

THE HEAD(CEO) OF "MAVI SOLUTIONS" LLP»
BOTEY M. M.



CODE OF BUSINESS ETHICS
MAVI SOLUTIONS LLP»

ALMATY, 2021

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Introduction

This Partner Code of Ethics and Business Conduct (“Code”) is applicable to us as an Oracle Partner, our resellers, and all personnel employed by or engaged to provide services to us (either “Partner” or “us”), regardless of where we are doing business. Oracle Corporation and its subsidiaries (“Oracle”) require that we comply with all applicable laws, regulations, and this Code. We must have a written company Code of Ethics and Business Conduct that, at a minimum, incorporates the requirements of this Code and the laws applicable to our business. As an Oracle Partner, we are expected to make our Code available, conduct periodic training programs, and conduct periodic reviews for our employees to ensure they are complying with both our code of conduct and Oracle’s Partner Code of Ethics and Business Conduct.

Compliance with laws, regulations, and business practices means not only observing the law, but also conducting corporate business in a way that recognizes our ethical responsibilities and fulfills them. Where local laws are less restrictive than this Code, we must comply with the Code, even if our conduct would otherwise be legal. On the other hand, if local laws are more restrictive than the Code, we must always, at a minimum, comply with those laws. We maintains open and frank business dealings with all Partners and strives to develop mutually advantageous relationships. We expects to adhere to high ethical standards and to avoid engaging in any activity that involves even the appearance of impropriety.

1. Purpose of the Code

1.1. This Code of Business Ethics (hereinafter referred to as the Code) is developed in accordance with the provisions of the legislation of the Republic of Kazakhstan, and establishes the fundamental values and principles of business ethics.

1.2. The Code of Business Ethics is a management tool for the development of Mavi Solutions LLP (hereinafter referred to as the Company) and effective interaction with stakeholders based on compliance with ethical standards and the norms of the legislation of the Republic of Kazakhstan.

1.3. An important part of the Code for gaining a reliable reputation is the creation of an atmosphere of trust and the implementation of a unified strategy. To this end, the Company pursues a policy of securing and attracting highly professional and responsible employees who want to work in the Company and achieve success in it; employees who are close and understand the basic principles of corporate rules and

the spirit of the Company and who are able to create an atmosphere of belonging to corporate values, traditions, and the style of established relationships. Maintaining the image and high business reputation of the Company, among other things, contributes to the mandatory business style of communication and the appearance of employees.

1.4. The purpose of this Code is to ensure a high level of corporate governance, professional and business ethics necessary for the implementation of strategic goals and objectives defined by the Charter and other internal documents of the Company.

2. The following concepts and terms are used in the Code:

2.1. Business ethics is a set of ethical principles and norms of business communication that guide all participants in the Company's corporate relations in their activities;

2.2. Interested person – a person whose rights, provided for by the legislation and the Charter, are related to the Company's activities;

2.3. Conflict of interest – a situation in which the personal interest of a participant in the Company's corporate relations affects or may affect the impartial performance of official duties;

2.4. Corporate culture – Company-specific values, principles, norms of behavior and attitudes;

2.5. Employee – a person who is in an employment relationship with the Company and directly performs work under an employment contract;

2.6. Participant of corporate relations – officials, employees of the Company, interested parties.

3. Values and principles of business ethics

3.1. The fundamental values on the basis of which the Company's activities are formed are the integrity, reliability and professionalism of its employees, the efficiency of their work, mutual assistance, respect for each other, for interested parties and society as a whole.

Ensuring positive results of work is possible if each employee observes the behavior corresponding to high standards and universal values.

3.2. The Company is guided by the following principles of business ethics:

- honesty;
- mutual respect;
- trust;
- justice;
- conscientiousness;
- transparency;
- responsibility.

3.3. In carrying out its activities, the Company:

3.3.1. complies with the norms of the legislation of the Republic of Kazakhstan, state bodies, and other documents related to the Company's activities;

- 3.3.2. ensures the observance and respect of human rights;
- 3.3.3. acts fairly and in good faith, does not accept bribes and similar vicious business practices, as well as the practice of giving and receiving gifts;
- 3.3.4. treats officials and employees fairly, with respect and compliance with ethical standards;
- 3.3.5. strives to ensure that all its relations with interested parties are mutually beneficial;
- 3.3.6. takes care of the environment.

4. Officials and employees

- 4.1. Officials and employees undertake to perform their professional functions in good faith and reasonably with due care and discretion in the interests of the Company, avoiding conflicts.
- 4.2. Responsibility for the assumed obligations equally lies with all officials and employees, regardless of their status and position.
- 4.3. In order to achieve the Company's strategic goals, the Company's officials make business decisions taking into account the fundamental values and principles of business ethics, and are fully responsible for the implementation of the tasks assigned to them.
- 4.4. The Company's officials and employees must make every effort to perform highly professional work, take care of the Company's property, and use it efficiently and effectively.
- 4.5. Officials and employees of the Company should contribute to the creation of a stable and positive environment in the team by their attitude to work and behavior.
- 4.6. Each employee and officials should be guided by the interests of the Company, and not by personal relationships or personal benefits in the performance of their official duties. It is forbidden to use the Company's resources to support or extract personal benefits for the official or employee, as well as their friends or relatives. It is forbidden to enter into business relations with friends or relatives.
- 4.7. Officials and employees should avoid any actual or perceived conflicts of interest, and avoid situations in which actual or perceived conflicts of interest may arise, either in relation to themselves (or related persons), or in relation to others.
- 4.8. When applying for a job in the Company, it does not allow any discrimination on any grounds. Recruitment and promotion of personnel is carried out solely on the basis of professional abilities, knowledge and skills.
- 4.9. The Company creates equal conditions for professional development of employees at all levels, appreciating employees who strive for self-education and professional development in accordance with the internal documents of the Company.
- 4.10. The Company is not allowed to grant any privileges and benefits to individual officials and employees except on a legal basis, with the mandatory provision of equal opportunities for all.
- 4.11. The Company's employees should be guided by generally accepted standards of ethics, morality and behavior in the course of their activities.
- 4.12. Decisions made by the Company's officials should be based on the principles of transparency and adequacy. Officials provide each other with reliable information in a timely manner, without violating confidentiality standards and taking into account the Company's internal documents.
- 4.13. Officials are obliged to immediately inform the Company's Board of Directors of any commercial or other interest (direct or indirect) in transactions, contracts, projects related to the Company, or in connection with other matters in accordance with the procedure provided for in its internal documents.

4.14. Officers are required to duly and promptly to notify the Company's management on the performance of work and/or position (s) in other organizations, the change permanent (main) place of work (office, business, etc.).

4.15. Officials should promptly inform the Company and not to participate in the discussion and voting on issues which are of interest.

4.16. Officials and employees of the Company are not entitled to accept:

- for the performance of their functional duties, remuneration in the form of money, services and other forms from organizations and individuals in which they do not perform the relevant functions;
- gifts or services in connection with the performance of their functions, or from persons dependent on them for work, with the exception of symbolic signs of attention and symbolic souvenirs in accordance with generally accepted norms of courtesy and hospitality, or during protocol and other official events.

4.17. Employees of the company undertake not to disclose commercial, official and other secrets protected by law, as well as to comply with the rules and procedures related to the security regime.

4.18. Officials and employees of the Company must:

- respect the honor and dignity of a person and citizen, regardless of origin, social, official and property status, gender, race, nationality, language, attitude to religion, beliefs, place of residence or any other circumstances;
- respect the symbols of the state – Coat of arms, Flag, Anthem;
- respect the corporate symbols;
- observe generally accepted moral and ethical norms, respect the state and other languages, traditions and customs of all peoples;
- observe the corporate style of clothing and monitor the appearance (wearing a certain uniform or freely choosing a business uniform);
- observe labor and performance discipline;
- be polite, correct, friendly and welcoming;
- be intolerant of indifference and rudeness;
- always thank you for your assistance, even if it is not fully provided;
- be attentive to other people's opinions;
- to ensure the unity of word and deed, to fulfill promises;
- do not hide / admit your mistakes.

4.19. Any situation leading to violation of the rights of officials and employees must be considered in accordance with the legislation of the Republic of Kazakhstan and the internal documents of the Company.

4.20. For questions concerning the provisions of the Code and/or ethical issues that have arisen in the course of work, as well as for facts of corruption and other illegal actions, officials and employees of the Company have the right to contact the General Director. At the same time, their rights should not be infringed in the event of such treatment.

4.21. When resolving the current situation at the workplace, the Company is guided by verified facts and reliable information.

5. Relations with government agencies and institutions

5.1. The Company carries out relations with state bodies and institutions in accordance with the requirements of the legislation of the Republic of Kazakhstan, the Charter and internal documents of the Company on the basis of the independence of the parties. The Company does not allow attempts to influence the decisions of state bodies.

5.2. **Improper Payments, Money Laundering, and Economic Boycotts**

We cannot offer or pay bribes. We are prohibited from offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage for Company or ourself. The Foreign Corrupt Practices Act (FCPA) and other similar international anti-corruption laws outlaw bribery. Penalties for violating these laws are severe and can include prison time and large fines for individuals.

Company also prohibits all forms of money laundering, which involves disguising, channeling unlawfully obtained money, or transforming such money into legitimate funds

The above prohibition applies to

-Government and public sector, which includes public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials

-Political parties or candidates for political office

-Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials

-Privately held commercial companies and their employees

-Company employees

- Any other third party

Company prohibits giving money or anything of value directly or indirectly to a government official or employee of a state-owned enterprise, or to the spouse, significant other, child, or other relative of any such person, for the purpose of influencing or rewarding an action or decision of the government or public sector employee or official or to gain any improper advantage for Oracle. "Anything of value" is intended to be broad and covers not only money, but also gifts, lavish or excessive entertainment, funding of personal travel such as sightseeing, contributions to charity, and employment opportunities. Oracle also prohibits facilitation or facilitating payments, which are payments to an

official to speed up or expedite routine government actions, including processing and approving applications and permits. We must not participate in any economic boycott not sanctioned by the KZ Government. We must not provide information that could be construed to support any such unsanctioned boycotts.

5.3. Lobbying of Government Officials

We must not pay or enter any agreement to pay, directly or indirectly, a contingent fee to any party for the purposes of obtaining a government contract or influencing government action. You may not receive any contingent fees or participate in any influence/referral fee program on any transaction involving a government or public sector end user (this includes, but is not limited to, public higher education, public healthcare, and utility entities). There are additional policies that govern the methods in which Company is allowed to compensate its Partners, particularly for those transactions that involve government or public sector employees and officials.

If we are selling or offering to sell commercial products to the KZ Government, we should be familiar with and must ensure compliance with the laws and regulations concerning the sale of commercial products and sales to government and, if applicable to Company, the Multiple Award Schedule (MAS) contracting regulations of the General Services Administration (GSA).

Lobbying is generally any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, however, the legal definition of “lobbying” can also cover procurement and business development activity.

We are responsible for understanding when our activities may legally be considered lobbying in a particular jurisdiction and for complying with all applicable laws

We may not lobby government on behalf of Company. Government relations consultants/lobbyists retained by us may not be used by Company, and we may not use Company’s consultants/lobbyists for any such purpose

5.4 Trade Compliance Laws and Regulations

United States global trade laws and regulations govern all imports, exports, re-exports, and use of US origin commodities and technical data, wherever located. Oracle requires that we comply fully with all applicable US and global trade laws and regulations. Failure to comply could result in the loss or restriction of our or Oracle’s trade privileges. Violation of these laws and regulations may also result in fines and imprisonment. We are responsible for understanding how the global trade laws and regulations apply and

for conforming to these laws to ensure no technology, data, information, program, and/or materials resulting from services (or direct product thereof) will be imported or exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws and regulations.

5.5 Conflicts of Interest

The term “conflict of interest” describes any circumstance that could cast doubt on our ability to act with total objectivity with regard to the distribution of Oracle products and services. Oracle wants its Partners’ loyalty to be free from any conflicts of interests. Conflict of interest situations may arise in many ways. If you feel that you have an actual or potential conflict with Oracle or any of its employees, we must report all pertinent details to Oracle.

5.6. Contracting

Oracle expects we and our employees to compete fairly and ethically for all business opportunities. Our employees who are involved in the sale or licensing of products/services, the

negotiation of agreements, or the delivery of services to Oracle and/or Oracle's customers are expected to understand and honor the terms of contractual agreements. We must ensure that all statements, communications, and representations to customers are accurate and truthful as they relate to Oracle.

6. Relations with business partners

6.1. The Company interacts with business partners on the principles of mutual benefit, transparency and full responsibility for the obligations assumed in accordance with the terms of the contracts.

6.2. The Company complies with the terms of contracts/agreements with business partners and fulfills its obligations towards them.

6.3. The Company selects suppliers of goods, works and services, in accordance with the legislation of the Republic of Kazakhstan, offering the lowest prices, the best quality, terms of delivery of goods, works and services, and enjoying a good reputation.

6.4. The Company does not allow the provision of unjustified benefits and privileges to business partners in its activities.

6.5. Antitrust and Competition Laws.

Compliance with antitrust or competition laws is required at all times. Therefore, we must not agree with any competitors to **(i)** fix or control prices, either by agreeing directly with a competitor or any other method, such as through third parties; **(ii)** structure or orchestrate bids to direct a contract to a certain competitor or reseller (bid rigging), including abstaining from bids or submitting noncompetitive or "courtesy" bids; **(iii)** boycott suppliers or customers; **(iv)** divide or allocate markets or customers; or **(v)** limit the production or sale of products or product lines.

7. The company and the public

7.1. The Company is aware of its social responsibility to society.

7.2. The Company strives to have a positive impact on the solution of socially significant issues.

7.3. The Company strives to serve the public, supports programs aimed at improving the level of knowledge and education, and other social programs.

7.4. The Company considers itself as an integral part of the social environment in which it operates and with which it seeks to establish strong relationships based on the principles of respect, trust, honesty and fairness.

7.5. The Company strives to create new jobs and improve the professional skills of employees, in accordance with the approved plans.

7.6. The Company strives to establish constructive relations with organizations (public, non-governmental and others) in order to improve public relations, improve the environment and ensure the safety of life.

7.7. The Company undertakes to refuse to cooperate with legal entities and individuals with a dubious reputation.

8. Responsibility

8.1. Each employee is responsible for compliance with ethical standards within the framework of their behavior.

8.2. Compliance with the provisions of this Code is mandatory for all officials and employees of the Company.

8.3. Violation of the provisions of this Code entails disciplinary liability in accordance with the established procedure.