

**Approved by the resolution N Ռ-25-001 of sole participant
of “Aktina Capital” limited liability company**

Director: Tigran Davtyan



May 12, 2025

"AKTINA CAPITAL" LIMITED LIABILITY COMPANY

BUISNESS CONDUCT

CODE

YEREVAN 2025

1. GENERAL PROVISIONS

- 1.1.** The Rules of Business Conduct of “Aktina Capital” Limited Liability Company (hereinafter referred to as the “**Company**”) (hereinafter referred to as the “**Rules**”) are a general description of the mandatory rules, standards of business ethics, and conduct of the company. Every employee of the company (including contract employees) is obliged to comply with the requirements of these Rules.

2. BASIC PRINCIPLES OF BUSINESS CONDUCT

- 2.1.** The key to success in the company's work is the coordinated and cohesive work of the staff. The company's team pays the most attention, and great importance is given to the observance and development of work ethics and rules of conduct.
- 2.2.** In their work, employees are guided by the principles of mutual respect, attention, and mutual assistance towards customers and other employees. Each employee is obliged to observe the rules of appearance, business style, manner of speaking, and behavior both in their actions and in performing professional duties, both in communicating with colleagues and clients.
- 2.3.** Every employee of the company shows equal respect and restraint to all clients and partners, regardless of their national or ethnic, racial, sexual, or religious affiliation, beliefs, social origin, class, age, political orientation or other beliefs, financial or other status and the scale of the transaction.
- 2.4.** In conflict or emergency situations arising from direct contact with a client, employees are required to be patient, answer a client's question that causes confusion and anger, calmly and with dignity, demonstrating benevolence and balanced behavior, if necessary, contacting their immediate supervisor to resolve the issue. The ways and methods of conflict resolution follow from the work situation, serve specific work goals, and are constructive.
- 2.5.** In carrying out its normal business, the company is guided by customer orientation and the principles of an impartial and fair attitude towards all personnel management processes. Company employees are required to:
- 2.5.1** Refrain from actions that may interfere with the normal working process of the company,
 - 2.5.2** be guided by the principles of fairness, integrity and honesty,
 - 2.5.3** be guided by the principle of priority of the client's interests,
 - 2.5.4** be impartial, unbiased, restrained, and exemplary,
 - 2.5.5** By their behavior, they contribute to the formation and maintenance in society of the belief and belief that the company's activities are based on the ideas of impartiality, honesty, and fairness.
- 2.6.** The company attaches great importance to a friendly and attentive attitude to each client, and the provision of high-quality services strives to maintain the company's high business reputation through compliance with the rules of business conduct and to prevent situations that may damage the company's business reputation.

- 2.7. Newly appointed employees are familiarized with the company's work ethics and conduct rules in advance to be most knowledgeable and ensure that a high level of business behavior is maintained in the company.
- 2.8. In case of gross violation of the rules of business conduct, disciplinary penalties may be applied to an employee following the requirements of the company's internal legal acts and the RA Labor Code.
- 2.9. The Company has adopted a policy to combat conflicts of interest, anti-corruption and sanctions, and every employee should be guided by the provisions of these policies.
- 2.10. Each employee is aware that he should not allow his personal interests, preferences and others to influence the objectivity of his professional judgments and decisions, that situations in which personal interests contradict the interests of the company and clients, in which a conflict of interests may arise, should be avoided.
- 2.11. An employee of the company is prohibited in any situation, including in direct or indirect form, personally or through third parties, from offering, giving, promising, asking, or receiving bribes or making unplanned (unspecified, off-tariff) other payments to circumvent or shorten any normal process, transaction or other issues of the company: The Company expects clients to comply with the relevant anti-corruption rules from partners and other external structures.
- 2.12. The Company unconditionally complies with the requirements of legislative acts regulating the fight against money laundering and terrorist financing. The company takes measures to establish partnerships only with reliable partners who are engaged in legitimate activities.
- 2.13. The Company maintains confidentiality of official information concerning clients and partners following relevant internal legal acts and the procedure established by the Legislation of the Republic of Armenia.
- 2.14. The Company properly participates in corporate social responsibility projects, striving to contribute to the growth of the welfare of society.
- 2.15. Employees involved in political life are required to exclude its influence on the performance of their official duties, as well as possible conflicts of interest related to it.
- 2.16. The company has developed and applied effective complaint management and resolution mechanisms, which are guided by each employee of the company. The process of filing, reviewing complaints, making decisions, and responding is regulated by the relevant company procedure.
- 2.17. The company supports the creation of an atmosphere of trust among staff, in which issues related to ethics can be discussed, but if clients identify violations of these Rules or ethical standards, as a result of which damage has been caused or may be caused to the client or the company, clients can report this. info@aktina.am All emails will be reviewed by the company, and efforts will be made appropriate steps to eliminate further violations.

3. FINAL PROVISIONS

- 3.1. All additions and amendments to these Rules are approved by the meeting of participants (unless otherwise provided by the company's articles of association) and come into force from the moment of approval by the meeting.