

Мы всё сможем

softline[®]

Corporate Code

ethics and compliance



Opening remarks by Softline Director Vladimir Lavrov



Dear colleagues!

Reputation is the main asset of any business. This asset consists of the company's policy and actions of each of its employees. That's why it is important to have a clear understanding of the rules that we must be guided by when making decisions. The Code of Corporate Ethics and Compliance is your reference point as you move toward your shared goal—the well-being and prosperity of the company and its employees. It is the framework within which we uphold Softline's ethical values: honesty, fairness, and the well-being of others.

Thank you for upholding Softline's reputation! The trust of our clients and partners is our greatest competitive advantage, regardless of the circumstances or market. Our company has already achieved incredible success, and the thoughtful and diligent actions of each of you will help us all reach even greater heights!

**Sincerely,
Vladimir Lavrov**

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Why do we have a Code of Ethics?

We help our clients grow their businesses by implementing digital transformation based on advanced information technologies and cybersecurity. Softline is a trusted partner and reliable provider of solutions and services.

Any successful business is built on trust between the company and its clients, as well as between the company and its employees. Softline's reputation is our greatest asset and competitive advantage. Our shared goal is to strengthen it every day with our impeccable service and ethical behavior.

Trust and business reputation are earned over years, but years of effort can be destroyed in an instant by unethical behavior.

The primary purpose of this document is to enshrine Softline's values and reflect our continued commitment to ethical business practices and compliance with laws.

The Code of Corporate Ethics and Compliance was specifically developed to ensure that every Company employee and every business partner acts in accordance with the values that have enabled Softline to achieve outstanding business results. Only by strictly sharing these common values will we develop and maintain our status as one of the most promising and successful companies in the IT industry.

Should everyone comply with the Code of Corporate Ethics and Compliance?

As members of the Softline team, we are obligated to strictly adhere to the rules of this Code, regardless of our status or job title. The Code applies to all structural divisions of the Company, regardless of their functional purpose, geographic location, or other factors.

The success of the business depends on the actions of every employee, whether shareholder, board member, senior executive, department head, manager, or any other employee. The rules set forth in this document require each of us to adhere to and respect the Company's rules and values.

Shareholders, board members, and senior managers have a special role to play. They must serve as role models of impeccable conduct for Company employees, encourage ethical behavior and prevent misconduct, and represent the Company impeccably in external matters.
relationships.

Any employee who violates the provisions of this Code must understand that disciplinary action, including dismissal, may be taken. Furthermore, some of the Code's requirements overlap with legal requirements, so the company may sue the negligent employee for damages, and competent authorities may impose administrative and criminal penalties.

It's important to remember that in performing our duties, we act on behalf of the entire Company. Reckless and unethical actions by any of us may result in penalties being imposed on Softline, investigations being initiated against it, or lawsuits being brought against it. Any form of unethical behavior may cause irreparable damage to the Company's business reputation and market capitalization.

The Code may be supplemented by other, more detailed Softline policies and documents, but has the highest priority.

We must:

- Recognize and demonstrate commitment to the principles set out in this Code always and everywhere, in any situation.
- Comply with the policies and other internal documents of Softline that supplement this Code, applicable legislation and standards.
- In situations where any issues are not regulated by the Code or applicable legislation, be guided by special questions or explanations Department of Ethics and Compliance, as well as common sense.
- Report to the compliance service any incidents or potential violations of requirements this Code and applicable legislation.

How should you handle situations where you can't find the answer in the Code or the situation isn't clear?

The world around us is a multifaceted, rapidly changing, and rapidly evolving environment, so it's impossible to anticipate every possible situation and ethical dilemma. The primary purpose of the Code is to help employees make decisions based on Softline's values.

If you have not found the answer in this Code, or are unsure about the correctness of a particular decision, you should ask yourself a few questions before making it: • Is this action legal? • Is this action ethical? • Would I want the media or close relatives to know about this action? • If I take this action, will Softline's business reputation be damaged?

If the answer to any of the questions is "No", give up your intentions!

Important!

During work, situations may arise where things aren't so clear-cut. In such cases, it's essential to use common sense, act honestly, fairly, and without harming others.

Not sure? Ask your manager or compliance officer for advice – they're always happy to hear from you.

We guarantee you protection from any kind of harassment if you act honestly, fairly, and without harm to others, even if this may negatively impact the company's business.

Our ethical values

1. Honesty

- We always act according to our conscience.
- We do NOT violate our obligations.

Softline is a responsible employer with transparent and clear incentive mechanisms. We do not deceive or mislead our business partners. We do not provide contradictory or ambiguous information.

2. Justice

- We are free from prejudice.
- We are objective in our views, judgments, actions and decisions.

We judge the actions and decisions of others based on objective data. We take responsibility for ensuring that our actions and decisions do not distort reality. We stand for equal opportunity and zero discrimination.

3. Well-being of others

- We strive to change the world around us for the better through digital transformation.
- We are responsible for our actions and decisions to the whole society.

We do NOT do things that may not be illegal but are unfair to others. We make decisions and act NOT ONLY in accordance with our own interests, but

We also take into account the interests of others.

Important!

Ethical behavior is honest and fair actions or decisions that do not harm others.

Corporate values

1. Leadership

- We strive to be a leader in the key areas of our business.
- We are accountable for our promises and actions.

We love what we do. We're inquisitive, constantly evolving, and confident in our own abilities. This confidence is based on real-world experience, allowing us to take on serious responsibilities and be accountable for results.

2. The client is in the center of attention

We listen to and hear our clients and see our mission as increasing the value of their businesses. We are committed to understanding and solving their challenges.

We are committed to building long-term, trusting relationships with our clients and always delivering on our promises. By offering multiple options, we find the most effective solution for each task. This allows for productive collaboration and collaboration.

to improve together with our customers and partners.

3. The team is the foundation of our business

- The success of the team is the success of each person!
- We are one team!

The Company embraces a trusting and honest partnership with its employees. We value the contribution of each employee, their professionalism, and their commitment to the common cause. Softline team members respect each other and honor the culture and customs of each country in which the company does business. We help employees grow and develop. This is facilitated not only by courses and standard programs, but also by the support of experienced colleagues, an internal knowledge base, and the opportunity to participate in a variety of projects.

4. Innovation

- We know and predict market developments.
- We focus on finding growth opportunities.
- We pay maximum attention to the latest technologies and developments, directing the majority of investments into them.

We constantly monitor the latest trends and technologies, integrating the best approaches and solutions into our portfolio. We are actively developing our own products and services.

Everything changes, and so do we, learning and improving. Softline is creating the future with its own hands, together with its customers and partners.

5. Responsible business

- We are for the rational use of resources and a healthy lifestyle.
- We comply with applicable laws and business ethics.
- We respect the traditions and culture of each country.

We conduct our business in strict compliance with applicable laws and business rules. The company respects various national traditions, cultural values, and accepted norms. We encourage resource conservation, participate in charitable projects, and support sports initiatives and healthy lifestyle programs.

life.

Non-discrimination*

We embrace diversity and individuality. We strive to create an environment where we offer equal opportunities for everyone. We maintain a work environment of respect and dignity within the Company. Every employee has equal opportunities for career advancement. We are committed to Unlawful discriminatory practices, including harassment, are prohibited.

We do NOT allow discrimination based on ethnicity or national origin, gender, religion, worldview, age, disability, sexual orientation, skin color, political beliefs, social origin or other characteristics protected by law.

The selection, hiring and further career advancement of our employees is carried out solely on the basis of their qualifications and abilities.

Important!

We are free from prejudice and do not tolerate discriminatory actions.

*For more information, see the "Non-Discrimination and Anti-Harassment Policy"

Non-tolerance of sexual harassment and stalking*

Sexual harassment constitutes discrimination and is illegal under applicable law. Sexual harassment can include a range of subtle and highly visible actions, targeting individuals of the same or different genders.

Depending on the circumstances, such behavior may include:

- unwanted advances or requests for sexual intimacy;
- offensive sexual remarks, comments about an individual's body, sexuality or sexual shortcomings, jokes about sex and sexual innuendo;
- inappropriate smirking, whistling or touching;
- offensive or obscene remarks or gestures;
- placing in the workplace or distributing objects that contain ambiguous sexual references or pictures;
- other physical, verbal or visual actions of a sexual nature.

We live in a civilized society and do not allow actions that can be interpreted as sexual harassment.

Conflict of interest**

We respect the privacy of our employees. However, we must prevent situations where personal interests conflict with business interests. It is unacceptable for decisions to be influenced by reasons related to the personal interests of Company managers or employees other than business expediency.

We consider such reasons to include conflicts of interest related to the participation of Softline employees in the work of other organizations, the influence of family ties, and other reasons.

Important!

A conflict of interest is a situation in which activities or relationships interfere (or may be perceived to interfere) with your ability to act objectively and fairly.

* For more information, see the Whistleblower Policy and the Non-Discrimination and Anti-Harassment Policy. ** For more information, see the Conflict of Interest Policy.

Important!

We DO NOT allow personal relationships to influence the objectivity and fairness of our decisions. We DO NOT conceal and honestly disclose any existing or potential conflicts of interest.

Joint work of relatives

Your relatives include your spouse, parents, siblings, grandparents, children, grandchildren, parents-in-law, or cohabiting partners. Relatives also include any family members who live with you or are otherwise financially dependent on you.

However, when dealing with family members not included in the above list, please ensure that your relationship does not (and cannot be perceived as) interfere with your ability to act objectively and fairly.

Perhaps one of your friends is an employee or shareholder of a client or supplier of the Company. In your dealings with such a client or supplier, you should ensure that your friendship does not affect your ability to act objectively and fairly, and cannot be perceived as affecting your relationship with the supplier or

client.

We do NOT approve of relatives working together who are directly or indirectly subordinate (influenced) by each other, as this creates the following problems:

- Decisions of relatives who are superiors in relation to relatives who are subordinates may be biased or perceived as biased by other employees of the Company and/or third parties, including shareholders, counterparties, the state and government bodies, trade unions and professional associations, and participants in the securities market.
- A similar situation may arise when relatives participate jointly in one business process, if the decision of one employee-relative affects the performance of the job responsibilities of another employee-relative.

We limit the number of times relatives can work together and reserve the right to not consider candidates for any position within the Company if they are related to or have the potential to influence current employees. We completely avoid favoritism based on nepotism.

We DO NOT allow situations where a relative who is a superior is a direct or indirect (influence) manager of a relative who is a subordinate. However, joint work at the Company between relatives who are not directly or indirectly subordinate (influenced) each other, is permitted by decision of senior management.

Engaging in entrepreneurial activity

We adhere to a policy of openly declaring the employment of employees in other areas of the business, and are also interested in full employment and the work of employees with maximum efficiency.

in the work.

Our company discourages employees from running their own businesses, which could distract them from their job responsibilities. However, Company employees are permitted to participate in the capital of other organizations through stock and bond ownership. As an exception, employees may participate in the authorized capital of organizations that generate income for the Company or offer services at below-market prices while maintaining quality.

Employees are NOT RECOMMENDED to found or manage organizations whose scope of activity does not coincide with the activities of Softline.

Employees are NOT ALLOWED to found or manage organizations whose activities overlap with those of Softline.

Human rights and the prohibition of forced and child labor

We respect the protection of human rights and the rights of the child. For us, these are fundamental norms, which we adhere to without exception.

We reject any form of forced or child labor, modern slavery, or human trafficking. Our position applies not only to our company but also to our business partners.

Forced labor is any work or service that a person is forced to perform against his or her will under threat of punishment, or to which the person did not agree voluntarily.

When hiring an employee, local regulations regarding the age of employment must be observed, and restrictions related to the use of minors in particularly hazardous work and facilities must also be kept in mind.

Furthermore, managers at all levels and HR staff must ensure that the employee has chosen our company of their own free will and is free to resign at any time in accordance with applicable law.

legislation.

Important!

We work for the company only by mutual consent of both parties. We do not hire employees who have not reached the age of majority.

Occupational Health and Safety*

We take the safety and health of our employees very seriously. We create workstations and office spaces that comply with all applicable occupational health and safety requirements. The health and safety of our employees is a priority for our company.

We continually improve and optimize working conditions to reduce occupational injuries, enhance employee productivity, and improve workspace comfort. We encourage and promote a healthy lifestyle, exercise, and avoidance of alcohol.
bad habits.

Important!

We work in comfortable conditions that ensure our safety and health. We inform our employer about the potential dangers and disadvantages of the office environment.
space.

Protection of trade secrets and intellectual property**

Trade secrets and intellectual property, whether owned by the Company under any legal basis, constitute one of the Company's most important assets. We carefully protect our trade secrets and intellectual property.

We create intellectual property every day of our work. Everything we do together constitutes intellectual property and trade secrets, regardless of whether we have a patent or trademark for it.

* For more information, see the Occupational Health and Safety Policy.

** For more information, see the "Policy for the Protection and Proper Use of Company Assets" and "Data Protection Policy"

Information systems

We use information systems within reasonable limits. Softline's rules must be strictly observed (even with respect to personal data) both within the Company's information systems and outside of them if the user's actions could be related to the Company. This means, for example, that we do not use the Company's information systems to send or forward personal (or any other) information that does not comply with our Code of Ethics and

compliance (or any other applicable policies) for any purpose that is knowingly false, dishonest, or otherwise impermissible.

If we have access to the Company's information systems, we take the necessary measures precautions, including protecting passwords and other login methods to prevent unauthorized access to these systems.

We use the software only in accordance with the license agreements and
We carry out the following actions only after receiving prior permission from Companies:

- install any software on the Company's computer equipment;
- install the Company's software on any non-computer equipment owned by the Company;
- provide anyone with copies of the Company's owned or licensed software provision.

Intellectual property

Our Company's intellectual property rights are assets of high value.

cost, and they must be protected by all employees. We also have great respect

We treat all intellectual property rights of others with respect. Intellectual property includes, but is not limited to, patents, trademarks and service marks, domain names, copyrights, including copyrights in software, industrial property rights, rights to access databases, rights to know-how or other confidential information (sometimes referred to as "trade secrets" or "proprietary information"), and rights under intellectual property agreements.

The results of employees' performance are also the property of the company. Their use for purposes not related to official activities is possible only if
if prior permission has been received from the company's security department.

We DO NOT use the Company's systems in violation of applicable intellectual property rights.
property. Examples include illegal or unauthorized copying and distribution of materials that are subject to intellectual property rights.

Confidential information

We define privacy as follows: "Information is considered confidential if it is of a personal nature (whether it is information about an employee or any other person); if it is commercially significant; if it was provided on the condition of maintaining confidentiality; if it is information, the improper disclosure of which may lead to negative consequences for Softline, its partners and clients."

Examples of information we do not disclose:

- Personal files of employees and other personal data.
- Data constituting a commercial secret.
- Identifiers and passwords of users of information systems; document numbers of authorities social protection; contacts within the Company; banking and financial information; medical and health information, disability status, or special needs information; information about insurance and benefits received; and employee wages.
- Information about Softline that has not been published in open sources or permission which was not received for disclosure, including, but not limited to, information regarding the budget, financial matters, negotiations, tenders and other data.
- Results of meetings or negotiations of two or more employees (clients, partners), concerning clients (or partners). Discussing this information with people outside the Softline is possible only in cases where the client's consent has been signed (partner) to disclose this information. Discussion of the above information with managers and other company employees who are not subject to this information due to their job responsibilities or areas of responsibility is also prohibited.
- Information characterized as confidential in accordance with any other Softline policies, rules or regulations.
- Other information and documents that the employee should not disclose due to his/her responsibilities.

Protecting confidential data involves the following steps: in relation to the above information:

- Proper storage of materials containing confidential information in a place with the access level determined by the Company, established on an individual basis.
- Compliance with internal rules for handling paper documents containing confidential information in such a way as to eliminate the risk of its leakage.
- "Clear desk" policy – in case of expected long-term absence from the workplace
The employee removes documents from the desk. When the employee leaves the workplace
The computer is locked.
- Mandatory authorization when entering the information system.

- Use of special folders closed for public access when storing and transferring confidential information.
- Compliance with internal rules when sending confidential information via e-mail, copying, faxing, etc.
- Attentiveness and personal responsibility of employees in any, including oral, transfer confidential information.
- Making copies and duplicates of materials containing confidential information in case of the occurrence of force majeure circumstances where these materials may be damaged.

Important!

We DO NOT disclose information to others that has not been published in public sources.
We carefully protect our intellectual property and trade secrets.

We DO NOT use unverified or unofficial information.

Environmental protection*

We have set ourselves an ambitious goal: to minimize the negative impact of the Company's activities on the natural world. This applies to both the short and long term.

We select areas of activity, work methods, and resource types that have minimal environmental impact. We also help our clients and partners implement advanced methods and technologies designed to reduce resource consumption and mitigate the environmental impact of their businesses.

Important!

We respect the environment and use resources sustainably throughout our operations.

* Read more in "Environmental Policy"

Opportunity to speak out

We all want to work in a positive environment, make honest and fair decisions, and feel secure and confident in our work. We adhere to high ethical standards and consider not only ourselves but also the interests of others.

We want to maintain the comfortable environment that has developed in the company, so if we encounter behavior that makes us doubt whether it is honest, fair, or does not violate the interests of others, we report it to our manager or to the compliance service (compliance@softline.com), or by email speakup@softline.com.

If you believe that the conduct you have encountered violates the provisions of this Code, you should also contact the compliance service (Compliance@softline.com).

We must remember that prompt reporting will allow us to address the situation promptly and correct it before a violation of the law occurs, the company's reputation is damaged, or other negative consequences arise. The company is committed to maintaining your anonymity and conducting a comprehensive and complete investigation of the incident.

During internal investigations, employees are required to assist the company by answering questions promptly, honestly, and in as much detail as possible.

For each case of violation of the Code, the measure of liability is determined in accordance with the nature of the violation, as well as the presence of mitigating or aggravating circumstances.

We especially value the assistance of employees who help improve the working environment within the Company by promptly reporting potential issues that require attention. We protect such employees from any retaliation. The fact that an employee has honestly filed a report or participated in an investigation cannot serve as grounds for any negative consequences on their employment, including dismissal, demotion, or other consequences.

positions, temporary suspension from office, loss of benefits, threats, harassment or discrimination.

If one of our colleagues has sent a report or provided information needed by the company, we treat them with even greater respect because they had the courage to point out the problem.

If you experience harassment, please report it! For more information, please refer to our Whistleblower Policy.

Important!

We speak out boldly and openly about issues to prevent negative consequences. By speaking out, we help the Company improve. The Company guarantees your anonymity and protection from harassment.

Anti-corruption*

We firmly believe that bribery and corruption distort the market and hinder free competition. We pledge zero tolerance for any form of corruption.

We do NOT attempt to influence decision-making by promising, offering, giving, or transferring material or other valuables in any form or by any means (direct or indirect) to a government official, an employee of any government agency, employees of companies with state participation, or other persons who are in any way related to the state.

We do NOT make payments for assistance or resort to commercial bribery in the form of any material or other valuables.

We DO NOT use charitable donations to influence customer purchasing decisions.

We incur expenses for business hospitality only in strict accordance with applicable law, and such expenses must be proportionate and pursue purely business purposes.

We DO NOT carry out the above actions, regardless of whether Softline funds are used, and regardless of whether the bribe is given or offered directly or indirectly through third parties (such as agents, consultants, sales managers, distributors, resellers and subcontractors).

A public official is understood to mean:

- public official;
- elected official;
- an employee or staff member of a government body and/or a local government body,
including also educational institutions, healthcare institutions, military institutions, law enforcement and customs agencies, tax and immigration services, organizations issuing state licenses, sanctions, permits and others;
- an officer or employee of any company, enterprise, commercial organization or structures that are wholly or partially owned by the state;
- an employee or staff member of international organizations such as the United Nations, the International Olympic Committee, the International Committee of the Red Cross and Red Crescent, and others;
- leader and activist of any political party;
- a candidate for any political office.

* Read more in "Anti-Corruption Policy"

Important!

The transfer of material or other assets to children, spouses or other close relatives of any public official shall be equivalent to the transfer of material or other assets to the public official himself.

Material and other values are understood to mean:

- money;
- present;
- entertainment expenses;
- job offers (including for relatives of government officials)
persons);
- promises of future employment;
- providing discounts on products that are not available to regular customers;
- payment of transportation costs, accommodation costs and reception costs;
- personal services;
- donations for political purposes;
- donations to charity.

I received a request to make an unauthorized payment, what should I do?

- Refuse to pay and explain that Softline does not make such payments, since this is contrary to the provisions of applicable law and is also prohibited by the Code Business Ethics and Compliance Softline.
- Explain that the refusal is final.
- Never use non-verbal means of communication, including gestures, postures, hints of implied mutual understanding, in order to avoid the slightest assumption of the possibility of actions that contradict the company's anti-corruption policy.
- If it is a joint venture partner or a representative of Softline, explain that they are not authorized to make payments on behalf of Softline and that if the payment is made, the Company will be forced to terminate the relationship with them.

Important!

We do NOT promise, offer, give, or transfer directly or through third parties any material or other assets (regardless of the source of their financing) to a government official, employee of any government body, employees of companies with state participation and other persons who are in one way or another related to the state with the aim of influencing decision-making.

We promptly report any cases that come to our attention to the compliance service. manifestations of corruption.

Compliance with trade restrictions

We pay particular attention to applicable trade restrictions, including export control regulations. We operate in accordance with our Trade Restrictions Policy and Business Partner Due Diligence Policy, and we expect suppliers to comply with our Supplier Code of Conduct, including provisions related to trade restrictions.

Important!

We screen our business partners for applicable trade restrictions.

Fair competition

We advocate free market competition. Free market competition is the engine of development and progress. We compete solely on the basis of our tangible advantages. We operate in strict compliance with antitrust regulations and work with suppliers based on objective criteria for their selection.

We DO NOT allow situations in which we hire former government employees or their relatives for the purpose of establishing contacts or receiving any preferences.

We use ONLY legal and ethical methods to collect information about our competitors.

We do NOT enter into any kind of collusion with our competitors regarding pricing policies, market division or customer distribution.

We DO NOT set unreasonably high or unreasonably low prices.

We do NOT negotiate with our clients before tender procedures, we always participate in them on a general basis and we do NOT use confidential information for restrictions on competition.

We do NOT encourage or support the practice of poaching employees or clients of competing companies through the use of non-market or unethical methods.

Important!

We do NOT use illegal or unethical methods to gather information about our competitors. We do NOT enter into any type of collusion or pre-arranged agreements with our competitors or clients. We do NOT use confidential information to gain unfair advantages. We report any instances of unfair competition that come to our attention.

Anti-money laundering and counter-terrorism financing

We take all possible measures to prevent transactions and deals that are directly or indirectly related to the laundering of proceeds from criminal activity, as well as to exclude the possibility of conducting transactions related to the financing of terrorist activities.

We conduct exceptional due diligence on our clients, business partners, and other parties with whom we enter into transactions. We maintain business relationships only with partners whose activities fully comply with legal and ethical requirements and are based on

funds of legitimate origin.

We understand our business partners and ensure transparent and open cash flow. All payments are strictly in accordance with relevant agreements and are processed exclusively through bank accounts.

We have implemented a system of mechanisms to combat money laundering and terrorist financing, taking into account applicable legislation and best practices, including FATF recommendations. The system's operation is determined by the proper implementation of applicable programs and procedures, and their ongoing updating.

quantitative composition and qualitative content.

The Company continuously analyzes the relevance and adequacy of existing control methods and techniques as new methods of money laundering emerge and spread, legislation changes, and international law spreads.

experience.

Important!

We thoroughly vet our business partners and know our clients. We closely monitor all payments, paying particular attention to unusual payment methods and supporting documentation. We report any suspicious transactions that come to our attention.

Confidentiality and protection of personal data

We pay special attention to maintaining the confidentiality and protection of the personal data of our clients, business partners, employees, and other individuals whose personal data we process. Personal data includes, but is not limited to: last name, first name, patronymic, residential address, driver's license number, passport number, telephone number, and

etc.

- We process personal data in compliance with the principles and rules, provided for by international standards and domestic legislation of the country of presence in the field of processing and protection of personal data.
- We DO NOT disclose or transfer personal data without the consent of the data subject, unless otherwise provided by the requirements of applicable legislation in the field of processing and protection of personal data.

- We process personal data only if at least one of the following applies:
the following conditions:
 - the data subject has given consent to the processing of his personal data for one or more specific goals;
 - processing is necessary for the performance of an agreement to which the subject of the processed personal data is a party, or at the request of the subject of the processed personal data personal data before concluding such an agreement;
 - processing is necessary for compliance with the relevant obligations of the person who processes it carries out;
 - processing is necessary to protect the vital interests of the data subject or another individual;
 - processing is necessary to perform certain tasks and is carried out in public interests or for the performance of the functions of the person performing it;
 - processing is necessary to ensure the legitimate interests of the individual, the person performing the processing, or a third party, except in cases where such interests conflict with the interests of the data subject, for example, when the data subject is a child.
- We take all necessary steps to ensure that the data subject can exercise their legal rights.
- We take all necessary legal, organizational and technical measures to protect personal data from unlawful or accidental processing, including distribution and other illegal actions.
- We process personal information of data subjects only if the purpose processing cannot reasonably be achieved by other means.

We process and store personal data of subjects in accordance with applicable regulations and for no longer than required for the purposes of processing. Personal data processing is organized using both automated and non-automated methods.

We do NOT process personal data of persons under 16 years of age without the permission and consent of their legal representative. If we discover that personal data of a person under 16 years of age is being processed without appropriate consent, such processing will be immediately terminated.
is terminated and personal data is deleted.

We do NOT request data concerning the data subject's health. We do NOT have the right to obtain or process personal information about the data subject's political, religious, philosophical, or other beliefs, or about their private life, without their written consent.

Rights of the personal data subject

- The data subject may revoke consent to the processing of his/her personal data at any time.
information.

- Upon request by a data subject, we will provide information relating to him/her in an intelligible form and in writing within no more than twenty-five days of receipt corresponding request.
- The data subject may request that personal information about him/herself be corrected if it is inaccurate, incomplete or out of date.
- The data subject may request that his or her personal data be deleted.
- The data subject may request that the processing of personal information be restricted.
- The data subject may request the transfer of his personal data, provided that their processing is based on his consent or the performance of a contract and is carried out with the help of automatic means.
- If the data subject objects to the processing of information concerning him/her, we must investigate the reason for the objection as soon as possible (within fifteen days) and then notify the data subject in writing of the decision taken.
- The subject of personal data has the right to compensation and reimbursement for damages in the event of violation of his rights.
- The subject of personal data may file a lawsuit for violation of his rights.
- In case of any problems related to the terms of processing personal data,
The data subject may also lodge a complaint with a data protection supervisory authority.

Important!

We take all necessary measures to maintain the confidentiality of the information received.
personal data.

We do not process personal data without the consent of the individual whose personal information will be processed. We will notify you of any instances of personal data being processed without permission that come to our attention.

Assessment of counterparty reliability

We conduct comprehensive due diligence on our business partners using a risk-based approach. The depth and breadth of our due diligence depend on potential risks and other factors. We enter into business relationships with counterparties only when positive test result.

We conduct a multi-stage comprehensive audit, which consists of legal, financial, and security audits.

In order to avoid legal, financial and reputational risks, Softline's legal department first evaluates the history of legal cases, registration documents, media publications, information on reorganization and bankruptcy, etc. In the second stage

The financial service is involved, assessing financial statements, budgetary settlements, financial stability, and other indicators. The security service checks the reputation of both the legal entity itself and its top management. Enforcement proceedings, criminal cases, and administrative cases are also reviewed.

Based on information obtained during legal, financial and reputational checks, A conclusion is reached regarding the suitability of entering into a business relationship with a given partner. Comprehensive checks allow us to provide reasonable assurance that our business partners share the values that guide us in conducting our business.

Important!

We always carry out a comprehensive due diligence check on businesses. partners, based on a risk-based approach. We do not interact with business partners who have received a negative conclusion or have not yet undergone a comprehensive check.

Accuracy and completeness of financial reporting data

We strictly adhere to the established procedures for accounting and reporting, which accurately reflect each transaction, and also maintain a system of internal accounting controls. The requirement for fair and accurate registration of transactions extends to all original documents, including invoices, receipts, and expense documents, not just the general ledgers. We reflect all transactions and related data exactly as stated in all documents.

Accurate bookkeeping helps prevent the concealment of improper payments, misrepresentation of financial results, and corporate fraud. We have zero tolerance.

We treat individuals who achieve results through dishonest actions that violate established accounting policies with disrespect. We guarantee comprehensive support to any employee, who will refuse to participate in the distortion of financial statements.

Important!

We do not distort or conceal data that must be reflected and accounted for. We form ONLY reliable reporting based on official documents. We report on cases of distortion or inaccuracy of data contained in that have come to our attention reporting

Corporate social responsibility

We are focused on long-term projects in the areas of social responsibility and corporate volunteering that address the most pressing social issues. Among projects involving external social activities, the Company prioritizes child protection programs.

assistance to children with disabilities, as well as initiatives aimed at improving health.

We are actively involved in charitable activities to support the most vulnerable in social terms of citizens.

We participate in projects and programs to find and attract talented people to work for the Company. young specialists.

We promote a healthy lifestyle among our employees.

We provide additional assistance to those employees who find themselves in difficult life situations.

We always recognize the achievements of our employees, provide them with opportunities for professional growth and development, and ensure an inclusive environment.

Important!

We actively participate in community affairs, participate in various charitable events, and participate in corporate volunteering projects. We support and develop young talent and care for the health and well-being of our employees.