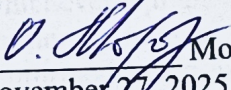


APPROVED

Director LIMITED LIABILITY COMPANY
"ADVERTISING AGENCY «HELLO PRO»


November 27, 2025

The company's code of ethics establishes norms and rules of conduct and communication for company employees, as well as our relationships with partners, consumers, and other interested parties. This document is intended to define our core values and to establish and maintain the high ethical and professional standards that form the basis of our culture.

The Code is an internal document that must be followed by all managers, officials, and employees of the company. The commitment to ethical behavior and compliance with the rules of this document is a necessary condition for the operation of our company.

1. Free choice of employer

1.1 Forced labor, bonded labor, or the use of forced labor by prisoners is prohibited.

1.2 Employees have the right not to provide their employer with a "deposit" or identification and to resign from their job by submitting a corresponding statement.

2. Respect for the right to freedom of association and the right to collective bargaining

2.1 All employees, without exception, have the right to join or form trade unions at their own discretion and to conclude collective agreements.

2.2 The employer takes an open position on the activities of trade unions and their organizational measures.

2.3 It is prohibited to restrict the rights of employee representatives and to restrict the performance of their representative functions in the workplace.

2.4 If the right to freedom of association and the right to conclude collective agreements are restricted by law, the employer is obliged to create conditions and not to hinder the development of alternative means of independent and free association in trade unions and the conclusion of collective agreements.

3. Safe working conditions that meet health and safety standards

3.1 The employer is obliged to ensure safe working conditions that comply with sanitary and hygienic standards, taking into account accumulated industry experience and specific risk factors. The employer shall take measures to prevent accidents and damage to health as a result of, in connection with, or in the course of performing official duties, eliminating, as far as possible, the causes of risk factors in the workplace.

3.2 Employees are required to undergo regular occupational health and safety training with a certificate of completion, and new or transferred employees must undergo training again.

3.3 Clean toilets and drinking water must be available, as well as, where possible, sanitary facilities for storing food.

3.4 Common areas (if any) must be clean, safe, and meet the basic needs of employees.

3.5 A company that adheres to the code is required to appoint a senior manager to be responsible for occupational health and safety.

4. Prohibition of child labor

4.1 Prohibition of new recruitment of child labor.

4.2 Companies should develop or participate in the development of policies and programs that provide for the transfer of any child performing child labor to enable them to attend educational institutions and continue to receive quality education while still considered a child.

4.3 It is prohibited to engage children or young people under the age of 18 in night work or hazardous work.

4.4 Relevant policies and procedures should comply with applicable International Labor Organization (ILO) standards.

5. Payment of wages at the minimum subsistence level

5.1 Wages and bonuses paid for a standard working week should, at a minimum, meet national legal requirements or comparable industry standards (whichever is higher). In any case, wages must be sufficient to meet basic needs and provide some discretionary income.

5.2 Prior to employment, all employees must be informed in writing and in a comprehensible manner of the terms and conditions of employment with regard to wages. They must also receive full information about their wages for the relevant pay period at the time of payment.

5.3 It is prohibited to apply deductions from wages as a preventive disciplinary measure, as well as deductions not established by national legislation, without the direct consent of the employee concerned. The employer is obliged to record data on all disciplinary measures.

6. Compliance with working time regulations

6.1 Working hours shall comply with national legislation, collective agreements, and clauses 6.2-6.6 below, whichever provides greater protection for employees. Clauses 6.2-6.6 are defined in accordance with international labor standards.

6.2 Working hours, excluding overtime, shall be determined by the employment contract and shall not exceed 48 hours per week.

6.3 All overtime work is voluntary. Overtime shall be used responsibly, taking into account all of the following factors: the amount of work, the frequency and total duration of overtime hours worked by individual employees and all staff as a whole. It shall not be a substitute for regular employment. Overtime shall always be compensated at an increased rate, which is recommended to be no less than 125% of the normal rate of pay.

6.4 The total working time during a 7-day period shall not exceed 60 hours, except as provided in paragraph 6.5 below.

6.5 Working time may exceed 60 hours over a 7-day period only in exceptional cases where all of the following conditions are met:

- it is permitted by national law;
- it is permitted by a collective agreement freely agreed with a workers' organization representing a significant proportion of the enterprise's workforce;
- the enterprise has adopted appropriate safeguards to protect the health and safety of workers;
- the employer can demonstrate that exceptional circumstances arise, such as unexpected production peaks, accidents, and emergencies.

6.6 Employees shall be given at least one day off every seven days or, if permitted by national law, two days off every 14 days.

7. Prohibition of discrimination

7.1 Discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, or political affiliation is prohibited.

8. Introduction of permanent employment

8.1 Whenever possible, work should be carried out on the basis of formal employment relationships established by national law and practice.

8.2 The obligations of workers covered by labor or social security and insurance legislation arising from permanent employment relationships cannot be circumvented by the use of temporary agency work contracts, subcontracting or home-based work, or through internship programs that do

not provide for the actual transfer of experience or subsequent employment on a permanent basis, nor should such obligations be excluded through the excessive use of fixed-term employment contracts.

9. Prevention of cruel and inhuman treatment

9.1 Physical violence or punishment, threats of physical violence, sexual or other harassment, verbal abuse, or other forms of intimidation are prohibited.

10. Confidentiality and protection of information

10.1 All information circulating within the company is its property, is considered restricted information, and cannot be disclosed to third parties. Confidential information may only be used in the course of performing official duties.

10.2 Disclosure of information to state authorities is carried out exclusively in accordance with the procedure provided for by the current legislation of Ukraine, the Charter, and our internal documents.

10.3 Disclosure of commercial secrets and other restricted information or use of such information for personal gain shall entail liability in accordance with applicable law..

11. Responsibility for violations of the Code

11.1 All employees of the company, regardless of their position and job title, are required to comply with this Code.

11.2 The heads of all structural units are responsible for ensuring that their subordinates comply with the provisions of the Code.

11.3 Violation of the provisions of this Code may result in disciplinary action, up to and including dismissal of the employee.

12. Preserving the anonymity of complaints and suggestions submitted

12.1 Employees may choose to submit reports anonymously.

12.2 The helpline must be configured to prevent automatic identification of incoming callers' telephone numbers.

12.3 Anonymous reports that have been registered are processed in the same way as other reports, provided there is sufficient information to respond to the report.

12.4 To ensure your anonymity when submitting a report, employees must follow these simple rules:

- Do not send reports from a work computer.
- Do not use a work phone provided by the company.
- Do not sign the report.
- Do not provide details that could help identify the person.

If your information concerns your immediate supervisor, the investigation should be conducted at a higher level in accordance with confidentiality requirements.

Contacts for submitting anonymous requests:

Mailing address: 1v Vadym Hetman Street, apt. 169, Kyiv, 03058, Ukraine

Email address: Olga@hello-pro.com.ua

Phone number for anonymous inquiries: (067) 9137717

The "trust box" for submitting anonymous inquiries is located in the corridor to the right of the office entrance door.