

“APPROVED”

Managing Partner of Arzinger Law Firm

T. Bondaryev



**CODE**  
OF BUSINESS CONDUCT  
(ETHICS) OF  
**ARZINGER**  
LAW FIRM

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# CODE OF BUSINESS CONDUCT (ETHICS) OF ARZINGER LAW FIRM

## 1. Introduction

The purpose of the Code of Business Conduct is to help employees of Arzinger Law Firm hereinafter “Arzinger”, the “Company”), including partners and counsels, to comply with the requirements of applicable national and international laws, rules, internal policies, procedures and standards of Arzinger in a uniform manner. In addition to clearly defined rules, the Code sets out the principles and criteria for decision-making within the Company.

The Code applies to all employees of Arzinger as well as to its separate offices. We hope that our clients and business partners will also adhere to the principles set out in this document.

Arzinger specifically relies on its partners and counsels to set an example for other employees, creating a culture of integrity within the team. Employees who are familiar with the requirements of the Code can easily contact the responsible persons (supervisors) in case of possible violations of the Code.

The Code has been developed to ensure that all employees are guided thereby in their actions and make decisions in accordance with the rules of ethics, the Company’s values, the requirements of applicable law and internal documents. The Code covers various topics of professional behaviour.

It is possible that some areas may not be regulated by the Code or a separate document within the Company or at the level of legislation. If this is the case, ask yourself the following questions to avoid violations and go for the right decision:

**1.** Does my action/omission violate the Code? Does my action comply with the Code?

**4.** Is my action likely to cause physical, emotional or other harm to any persons?

**2.** Would I feel ashamed if my friends or relatives knew about what I did?

**5.** Would I feel ashamed if my actions were reported on social media or mass media?

**3.** Can my action/omission damage the Company’s reputation?

If all the answers to the questions are “No”, it is likely that the requirements of the Code will not be violated. If the answer is “Yes” or “I am not sure”, please seek advice from those responsible for compliance with the Code.

## 2. Arzinger's core corporate principles



### Compliance with and respect for laws

Arzinger is a professional association of the highest-qualified attorneys-at-law. Accordingly, it is the professional duty of every employee to understand, apply and adhere to the law. We comply with applicable laws and regulations in all relevant jurisdictions, including the rules of professional conduct for attorneys-at-law.



### Good faith in actions

A Client's problem is Arzinger's problem. We always make decisions and act as if it were about our personal reputation. Standing up for our views and achieving the highest quality are key aspects of the Company's business.



### Professional competence

The knowledge and experience of our employees are our shared values and a real asset at Arzinger. This experience and in-depth professional knowledge give Arzinger a real competitive advantage. Professional competence enables us to be competitive and create new markets by developing novel products and services.



### Dynamism

Readiness for change and innovation, flexibility and initiative. In a constantly changing environment, Arzinger is highly responsive and proactive, as this is the key to being able to adapt to new circumstances.



### Rethinking the possible

Critical analysis of the state of affairs and innovative approaches to solving problems are the key to success. Arzinger is always open to discussions and new ideas.

## 3. Our employees

### Healthy and safe working environment

In 2021, the Company joined the UN Global Compact Network in Ukraine, which is the official representative of the **UN Global Compact**

As a member of the UN Global Compact,

Arzinger is committed to the **10 Principles** in the **four key areas:**

**human rights,**  
**labour, environment,** and  
**anti-corruption.**

The Company also continues to work towards achieving the Sustainable Development Goals in such areas as the **environment, education, healthcare and overcoming the challenges associated with COVID-19, promoting peace in Ukraine** and supporting socially vulnerable groups.

The company attaches great importance to the well-being of its employees and **strives to create a safe and comfortable working environment** as well as to minimise health risks in the workplace.

Arzinger employees have the opportunity to use their full potential to work and develop within the company.

The company pays much attention to providing opportunities for work-life balance, which may include remote work, flexible working hours or part-time work in those positions and areas where it is possible and appropriate.

## Diversity and Inclusion

We strive to create  
a **supportive,**  
**tolerant** and equal opportunity  
working environment **for all**  
employees, clients and  
partners, where individual  
differences and **contributions**  
**of each** team member are  
recognised and valued, and where  
everyone is **treated with dignity**  
and **respect.**

Since the company's inception, we have been striving to create a tolerant environment of equal opportunities that will encourage our employees to work efficiently and develop personally. In this way, each employee contributes to the success of the Company and the clients we serve. We do not tolerate discrimination of any kind in the workplace.

All personnel decisions (filling vacant positions, remuneration decisions, promotions and assignment of employees to participate in projects, disciplinary actions, etc.) are based solely on the assessment of professional qualifications, performance and potential of employees, compliance with internal corporate policies, without regard to gender, age or other characteristics and individual differences of people, based on the principle of equal opportunities and impartiality.

We **do not tolerate**  
**harassment** and **bullying**  
in the company.

**Any** verbal, non-verbal or physical form  
of behaviour, or a **humiliating,**  
**aggressive** or offensive work  
**environment** that may  
harm the human **dignity** of an  
employee or the work of a team  
**is prohibited.**

## Motivation and development

Arzinger offers decent remuneration and additional incentives (health insurance, performance-based bonuses, employee recognition programmes, etc.) to its employees. Arzinger creates and provides opportunities for professional development and training as well as career growth.

## Extra-curricular activities

Arzinger does not support the establishment of additional employment or other contractual relationships related to the employment of its employees or other paid work that may give rise to a conflict of interest. In addition, employees who are admitted to the Bar are subject to the restrictions provided for by the Law of Ukraine "On the Bar and Practice of Law" and the Rules of Professional Conduct.

## Political participation

The Company recognises the right of its employees to participate in political parties and public organisations. However, such activities must be carried out outside of working hours, and outside the Company. In carrying out their political/civic activities, employees may not abuse their position and shall refrain from any actions that may affect the reputation of Arzinger.

Employees must inform the Company of their intention to hold any position in a political, public or governmental organisation. Employees may not use their position in a political or governmental organisation while working for Arzinger.

Arzinger's resources (human resources, equipment or other assets) must not be used to support political activities.

# 4. Our Clients

The Company guarantees equal treatment to all its clients. Relationships with clients should be established in accordance with the principles of loyalty and solidarity as well as in accordance with the obligations assumed to clients. When making decisions, the interests of clients shall be prioritised, observing the principle of fairness and equality.

## Uncompromising service quality and competence

Our **reputation** is based on the quality of our services.

**Arzinger** ensures that the right people are **assigned** to **each matter** and that they **perform their work** with **integrity** and **quality**.

The company expects that in situations where the Client's issues are beyond the scope of the company's expertise, they will refer to employees who are competent to handle the relevant issues.

**We ensure** that the services used by our Clients are **competent** and **timely**, and **are tailored** to the specifics, **needs** and circumstances **of each Client**.

## Establishing business relationships

As any other company, Arzinger must do its due diligence before engaging with new clients. Thus,

- we have a legal and professional obligation to know our Clients and refuse to do business with anyone whose activities are in breach of the law or whose source of funds is suspicious;
- we must avoid conflicts of interest and promptly notify our Clients in the event of an actual or potential conflict of interest;
- in some cases, the Company is obliged to perform the functions of a primary financial monitoring entity, and therefore to conduct research on its Clients.

## Time recording and billing

We have a professional and contractual obligation to provide our clients with timely, complete and accurate reports on the work we do and the time we spend on their cases. The Company does not tolerate actions that contradict its accounting policy.

## Business meetings

Our customer service principles encourage us to get to know our clients personally. However, we always remember that customer relationships are business relationships and, therefore, have certain boundaries and rules, as set out in the Arzinger Anti-Corruption Policy.

## Combating money laundering

It is our policy to do business with clients who are engaged in **legitimate** business activities, using funds obtained through **legitimate** means.

We are **committed** to complying with applicable national and international **anti-money laundering** and counter-terrorist financing **laws**.

We **do not** engage in or **assist clients** in **money laundering** activities.

# 5. Preventing conflict of interest

We acknowledge that **avoiding** conflicts of interest is a **prerequisite** for the **proper** provision of professional **legal** services

A **conflict of interest** is a contradiction between an employee's personal interests and his/her professional rights and duties, which may affect the objectivity or impartiality of the employee's fulfilling his/her professional duties as well as his/her taking or refraining from actions in fulfilling his/her duties.

We shall avoid any action that interferes or may interfere with the independent exercise of our own judgement and obligation to perform our duties in the best interests of the Client.

As such, with respect to our clients and their transactions,

**Arzinger**  
has approved and **put in place**  
the **Conflict** of Interest and  
**Reputation Protection Policy**  
that **provides** for a sophisticated review  
process involving **all** Arzinger partners  
and counsels **to identify** potential **conflicts**  
**of interest** and **manage**  
them appropriately

Each team member is obliged to immediately declare his/her conflict of interest and promptly notify the partner, counsel or conflict of interest officer of its existence.

## 6. Anti-corruption, gifts

To counteract any corrupt practices, Arzinger has **approved** an **Anti-Corruption Policy** that establishes the principle of “**zero tolerance**” to any manifestations of corruption both within and outside the Company.

The policy sets **standards** and **requirements** in accordance with the **Law of Ukraine** “On Prevention of Corruption”, the Model **Anti-Corruption Programme** approved by the **National Agency** for the **Prevention of Corruption** and **international** standards for the **prevention** of corruption.

## 7. Social media

In all external PR communications, Arzinger employees shall comply with the relevant internal requirements. External PR communications are coordinated by the Company’s Marketing and PR Department. Any requests from the media for comments, interviews, articles, or other types of cooperation that come to the attention of Arzinger or its individual employees as well as requests for cooperation with the media initiated by employees within the Company, are forwarded to the Marketing and PR Department. Disclosure of any information about the current affairs of the Company and its clients is made only with the express permission of the client and with the approval of the responsible partner or the Head of Marketing and PR.

When using social media, Company employees should be guided by the relevant internal requirements. All potential readers of their publications should be respected. One may not use any offensive language, including on national or racial grounds, obscene language, or post or ‘like’ material that is obscene, libelous, defamatory, offensive, abusive, threatening or intimidating to any person or organisation. All relevant copyrights, fair use and financial disclosure laws must be respected.

### Arzinger employees are not allowed to:

- carry out their own business activities in social networks without obtaining the consent of a partner/counsel or Corporate Governance Officer;
- provide any official comments on behalf of Arzinger if the Company’s employees are not its official representatives/spokespersons;
- make any comments that may harm the Company, its clients or its employees;
- make comments in the form of criticism, slander, insult, commenting on the activities of a client or its management, open contempt, humiliation or disclosure of confidential information.

In personal posts, it is prohibited to cite or refer to clients, partners or colleagues without their prior permission. If employees are not sure whether to post certain information on social media, they can always discuss their intention with their line manager or representatives of the Marketing and PR Department in advance.

# 8. Pro bono legal services

We **strive**  
to apply our legal knowledge  
to the **development of law**  
and **provide** professional  
**assistance**  
to those in **need.**

We do so through  
**pro bono** services  
**in cooperation** with clients  
and civil **society**  
**organisations, movements**  
and **initiatives**

The Company encourages and supports employees to provide pro bono services. However, such employees must ensure that rendering such services does not create a conflict of interest with Arzinger's current/potential clients and does not damage the Company's reputation.

When providing services on a pro bono basis, Arzinger recommends applying the same approach as to other clients of the Company. Among other things, this means that:

- 1) an Arzinger employee is obliged to ensure that the provision of pro bono services does not give rise to a conflict of interest and that the client is properly vetted;
- 2) An Arzinger partner must approve a pro bono case before taking any legal action on it and must provide appropriate supervision.



## 9. Sanctions regime

As a professional **law firm** and a **leader** in the field of legal services, to **protect** the national interests, **security, sovereignty** and territorial integrity of **Ukraine**, **counteract** terrorist activities, etc. **Arzinger undertakes not to violate** special economic and other restrictive **measures applied** by the State, foreign international organisations and/or foreign states to **individuals** and **legal entities**

## 10. Information security, confidentiality

As lawyers and attorneys, Arzinger employees are in possession of confidential information. We understand that clients' trust is largely based on the belief that the information will be properly stored within the Company and that the ways to protect it will prevent the dissemination of such information and access to it by third parties.

At the same time, Arzinger employees need access to confidential client information to perform their work. Arzinger is responsible for safeguarding information on its clients (and, in some cases, on business partners and suppliers). Except in certain cases, the Company may be required to disclose such information in accordance with professional liability rules or the law.

When providing services,

**Arzinger** shall duly **keep** the attorney-client **privilege**

and other information about the

**client's** activities

**and status.**

Arzinger employees are required to maintain their duty of confidentiality even after they have been transferred to another position or have terminated their employment with the Company.

# 11. Reporting ethical violations

In case of suspicion of any violations of the Code or in case of need for advice on a specific situation or on the interpretation of the Code in general, **the following methods of reporting/referral are available to Arzinger employees:**

- personally to the Head of the Human Resources Department or an in-house lawyer;
- informing by means of corporate e-mail to [safereport@arzinger.ua](mailto:safereport@arzinger.ua);

Any reports, statements or investigations will be treated confidentially and in accordance with the requirements of the applicable laws of Ukraine and the Company's internal regulations. In the event of a violation of the Code, procedures and sanctions are applied in accordance with the principles set out in Arzinger's internal regulations.

When deciding on the application of procedures, sanctions and/or liability for violations of the Code, Arzinger is guided by internal documents, procedures (in terms of disciplinary sanctions for violations) as well as the provisions of the applicable legislation of Ukraine.

Unsubstantiated or malicious statements (defamation) are undesirable and may have legal consequences.

All employees are required to read the Code and sign a personal acknowledgement of compliance with its requirements upon hiring. The personal acknowledgement is updated by all Arzinger employees once a year.

The Code shall come into force upon its approval by the Managing Partner of Arzinger. The Code shall be reviewed as necessary, however, at least once a year.