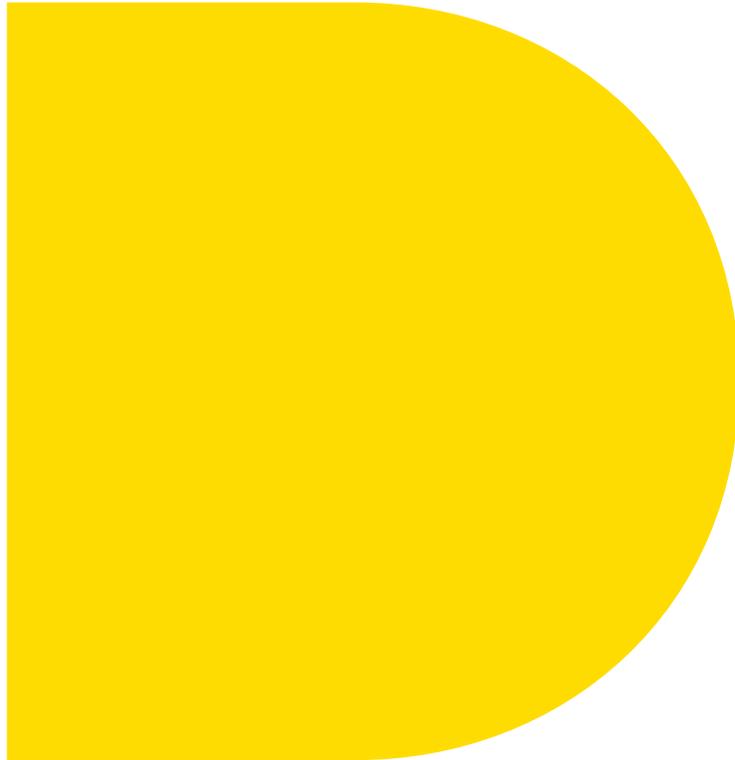


Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	



DTEK Ethics and Business Conduct Code

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK`S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

TABLE OF CONTENTS

Foreword	5
1. Introduction to the Code	7
2. Mission, vision, and values	8
3. ESG Strategy	10
4. Core Rules and Principles of Business Conduct	11
5. Tone at the Top	12
6. Occupational Health and Safety	13
7. Equality in the Workplace. Diversity and Inclusion	15
8. Conflict of Interest	16
9. Fraud	17
10. Use and Protection of DTEK`S Resources	18
11. Corruption	19
12. Business Hospitality and Gifts	21
13. Interaction with Counterparties	22
14. Interaction with the Government	23
15. Confidential information and personal data	24
16. Inside Information	25
17. Fair competition and trade	26
18. Accuracy of Records and Reporting	27
19. Anti-Money Laundering and Combating the Financing of Terrorism	28
20. Political and Religious Activities	29
21. Environment	30
22. Reporting Violations of the Code	30
23. Whistleblower Protection from Retaliation	32
24. Sanctions for the Breach of the Code	33
Contacts	34

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←



Dear colleagues,

DTEK Group is the leader and the largest private investor in the energy sector of Ukraine, with our sights set on European growth.

The combination of efficient production processes and open, responsible, and ethical business conduct is a vital factor that determines successful implementation of all our development plans and helps us to maintain our leadership position.

Honest and ethical conduct of each employee is a cornerstone of the company's success. This is why this Code is not a mere formality. We strongly believe in the values and principles outlined in the Code. It means that we have to act with the greatest respect for the law and human rights, follow rules of ethics, and know and comply with the rules set out in this Code both in and outside the workplace.

It is essential that each of us acts as the guardian of the Code and that we immediately raise any concerns whenever we see that it has been breached.

We must remember that trust in and within the company is a cornerstone of our business's sustainable and successful development. This trust is built by the actions taken by each of us.

Sincerely yours,
**Maxim Timchenko, Chairman of the Management Board
DTEK GROUP B.V.**

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

1. Introduction to the Code

This Code is a set of the rules of corporate ethics and business conduct that have to be followed by Employees of DTEK GROUP B.V. as well as Employees of businesses whose shares (participatory interests) are held either directly or otherwise by DTEK GROUP B.V. (together – “DTEK” or “DTEK Group”).

The Code outlines the core values and principles inspired by DTEK’s mission, vision, and corporate values, as well as the rules of ethics and business conduct that must be adhered to by all Employees.

The knowledge of and adherence to the Code will help each Employee make the right decisions and therefore avoid situations that could cause damage to the reputation of the Employee and DTEK in general.

It is the duty of each Employee to know and comply with this Code while performing their employment duties or services.

The Employee means:

- any member of the executive or supervisory body, including CEOs, members of the Management Boards, members of the Boards of Directors and members of the Supervisory Boards of DTEK GROUP B.V. and other DTEK Group companies, as well as all other direct managers and supervisors (the “Managers”);
- any employee having an employment contract with either of DTEK Group companies, including full-time or part-time employees working on a permanent or on a temporary basis; independent contractors and consultants; trainees and interns.

Each Employee must remember that their conduct has a direct impact on their own reputation and the reputation of DTEK, which is why compliance with the Code is also encouraged in their everyday lives.

Whenever the Employee is not sure what they are expected to do in a controversial situation or does not understand the requirements of the Code, the Employee should seek advice from their direct Manager, the Trust Line, the Security Service Officer or the Compliance Officer.

The Managers have to prevent, detect, and promptly respond whenever the Code is breached by their subordinates.

The Compliance Officer is an Employee at DTEK’s Compliance Service.

DTEK expects its Counterparties to share DTEK’s values and principles and commit to following the rules of ethics and business conduct established by DTEK and reserves the right to refuse to cooperate with the Counterparties who violate the Code.

Counterparties mean DTEK’s existing or potential counterparties, including customers, clients, agents and persons providing outsourced services.

Inside Information means information, which: (i) is of a precise nature; (ii) has not been made public; (iii) is relating, directly or indirectly, to one or more Financial Instruments or Wholesale Energy Products, or one or more Financial Instruments; and (iv) would, if it were made public, be likely to have a significant effect on the price of Financial Instruments or Wholesale Energy Products, respectively.

Financial Instruments mean any publicly traded or other financial instruments (including but not limited to, shares, bonds, or other debt instruments) that are issued and/or traded by any of DTEK Group companies, and any related derivative instruments that are convertible into such financial instruments.

Wholesale Energy Products mean the following contracts and derivatives, irrespective of where and how they are traded: (i) contracts for the supply of electricity/natural gas; (ii) derivatives relating to electricity/natural gas; (iii) contracts relating to the transportation of electricity/natural gas; (iv) derivatives relating to the transportation of electricity or natural gas; and (v) other contracts and derivatives that are determined as “wholesale energy product” according to the applicable laws.

2. Mission, Vision, and Values

✓ Our mission

We are working in the name of progress and social prosperity. Our energy brings light and warmth to people.

✓ Our vision

We are a dynamically developing Ukrainian company that strives for leadership on the European energy markets. Our success is based on people, efficiency, and advanced technologies.

✓ Our values

Professionalism

Our Employees have extensive professional knowledge, carry out their duties responsibly and diligently, and accomplish their tasks in a timely and very competent manner. We strive to achieve the best results while making the best possible use of human, natural, and financial resources.

Unity

We value team spirit, unity, and solidarity. We can only achieve strong results as a team. We enjoy both working and socializing together. Achieving our common potential comes from the diverse experience and knowledge of each Employee. Our unity comes from the pursuit of common ideas and goals, while understanding and supporting each other.

Responsibility

We are building our business on the understanding that all our efforts should serve the interests of society. We bear responsibility for the quality of our work and the observance of corporate standards, for meeting our obligations, for using resources prudently, and for protecting the environment. We are responsible for the people who make the success of our company possible – our Employees.

Openness

We are open and keep our Employees, partners, shareholders, and other external stakeholders informed about important issues regarding our development, creating a foundation for working together in a spirit of trust. We conduct our business based on principles that are clear to our Employees and partners.

Customer and client focus

We build trust with our customers and clients by creating a diverse portfolio of energy products and solutions for them, educating them about responsible consumption through the provision of energy services, and developing with them sustainable business relations. We have created a retail brand to allow everyone access to reliable supply and innovations.

Pursuit of excellence

We create the right conditions for the development of our Employees' talents and abilities, we implement the most promising technologies, and we improve production and management processes. As we expand our business, we strive to instil confidence in our Employees and contribute to the successful development of Ukraine.



Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

3. ESG Strategy

DTEK is a leader of environmental modernization in the energy sector, accepts full responsibility for the environmental and social impact of its activities and is concerned about the quality of life of future generations. DTEK has integrated 12 Sustainable Development Goals promoted by the UN Global Compact into its ESG Strategy until 2030.

ESG Strategy is a document setting out the strategic Environmental, Social, and Governance initiatives undertaken by the company to ensure its sustainable development.

Priorities of the ESG Strategy

- Fulfil air and climate protection commitments by investing in renewable energy and reducing the carbon footprint of thermal generation.
- Follow the principles of circular economy, including the reuse of industrial waste.
- Protect biodiversity and promote the preservation of ecosystems.
- Strive to achieve high social standards while acting as a responsible corporate citizen.
- Ensure a safe workplace, promote a strong safety culture, and operate a holistic health care system for employees.
- Comply with the best corporate governance, risk management, and compliance practices.

4. Core Rules and Principles of Business Conduct

DTEK bases its activity on the principles of compliance with the applicable laws. DTEK builds relations with Employees on the principles of respect for human rights, protection of personal dignity, and equal employment opportunities. Employees should share DTEK's mission, vision, and values.

Relations between the Employees, regardless of their position or occupation, as well as between the Employees and DTEK, are based on the following principles:

- honesty;
- respect;
- fairness;
- good faith.

DTEK builds relations with Counterparties based on the following principles:

- honesty;
- regulatory compliance;
- fairness;
- economic expediency.

DTEK strives to promote the sustainable development of local communities by providing support to the social infrastructure of the regions where DTEK operates and implementing social partnership programs.

DTEK engages in a dialog and fosters relations with local communities, civil society organizations, governmental authorities, and local self-governments based on the following principles:

- openness;
- cooperation.
- partnership;

DTEK strongly condemns any forms of harassment (including sexual harassment), as well as mental and physical abuse (including bullying and mobbing) committed by or against Employees.

DTEK does not tolerate the presence of Employees under the influence of drugs and/or alcohol on DTEK's premises while performing their job functions.

In the course of performing their job duties, Employees must adhere to business conduct standards.

5. Tone at the Top

Managers at all levels should act as role models for the Employees by complying with the rules of ethics and business conduct and demonstrating the importance of adherence to the standards set out in the Code:

- demonstrate a commitment to the values and principles of the Code through their personal conduct and actions;
- maintain an atmosphere of openness and trust that allows each Employee to feel comfortable and raise their concerns;
- avoid giving any instructions to Employees that would constitute a violation of the Code and breach the laws and regulations that apply to DTEK;
- support the Employees who raise their concerns about ethics and business conduct issues;
- take prompt action to remedy violations of the principles and standards set out in the Code and protect Employees who have reported violations of the Code from punishment or discrimination;
- consider the Employees' compliance with the requirements of the Code and their contribution to the formation of a culture of business conduct at DTEK when nominating them for employee development and motivation programs.

6. Occupational Health and Safety

DTEK takes every precaution to ensure labour protection.

DTEK strives to ensure strict compliance with occupational health and safety regulations and standards and demands the same attitude from its Counterparties.

DTEK reserves the right to refuse to cooperate with Counterparties who violate laws and DTEK's standards on labour protection.

DTEK creates and maintains a modern occupational safety management system that meets international standards.

DTEK's Managers set an example for other Employees in meeting occupational safety requirements.

DTEK's Managers take personal responsibility for creating and maintaining safe and healthy working conditions, reducing and preventing occupational injuries, and improving the production culture.

- Where applicable, the use of personal protective equipment is compulsory for Employees, who must strictly adhere to the applicable occupational safety rules while performing their job duties and while on the territory of DTEK enterprises.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←



7. Equality in the Workplace. Diversity and Inclusion

DTEK complies with labour laws and regulations.

DTEK operates in accordance with the principles of the Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions (Conventions Nos. 29, 87, 98, 100, 105, 111, 138, and 182), and other international human rights documents, and honours its commitments under the UN Global Compact.

We have embraced those principles by including them in our policies and conduct towards our colleagues, customers, clients, partners, and all other persons with whom we interact.

DTEK respects the right of the Employees to join the trade union or other organizations of their choice in full freedom to represent their rights.

DTEK pursues a policy of equal opportunity in the workplace and does not tolerate any discrimination on the following grounds:

- gender;
- skin color;
- ethnicity;
- nationality;
- race;
- age;
- ethnic, social, and foreign origin;
- political, religious, and other beliefs;
- gender identity;
- marital status and financial situation;
- sexual orientation;
- health;
- disability;
- language or other characteristics.

Child labour and forced labour are absolutely prohibited at DTEK. The same standards apply to DTEK's Counterparties.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

8. Conflict of Interest

Employees should avoid actions and situations that could cause a conflict of interest and are contrary to DTEK's interests. Employees must avoid gaining personal advantage from business opportunities that arise when they perform their job duties at DTEK.

Situations of conflict of interest include the following situations:

- the Employee combines his/her employment or other duties at DTEK with employment or serving as the board member at a legal entity outside DTEK Group;
- the Employee acts as a supervisor or exercises influence on the performance appraisal or promotion of relatives, close friends, or other related persons;
- the Employee, while acting on behalf of DTEK, establishes business relations and/or conducts business with legal entities where the Employee or their related person is a member of a corporate body or holds a share in the capital; and
- other situations where the Employee, while performing their duties, has a personal interest which affects or may potentially affect the Employee's objectivity or impartiality of their judgements, decisions, or actions in performing their duties.

The aforementioned situations may be considered as potential conflict of interest but will not be deemed a breach of the Code if the Employee has notified the Compliance Officer and obtained their approval.

In addition to the provisions of this Code, the situations of Conflict of Interest of the Supervisory Board members are governed by the Supervisory Board Regulations of relevant DTEK Group companies.

9. Fraud

DTEK prohibits any fraud, which means the illegal acquisition of the right to DTEK's property by deception or abuse of trust.

In particular, fraud includes but is not limited to the following actions:

- accepting or providing improper benefits by Employees to influence business decisions made by the Employee or Counterparty;
- supplying or accepting products/equipment, the quality or quantity parameters of which do not correspond to those indicated in the documents;
- fictitious deliveries of goods and materials, including the situations when an Employee colludes with a Counterparty;
- actions aimed at obtaining personal benefits in the course of a pre-action process in collusion with a Counterparty;
- submission of forged payment documents for payment.

10. Use and Protection of DTEK'S Resources

All employees should treat DTEK's resources with due care and use them prudently and in accordance with applicable rules.

Resources include DTEK's tangible assets (for instance, movable and immovable property, money, etc.) and intangible assets (intellectual property, corporate reputation, Employees' paid working hours, etc.).

In particular, the improper use of DTEK's Resources includes but is not limited to the following actions of Employees:

- the use of equipment, vehicles office equipment, and other DTEK's property in violation of DTEK's internal regulations;
 - inefficient use of DTEK's funds, working hours, and other resources by Employees;
 - embezzlement, fraudulent write-offs, and removal of parts/components as well as a failure to disclose information about such incidents;
 - negligent handling that may result in damage, or wilful damage to machinery, equipment, and personal protective equipment provided to the Employees for carrying out their job duties.
- ! DTEK discourages the use of its name and reputation by Employees for personal gain.

11. Corruption

Employees may not promise, offer, or provide remuneration in the form of cash, property, material value, or services to government officials or their related persons, as well as representatives of a legal entity (an employee, officer, or representative by virtue of a power of attorney or contract, etc.) to obtain or retain advantages for DTEK.

DTEK also prohibits making facilitating payments to government officials and their affiliated persons with the intention of expediting an administrative process related to obtaining permits, simplifying formalities, or obtaining similar benefits for DTEK.

DTEK conducts its business in line with applicable anti-corruption laws, international anti-corruption laws and regulations, and complies with the best international anti-corruption standards and practices.

! Whenever Employees encounter an issue or situation that concerns corruption, they must contact the Compliance Officer.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←



12. Business Hospitality and Gifts

Business Gifts mean material items (such as money, its equivalents, goods, and services) that are given/received free of charge by DTEK's Employees when interacting with third parties.

Business Hospitality is any form of hospitality (such as lunch, dinner, visits to sporting or cultural events, including associated accommodation and transportation services) provided/received free of charge by DTEK's Employees when interacting with third parties.

DTEK discourages Employees from accepting, offering, or giving/providing Business Gifts or Business Hospitality from/to third parties, including suppliers and Counterparties. In any case, Business Gifts and Business Hospitality should not impact and should not be assumed to be impacting business decisions made by Employees or binding them to make certain business decisions

When giving or accepting a Business Gift or Business Hospitality, Employees should ensure that such Business Gifts or Business Hospitality are given or accepted openly and not in an attempt to deceive or conceal a nature, value, or purpose of the Business Gift or Business Hospitality, or identities of the persons giving and receiving them.

Business Gifts and Business Hospitality may be accepted or offered by Employees only if they are appropriate, reasonable, proportionate, and are not contrary to the requirements of applicable law, the Code, and DTEK's internal rules and regulations.

Employees must seek prior approval to giving/providing or accepting a Business Gift or Business Hospitality when required by DTEK's internal rules and regulations.

13. Interaction with Counterparties

DTEK reserves the right to refuse to cooperate with Counterparties who breach the applicable law, including but not limited to, anti-corruption laws, laws protecting the rights of employees, occupational health and safety laws and regulations, and environmental protection laws. DTEK will not also cooperate with Counterparties who do not share DTEK's values and principles, rules of ethics and business conduct outlined in the Code.

DTEK may provide training on anti-corruption matters to the Counterparties that act as DTEK's representatives or agents.

DTEK protects confidential information about its Counterparties and their personal data.

- DTEK respects the property rights of the Counterparties, including their intellectual property rights, and does not acquire confidential information about Counterparties illegally. DTEK promotes free and fair competition and offers its Counterparties equal competitive opportunities for cooperation.

14. Interaction with the Government

DTEK builds its relations with governmental authorities and local self-governments on the principles of openness and strict adherence to the rules of law.

When interacting with governmental officials, the Employees must comply with laws and regulations that apply to DTEK.

DTEK promotes the sustainable development of society and strives to contribute to the economic and social development of the countries where DTEK conducts its business.

Society and civil society organizations

DTEK is a socially responsible business. One of DTEK's priorities is the development of open and transparent business relationships with the communities in the regions where it operates.

Successful cooperation between the company and society is a cornerstone for the sustainable development of local and territorial communities in the regions where the company operates.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

15. Confidential information and personal data

Each Employee must comply with DTEK's internal regulations that govern the access to, use, and disclosure of Confidential Information.

Confidential Information is information relative to DTEK's production processes, management practices, technologies, financial, and other operations, the disclosure or dissemination of which may be detrimental to DTEK's interests or cause a substantial impact on the reputation and financial position of the company.

Employees are prohibited from collecting and disclosing Confidential Information to anyone to obtain personal benefits and benefits for third persons.

To prevent an adverse impact on DTEK's reputation, Employees are discouraged from communicating with the media on behalf of DTEK without the prior approval of their direct Manager and the Corporate Communications Service.

Employees may not discuss or disclose Confidential Information to any third parties unless required by applicable law, or unless Confidential Information is discussed or disclosed within the framework of officially approved processes and projects with the Counterparties subject to the execution of a valid Non-Disclosure Agreement.

DTEK respects everybody's right to confidentiality and ensures compliance with applicable personal data protection laws and regulations.

Employees may not process personal data without legal basis.

Whenever the Employee receives a request for the disclosure of Confidential Information or is blackmailed by any third parties into disclosing the company's Confidential Information, the Employee must immediately notify their direct Manager, the Trust Line, the Security Service Officer or the Compliance Officer.

Whenever the Employee receives a personal data subject access request made in any form, the Employee must immediately notify their direct Manager and the Data Protection Officer (if applicable).

16. Inside Information

DTEK treats Inside Information responsibly and shares zero tolerance to any attempts of insider dealing or trading or disclosure of Inside Information in violation of applicable law.

Employees who have access to Inside Information must treat Inside Information as strictly confidential and use Inside Information exclusively in full compliance with the provisions and requirements of applicable law, this Code and other internal policies or regulations adopted by DTEK group companies in respect of management and control of Inside Information.

Employees are not entitled to disclose Inside Information to any persons, except when required in accordance with the proper execution of their employment or professional duties, or mandatory provisions of the applicable legislation. If Inside Information is disclosed by an Employee or a Manager on the basis other than described above, this will be treated as unlawful disclosure of Inside Information.

Inside Information may only be communicated or made available to another person if the recipient has a relevant, well-founded need for the information, assessed on the basis of DTEK's interests. A strict "need to know" principle applies at DTEK, i.e. as few people as possible shall have access to the information.

Employees are prohibited from insider dealing or trading (using or attempting to use Inside Information for acquiring or disposing of Financial Instruments and/or Wholesale Energy Products to which Inside Information relates or may impact); recommending or encouraging another person to engage in insider dealing or trading; unlawfully disclosing Inside Information to any person; and market manipulation in Financial Instruments and Wholesale Energy Products.

Non-compliance with this Section of the Code may lead to criminal or administrative sanctions to be imposed on Employees and relevant DTEK Group companies pursuant to applicable law.

Any Employee who communicates Inside Information or makes Inside Information available to another person, has independent responsibility to ensure that the person, who is given access to Inside Information, is simultaneously made aware of the duties and responsibilities entailed by the receipt of such information, including the duty of confidentiality, the duty not to misuse Inside Information and the criminal liability that is attached to any misuse or unwarranted distribution of such information.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

17. Fair competition and trade

DTEK is committed to the principles of free-market economy which is based on fair competition and trade. DTEK Group companies compete fairly and vigorously and respect the values of integrity wherever their business is done. In order to generally ensure consumers' well-being DTEK stands for integrity to fair competition and transparency of Financial Instruments' and Wholesale Energy Products' markets and other markets.

DTEK shares zero tolerance to any attempts of any abusive market practices, market manipulation, spreading misleading signals on the market, securing prices on artificial level or any other anti-competitive conduct and actions that are defined as a violation of competition law.

Any Employee shall be aware of fundamental competition law and fair trade principles, be capable to identify and avoid situations of violation of competition law or abusive market practices issues may arise, to understand the personal and corporate consequences of breaches. Any Employee shall act in accordance with the requirements of the competition law.

Non-compliance with this Section of the Code may lead to criminal or administrative sanctions to be imposed on Employees and relevant DTEK Group companies pursuant to applicable law.

18. Accuracy of Records and Reporting

DTEK ensures full compliance of its financial accounting and reporting with applicable laws and the International Financial Reporting Standards. DTEK strongly condemns and uses all efforts to prevent any manifestations and attempts of fraud and manipulation of its financial information.

DTEK's management has a duty to ensure the timely disclosure of information about significant financial risks to the benefit of investors, the Employees, and society.

Along with specified, DTEK takes responsibly for being transparent when dealing in Financial Instruments and Wholesale Energy Products and ensure sufficient transactions' reporting in a timely manner as prescribed by applicable local laws.

Any Employee engaged in trading activity is obliged to be aware of reporting duties in countries of DTEK's presence within their area of responsibility according to DTEK's internal codes and procedures in respect of reporting.

In order to ensure the sufficient level of Employees' awareness in respect of reporting duties, DTEK shall integrate and maintain education programs, which are obligatory to be passed by any Employee engaged in trading process at any level.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

19. Anti-Money Laundering and Combating the Financing of Terrorism

Employees must comply with anti-money laundering laws and laws countering terrorist financing that apply to DTEK.

DTEK interacts with its Counterparties in compliance with sanctions regimes within the framework of laws applicable to DTEK.

DTEK carries out due diligence of Counterparties to determine the legality of the Counterparty's business and to identify the risk exposure for DTEK.

- Employees are prohibited from entering into contracts on behalf of DTEK with Counterparties that have not passed the KYC procedure unless otherwise set forth in internal regulations of DTEK.

DTEK makes all payments in accordance with the laws applicable to DTEK and DTEK's internal rules and procedures.

20. Political and Religious Activities

DTEK does not engage in any political or religious activities.

Employees are prohibited from promoting any political or religious views or beliefs while performing their job duties and on or around DTEK premises.

Employees may not use DTEK's name, financial, material, or any other DTEK's resources to conduct their political or religious activities.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

21. Environment

DTEK strives to ensure that its production processes do not cause any harmful effects on the environment and uses its best efforts to mitigate such effects.

DTEK strives to mitigate the impacts of climate change and adapt to them, ensure the prudent use of its resources, and protect biological diversity and ecosystems.

DTEK is constantly engaged in a search for the most efficient innovative solutions for environmental protection and reduction of the impact of climate change and favors Counterparties that place the utmost importance on the environmental and social issues, have introduced measures, and apply instruments required to mitigate the negative impact directly resulting from their operations.

DTEK expects its Employees to make the necessary efforts to minimize the impact on the environment and climate through the prudent use of water and electricity, reduced travel by cars, reduced waste production, and ensuring proper treatment and disposal of waste.

DTEK uses its best efforts to improve environmental conditions in the regions where the company operates and preserve the environment for future generations.

22. Reporting Violations of the Code

Whenever the Employee becomes aware of any violation of the Code, they must immediately report their concerns to their direct Manager, the Trust Line, the Security Service Officer or the Compliance Officer.

Violations may be reported anonymously at DTEK. **The contact details of DTEK's Trust Line (online forms, phone numbers and email addresses) are published on DTEK's corporate portal.**

DTEK also encourages reports about violations of the Code committed by the Counterparties.

If the Employee suspects that another Employee might be violating the Code, they must point to such a violation, demand that the violation be stopped, and report it to the Trust Line.

DTEK conducts internal corporate investigations into reports about violations of the Code in accordance with procedures that apply at DTEK.

It is a duty of Employees to provide maximum support and assistance to internal investigators within the scope of internal corporate investigations conducted by them.

In the case the Employee has reasons to believe that their direct Manager has been involved in a violation of the Code, they must report their concerns through the Trust Line or contact directly the Compliance Officer or the Security Service Officer for help.

If the Employee is not sure whether certain acts constitute a violation of the Code, they may ask the Compliance Officer or the Security Service Officer for advice.

If the Employee, when reporting a violation of the Code to their direct Manager, the Trust Line, or the Compliance Officer, reveals their identity to receive information about the status of their report, the direct Manager or the Compliance Officer must protect the confidentiality of the Employee's identity.

Whenever the identity of the Employee who reported a violation is disclosed, the Compliance Officer must open an internal corporate investigation into a breach of confidentiality and take proper actions to protect the Employee from any subsequent retaliation or discrimination.

The provision of knowingly false information on violations of the Code by the Employees will not be tolerated.

Foreword	Introduction to the Code	Mission, vision, and values	ESG Strategy	Core Rules and Principles of Business Conduct	Tone at the Top	Occupational Health and Safety	Equality in the Workplace. Diversity and Inclusion	Conflict of Interest	Fraud	Use and Protection of DTEK'S Resources	Corruption	Business Hospitality and Gifts	→
Interaction with Counterparties	Interaction with the Government	Confidential information and personal data	Inside Information	Fair competition and trade	Accuracy of Records and Reporting	Anti-Money Laundering and Combating the Financing of Terrorism	Political and Religious Activities	Environment	Reporting Violations of the Code	Whistleblower Protection from Retaliation	Sanctions for the Breach of the Code	Contacts	←

23. Whistleblower Protection from Retaliation

DTEK absolutely prohibits any intimidation, harassment, or retaliation against Employees who reported violations of the Code, applicable laws, or other internal rules and regulations that apply at DTEK.

Acts of retaliation include any acts aimed at pressuring, threatening, humiliating, or persecuting the Employee who reported a violation.

24. Sanctions for the Breach of the Code

Violations of the Code by the Employee may result in disciplinary action.

- If DTEK discovers that the Employee or Counterparty violated the law, DTEK reserves the right to report the violation to law enforcement authorities that may result in administrative or criminal liability.



Trust Line Contact information

The contact details of DTEK's Trust Line (online forms, phone numbers and email addresses) can be found on DTEK's corporate portal.



Contact information of DTEK'S compliance service:

compliance-office@dtek.com

