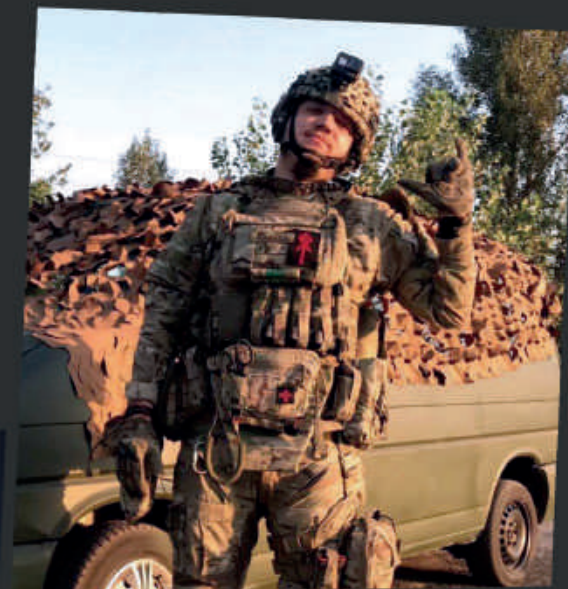




NOVA POST CORPORATE CODE OF ETHICS

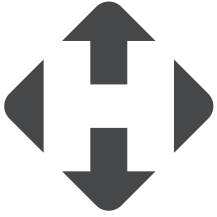


(067) 451 07 39

compliance@novaposhta.ua

Table of Contents

Message from the Nova Group of Companies co-founders	3
Nova Group of Companies	4
Mission	5
Values of the Nova Group Companies	6-7
Portrait of an employee of the Nova Group Companies	8
Rules and principles of our ethics	9
Purpose and objectives of the Code	10
Intra-company relations	11
Human rights	12
Workplace occupational health and safety Environment	13
Use of company resources	14
Information storage and protection	15
Financial accounting and reliable reporting	16
Fraud management	17
Conflict of interest	18
Gifts, entertainment, and other services	19-20
Relations with counterparties	21
Relations with customers	22
Relations with markets	23
Relations with public authorities	24
Political activity	25
Relations with media	26
Communication with the public	27
Social media	28
Activity in wartime	29
Responsibility for compliance with the Code provisions	30
Final provisions	31



MESSAGE FROM THE CO-FOUNDERS



Dear colleagues!

Nova Post is a rapidly growing company that helps to bring loved ones, relatives, and business partners closer. Thanks to the dynamics we have maintained since establishing the company, we have managed to not only scale our business to a nationwide level, but also become the leader of express delivery services across the country. Our daily activities affect the lives and businesses of millions of people. With this in mind, our priority is to be honest in our work to ensure our ongoing success.

Honest, responsible, and ethical business conduct is crucial to protecting the company's reputation and maintaining its competitive advantages. We are jointly responsible for our actions and decisions, and we owe our victories to everyone.

This document contains the standards we adhere to and the values we are committed to in our daily operations. It is a list of rules and standards of conduct that each and every employee should follow.

Business entities that are currently the company's Partners (trademark users) or intend to become partners should share our values as set forth in this Code.

We embody the Nova Post values and adhere to this Code, treat each other with respect, honor and value our business partners, and achieve the planned results properly.

No business interests justify nefarious acts.

Sincerely,
Volodymyr Popereshniuk,
Viacheslav Klymov,
Inna Popereshniuk



Group of companies that offers logistical, financial, and IT services in Ukraine and globally

UA **НОВА ПОШТА**

Leader of express delivery services in Ukraine. The company delivers documents, parcels, and heavy loads, and also provides freight transportation and fulfillment services. It has a hugely extensive network for customers, with more than 18,000 service points



NOVA POST

Nova Post is a logistics company providing a complete range of logistics services for both individuals and business clients. The company ensures fast and reliable delivery of documents, parcels, and cargo across Europe, as well as from/to the EU and Ukraine. Every month the company expands its presence in Europe, with representative offices already operating in 12 countries so far: Poland, the Czech Republic, Slovakia, Germany, Lithuania, Latvia, Estonia, Romania, Moldova, Hungary, Italy, and the UK



NovaPay

NovaPay is a non-bank financial institution that develops its international payment system and provides financial services to individuals and businesses. NovaPay processes 2.6 million transactions per day. The company is a fully-fledged member of the Visa and MasterCard international payment systems (IPS).

and is certified under the International Payment Card Industry Data Security Standard (PCI DSS). At the beginning of 2024, the company launched an application for customers to open current accounts



NOVA GLOBAL

Nova Global is mainly focused on the global e-commerce market and cooperates with international online marketplaces. With Nova Global, any

online store in North and South America, the Asia-Pacific region, as well as the United Kingdom, are now available to the Ukrainian consumer thanks to the delivery services provided by Nova Post. For small and medium-sized businesses in Ukraine, the company's services provide an opportunity to enter new markets and develop exports



SUPERNOVA AIRLINES

Supernova Airlines provides fast transportation services to its customers from anywhere in the world. The company has already completed dozens of flights within Europe, and will soon launch transcontinental cargo flights



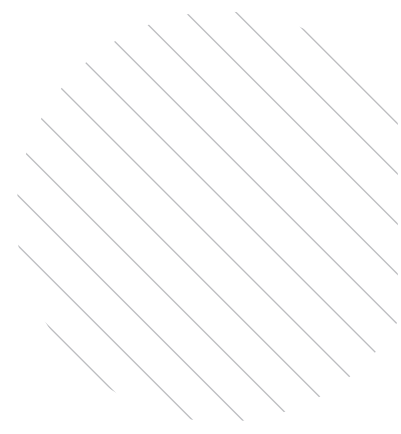
Nova Digital

Nova Digital is an IT company that provides technological solutions for logistics, production, and infrastructure businesses. The company develops and supports software products to process up to 30,000 transactions per second



NOVA CENTER

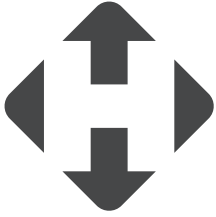
Develops centralized services for all companies of the group



MISSION

EASY DELIVERY
FOR LIFE AND BUSINESS





VALUES OF THE NOVA GROUP COMPANIES

NOVA means delivery services of the future. Every delivery changes someone's life. One person gets a parcel on credit to start their own business, another is given a violin and becomes a musician, and yet another person's life is saved due to technology. We call this shaping the future. We are the best when it comes to delivery services, which is a core activity for Nova Post, NovaPay, and Nova Digital. We deliver parcels, money, and even technology.

Our goal is to become "easy" in every sense of the word; just like breathing, which is so easy we don't even think about it. We aim for maximum service speed; send something, receive something, use our services, and see you next time.

Our strategy is about the means and path we take to reach our goal. In our case, it's the path towards making delivery simple and easy, both for life and business. So, our strategy must answer the question "How?", as in "How will we satisfy the customer and make this delivery as easy as possible"? The answer is in our six values: **FAST - EASY - SAFE - HUMAN - TECH - GROWTH.**

- ▶ **FAST.** We are fast – the fastest in Ukraine. One of our goals is to become even faster in everything we do - whether it's the speed of service, the speed of our mobile app or website, the speed of feedback, or, eventually, super-fast delivery.
- ▶ **EASY.** We are easy, available, and transparent. We strive to make our services as easy as possible, whether it's finding your parcel's location, transferring money, paying utility bills, sending something abroad, finding your way around the branch, or finding information on the website.
- ▶ **SAFE.** This is about ensuring safety for the consumer. Your parcel is in safe hands. Your money is in safe hands. Our technologies are developed by safe hands. We are always there for you. You can count on us. Our key consumers are individuals, while our Business direction is our main sales channel. We help our business clients in their trade, production, and communications operations. For our individual customers, we are the best solution solution for making purchases and communicating with loved ones anywhere around the globe.

VALUES OF THE NOVA GROUP

NOVA is a global group of companies with a unique history that is expanding its business model beyond Ukraine to international markets. Our largest original market is still Ukraine, but we strive to become a leader in all markets where we operate.

▷ **HUMAN.** Our team is comprised of the most talented, hard-working and highly qualified people, who work to ensure that our operations run as smoothly as possible.

NOVA is a platform for professionals to self-actualize and the best company to start a successful career. People are our main value, and our cooperation is based on mutual respect, trust, and peer support. Employee health and safety is a key priority for the management of the group companies.

Within our company, we ensure a supportive environment for the development of innovations, technologies, and products.

NOVA has implemented an effective system for recruitment, training, and professional development to allow employees to continuously further their education and skills at the corporate university and school. Ongoing employee training is a driver of our company's development.

NOVA assumes social responsibility for the community's well-being and development by taking an active part in economic reforms, encouraging a healthy lifestyle, as well as by ensuring public well-being in Ukraine and around the world.

▷ **TECH.** It is technology that helps our employees achieve their goals and allows us to develop a quality product for the customer. We are innovative and always fully test our latest developments and achievements.

We update our products and processes on a regular basis by implementing the latest cutting-edge innovations in the fields of communications, information technology, and automation.

We are always looking for ways to grow. Lean management technologies are fundamental in perfecting our operational processes. The IT component is a powerful tool in the competitive struggle.

Cutting-edge technologies help us to provide impeccable service to our customers, gain a competitive advantage by being "fast - easy - safe," and develop the most effective tools for our employees to use in their work.

▷ **GROWTH.** Growth is the result of our activities. As long as the company is highly customer-oriented, provides professional development opportunities for its employees, and implements the latest technologies, it will be successful, profitable, and continue to grow. This is a continuous development - vertical and horizontal, geographical and operational.

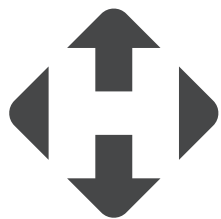


PORTRAIT OF AN EMPLOYEE NOVA GROUP COMPANIES



An employee of any NOVA group company embodies the following virtues and traits:

- hard-working, diligent, efficient and productive
- continuous development, the need to create new things, restlessness
- responsible, willing to take risks, self-disciplined and holds themselves to high standards
- ambitious, determined, results-driven
- honest, sincere, open, does not manipulate or embellish data
- driven by LEAN culture and focused on important issues
- keeps things simple and easy



RULES AND PRINCIPLES

OUR ETHICS



At Nova Post, the rules and principles of our ethics are based on universal human values: humanism, mercy, compassion, honesty, and mutual respect.

Nova Post operates according to the requirements of both Ukrainian legislation and the laws of other countries where it directly or indirectly operates.

In our relations with public authorities, employees, partners, and customers, we strive to be honest and adhere to our principles. This is the main criteria used to assess our actions when paying taxes to the budget and salaries to personnel, creating adequate working conditions, entering into agreements, and designing operational processes.

Wherever we conduct business, we always keep our promises and try to act in the right way, even if it's not the easiest path.

We believe that it's not just about achieving results, but the way in which we achieve them that is important. The company relies on the honesty of its employees at all levels, and their compliance with the requirements of legislation and internal regulations.

All our employees should take a stance of intolerance stance when it comes to violations of the Corporate Code of Ethics, and should inform the compliance department of any such violations.

For advice, clarification, or to report a Code violation, please call the compliance hotline on **(067) 451 07 39**    or e-mail **compliance@novaposhta.ua**

Messages can be sent anonymously.



Implementing the company mission and its values is a part of the collective day-to-day work of all our employees, from members of the Supervisory Board to professionals. The company's reputation and prestige are our shared achievement



PURPOSE AND OBJECTIVES

THE CODE

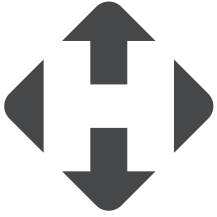
The Code's purpose is to:

- enshrine the mission and values of Nova Post
- raise employees' awareness of personal responsibility for the company's success, reputation, and safety
- determine Nova Post's basic relations with employees, counterparties, public authorities, and mass media
- protect the interests of Nova Post customers, business partners, and employees

Guided by this Code, we are committed to conducting our business in a fair and transparent manner. The Corporate Code of Ethics and values of the Nova Post company are fundamental to building trust and a positive image, which will undoubtedly have an impact on our financial success.

Objectives of the Code

The main objective of the Corporate Code of Ethics is to set standards for Nova Post operations and rules of conduct for its employees both inside and outside the company. These standards and rules are intended to ensure compliance with legal regulations and high ethical principles when implementing the company's mission.



INTRA-COMPANY RELATIONS



We believe it is our duty to treat each other with respect, fairness and tolerance, strive for perfection, and work in a team

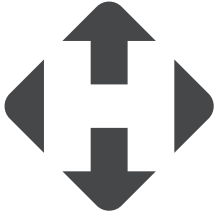
RESPECT, HONESTY, AND TRANSPARENCY ARE THE FOUNDATION OF INTRA-COMPANY COMMUNICATION

We have adopted the principles of fair and transparent employment, and we also ensure comprehensive professional development and training for our employees. We work to foster an environment of trust where mistakes and problematic issues are discussed publicly but tolerantly.

We do not tolerate intimidation, bullying, or other actions that violate the law and/or moral and ethical standards (mobbing,

pressure, humiliation, gossip, harassment, etc.). All colleagues should be treated with respect and dignity.

The following in particular are unacceptable: verbal or written comments or "jokes" about religion, race, ethnicity, gender, or age; sexual advances or overtones; gestures or expressions of a violent nature; threats of violence. Such behavior can come from colleagues, superiors, suppliers, counterparties, or customers. We are all responsible for maintaining mutual respect in the workplace.



HUMAN RIGHTS

We recognize the human rights declared at national and international level, we fully and continuously observe these rights, and strongly condemn any violation of these rights



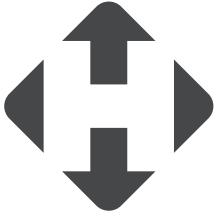
The Nova Post company doesn't tolerate any discrimination with regard to employment, pay, or promotion motivated by nationality, ethnicity, politics, gender, age, race, religion, or any other characteristics that are not directly related to the work performed. This means that Nova Post never denies employment due to gender, nationality, ethnicity, religion, sexual orientation, or political beliefs, etc. Employees are equally paid for equal work, regardless of nationality, ethnicity, religion, race, gender, age, etc. We exclude any types of forced and child labor and respect the freedom of establishing trade unions.

The company guarantees collective negotiations with representatives of the per-

sonnel who were selected according to the procedure defined by law.

The company has not adopted any repressive policies in the event that an employee raises issues related to illegal behavior

No company employee may be fired, deprived of benefits, demoted, harassed, or discriminated against for honestly raising issues related to the wrongful conduct of either management or another employee. Reporting is considered honest and fair if you believe your data to be true and accurate. If you believe someone is retaliating against you, it should be reported as a Code violation. All such facts will be thoroughly investigated



OCCUPATIONAL HEALTH AND SAFETY IN THE WORKPLACE

WE CARE ABOUT
WORKPLACE OCCUPATIONAL HEALTH AND SAFETY

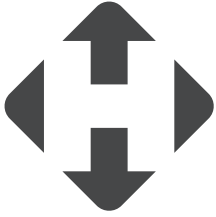
Our employees are the main value of the company

Occupational health and safety is one of the main values of our company. We have always adhered to the current standards and regulations on health and safety, and we seek and implement new, safer work practices to avoid unjustified risks for employees. Our responsibility is to ensure that our workplace is compliant with the requirements of occupational health and safety policy. A properly organized workplace ensures that production tasks are performed to a high level and work is carried out efficiently.

We require all our employees to follow healthy and safety rules for their own and their colleagues' benefit.

In turn, employees undertake to:

- know and implement legislative and other standards, namely, internal regulations and guides on occupational and fire safety in their field
- ensure personal health and safety and the same for their colleagues around them
- participate in training sessions, conduct preliminary and periodic medical check-ups as required, and use means of collective and personal protection



The company has adopted a responsible approach to environmental problems. We comply with the requirements of legislation on environmental protection



ENVIRONMENT

One of Nova Post's main principles is environmental protection

Nova Post conducts its activities in line with the requirements of current environmental legislation, regulations, and permits.

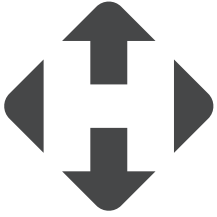
In the absence of such requirements, the company sets its own environmental protection standards.

Post complies with environmental policies regarding:

- water conservation
- efficient use of energy resources use
- waste reduction and development of waste processing practices

Nova Post supports and implements the principle of developing and distributing environmentally friendly technologies in every way





We are committed to protecting company-controlled resources



USE OF COMPANY RESOURCES

The company's resources are property, information, monetary funds, intellectual property items, and equipment used by employees when performing their work-related obligations.

We must all undertake to properly use and protect company resources.

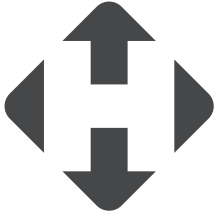
All employees must:

- use company resources as intended and never for personal benefit
- properly manage the company's monetary funds and expenses
- comply with safety requirements and

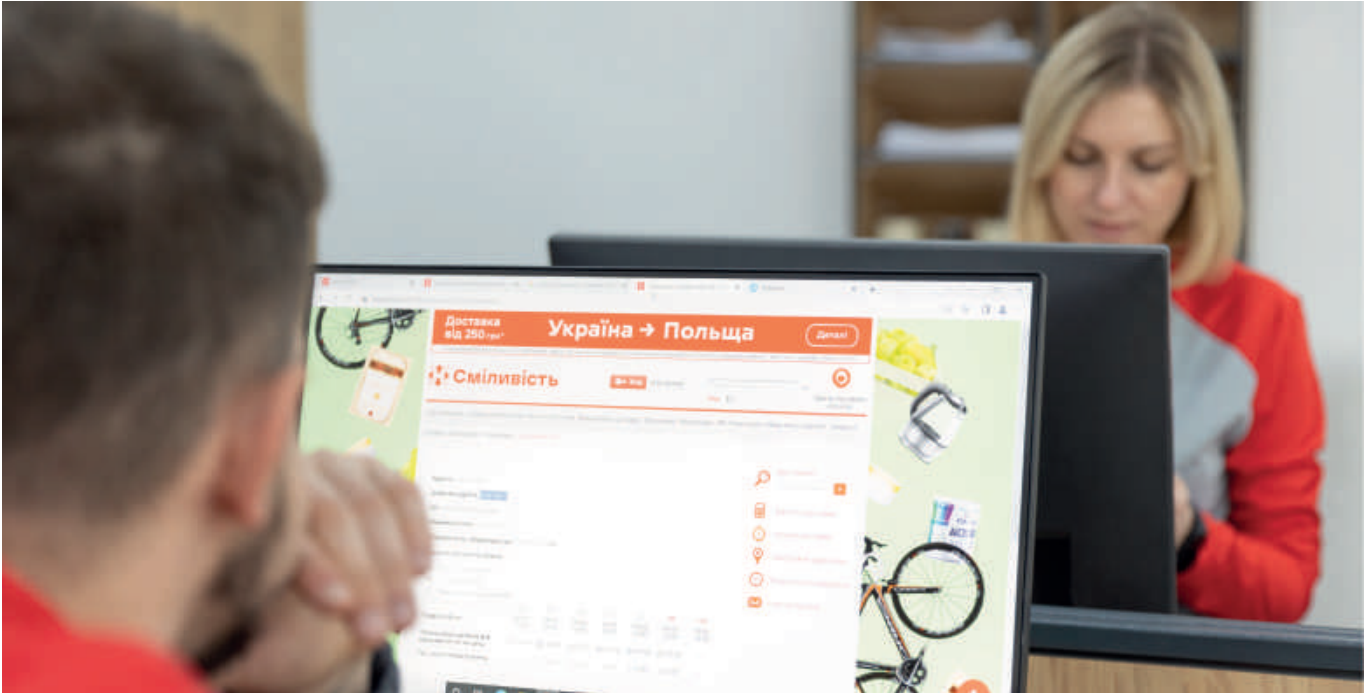
notify of situations that may result in loss, theft, or improper use of company resources

- take care of company property
- report situations involving deliberate and careless handling of resources resulting in losses to the company

Use of telephones, printers, scanners, corporate equipment, or similar equipment for personal benefit is acceptable only in case of emergency, if it is not an abusive practice, does not interfere with the performance of duties, and is not related to malpractice.



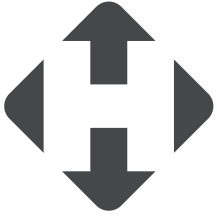
We comply with legislation on the protection of personal data, confidential information, and trade secrets



INFORMATION STORAGE AND PROTECTION

Any disclosure of personal data, confidential information, and trade secrets is unacceptable. We must therefore comply with the following important rules:

- never discuss company operations in public places, for example, in elevators, food outlets, or when talking on a cell phone
- never perform work tasks on a computer whose screen is visible to another person
- do not allow third parties to access the company premises without relevant permission
- maintain confidential information and ensure its proper storage in line with internal policies and guidelines
- use authorized software only
- it is prohibited to discuss, share, or disclose confidential information to third parties, except for cases stipulated by the legislation of Ukraine. For this purpose, the employee must first obtain authorization from the company director.



The company's operations are based on the principles of transparency, reliability, and integrity.

Falsifying records or failure to record assets is deemed a major violation



FINANCIAL ACCOUNTING AND RELIABLE REPORTING

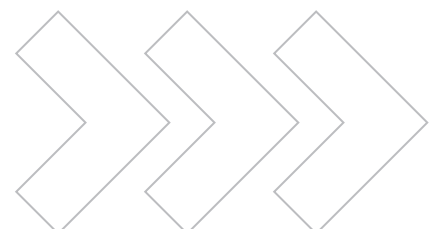
Violations related to bookkeeping, tax accounting, and rules of financial reporting may have negative consequences for the company.

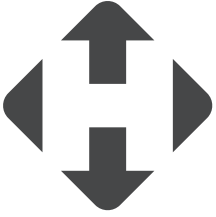
Therefore, it is strictly prohibited to:

- intentionally make false or misleading statements in a report, record, or refund claim
- falsify, conceal, or destroy any company record or document

- use leverage on others to make them act to compromise the company's financial records, reports, or statements.

All documents and other records made or received by employees during their work activities should be stored in line with the requirements of the current legislation and regulations, as well as company policies.





Fraud management is an integral part of the Nova Post corporate culture.

Employees should inform the compliance department about any fraudulent behavior.



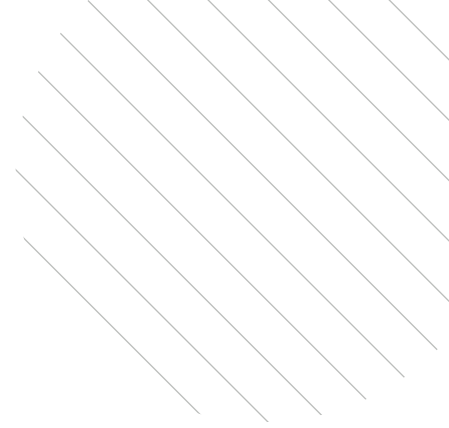
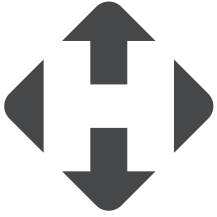
FRAUD MANAGEMENT



The company does not tolerate and condemns any type of fraud, defined as any action or inaction with the aim of obtaining an illegal benefit at the expense of the company and/or that results in material and/or non-material damage to it.

In particular, the following is deemed to be fraud:

- forging documents
- distorting financial statements
- appropriating assets, namely monetary funds
- paying inflated or unjustified bills
- any actions aimed at obtaining personal advantage through abuse of power
- encouraging the company to enter into agreements for personal gain
- receiving “kickbacks” or improper advantage



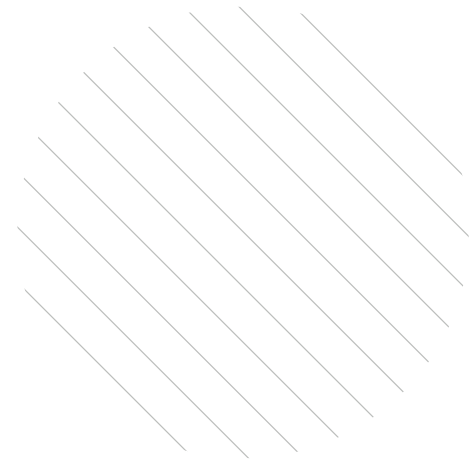
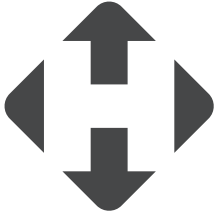
CONFLICT OF INTEREST



We are opposed to corruption, bribery, and illicit enrichment. We strive to always act in the company's interests and avoid any conflicts between the Company's and personal interests

Any conflict of interest occurs when a personal relation, financial, or other interest may prevent you from acting in the company's interest or if you use your position in the company for personal advantage. Below are some common examples:

- a close acquaintance (a relative, a close friend, or a roommate) is a company supplier, partner, customer, or competitor, or is an employee of any such company
- you or a close acquaintance hold a financial or other interest in a company or a person who is a competitor, conducts or is seeking to conduct business with the company
- you are directly or indirectly accountable to a close acquaintance or can influence decisions on the person's employment terms, remuneration, promotion, or performance assessment
- you gain a personal advantage from any business activity considered by Nova Post (for example, you directly or indirectly own property, patents, or other rights the company holds interest in)
- you have a part-time job or other activity with a company or person competing or doing business with Nova Post.



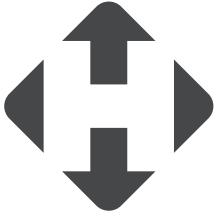
CONFLICT OF INTEREST



To prevent conflicts of interest, employees must:

- act for the benefit and in the interests of the company
- avoid any conflicts of interest and prevent the same when performing official duties
- never act or make decisions in the event of a conflict of interests, until the latter is settled

If you find yourself in any of the above situations or observe a conflict of interest with someone else, you should notify your supervisor and the compliance hotline immediately. New employees must also disclose any related information when being recruited by the company, so that the situation can be properly analyzed, evaluated, and an appropriate solution can be found. Any employee who reports a conflict of interest and agrees to its settlement in a timely manner will not be accused of violating this Code.



Accepting or giving gifts, attending entertainment events, and using the related services may result in conflicts of interest



GIFTS, ENTERTAINMENT, AND OTHER SERVICES

During the employment period, customers, suppliers, and other business partners may offer you gifts and/or invitations to entertainment events, recreational activities, or similar services. Accepting such offers can affect your ability and impartiality when making decisions in the company's interest.

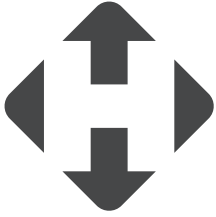
Types of gifts that Nova Post employees are permitted to accept:

- branded souvenirs of our client companies or business partners - for example, pens, calendars, or small business-related promotional items

- occasional visits to local sporting events, theater performances, or other cultural events with a business partner, etc.

In any case, the value of a gift, service, invitation, or dinner may not exceed 10% of the minimum wage. The same rule regarding the value and types of gifts permissible also applies to Nova Post employees wishing to present a gift to a business partner or a customer.

It is strictly prohibited to present any kinds of gifts, except for Nova Post branded souvenir products, to representatives of public authorities.



The company actively opposes any manifestations of corruption, namely extortion. Our relations with counterparties are based on the principles of openness and transparency



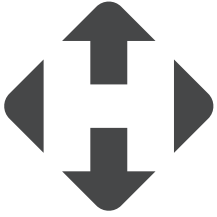
RELATIONS WITH COUNTERPARTIES



The company is committed to providing fair deals, high-quality services, and ultimately excellent service. Information about our procurements and tenders is open and publicly available.

Our suppliers

Our suppliers play an important role in our business processes, and we must therefore select them carefully, since we expect profitable and mutually beneficial cooperation, as well as compliance with the requirements of legislation and the Supplier Code. During the procurement process, we should be guided by business criteria such as quality, price, level of service, and reliability, as well as compliance with the requirements of the policy on the provision of goods, works, and services.



RELATIONS WITH CUSTOMERS

We value every customer. Our operations are based on prioritizing the customer's interests. Our customer is always right, and our customer should always be satisfied!

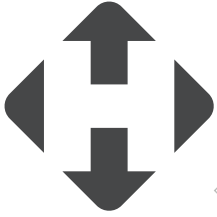
Our customers

The success of our business strategy depends on having loyal and satisfied customers, both legal entities and individuals. All our employees, whether they work at the branch, terminal, or support office, are always ready to help the customer should any difficulties arise.

The company is committed to providing high-quality services and uncompromisingly excellent service.

Our customers choose us for our high-quality and safe services. The customer should always get the promised service at the promised price. We must all be familiar with and adhere to the company policies, standards, and procedures to ensure our services are provided to the required level.

Incorrect information about Nova Post products and services may negatively affect the company's image, jeopardize customer loyalty and satisfaction, and result in litigation.



We never discuss pricing, terms of service, goods supply, investments, etc. with our competitors



RELATIONS WITH MARKETS

We adhere to competition laws and strive to always be the leading company

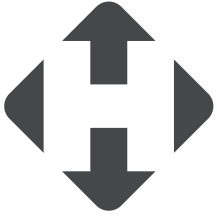
Never discuss any sensitive business issues with competitors, in particular, prices, terms of service provision, business or marketing plans, profits, costs, production capacity, or the company inventory. The company deems any concerted anti-competitive actions on the part of business entities to be unacceptable, especially when this is aimed at hindering the company from implementing its mission and values.

The company will adequately respond to such violations to protect its mission and values with all legally available measures.

Concerted actions constitute any actions/ in actions on the part of business entities cooperating with the Company that bear characteristics of concerted anti-competitive behavior.

We also determine the establishment of a business entity or an association with the purpose of or intention to concert anti-competitive behavior and joining such an association as concerted actions.

Should the company's partners (trademark users) discredit any company trademark (through actions, inactions, statements etc.), the company reserves the right to unilaterally terminate any contractual relationship with such partner(s).



We abide by legislative provisions and by-laws



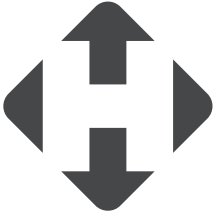
RELATIONS WITH WITH PUBLIC AUTHORITIES

We develop cooperation with public authorities based on the principles of legality, openness, and responsibility

You should always consult and get recommendations from our legal department if you are unsure of how to handle a situation involving representatives of public authorities.

You should also check information on the mandates of representatives of public authorities.

If you are contacted by any official of a public authority requesting information about your work or are asked to provide information based on a request in connection with an investigation or audit, you should first ask for documents confirming the official's mandate politely, and then inform the representative of the legal department of the situation.



It is important to remember that any media information or point of view expressed is associated with the Company and affects its image and reputation



POLITICAL ACTIVITY. **RELATIONS WITH THE MEDIA**

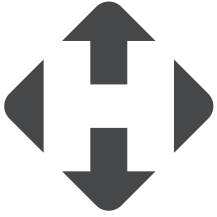
The Nova Post company stays out of politics. Employees may only make statements on political topics, comments on political issues, actions, or decisions made by political figures as long as the employee's profile on social media does not contain any information that could link them to Nova Post or suggest that the employee is expressing an official position of the company rather than their personal opinion. The company never prevents its employees from exercising their rights and freedoms but will not allow the company brand and its good business reputation to be exploited when exercising these rights. The company's employees and partners (trademark users) should not make statements or leave comments that may harm the company's reputation or brand or be interpreted, even erroneously, as a comment or statement made on behalf of the company.

Citizens may exercise their constitutional political rights and freedoms in any way not associated with the company's activities or brand, or the activities of any individual as a company employee (using the company brand, symbols, being on the premises, against the company background, in the company's branded clothes, etc.).

We condemn any manifestations of incitement to hostility based on political beliefs, calls for political actions, as well as the adoption of such decisions.

Communication with media representatives on the company's activities is allowed only if granted the related permission and in accordance with the Company's Information Policy.

Only information that can be obtained from the company's publicly available sources should be used, including websites, booklets, and press releases.



Respect for human honor and dignity, and the territorial integrity, sovereignty, and cultural diversity of our state is an indisputable value of Nova Post

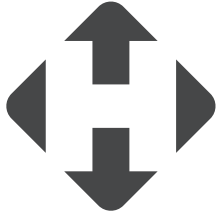


COMMUNICATIONS WITH THE PUBLIC

During both working hours and spare time, employees must adhere to the company's values, and think of the company's image, including when using social networks, since anything that is posted or discussed publicly by an employee, along with their judgments and actions, can have adverse effects on the company. Except for the relevant authorized persons, Nova Post employees should never post

any comments on the company's behalf related to the company operations on social networks.

Employees who use social media to discuss political and social issues should be careful and always expressly note that their position stated online is nothing more than their personal opinion and does not reflect the position of Nova Post.



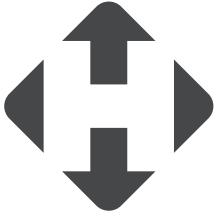
No personal statement on social media should bring harm to the company's reputation. Any employee that violates these rules and causes reputational damage to the company may receive a disciplinary penalty, even resulting in dismissal.



SOCIAL MEDIA

In their public communication and actions, employees must not:

- call for a violent change in the constitutional order of Ukraine, initiate war or promote war propaganda, incitement to national, racial or religious hatred
- aggressively defending their political views, denying freedom of choice, or expressing disdain for the choice of other citizens
- express statements aimed at dividing society, including those that imply separatism, discriminate against people on the basis of place of birth, nationality, ethnicity, political or religious affiliation, gender, sexual orientation, physical or mental health, or express statements against equal human rights
- propagandize the aggressor state, illegal military formations, persons, or any of their actions, statements, or speeches that justify or recognize the occupation of the territory of Ukraine as legitimate



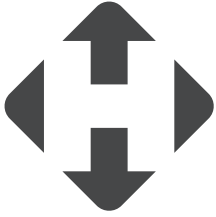
The company will not conduct any business relations with persons who have cooperated with the aggressor state or assisted in its activities in any way

ACTIVITY IN WARTIME



Nova Post reports to the law enforcement authorities any and all facts available to it about the persons listed below and also initiates immediate termination of labor, business, or any other relations with persons who:

- have voluntarily received passports of the aggressor state
- have implemented or supported the decisions and actions of the aggressor state
- were/are members of the military formations or occupation administrations of the aggressor state
- have voluntarily collected, prepared, and transported inventories or other assets to representatives of the aggressor state, or voluntarily provided any assistance to military or paramilitary formations of the aggressor state
- have desecrated state symbols
- have conducted economic activities in cooperation with the aggressor state or illegal authorities established in the temporarily occupied territory
- have voluntarily held any positions in illegal authorities established in the temporarily occupied territory, namely, in occupation administrations of the aggressor state, have been voluntarily elected to said authorities, called for illegal elections or referendums, and also participated in their organization, etc.
- deny the military aggression against Ukraine
- promote propaganda narratives supporting the temporary occupation of part of the Ukrainian territory
- contribute to the fact that representatives of the aggressor state may avoid taking responsibility for military aggression against Ukraine



This Code aims to establish employees' responsibilities within and outside the Company

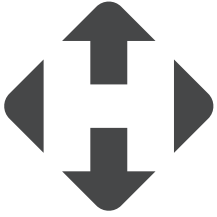


RESPONSIBILITY FOR COMPLIANCE WITH THE CODE PROVISIONS



The company's employees are responsible for stringently complying with the provisions of this Code:

- any violation of the provisions of this Code may be deemed a violation of the company's internal labor regulations and/or the employee's job duties and can result in disciplinary penalty and even dismissal; no disciplinary action exempts the person in question from the obligation to compensate for the damage caused
- any violation of the provisions of this Code by the company's Partner/Partners (trademark users) may result in reconsidering the feasibility of further cooperation
- the obligation to comply with the provisions of this Code lies with all company employees and Partners (trademark users)





Covering up a violation of the Corporate Code of Ethics is deemed unacceptable.

We guarantee anonymity to all whistleblowers who report violations and help the company to set things right and grow. If you are aware of a violation, please inform us as soon as possible



FINAL PROVISIONS

If you are aware of a violation of the Corporate Code of Ethics, you should report this by calling the compliance hotline on **(067) 451 07 39**   or by e-mail: **compliance@novaposhta.ua**. Messages can be sent anonymously.

Knowing about a violation and not reporting it = Being complicit

You should always report the following:

- a conflict between the company and an employee's interests
- a violation of the Trade Secrets and Confidential Information Standard
- distortion of financial statements/falsified documents/planned indicators/factual indicators
- embezzlement or misuse of company property
- fraud, abuse of power
- corruption, bribing employees (bribes, "kickbacks", and gifts that may affect impartiality when making decisions)
- working under the influence of alcohol or narcotics
- distributing false information about the company
- insulting colleagues, mobbing, committing actions and/or threats to intimidate, harassment
- a violation of occupational health and safety standards
- retaliation against whistleblowers
- any other violations of the Corporate Code of Ethics

If an employee, partner, or counterparty violates the law, the company reserves the right to transfer information about the violation in question to law enforcement agencies to bring those responsible to civil or criminal liability.

