CODE OF CONDUCT

ScienceSoft
Professional Software Development

Letter from CEO

Dear Partners,

We are delighted to welcome you as a valued member of our network and business community. Together, we aim to create solutions that empower businesses to grow, innovate, and succeed by delivering the best technological advancements.

Our partnership is built on shared principles of mutual respect, trust, and a commitment to quality and safety standards. These values are the foundation of everything we do and the key to fostering strong, enduring relationships.

We would like to draw your attention to our Code of Conduct, which outlines our collaboration guidelines. This document represents our core values and sets clear expectations for professionalism, integrity, and mutual respect in all interactions. By adhering to these principles, we can maintain a productive, transparent, and respectful working environment.

Together, we deliver digital success while prioritizing quality, security, and reliability.

Thank you for being part of this journey. We look forward to achieving outstanding results together!

Sincerely,
Nick Kurayev
Chief Executive Officer
ScienceSoft

ScienceSoft's mission and values

ScienceSoft USA Corporation and our subsidiaries (collectively "ScienceSoft", "Company", "we", "us", or "our") believe a strong relationship with our business partners is key to ensuring our mutual success.

The Code of Conduct ("Code") is the basis for doing business with all ScienceSoft's clients, vendors, contractors, consultants, agents, representatives, distributors, employees, and sub-contractors (collectively referred to as "business partners" or "partners").

ScienceSoft's mission is to achieve our clients' goals and ensure project success in spite of time and budget constraints, changing requirements, evolving regulations, and other challenges.

ScienceSoft's key values:

Our partners' and clients' success is our top priority: we strive to solve our clients' problems and actively contribute to the success of their businesses.

Respect for everyone: we promote an environment that is inclusive of all people and their unique abilities, strengths, and differences. We respect diversity in each other, our clients and partners, and all others with whom we interact.

Transparent and honest collaboration: We build trusting relationships with our clients and partners, as well as among our employees and sub-contractors (hereinafter 'specialists').

Encouraging professional growth and development: we encourage and reward our specialists' learning, development, and career advancement, supporting their pursuit of self-improvement.

Caring about health and well-being: we care about the well-being of our specialists and their families, creating conditions for a comfortable and safe work environment.

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Respectful conduct

ScienceSoft promotes a culture of respect among our team and partners.

We treat each other with respect and kindness, just as each of us wishes to be treated, fostering collaboration and building trust. ScienceSoft aims to provide a healthy, safe, and productive work environment free from discrimination and harassment. We recognize and avoid behaviors that may be offensive to others, understanding that cultural, regional, and other differences exist. ScienceSoft complies with laws and respects the traditions of the countries where ScienceSoft operates or visits during business trips.

ScienceSoft does not tolerate disrespectful behavior, offensive, threatening, or degrading words or actions that harm our teams. Harassment in any form—verbal, physical, or sexual — is strictly prohibited in the Company.

We demonstrate respect by:

- **Thinking carefully about our words and actions.**
- **Never saying or doing anything others may find offensive.**
- **Providing fair and respectful feedback.**
- **Speaking up when we see disrespectful behavior.**
- **Always treating others with kindness and acceptance.**

The Company's principles

1 OPEN-MINDEDNESS

Keeping an open mind to ideas and opinions and listening to different points of view.

2 ZERO TOLERANCE FOR OFFENSIVENESS

Standing against offensive messages, comments, and inappropriate jokes that conflict with our culture and harm our team environment.

3 NO INTIMIDATION OR BULLYING

Zero tolerance for intimidation, harassment, or bullying of any kind.

4 FAIR EMPLOYMENT DECISIONS

We base employment decisions solely on business needs, ensuring that personal biases or stereotypes never influence our choices.

If a specialist believes they are a victim or witness of inappropriate workplace conduct, such specialist should speak up and not silence the incident. If the issue is not resolved by the specialists involved, it should be reported to a specialist's manager or the HR/PR department.

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Conflict of interests

At ScienceSoft, we ethically handle conflicts of interest.

A conflict of interest arises when personal interests interfere with the ability to make unbiased decisions for the Company or when an employee's personal interests are inconsistent with those of the Company.

ScienceSoft's employees must avoid situations where our personal interests conflict or appear to conflict with the interests of ScienceSoft.

In any potential conflict of interest situation, a specialist should ask themselves:

- Could my personal interests interfere with the Company's interests?
- Could it appear that way to others, inside or outside the Company?
- When in doubt, a specialist should ask their manager, the HR Department, or the Legal Department.

In all situations, we expect specialists to conduct themselves in an honest and ethical manner and act in the best interest of ScienceSoft.

We support inviting specialists' relatives and friends to apply to the Company. However, such candidates are considered on equal terms with others. Each candidate is selected based solely on their individual merits.

Common situations to avoid

SUPERVISION CONFLICTS: direct supervising someone with whom a specialist has a close personal relationship.

MISUSE OF RESOURCES: using ScienceSoft's time or equipment for personal employment or business interests.

COMPETITIVE INTERESTS: owning or working for a company that competes or does business with ScienceSoft.

UNAUTHORIZED USE: using ScienceSoft's name, logo, trademark, property, or information without approval, even for charitable or community purposes.

All purchases, participation in tenders, and negotiations conducted on behalf of the Company shall be fair, without bribery or favoritism towards anyone.

If a specialist identifies a potential conflict of interest, they shall:

- Inform a specialist's manager, HR, or the legal department promptly. If the conflict is detected early, we can work on a resolution more effectively.
- Recognizing, avoiding, and promptly resolving potential conflicts uphold the integrity and trust essential to our success.

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Data confidentiality and protection

We maintain the security of all confidential information. Confidential information means any private or/and nonpublic information, which is the property of the Company or/and its partner(s) and clients disclosed to the specialists or received by them within the whole period of their work at the Company.

Keeping our clients' and partners' confidential information safe and secure is vital for our success as a Company. We always take appropriate measures to preserve such confidential information and have an ISO ISO 27001-certified security management system in place, according to which we protect our clients' intellectual property, project environments, and IT assets we access.

To protect our confidential business information, we and any specialist shall:

- Never leave confidential information where others can see or access it.
- Access and store confidential information only on the devices approved by the Company.
- Never discuss confidential information in public.
- Ensure confidential information is always secure, even at a specialist's office desk.
- Dispose of all confidential information according to the Company's policies.

We take all necessary legal, organizational, and echnical measures to protect our corporate nfrastructure and the information it processes from cyber threats.

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Partner and client data privacy

ScienceSoft respects the confidentiality of all its partner and client information and never discloses it inappropriately. We comply with all applicable laws governing data protection and data processing.

If we need to collect personal data from our partners for business purposes, we handle such data according to high ethical standards and applicable data protection laws. We take the following measures, among others, to protect our partners' personal records or/and data.

- **Authorized Access:** only those with appropriate authorization may access personal data records.
- **Legitimate Collection:** we collect and access records only for legitimate business purposes.
- **Confidentiality:** we keep personal data in strict confidence in accordance with data protection legislation. We never share employee personal data without explicit permission outside of the Company's business operations.

Other data security measures we employ in our projects include but are not limited to:

- Deleting customers' data from our ecosystem as soon as it is no longer needed for the project's purposes.
- Securing project environments with VPN tunnels, using secure corporate devices, including the ones with encrypted disks and secure virtual machines, using separate secure code repositories for each project, and more.
- Evaluating the security of customers' IT assets, including conducting penetration testing, social engineering testing, and security audits.

If a specialist's job involves access to others' personal data, such specialist shall use such personal data only to the extent necessary to perform their duties in accordance with the Company's instructions based on data protection legislation. When processing personal data, such personal data shall be anonymized whenever possible to minimize risks.

Personal data shall not be disclosed to anyone who does not have a legitimate need to know, whether within or outside of ScienceSoft, during or after cooperation with the Company.

If a specialist mistakenly receives any personal data or if they suspect that any personal data has been misused, lost, stolen, or accessed inappropriately, such specialist shall report it immediately to the Data Protection Officer.