

ETHICAL POLICY

The purpose of this Policy is to promote honesty, ethical conduct and fair affairs within the Company and in its interactions with the outside world.

The standard for ethical conduct expected from our employees is compliance with current laws and regulations. Employees are expected to be aware of this Policy at all times and to act and work within its boundaries. Each employee is expected to take appropriate decisions and have common sense to comply with Company laws and current regulations, and to seek advice from department managers on the issues they are unsure. Breach of any terms of this Policy may result in legal proceedings, including dismissal.

In addition, the following policies/principles are part of this Policy.

• Anti-Corruption

Employees shall not offer, promise or pay bribes to any foreign, local or local administration and/or public officials, or shall not demand, receive or accept bribes from any foreign or local government and/or public officials, or in other words, violate existing laws regarding anti-corruption and anti-bribery. Bribe is giving or offering anything of value (including, but not limited to, cash, gifts, meals, entertainment, employment opportunities, company products, and employment offers) to administration and/or public officials to influence their discretion.

• Books and Records

Accurate information is essential for meeting the company's legal and regulatory obligations. All employees must accurately and honestly record all information. All Company Records must be maintained in accordance with current regulatory standards.

• Competition

The Company strives to follow the high standards of competition law, avoiding deviating from the principles of fair competition and avoiding anti-competitive behavior.

• Confidentiality

The Company and its employees take adequate steps to ensure the confidentiality of proprietary information belonging to the Company and/or third parties (including their customers, process licensees, service providers, and suppliers) provided to them. Such information shall only be disclosed under existing agreement or law.

• Employment

The Company undertakes to ensure that all employees and applicants are treated regardless of their race, color, national identity, gender, age, marital status, disability or legally protected characteristics. The Company believes that providing a healthy, safe, secure, challenging and opportunistic working environment will increase the development and productivity of employees. The Company does not tolerate any conduct that harms, disrupts or disturbs other people's ability to do business.

The Company respects core values arising from existing laws and contractual agreements, such as the right to organize, union membership, and community engagement. The Company follows all applicable laws for employee welfare, including those related to health and safety, working hours, wages and disciplinary actions. The Company does not provide child labor or forced employment in any way.

• Health and Safety

The Company definitely undertakes to provide a healthy and safe working environment for individuals, customers, subcontractors, business partners and those affected by its operations.

• Conflict of Interests

Employees shall refrain from any activity or situation where their personal interests appear to harm or impair the best interests of the Company.

• Gifts

The use of the Company's assets and funds to provide gifts, donations or other benefits to persons, subcontractors, customers and/or other persons doing or wishing to do business with the Company is prohibited, except to the extent permitted by applicable law and where it is customary and acceptable under the circumstances.

Employees shall not accept gifts, donations or benefits from subcontractors, customers and/or other persons doing or wishing to do business with the Company, except to the extent permitted by applicable law and where it is customary and acceptable under the circumstances.

• Subcontractor Supply Chain

All subcontractors and supply chain partners are expected to comply with the essential and material provisions of this policy.

The Company reserves the right to modify, amend or terminate this policy at any time.

General Manager

Dikran ACEMYAN

