

# EMPLOYEE MANUAL ON ETHICAL CONDUCT

**Effective Date:** 01/01/2020

**Issued by:** System Interlace and Software Joint Stock Company (**sysco.Soft JSC**)

**Purpose:** This manual establishes ethical standards and guidelines for all employees to ensure integrity and compliance with anti-bribery, anti-corruption, and business ethics policies.

## 1. Introduction

At sysco.Soft JSC, we commit to the highest standards of ethics and integrity. This manual serves as a guiding document for ethical behavior in all professional dealings.

## 2. Code of Ethics

### 2.1 Integrity & Honesty

Employees must uphold honesty and transparency in all communications and business transactions.

### 2.2 Anti-Bribery & Corruption

- Employees must **never** offer, accept, or condone bribery, kickbacks, or illegal incentives.
- Gifts, hospitality, and entertainment must be **modest, infrequent, and compliant** with company policy.
- Any suspicious activity must be **reported immediately** to the ethics committee or compliance officer.

### 2.3 Conflict of Interest

- Employees must **avoid** personal relationships or financial dealings that could conflict with company interests.
- Outside employment or business ventures must be **disclosed** to ensure no conflict exists.

### 2.4 Confidentiality & Data Protection

- Protect sensitive company and customer information.
- Employees must **never** disclose trade secrets or proprietary data.

## 3. Reporting Ethical Violations

### 3.1 Whistleblower Protection

- Employees who report misconduct are **protected from retaliation** under company policy.
- Reports can be submitted **anonymously** via [Insert Reporting System].

### 3.2 Investigation & Consequences

- Reported cases will be **thoroughly investigated** by the ethics committee.
- Violations of ethical conduct may lead to disciplinary actions, including termination or legal consequences.

#### **4. Ethics Training & Awareness**

- Employees must complete **annual ethics training** to reinforce ethical standards.
- Leadership will conduct **seminars and workshops** to ensure compliance across all levels.

#### **5. Commitment to Corporate Social Responsibility (CSR)**

sysco.Soft JSC believes in social responsibility. We commit to fair labor practices, environmental sustainability, and ethical partnerships globally.