



Approved by Joint organization
members meeting of
GREEN COOL LTD
02.02.2023
Vinnytsia, Ukraine

Business Ethics Policy

1. Purpose and Scope

LLC GREEN COOL is committed to upholding the highest standards of business ethics and integrity in all its operations. This Business Ethics Policy defines the principles guiding our ethical conduct and outlines the expectations for all individuals and entities associated with our company.

2. Relevant Business Ethics Topics

To ensure transparency and uphold our values, LLC GREEN COOL addresses the following ethical topics:

- **Anti-Corruption and Bribery:** Our company maintains a strict zero-tolerance policy for all forms of corruption and bribery, including facilitation payments and illegal benefits(Code).
- **Fraud Prevention:** We implement measures to detect and prevent fraudulent activities within our business operations(Code).
- **Conflict of Interest:** Employees and management must avoid situations where personal interests conflict with their professional duties. Potential conflicts of interest must be disclosed to the Compliance Officer(Code).
- **Anti-Competitive Practices:** We strictly adhere to antitrust laws, avoid price-fixing, and prohibit unfair competitive practices to maintain a fair marketplace(Code).
- **Confidentiality and Information Security:** Employees are responsible for safeguarding the company's confidential information, as well as that of our clients and partners, and must follow data protection regulations to ensure security(Code).

3. Applicability

This policy applies to **all employees, management, board members, suppliers, contractors, and consultants** who are involved in LLC GREEN COOL's business activities. We expect each party to adhere to this policy as a fundamental component of their relationship with our company.

4. Accountability and Responsibility

The **Compliance Officer** holds primary responsibility for implementing and overseeing this policy. Additional roles include:

- **Managers and Department Heads:** Responsible for ensuring team compliance and reporting potential issues.
- **Legal and Compliance Departments:** Tasked with providing guidance on ethical matters, managing compliance training, and addressing concerns raised by employees and other stakeholders(Code).

5. Commitments

LLC GREEN COOL is dedicated to the following ethical commitments:

- **High Ethical Standards:** We pledge to conduct our business with integrity, transparency, and in full compliance with all applicable laws and regulations (Code).
- **Continuous Improvement:** We regularly assess and improve our ethical practices, offering training and resources to educate our team and stakeholders.
- **Open Communication:** Employees are encouraged to raise concerns about ethical matters without fear of retaliation. Concerns can be directed to immediate supervisors, the Compliance Officer, or submitted anonymously via designated channels(Code).
- **Transparency in Relationships:** We carefully vet our business partners, working only with those who align with our ethical standards and values (Code).

By adhering to this Business Ethics Policy, LLC GREEN COOL demonstrates its commitment to responsible business practices, integrity, and respect for all individuals and entities it engages with. This policy will be reviewed periodically to ensure alignment with evolving ethical standards and regulatory requirements.