

"TECHPRO DC" LTD


**CODE OF CONDUCT
AND
BUSINESS ETHICS**

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 TECHPRO DC	<i>Techpro DC Ltd</i>			Notes:
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"Techpro DC" Ltd Code of Conduct and Business Ethics				

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CODE OF CONDUCT AND BUSINESS ETHICS AND OUR GOVERNING PRINCIPLES

Overview

Techpro DC Code is an integral part of our business within the Company and is a useful handbook that governs the conduct that is expected from us during our day-to-day operations. The Code, which guides us in making sound and ethical decisions, and provides the guidelines for addressing issues or concerns as needed, helps the Techpro DC to maintain its Company values and standards of ethical and legal business conduct, as well as attain the company's future prospects. Compliance with the Code's principles helps us to gain the confidence of our colleagues, customers, suppliers, business partners, local communities, and governments. We all must follow the instructions and directions of this Code. The principles of this Code apply to all employees, responsible employees, directors and contractors irrespective of whether they are working on behalf of Techpro DC or its subsidiaries and affiliates. In addition, we expect that our suppliers, agents and business partners will follow the same set of principles while working for Techpro DC or its affiliates. Nobody may waive any of the provisions of this Code without the prior approval of the Chief Legal Advisor, unless otherwise stated.

Sincerity


Techpro DC business is characterized by sincerity, transparency, and responsibility. Conscientious work is crucial to maintaining trust and confidence between us and our customers, partners, and employees. This requires trust and confidence in the transparency of business activities as well as belief in protecting the confidentiality of individuals and corporate assets. Creating a transparent environment for business activities is a key. Techpro DC Code of Business Ethics is company's promise to act on the principle of integrity and trustworthiness in our operations and relationships in the market. We expect the Company to be governed by the principles set forth in this Code. Everyone, starting from company's management to each and every Techpro DC employee, will be responsible for meeting these standards. The Code of Business Ethics reflects our company's commitment to conduct our business activities in a responsible way.

Cultural behavior

Techpro DC Code of Conduct should be applied in respect of human rights, fair business environment and safe working environment, including any processes that Techpro DC is involved in. The Code of Conduct provides the following:

- Everyone is free to peacefully and legally join to employees' associations of their choice and has the right to collective bargaining;
- Techpro DC does not accept use of child labor;



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- c. No person shall be subjected to discrimination based on their race, color, sex, sexual orientation, marital status, pregnancy, parenting status, religion, political opinion, nationality, ethnic origin, social background, social status, nationality, physical or other disability or any other feature protected by law.
- d. Techpro DC must be fair with our suppliers of products and services and work with honest and fair suppliers.

Respect for the Code of Conduct and its promotion is a commitment of every Techpro DC employee and ensuring that Techpro DC employees are treated in accordance with this Code of Conduct is the responsibility of each Techpro DC division and company, as well as its management. Suppliers and their subcontractors are required to comply with the Code of Conduct and confirm this compliance.


Dress code

- a. Simple and tasteful attire is preferable;
- b. Clothing should not hinder your work;
- c. Clothing should not cause irrelevant questions or distract from work;
- d. Remember, attire will also affect customers' opinions about us;
- e. Work attire should not cause irritation of or unserious notion from clients and employees;
- f. Restrain from wearing clothing with meaning that you do not understand;
- g. Clothing also protects you, so you may need to take the necessary precautions if you could get an injury during work without proper clothing;
- h. Showing up every day to work in a new (washed) shirt (form) demonstrates that you are a neat person, don't forget that the odor of sweat that comes from you disturbs both your customers and your colleagues;
- i. The Techpro DC's work attire creates a team spirit, meeting a client in an official form leaves a serious impression about us;
- j. It is forbidden to come to work in clothing bearing titles or logos of the Techpro DC's competitors.

Confidentiality and protection of company assets

- a. Personal and confidential information refers to information that may result in putting the Techpro DC's competitiveness in a disadvantaged position, trade secrets, open to public financial and other types of information, employee's personal information, and information provided under "confidentiality agreements" with third parties.
- b. As Techpro DC employees, it is of great importance to protecting the secrets of our customers, employees and other related parties and companies and their privacy. Techpro DC protect confidential information about the operations of Techpro DC, use it for Techpro DC purposes and share it with relevant authorized parties only.
- c. It is strictly prohibited to conduct secret bargaining or obtain the financial or commercial advantages by disclosure of confidential information pertinent to the Techpro DC. After completing activities in the company, it is prohibited to take any confidential documents, projects, normative and legal acts, etc., which were assigned beyond the scope of our duty.



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- d. Techpro DC has extensive resources, including physical assets, company secrets, and intellectual property. Employees are responsible for protecting the Techpro DC's property, assigned to them and have to assist in protecting the assets of Techpro DC in general. For this, knowledge and understanding of the security instructions of Techpro DC. Everyone should be vigilant and report any loss of property or threat to loss of property of Techpro DC immediately to your immediate supervisor or to the Techpro DC Security Department.
- e. Intellectual Property covers various types of property, such as computer applications, technical documentation, and inventions. Certain intellectual property rights are or may be subject to copyright, patent right, trademark law and other similar protection rights. Intellectual property is the most important asset for Techpro DC and should be treated with the utmost care. You must comply with the guidelines for safeguarding these valuable assets and, when in doubt, you should refer to these guidelines. Intellectual property created by Techpro DC's employees during the performance of their duties goes to and belongs to Techpro DC based on law and/or employment contract or other agreement, taking into account the international conventions, laws and exceptions mentioned in the contract made with Techpro DC.

Conflicts of interest

- a. Employees of Techpro DC, take the responsibility to prevent the situations and relationships that lead to conflicts of interest. Using current position to make any profit either personally or through family members and relatives through individuals or companies that we build business relationships is strongly prohibited. There must not be any engagement in any business activity outside of Techpro DC's operations aimed at personal financial gains that result or may result in the conflict of interests. We do not use either the name of Techpro DC, nor the influence of Techpro DC for the sake of personal gain.
- b. In the event of a potential conflict of interests, employees accept these methods when they believe that the interests of the parties concerned can be safeguarded legally and ethically. In case of hesitation, we discuss the situation with our supervisors and the Human Resources Department.

Our responsibilities


In addition to legal obligations, company emphasizes huge importance to the fulfillment of the following responsibilities to our customers, employees, suppliers and business partners, competitors, the public and humanity in the name of Techpro DC.

Our legal responsibilities

We carry out our internal and international operations and procedures in accordance with the laws of the United Kingdom and international laws; we provide accurate, complete, clear and timely information to all regulatory authorities and agencies.

During the implementation of all operational and procedural guidelines, Techpro DC seeks no profit from any government agencies and organizations, administrative bodies, non-governmental organizations, or



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political parties and maintain equal distance in relation to all of them; we fulfill our commitments in responsible manner.

Responsibilities to our customers

Techpro DC is guided by a customer satisfaction, meeting customer needs and requirements in a timely and appropriate manner. Techpro DC delivers services in a timely manner and on the principle of loyalty; customers are to be treated with respect, honesty, fairness, equity and courtesy.

Responsibilities to our employees

Techpro DC is committed to treating its employees honestly and fairly, enabling them to exercise their rights fully and in good faith, providing them with non-discriminatory, safe, and healthy working conditions. It makes the necessary effort to create opportunities for employees; supports through social awareness their exercising of relevant social and public activities on their own initiatives; ensures that their personal lives and their professional lives are respected and balanced.

Responsibilities to our suppliers and business partners

Partners Techpro DC works with are to be treated respectfully and fairly and ensure that all commitments are fulfilled on time, confidential information received from individuals and legal entities and business partners must be carefully protected.

Responsibilities to our competitors

Techpro DC effectively competes only in areas that are legitimate and ethical and avoids unfair competition. Company supports all the efforts of the community to build a sustainable, competitive structure.

Responsibilities to community, society, and environment

Techpro DC is sensitive and respectful to the traditions and culture of all countries, where we implement international projects.

Responsibilities on behalf of our brand

Business partners and customers rely on Techpro DC professional competence and honesty. Techpro DC strives to keep our reputation at the highest level.

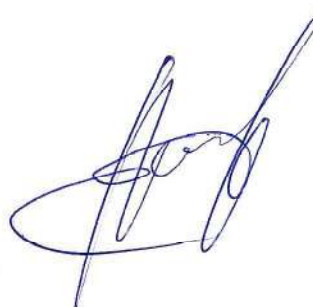
Techpro DC offers its services within the company's policies, professional standards, commitments, and ethical codes and ensure the fulfillment of all commitments.


Work with clients, business partners and employees who meet the truthfulness and legitimacy criteria. Techpro DC aims to avoid co-operation with parties that harm public morals, the environment, or the public health.

In front of the public and audiences, who may think that employees speak on behalf of our company, only the company's opinion must be expressed, not personal opinion.

When it comes to the challenges facing Techpro DC, employees are first to follow the relevant technical and administrative consultation procedures and consult with related departments.

In cases where encountering complicated situations that puts Techpro DC at risk, employees are to consult with the appropriate personnel following technical and administrative consulting procedures.



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POLICIES SUPPORTING CODE OF BUSINESS ETHICS

Conflict of Interests Policy

Techpro DC employees are required to avoid real or potential situations and relationships that may lead to conflict of interests. Employees are therefore responsible for avoiding the use of resources, name, reputation and power for personal gain and situations that may have a negative impact on the company's reputation and image. The following procedure rules illustrate the situations or relationships, which could lead to conflict of interests facing employees in process of performing their duties or during certain business relationships and reflects the principles that employees should comply with in such cases.

Activities that may lead to conflict of interests

All employees of the company are required to act in accordance with the situations defined as activities that may lead to conflict of interest and the following principles below. The company strives to motivate its employees to be committed to these principles.

Engaging in activities that may lead to conflict of interests


Employees may not attempt to establish business relationships with family members, friends or third parties offering mutual or unrequited profit. For example, an employee with a procurement authority must not conduct business relationships with a supplier that employs his/her family member. In exceptional circumstances, the company's chairman's knowledge and approval is required. Similarly, employees of the company should be careful not to allow possibility of conflict of interests, if they have a family member working in the rival company. Employees of the Techpro DC may not perform direct or indirect activities that require their registration entrepreneurs. Employees may work for third parties during after or during the working labor legislation for payment or in return for similar profits, provided that such activity:

- Does not lead to any conflict of interests between their current position in the company they are currently working in and other activities.
- Complies with other business ethics codes and other policies that support these codes.
- Does not have a negative impact on employee's ability to work for the company and is implemented with written permission of the management. This permission is granted by the CEO of Techpro DC upon the recommendation of the immediate supervisor.
- Managers with employment decision powers may not hire their spouses, close relatives, or their relatives.
- Employees can make public speeches and write academic articles, without being in contrary to company policies, in matters not related to the company and its activities. The CEO's permission is required to use the company name for such activities.
- Employees can offer material or non-material donations to third parties for activities outside of company and can be active in charitable organizations.

Violation of work ethics

Actions that result in damage to the company due to employee's abuse of his/her position for the sake of his/her own interests or interests of his/her relatives are impermissible.



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Employees may not directly or indirectly derive personal profits from contracts or sales-related activities made by the company.

Employees may not engage in activities or behaviors that are illegal or in conflict with ethical rules or company disciplinary rules.

Use of resources

The company's interests should be considered when using the company's name or resources. The Company's material assets, resources and personnel cannot be used for any reason or on behalf of any person or his/her interests outside of the Company's operations except for the interests of the company. All personnel should demonstrate commitment to the principle of "saving all resources".

Proper use of resources in the interests of the company also makes the proper use of time more relevant. Employees of the company should use their time during the work hours effectively and not spend time in personal affairs.

In principle, it is not recommended to invite guests and make personal appointments during work hours. Employees should meet and interview important visitors according to the subject of visit within a reasonable time without disrupting the workflow.

Communicating with persons or organizations that company has business relations with

It is not allowed to establish personal business relationships with companies, contractors or suppliers, and other persons or entities that the company has commercial relations with and take personal debts or accept goods or services from them. It is not allowed to give personal loans in cash or in the form of goods or services to other persons or entities that have commercial relationships with company.


The following factors should be considered in relations with customers:

- no transaction can be made without informing and receiving the authorization of customer, even if it is in the customer's interest.
- the weak points of the customer may not be exploited, and no profit may be made by providing incomplete or inaccurate information to the customer, even if it is in the company's interest.
- the Company's employees may not demand gifts from any person or company they establish a business relationship, nor indirectly hint to this end, they may not accept any donations, any gifts, money, coupons for tickets, property, free recreation, special discounts, etc., which may put the company under obligation. No personal assistance or donations may be accepted from any person or company that established business relations with the company. In the event of occurrence of such situations, the Receiving and Giving Gifts Policies shall be followed.

Relations with media

All activities regarding media relations should be in line with the company's Communication Protocol. The company management authorization is required to make comments or give interviews to any media organization, to participate in seminars, conferences and so on as a rapporteur. No personal gain should be obtained from such activities.



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Confidentiality policy

- Information is one of the most important assets to be used in achieving Techpro DC's vision. In this regard, using the information effectively, sharing it properly, and ensuring its confidentiality, completeness and accessibility in this process are the common responsibilities of all our companies and employees.
- Compliance with the management systems and processes implemented in the field of data management and privacy is crucial in terms of maximizing profitability of the company. Details of this case are provided in Company Data Security Policy and related documentation. The following procedural guidelines defines what the confidential information for the Techpro DC company is and applies the principles that employees must comply with.
- Confidential information includes but is not limited to Techpro DC trademarks, intellectual property rights and all kind of innovations: written, invented, developed or applied database, printed communication materials, business processes, advertisements, product packaging and labels (marketing, product, technical) business strategies, shareholders, strategic partnerships and partnership information, financial information, employees' personnel files, client list, price products designs, method information (know how), list of conditions, potential and current client information, supplier information and similar sorts of printed, graphic or machine readable information.

Principles for the confidential information is set out below:

- Confidential information, unless imposed by judicial decisions and regulatory requirements is not allowed to be disclosed to third parties. In this case, disclosing party should discuss the volume of information to be disclosed with Techpro DC and provide opportunity for Techpro DC to object the disclosure of such information according to current legislation.
- Confidential information should not be copied or damaged. Precautions should be taken to maintain and protect confidential information. Any changes on the information should be recorded by date.
- Confidential documents and information should not be taken out of the company. Employees working with confidential information or documents to be taken out of the company must follow Company Data Security Policy.
- Passwords, usernames, authorization, and similar information which are used to access the company information systems should be kept confidential and should only be available to authorized users.
- Company confidential information should not be talked about in cafeterias, restaurants, elevators, service cars or similar public areas.
- Confidential information is classified according to its degree of confidentiality, and this is clearly stated in the content of information. Company personnel knows the degree of confidentiality of received documents according to their positions and acts accordingly. In the event of any hesitation regarding the degree of confidentiality, a higher degree of confidentiality shall be applied, and consultation shall be conducted with the relevant management, as appropriate.
- If it is beneficial for company to share information with third parties and/or persons, it is a priority to sign a confidentiality agreement to ensure the responsibilities related to the protection and information security or a written confidentiality commitment must be received from the third party. The objective



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here is to ensure that the parties are aware of their responsibility for the safety and protection of these assets.

- h. Gossip and/or unsubstantiated statements about individuals or institutions are not allowed.
- i. Employee specific confidential information such as salary, benefits and personal information should not be disclosed except to authorized personnel. Employees' personal information must be sent privately. Employees should not be pressured to disclose such confidential information and they should not disclose such information to others.

Policy for establishing and maintaining fair work environment.

- a. Techpro DC considers establishing and maintaining fair business environment for its employees its priority. The goal of establishing a fair, healthy, and safe working environment, respectful to employees and based on following the rules is to improve and strengthen employee loyalty, self-development, and commitment to work. The following procedural guidelines set out the basic principles for establishing and maintaining fair work environment at Techpro DC.
- b. Company work rules about employment and business life are in accordance with related laws and regulations. Employees comply with all legal requirements in scope of their work and act according to the legislation.
- c. Techpro DC human resources policy and procedures enable fair practices in hiring, promotion, transfer, rotation, performance management, pricing, rewarding, social benefits and similar areas.
- d. Any kind of discrimination such as language, racism, gender, political ideas, religion, appearance, etc. among the employees of company cannot be tolerated.
- e. We aim to support collaboration by creating a positive and coherent work environment, so employees with different religion, ideas and opinions could work together in coherence.
- f. We provide a healthy and secure work environment and conditions for all employees.
- g. Privacy and personal space of employees are respected.
- h. In addition to overall employee privacy, their physical, gender and spiritual privacy are also protected.
- i. Violation of workers' privacy through physical, sexual, or moral harassment at work or in any place used for business purposes is against to the law and the rules of ethical conduct; the company never tolerates such violations. The purpose here is to enable the employees to work in environment, where their physical, sexual, and moral privacy is protected.
- j. Violation of physical integrity of any person by sexual harassment or sexual rudeness without contact is considered a sexual abuse. Accordingly, any behavior that is defined within this context is forbidden.
- k. It is equally unacceptable to exhibit a negative attitude or behavior towards those who file a complaint or report on violence or those who cooperate in such investigations.
- l. No employee may claim any privilege due to different sex, religion, language, or race; no special privileges are granted to any person. It is not acceptable to provide and accept privileges due to sex, religion, language, race, etc.
- m. A healthy and safe physical working environment should be created for all employees.



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- n. It is forbidden to come to work under the influence of alcohol or drugs or similar substances, or to have, use, offer or give any of the above-mentioned substances for any reason.
- o. It is not allowed to threaten, scare, or otherwise commit a violation at the workplace or bring weapons, including hunting weapons, to the facilities of the company.

APPLICABLE REGULATORY LEGAL ACTS

Techpro DC can engage in business operations in international markets and the company's activities can be subject to different countries' legislation. When facing uncertainty and hesitation regarding ethical behavior in business operations in different countries, employees must first act in accordance with the regulatory legal acts on business operations in the relevant country. If operations in the country or the countries in which the business is carried out, may lead to negative consequences for the ethical values, adopted by Techpro DC, then the solution will be considered within the framework of existing ethical conduct and procedural guidelines.

RESPONSIBILITIES OF EMPLOYEES


Techpro DC's ethical conduct rules on how to behave and conduct business in the related policy and procedural guidelines are detailed in the Code of Ethical Conduct. Following these codes is the primary duty of all employees. Therefore, all employees of Techpro DC are responsible for following:

- In all circumstances, complying with the laws and regulations;
- Acquaint yourself, learn, understand adopt the Code of Business Ethics of Techpro DC and act in accordance with the code, principles and values, contained therein;
- Study policies and procedural guidelines, related to general and specific business areas that are considered valid by the Company;
- Contact their own management or Human Resources about violations of their own or others;
- Immediate report about potential violations regarding himself/herself or others; Report to Ethical Conduct Compliance Officer, Human Resources, or Ethics Committee, either anonymously or by acknowledging their name;
- Comply with the "Procedural guidelines and Methods to Enforce Ethical Decision-Making", which is intended to guide conduct and actions towards compliance with codes and to guide them towards solving problems;
- Cooperate with Ethical Conduct Compliance Officer and with Ethic's Committee in investigating ethical misconduct; keep the investigation information confidential.

RESPONSIBILITES OF MANAGERS

Techpro DC managers have additional responsibilities besides their responsibilities identified by the Code of Ethics and Business Conduct. Accordingly, managers are responsible for:



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- Creating and sustaining a work environment and company culture that support code of ethics,
- Leading by example in terms of code of ethics, training employees,
- Supporting employees, who have questions, complaints, and tip-offs in communicating the issues,
- Guiding subordinates when consulted with, paying attention to tip-offs received and notifying Ethics Committee as soon as possible when deemed necessary,
- Structuring business processes under his/her supervision, in order to minimize ethics related risks, applying the necessary approaches and methods to comply with code of ethics.

ETHICAL CONDUCT COMPLIANCE OFFICER

- Guiding and consulting to employees on ethics related questions and issues,
- Provide support for the solution of any ethical violation brought to his/her attention in company, where he/she works,
- Directing issues that cannot be resolved or that require investigation to the Ethics Committee,
- Reporting all complaints and tip-off brought to his/her attention to the Ethics Committee,
- Supporting investigations and being the contact person in investigations conducted by the Ethics Committee,
- Regularly reporting ethics questions or issues to the Member of Board, responsible for Ethics and Business Conduct Code,
- Following, monitoring, and supporting implementation of ethics-related activities in the company.

OTHER RESPONSIBILITIES

Company's top management is responsible for the effective implementation of the Ethics Code of the Techpro DC company, or the Code of Business Ethics prepared in this context and the establishment of an incentive environment for these codes.


Human Resources of the Company are responsible for:

- Explaining policies and codes, communicating with employees on a regular basis to provide them information regarding the Code of Ethics and regularly conduct ethical behavior trainings;
- Ensuring that the newly recruited employees are acquainted with the Code of Ethics, informing them on this subject and ensuring that they signed the Employee's Ethical Conduct Declaration Form;
- Ensuring that employee have signed the Annual Report on Ethical Conduct and that the latest information is included in the Declaration.

Company's top management, together with the Ethics Code of Conduct, are responsible for the following:

- Ensuring the confidentiality of the complaints and tip-off provided in context of the Code of Ethics and protect persons when such complaints are filed;
- Ensure the job security of the employee that filed the complaint or made a tip-off;



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- Ensuring that complaints and tip-off are investigated timely and fairly, in consistent and sensitive manner, and taking decisive actions against violations.

INTERFERENCE WITH ETHICS CODE

Interference with or actions against the Code of Business Ethics or the Company's policies and procedures will be subjected to disciplinary action, up to termination. Disciplinary action also applies to persons who approve or incite conduct and actions in conflict with the code of ethics, as well as to those who knew about the potential violation, but had not raised the issue or reported it.

Ethics Committee

The Ethics Committee is responsible for investigating and resolving all complaints and tip-offs violations of the Code of Ethics and related policies.

Chairman: Nigar Hasanova

Member: Ilkin Huseynli

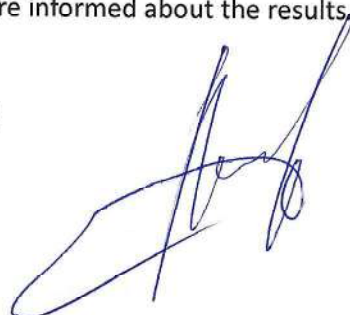
Member: Jamila Zeynalova


Member: Huseyn Hasanli

Ethics Committee working principles

Ethics Committee functions in line with the principles, listed below:

- Keeps tip-offs, complaints as well as the identities of complainants and informers confidential.
- Conducts investigations in line with confidentiality rules.
- Is authorized to request information, document, and evidence about the investigation directly from the related department. Can review all acquired information and documents limited to the subject of the investigation.
- Investigation process is documented via written protocol from the beginning. Information, evidence, and documents are also added to the related protocol.
- Protocol is signed by the Ethics Committee chairman and the members.
- Investigation is reviewed in an urgent manner and is concluded as soon as possible.
- The decisions made by the Committee are put into practice immediately.
- Related departments and authorities are informed about the results.





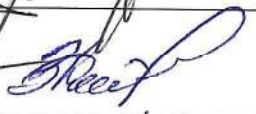
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- The chairman and the members of the Committee perform their duties independent of their department managers and the hierarchy in the organization. They cannot be pressured about the investigation.
- The Committee can seek an expert opinion when needed taking the necessary precautions with regards to confidentiality principles.

Any employee can directly contact the Ethics Committee regarding any questions or concerns about any potential violations by email, post address or telephone number below:

Email:	ethics@techprodc.com
Address:	Techpro DC Ethics Committee, Baku White City Office Building, 3rd floor, 25e, 8 November ave., Baku, AZ1025, Azerbaijan
Phone:	(+99412) 488 10 01 <i>business hours: 09:30~13:00 and 14:00~17:30 during weekdays</i>

APPROVALS:

Position	Name Surname	Date	Signature
Committee Chairman	Nigar Hasanova	15.03.23	
Committee Member	Ilkin Huseynli	15.03.23	
Committee Member	Jamila Zeynalova	15.03.23	
Committee Member	Huseyn Hasanli	15.03.23	