



CODE OF CONDUCT

Our Values in Practice

TOLERANCE

DILIGENCE

FLEXIBILITY

INTEGRITY

QUALITY

INCLUSIVENESS



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Foreword

High-Tech Solutions fosters the values of openness, fairness, tolerance, honesty and responsibility throughout all of its business operations. Given our profound presence and influence on the Georgian IT market, we consider our primary responsibility to establish practice of highest standard that fully reflects our core values.

It is our key priority to provide stable, progressive and client-oriented service. Thus, in accordance with the Labour Code of Georgia¹, it is the purpose of this code of conduct to effectuate the established principles and define our expectations for the current/future employees, and management. The presented document along with risk management policies and other internal regulations strive to provide transparent outlook about the framework of the company, while outlining core values, expectations and responsibilities.

The following Code of Conduct is intended for all our employees and management. Each and every one of them has a personal responsibility to familiarize with, share the values depicted and convey them in their day-to-day activities.

Honesty and integrity

While performing their responsibilities, all employees are obliged to act honestly and with utmost integrity. HT Solutions has zero-tolerance policy towards corruption, fraud, bribery and any type of unlawful conduct that harms or may harm the company's objectives and/or its business partners. Any such violation shall render the culprits to the harshest disciplinary actions. Conflict of interest framework, issues pertaining to anti-corruption and anti-bribery are detailed in Employment Risk Management Policy and is mandatory for employees and the management.

Quality

The service quality

The ultimate mission for HT Solutions is to provide the service of the highest quality. Therefore, by ensuring quality stability and its gradual improvement, we promote client satisfaction and trust. All of the employees are obliged to deliver the service that correlates to the company's principal objectives. To guarantee the adherence to the established high-quality standard, the direct manager shall monitor the performance and provide relevant recommendations to every employee.

Work environment

We provide all of our employees with a work environment that promotes personal development. Feedback on ongoing improvements and recommendations on how to further enhance the quality, performance and functionality of the company are acknowledged and appreciated. We strongly believe that proactive teamwork leads to more efficient and effective results, thus, we shall actively listen and respond to each and every suggestion proposed.

¹ Labour Code of Georgia: <<https://matsne.gov.ge/en/document/view/1155567?publication=18>>

Furthermore, we encourage flexible work environment by offering our employees and management the opportunity to choose the working format that may be conducted on-site (in company's office), online or through a combination of the two options mentioned above. We believe that this freedom of choice, increases the overall productivity, which by default shall improve the company's output and its respective quality.

Orientation and training

HT Solutions strives to provide a transparent and informational approach towards its current and potential employees. For this reason, a specific orientation program was developed to ensure that all new employees receive the information and training required to fulfill their responsibilities and facilitate their transition into the company. The Employee Orientation Program is an essential mechanism in developing a workforce that is committed to providing seamless service, ensuring the optimization of the company's resources, and achieving the principal objectives. The completion of the program is mandatory for all new employees and it shall be conducted by the direct supervisor.

The orientation program shall include:

- Employee Responsibilities and Rules;
- Reporting potential risks, violations, and any other threats that damages or have the potential to cause damage to the company and/or its current and/or prospective business partners;
- Workplace violence and harassment;
- Anti-bribery and anti-corruption policies;
- Health and safety procedures and policies;

Moreover, we recognize the importance of constant development of the employees as it is the conditional factor to delivering the service of the highest quality. For this reason, we promote continuous improvement by providing our employees with relevant training modules to boost their performance and information on the beneficial training programs conducted by the third parties. Moreover, specific risk management training shall be given annually on the topics recommended by our Compliance Officer.

Recruitment and Promotion

We are an equal opportunities employer, which means that we are committed to providing equality of opportunity in employment to all persons. When recruiting new employees or when affording our current employees with opportunities for promotion, it means that we will:

- not discriminate unlawfully against any person.
- elect the best person for the job in terms of qualifications and abilities
- encourage employees to continuously improve and further develop their skill sets.

We recruit and promote people based on their suitability for the position and potential to make future contributions. We recognize the individual value that employees create for the company.

Risk management

Risk management policy is an integral part of HT Solutions' business activities and it aims to protect the company and its business partners from the risks that harms or may harm the further growth and development

of the company. Therefore, to prevent these threats and guarantee the stable performance of the company's ventures, we have specially designed an Employment Risk Management Policy that is mandatory for employees and the management.

Diversity, Inclusion and Equality

HT Solutions encourage employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, and other characteristics that make employees unique. Proactive behaviors that create an environment in which all people are actively included treated fairly and respectfully, have equal access to opportunities and resources and can be themselves while contributing fully to the company's success.

HT Solutions does not tolerate discrimination in the workplace based on gender, race, age, skin color, religion, marital status, sexual preference, heritage, physical or mental disability, or any other characteristics protected by applicable laws or regulations where HT Solutions operates. All employees of HT Solutions have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions, or all other participative events.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from **Compliance officer**. Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Safety and Environmental Protection

HT Solutions aspire to provide a clean, hazard-free, healthy, safe environment in which to work, and we make every effort to comply with all relevant occupational health and safety laws.

One of the employee's most important responsibilities is to protect his/her Health and Safety as well as that of other co-workers.

All employees are expected:

- to take an active part in maintaining this hazard-free environment.
- to observe all posted safety rules, adhere to all provided safety instructions
- to use safety equipment where required
- to report any accidents or injuries including any breaches of safety and to promptly report any unsafe working condition to a Compliance Officer.
- in case, if you become ill or get injured while at work, you must notify your manager immediately.

Failure to abide by the Company's safety and environmental protection principles may result in disciplinary action, up to and including termination.

Contact

If you have any questions regarding this document, please direct your inquiries to the CEO of the HT Solutions
- Nino Gvazava