CODE OF CONDUCT

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GTEOM Group

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GTEOM Group OÜ's Code of Conduct

At GTEOM Group OÜ, we are committed to conducting our business with integrity and transparency. We hold ourselves to the highest standards of ethical behavior and expect the same from our employees, partners, and suppliers. Our Code of Conduct outlines our expectations for conduct and behavior, and we expect all individuals associated with GTEOM Group OÜ to adhere to these standards.

- Compliance with laws and regulations GTEOM Group OÜ and its employees must comply with all applicable laws and regulations in the countries in which we operate. We expect our employees to act with integrity and not engage in any activity that violates the law.
- 2. Conflict of interest Employees should avoid conflicts of interest or the appearance of conflicts of interest. Any potential conflicts of interest should be disclosed to management.
- 3. Fair competition GTEOM Group OÜ is committed to fair competition and we will not engage in any illegal, unethical, or anti-competitive behavior. Employees must follow all laws and regulations related to competition.
- 4. Discrimination and harassment GTEOM Group OÜ is committed to providing a safe and respectful workplace for all employees. We do not tolerate discrimination or harassment in any form, including but not limited to race, gender, age, disability, religion, sexual orientation, or national origin.
- 5. Confidentiality and data protection GTEOM Group OÜ and its employees must protect the confidentiality of the company's proprietary information and any sensitive data that we handle. We are committed to protecting the privacy of our customers, partners, and employees.
- 6. Gifts and entertainment GTEOM Group OÜ prohibits employees from accepting gifts or entertainment that could influence business decisions or create the appearance of impropriety.

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- 7. Health and safety GTEOM Group OÜ is committed to providing a safe and healthy workplace for all employees. We expect employees to follow all safety policies and procedures.
- 8. Environmental responsibility GTEOM Group OÜ is committed to minimizing our impact on the environment. We expect our employees to follow all environmental policies and procedures.
- 9. Reporting of concerns GTEOM Group OÜ encourages all employees to report any concerns regarding potential violations of this Code of Conduct, or any other unethical or illegal behavior. Employees may report concerns without fear of retaliation.

GTEOM Group OÜ expects all employees, partners, and suppliers to comply with this Code of Conduct. Any violation of this Code of Conduct may result in disciplinary action, up to and including termination of employment or contract.

Effective Date: 23/04/2023