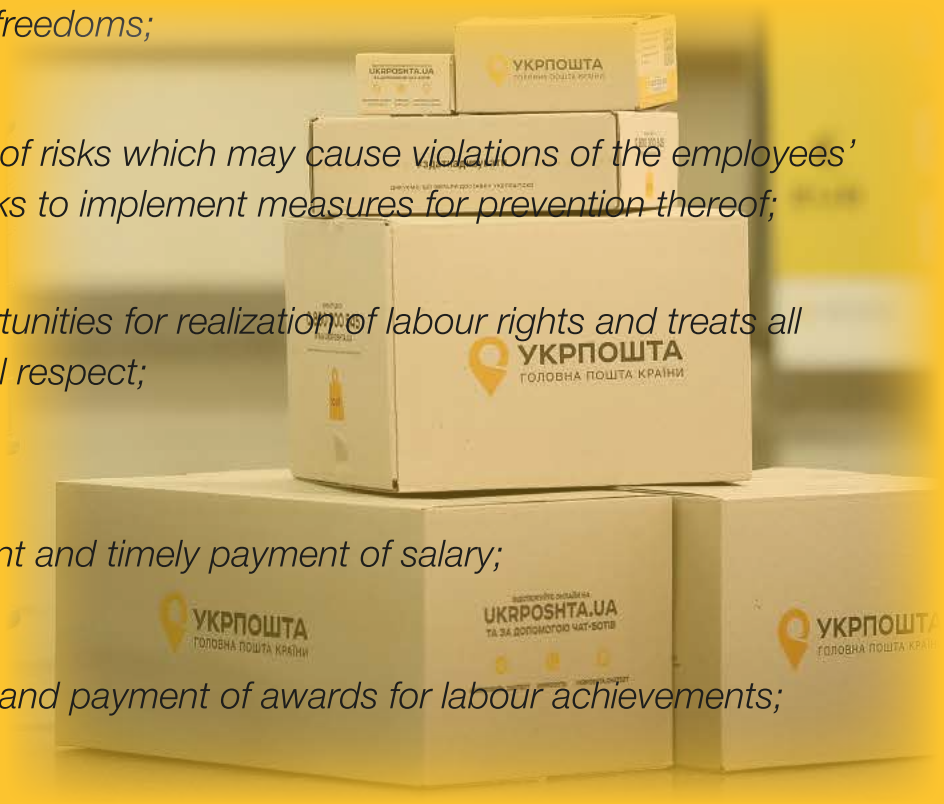
- ✓ *Prohibition of discrimination on any grounds. Any preference, distinction or non-admission based on sex, ethnic or social origin, place of birth or citizenship, age, state of health, disability, suspicion or presence of disease, marital or property status, place of residence, race, colour, gender identity, political or religious beliefs, membership in trade unions or other associations of citizens, participation in strikes or gatherings, appealing or intending to go to the court or other bodies to protect their rights, for linguistic or other signs, which leads to the violation of equal opportunities or prejudice against employees is unacceptable in Ukrposhta.*

For implementation of the above, Ukrposhta:

- ✓ *creates conditions and makes efforts to prevent violations of the employees' legitimate rights and freedoms;*

- ✓ *performs an analysis of risks which may cause violations of the employees' rights, as well as seeks to implement measures for prevention thereof;*

- ✓ *provides equal opportunities for realization of labour rights and treats all employees with equal respect;*



- ✓ *ensures stable amount and timely payment of salary;*

- ✓ *ensures assessment and payment of awards for labour achievements;*

- ✓ *creates safe and healthy working and living conditions;*

- ✓ *creates and develops professional training systems, ensures opportunities for advanced training;*

For implementation of the above, the Employees:

- ✓ *support and comply with the principles of the Codes;*
- ✓ *perform properly their work duties in accordance with the labour contracts, as well as the Ukrposhta internal regulations;*
- ✓ *comply with the generally accepted social norms and rules of conduct within the relations with the colleagues, clients and partners, comply with the principle of mutual respect, courtesy and emotional restraint, share professional experience and production information, cooperate horizontally and vertically, are focused on the teamwork priority;*
- ✓ *must know and comply with the principles of this Code, provisions of the Ukrposhta internal regulations and the requirements of the law related to the organization of work and performance of their work duties;*
- ✓ *comply with the resolutions and orders of the Director General, orders of their immediate managers, as well as orders of their functional supervisors;*
- ✓ *know and comply with the Ukrposhta internal regulations;*
- ✓ *constantly develop their professional knowledge and skills.*

10. IMPROPER CONDUCT

Ukrposhta does not allow any forms of threats or use of physical influence or violence, sexual harassment or any other harassment, physical or psychological abuse.
Any conduct on the part of an employee that endangers physical and/or mental condition of another employee, or employees or customers is considered a violation of this Code and is a ground for disciplinary action.

Ukrposhta strenuously does not recognize and prohibits the use of alcohol, psychotropic and narcotic substances, organization and conduct of gambling during work and during non-working hours in the premises or on the territory of production facilities of Ukrposhta, as well as in the vehicles owned by Ukrposhta or used in production activities. Failure to do so is a ground for imposing disciplinary

sanctions on guilty employees.

Staying on the premises or on the territory of Ukrposhta's production facilities, as well as in vehicles owned by Ukrposhta or used in production in a state of alcohol intoxication, under the influence of psychotropic and narcotic substances, organization and participation in gambling are unacceptable and may be a ground for disciplinary action.
Smoking is prohibited at the workplace or in the production premises, or on the territory of Ukrposhta's production facilities, except for specially designated smoking areas.
Ukrposhta does not allow the employees to carry weapons into the premises or on the territory of Ukrposhta's production facilities, except as provided by the legislation or internal regulations of Ukrposhta.

11. PRINCIPLES OF COMMUNICATION

Ukrposhta employees, regardless of their position, must communicate in Ukrainian in a polite, emotionally restrained and friendly manner.

Customer Relations

We make every effort to meet the expectations of our customers, to provide them with quality services.

We understand that we work to meet the needs of our customers, and for this reason we:

- ✓ *make sure that our services are of proper quality;*
- ✓ *provide a positive attitude to the interests of customers;*
- ✓ *adhere to the appropriate standards of customer service;*
- ✓ *are guided by the principle of specificity, transparency and accessibility when communicating with the clients and providing them with information;*
- ✓ *keep personal data and trade secrets defined by law;*
- ✓ *we treat appeals and complaints responsibly.*

Ukrposhta recognizes and guarantees to each customer the secrecy of exchange of letters and other correspondence:

- ✓ *exceptions may be established only by a court in cases provided by law.*
- ✓ *mechanical damage to letters and other correspondence, which may occur as an exception, as a result of technological processes, is not a violation of the secrecy of exchange of letters and other correspondence and in such exceptional cases we act to preserve the secrecy of exchange of letters and other correspondence.*

12. OVERALLS AND APPEARANCE

The employees of Ukrposhta, whose duties include the use of overalls and/or individual means of protection, are obliged to comply with the requirements of the regulations on the use of overalls and/or individual means of protection.

Ukrposhta employees, whose duties do not involve the use of overalls, must adhere to a restrained casual or business style, which should correspond to the position and the nature of the work performed.
The appearance of the employee should not be provocative or floppy.



13. CONFLICT OF INTEREST

Ukrposhta respects its employees' right to privacy. However, situations when an employee has a conflict between personal interests and job (functional) responsibilities cannot be allowed. This is unacceptable, as it may harm the legitimate interests of Ukrposhta and adversely affect its activities and reputation.

The employee is obliged to assess himself the conditions and actions that potentially may affect the objectivity of his work. When performing labour (official) duties the employee is obliged to be guided by the interests of Ukrposhta.

Common situations that can lead to a conflict of interest include, in particular, the following:

- ✓ *part-time work or entrepreneurial activity;*
- ✓ *providing consulting and other services to business partners or Ukrposhta's rivals outside of work responsibilities and outside the working hours;*
- ✓ *ownership of corporate rights by an employee or a member of the employee's family in another legal entity that is a business partner or Ukrposhta's rival;*
- ✓ *part-time work of an employee or work of the members of the employee's family in a legal entity that is a business partner or Ukrposhta's rival;*
- ✓ *the work of the employee's family members or other relatives under the direct supervision of such employee.*

The employee of Ukrposhta must immediately notify (in writing or by e-mail) his immediate supervisor and the department performing the conflict of interest compliance function in Ukrposhta of the existence of a potential or actual conflict of interest. Such notification shall be made by the employee in a timely manner as soon as the employee becomes aware of the occurrence of a conflict of interest, in the manner esatblished by the Ukrposhta internal documents.

In relationships arising from a conflict of interest the employees adhere to the following basic principles:

- ✓ *avoidance of situations and circumstances in which the personal interests of the employee in the performance of his labour (official) duties may affect the objectivity of his decisions or acts/omissions in the interests of Ukrposhta or in any other way may lead to the violation of the interests of Ukrposhta;*
- ✓ *decision-making within the powers and only in the interests of Ukrposhta;*
- ✓ *refusal to use any assets, resources, information to which the employee has access in Ukrposhta for personal material benefit, as well as the benefit of other individuals or legal entities.*

In order to prevent any conflicts of interest, Ukrposhta:

- ✓ *hires family members of employees subject to selection on general and equal terms with other candidates;*
- ✓ *establishes a prohibition on the work of family members of Ukrposhta's employees in positions that may lead to a conflict of interest;*
- ✓ *analyses the conflict of interest situations and takes appropriate measures to prevent or timely resolve such conflicts.*

Exercise by Ukrposhta employees' of the right to work in their free time:

Ukrposhta expects all of its employees to dedicate their entire working day to the performance of their duties and ensuring Ukrposhta's interests. Therefore, performance of other types of activities is possible exclusively if this requirement is complied with and there is no conflict of interest.
In case if the Employees intend to combine their work in Ukrposhta with holding positions in collegial bodies of other legal entities, performance of entrepreneurial activities or having other employment outside Ukrposhta or its subsidiaries, they must obtain the agreement of their immediate supervisor and the Complaince Director.

14. UKRPOSHTA ASSETS USE

Ukrposhta's assets include: real estate, vehicles, funds, information, intellectual property (including licenses, patents, software), equipment, devices and machinery used by employees to perform labour (contractual) duties, firearms and its ammunition, other movable property accounted for on the balance sheet of Ukrposhta.

Intangible assets created or developed by employees during the performance of their duties are the property of Ukrposhta in the manner and under the conditions specified in the employment contract and by legislation.

Employees:

- ✓ *use the assets of Ukrposhta exclusively in its interests;*
- ✓ *refrain from using the assets (movable and immovable property and information) of Ukrposhta for their own needs or for their own benefit;*
- ✓ *use computer equipment and information systems of Ukrposhta in compliance with the information security measures established by Ukrposhta's regulations;*
- ✓ *do not use office computers for illegal activities and gambling, nor do they access, store, transmit, post or publish information that promotes violence, hate, terrorism, discrimination, intimidation, or obscene and humiliating audio visual materials;*
- ✓ *inform the immediate supervisor about the facts of theft, waste, improper use of Ukrposhta's assets;*
- ✓ *prevent fraud and corruption.*



Employees of Ukrposhta must take care of the preservation of tangible and intangible values (assets) of Ukrposhta.

Illegal use and / or occupation of Ukrposhta's assets (funds) is basis for disciplinary, administrative or criminal liability.

15. ANTI-CORRUPTION

Ukrposhta declares zero tolerance and absolute inadmissibility of any form of corruption. Ukrposhta does not apply to corruption in order to obtain any benefits in the field of its activities from governmental and international organizations, does not make illegal payments for facilitation or simplification of formalities in connection with economic activities, in particular, to ensure faster resolution of certain issues, and acts in strict compliance with anti-corruption legislation.

To implement these principles Ukrposhta:

- √ *Complies with anti-corruption and anti-money laundering legislation;*
- √ *Cooperates only with business entities which comply with the requirements of anti-corruption legislation;*
- √ *Develops and implements anti-corruption program, policies and procedures in accordance with current anti-corruption legislation and international practices aimed at strengthening control over financial and accounting reporting.*

Employees of Ukrposhta must notify the person/department responsible for combating corruption in the event of any suspicion of counterparties and the terms of the transactions offered to Ukrposhta in accordance with the procedure established by the internal documents.

16. ANTI-MONEY LAUNDERING

Ukrposhta takes an active part in counteracting:

- √ *legalization (laundering) of the proceeds of crime,*
- √ *terrorist financing;*
- √ *financing the proliferation of weapons of mass destruction.*

For this Ukrposhta:

- √ *refrains from performing activities related to legalization (laundering) of the proceeds of crime;*

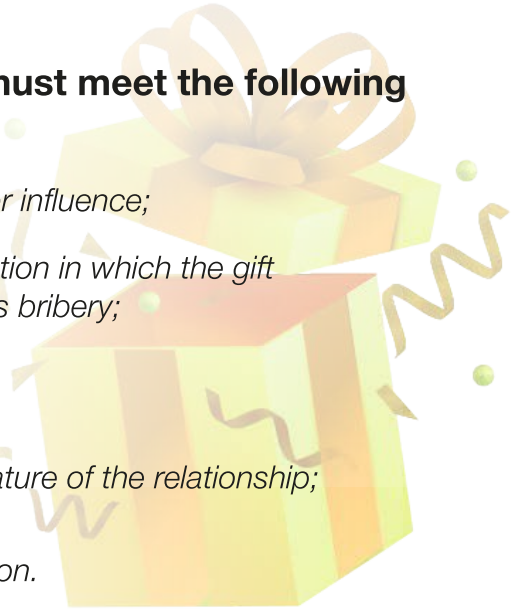
- ✓ *does not enter into any agreements in respect of which there are doubts as to the origin and purpose of the funds to be received or paid;*

- ✓ *in its activities adheres to the regime of economic sanctions against any state imposed by the Government of Ukraine, as well as US, UN, and EU sanctions prohibiting activities with legal or individual entities related to these states or to terrorist activities and other illegal activities.*

17. BUSINESS HOSPITALITY AND GIFTS

Ukrposhta allows the possibility of accepting or providing gifts that meet the generally accepted kinds of hospitality, except as provided by the Law of Ukraine "On Prevention of Corruption". Ukrposhta establishes limits for obtaining gifts and business hospitality for the Employees, as well as make sure that all of the Employees and stakeholders are familiar with these requirements.

Gifts and business hospitality accepted and offered must meet the following criteria:



- ✓ *are not presented for the purpose of gaining an illegal advantage or influence;*
- ✓ *the value corresponds to the position of the recipient and the situation in which the gift or business hospitality is provided, i.e. they cannot be perceived as bribery;*
- ✓ *should not be in the form of cash or easily convertible into cash;*
- ✓ *the frequency of gifts or business hospitality corresponds to the nature of the relationship;*
- ✓ *gifts and business hospitality do not contradict the current legislation.*

Employees and persons acting on behalf and in the interests of Ukrposhta:

- ✓ *do not offer, do not give, do not promise to provide any illegal benefit (money, valuable gifts, etc.) to any persons (including, inter alia, authorized persons of legal entities, government officials, officers) for illegal purposes;*

- ✓ *do not demand receipt, do not accept and do not agree to accept from any person, directly or indirectly, illegal benefit (cash, valuable gifts, etc.);*

- ✓ *in case of discovery of property that may be an illegal benefit or a gift in their office, immediately notify in writing (but not later than one working day) this fact to their immediate supervisor and the Compliance Service;*

- ✓ *before offering, providing or receiving gifts or business hospitality in excess of the above value limit, submit a declaration in the form of Annex 4 to this Code and obtain the approval of the head of the Compliance Service.*

18. RELATIONSHIPS WITH COUNTERPARTIES

Ukrposhta builds partnerships based on cooperation, mutual benefit and balance of interests, respect, trust and justice, objectivity, and conscientious performance of its obligations under the terms of the agreements.

Ukrposhta in relations with Counterparties:

- ✓ *selects partners who have an irreproachable business reputation and are not subject to sanctions;*
- ✓ *conducts a thorough check of partners' reputation;*
- ✓ *resolves misunderstandings, that arise in the process of activity, through negotiations and finding a compromise;*
- ✓ *complies with legislation, in particular on intellectual property, and uses only those intellectual property objects that are created by Ukrposhta or legally acquired;*
- ✓ *provides protection of confidential information about business partners, which may lead to material or moral damage to Ukrposhta and / or business partner, except in cases where the provision of confidential information is carried out in accordance with the law.*

19. COMPETITION AND RELATIONS WITH RIVALS

Ukrposhta in relations with rivals:

- ✓ *does not allow the conclusion of agreements (collusion) with rivals on pricing, customers or terms of providing service;*
- ✓ *does not enter into any agreements with rivals aimed at restricting competition;*
- ✓ *builds relations with rivals on the principles of mutual respect, always welcomes and supports mutually beneficial sectoral cooperation;*
- ✓ *does not allow any manifestations of unfair competition, as well as violations of generally accepted norms of doing business and rules of business conduct.*

Employees:

- ✓ *avoid unreasonable statements addressed to rivals and unreasonable criticism of their services;*
- ✓ *do not distribute pseudo (unreliable) information about rivals.*

Ukrposhta achieves its economic development through fair competition and providing quality services to consumers.

20. UKRPOSHTA AND PUBLIC AUTHORITIES

Ukrposhta, realizing the social significance of the results of its activities and responsibility to the state as the founder and the sole shareholder, strive to build and maintain persistent, constructive relationships with bodies of authority and local governance, based on the principles of legitimacy, integrity, transparency, professionalism, partnership, partnership, mutual trust, respect and steadfastness of commitment.

To implement the principles of interaction with public authorities Ukrposhta:

- ✓ *does not participate in campaigning, political activity and does not finance political organizations;*
- ✓ *does not provide for the use of assets (premises, office accessories, electronic mail, fax machines, copiers, etc.) for the preparation and distribution of campaign materials, does not provide assets as contributions to political organizations or to candidates for elective office;*
- ✓ *forbids agitating other employees for any political parties or candidates during working hours;*
- ✓ *Provides the information required by law to the extent and in the manner prescribed by law, does not conceal, delay or distort information;*
- ✓ *does not come to arrangements with an economic entity that is wholly or partly owned by a civil servant, a deputy of the Verkhovna Rada or their close relatives, without the prior consent of the Compliance Service;*
- ✓ *avoids inaccurate criticism of public authorities.*

Employees:

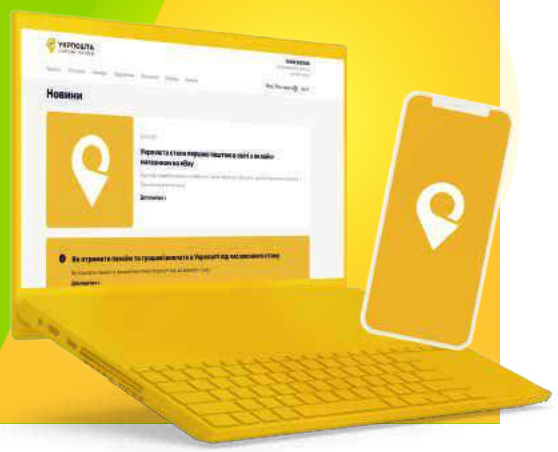
- ✓ *do not use of assets of Ukrposhta (premises, office accessories, electronic mail, fax machines, copiers, etc.) for the preparation or agitation of a political nature or to support their own political activities;*
- ✓ *Inform the immediate supervisor in advance if they plan to hold elected office and discuss with him the possible negative impact of an elected office on official duties;*
- ✓ *ensure that information provided to government officials in connection with a request or investigation is reliable and accurate, and that the Company's legitimate interests are protected.*

21. MASS MEDIA

Ukrposhta constantly cooperates with mass media (hereinafter - media) and build relations on the principles of openness and transparency, speed and readiness for dialogue, observance of high moral and ethical standards of communication.

To implement the policy of interaction with the media, the Company:

- ✓ *designated a corporate communications unit responsible for media relations and the only source of information about Ukrposhta, which uses all available communication channels;*
- ✓ *designated authorized persons of Ukrposhta, who have the right to speak in public on behalf of Ukrposhta in the media and during other events with the participation of representatives of the media, to discuss the activities of Ukrposhta with the media.*



Employees:

- ✓ *avoid any statement or utterance that might be perceived as official position of the Company and affect its reputation;*
- ✓ *do not transmit to the media information and documents, as well as allegations about the Company's current financial position and anticipated financial statements, if not wield appropriate credentials.*

22. BEHAVIOR IN SOCIAL MEDIA

Ukrposhta supports universally recognized democratic values, including freedom of thought and freedom of speech. Therefore, Ukrposhta:

- ✓ *guarantees employees the freedom of expression, including in social media, but such utterances do not cause material or moral harm to the company, customers, employees or shareholders of the company;*
- ✓ *prevent any prosecution for expressing opinions openly;*
- ✓ *may not share the vision of the employees and in such a case shall not be responsible for the expression of the opinion of the employees, who act on their own behalf and have no authority to act on behalf of Ukrposhta;*
- ✓ *does not support and abuse of the right to freedom of thought and freedom of speech are unacceptable for the corporate culture of Ukrposhta, in particular if it is aimed at violating the Constitution of Ukraine, violating the principles of the Universal Declaration of Human Rights, and violating the principles of this Code.*

Ukrposhta supports the principle of responsible use of social media, which provides for:

- ✓ *knowledge of the rules for the use of social media and awareness of the consequences of their*
- ✓ *conscious and appropriate use of social media;*
- ✓ *compliance in the use of social media with laws and other regulations, including on the protection of personal data, the protection of confidential information and commercial secrets;*
- ✓ *avoiding a conflict of interest in accordance with the principles of this Code.*

23. PROTECTION OF INFORMATION

Ukrposhta is responsible for the protection of information:

- ✓ *adheres to the confidentiality rules for information received from third parties (partners, contractors and others);*
- ✓ *prevents the spread of misinformation and the distortion of facts that could harm it, its partners and the country as a whole;*
- ✓ *protects its own information, information is used by Ukrposhta employees solely for the performance of their duties and may be disclosed or passed on to third parties only to the extent and in a manner, that stipulated by current legislation of Ukraine and the internal regulations of Ukrposhta;*
- ✓ *keeps personal data of employees in confidential mode, collection and processing of personal data is carried out in compliance with the requirements of the legislation.*

Employees:

- ✓ *do not disclose internal (insider) information known to them that has not been disclosed in accordance with the legislation, unless this is part of functional responsibilities;*
- ✓ *receive, transmit, store, use and destroy information in accordance with the legislation and internal regulations of Ukrposhta;*
- ✓ *during the period of validity of the employment contract and for a period of five years after its termination, are obliged to respect the confidentiality of the information of the Ukrposhta and its customers and counterparties and to take measures to prevent its unauthorized disclosure;*
- ✓ *do not use computers which are the property of Ukrposhta and service e-mail addresses owned that belong to Ukrposhta for personal purposes not related to the performance of employment (official) duties. Such correspondence cannot be considered as personal correspondence and it is not subject to guarantees of protection of the confidentiality of correspondence.*

24. TRUE RECORDING AND ACCOUNTING

Ukrposhta ensures full compliance of its financial recording and accounting with the legislation of Ukraine as well as with the International Financial Reporting Standards. Ukrposhta strongly opposes any manifestation or attempt of fraud and manipulation

or attempt of fraud and manipulation of its financial accounting or information about such accounting. Ukrposhta should ensure timely disclosure of material financial and operational risks for the benefit of shareholders, investors, employees and the public.

25. POLITICAL AND RELIGIOUS ACTIVITIES

Ukrposhta is not involved in political or religious activities. Employees are prohibited from engaging in political or religious propaganda while performing their work duties and staying on the territory of Ukrposhta facilities.

Employees are prohibited from using the name Ukrposhta, financial, material or any other resources of Ukrposhta for their political or religious activities.

26. FAMILIARIZATION AND LIABILITY FOR FAILURE TO COMPLY WITH THE CODE

Ukrposhta ensures timely familiarization of the employees and all stakeholders with the requirements of the Code, including by making it available at its external and internal websites, as well as informs them about any amendments hereto. All of the Company's employees must be familiar with the Code and are responsible for strict compliance with the provisions hereof. In case is any employee is not familiar with this Code, regardless of the reason, this does not relieve him from the duty to comply with the norms hereof.

Ukrposhta shall take disciplinary measures with respect to each violator of this Code. In particular, Ukrposhta shall make warnings, send warning letters or issue reprimands for minor violations hereof.
Significant or repeated violations hereof may cause a loss or reduction of bonuses or implementation of other measures provided for by the law.

27. SEEKING ADVICE AND REPORTING VIOLATIONS

You may clarify the information about proper interpretation or use of the information included in the Code or report any violations of its requirements by sending a letter to the following E-mail address: *compliance@ukrposhta.ua*

In connection with reporting a violation of the requirements of this Code by the Ukrposhta Employee, termination or coercion to termination, bringing to disciplinary responsibility or implementation of other negative coercive measures (transfer,

certification (recertification), change of working conditions, refusal to appoint such employee to a higher position, salary reduction, etc) is not allowed.