

1. INTRODUCTION

This Code is designed to develop a strategy for business partner interaction with the values of PROFITABLE PURCHASE Limited Liability Company (hereinafter referred to as the "Company").

### THE MISSION OF THE COMPANY



ACCESSIBLE TO EVERYONE, TO BE THERE FOR EVERYONE AT ALL TIMES.

**For our partners this means:** We achieve our mission by constantly seeking out the best offers from partners.

THE CODE IS BASED ON THE COMPANY'S CORPORATE VALUES, WHICH ALSO LEAD TO THE ACHIEVEMENT OF OUR MISSION:

#### **#BE\_OPEN\_TO\_NEW**

We are a flexible team that always finds unconventional solutions and new opportunities to get better every day. Being open to change is our door to the future.

#### **#LEAD\_IN\_EFFICIENCY**

Our success is based on cost control and the right use of resources. We provide low prices and additional benefits to the customers, for which they choose Avrora.

#### **#INTERACT\_FOR\_THE\_DREAMS**

Unity is our core strength, for success is not the work of a single person. At Avrora, the environment is such that everyone is heard, and this awareness helps to serve customers and build trust.

#### **#CREATE\_YOUR\_OWN\_WORLD**

Everyone has personal dreams and ambitions. At Avrora, we achieve our personal dreams even as we help others. We believe that even a small idea can be the beginning of something big and real.

#### #TAKE\_RESPONSIBILITY\_ \_GET\_AN\_OPPORTUNITY

Taking responsibility is the desire to do more and better, because one wants special achievements. We create a fair environment in Avrora and are given opportunities to grow and develop.

We aim to work only with those who share our values, are willing to act transparently and continually improve their performance. We adhere to the principles and standards that are the basis of this Code and expect the same attitude from each of our partners. We recognise that business transformation takes time. To help make this a reality, the Company voluntarily accepts the responsibility to support the continuous improvement of our business partners' commercial practices and to facilitate their innovative projects. Our shared success is to be based on standards of openness and integrity, keeping promises and admitting mistakes.

We prioritise working with partners whose products and activities meet the highest standards of quality and safety.

### #GIVE\_GOOD\_FOR\_FREE

We have kind hearts that are capable of giving love without expecting anything in return.

## THIS CODE DEFINES THE BASIC PRINCIPLES OF OUR INTERACTION WITH PARTNERS.

We expect business partners to share with us a commitment to the principles outlined in this Code. We hope that partners plan to devote the necessary resources to this, particularly in terms of enhancing knowledge; adherence to standards; addressing shortcomings

identified; exceeding expectations of quality and standards of performance; continuity of processes (including risk mapping and response plans); improving the qualifications and quality of work of their own employees who are involved in cooperation with Profitable Purchase LLC.

WE LOOK FORWARD TO WORKING WITH THOSE WHO SHARE THESE PRINCIPLES. FOR THIS PURPOSE, WE HAVE DEVELOPED A SIMPLE REGISTRATION IN THE "PARTNERS" SECTION OF THE WEBSITE

HTTPS://AVRORA.UA/

## 2. WHO IS OUR BUSINESS PARTNER?

We require our business partners to carry out their activities in accordance with current legislation, including material safety, working conditions and occupational safety, environmental friendliness, fair competition, prevention of corruption in cooperation, ensuring authenticity and transparency of products and operations through the use of continuous accounting. All of the above are the basis of cooperation with PROFITABLE PURCHASE LLC.

#### THE MAIN CHARACTERISTICS OF OUR BUSINESS PARTNER:

Has excellent business reputation. Each potential partner after deciding to cooperate with us and submitting a relevant application on our website is checked by internal security and lawyers for integrity.



Maintains the highest level of customer focus and flexibility.



Meets or even exceeds the minimum stated capacity criteria.



Offers optimum delivery times, price levels and reasonable payment terms in line with our requirements as stipulated in the Cooperation Agreement.



Provides favourable warranty and service conditions; offers free training if the subject of purchase is specific equipment, machinery, software etc.



Develops its own business in order to set high quality standards of the respective industry.



Conducts business ethically and is willing to testify to mutual assurances regarding joint efforts against fraud and corruption.



Shares the principles and values of PROFITABLE PURCHASE LLC.

## 3. HOW TO BECOME A BUSINESS PARTNER?

We take pride in the quality of our products, which is why our standards are in most cases higher than legal requirements. This is why partners should be prepared, if necessary, to:

- provide product samples and additional verified information on product quality;
- be audited for integrity, market and quality requirements;
- undergo periodic audits by representatives of PROFITABLE PURCHASE LLC and allow them to enter their manufacturing facilities;
- monitor the development and implementation of corrective action plans;
- undergo third-party certification or annual training.

We also try to assess the long-term risks associated with our supply chains. With a view to continuously improving and enhancing operational processes, PROFITABLE PURCHASE LLC periodically updates specific requirements for business partners, including those related to logistics, product quality, labelling, palletising, protection of intellectual property rights, etc.



#### 4.4. SUPPORT FOR THE UKRAINIAN MANUFACTURER.

We consider Ukraine as our home country, so we support manufacturers who are transforming the country with their business. As the global economy becomes increasingly interconnected, PROFITABLE PURCHASE LLC strives to build its own business ecosystem, creating more opportunities that change the business climate and improve the business excellence and competitiveness of Ukrainian businesses. Shared growth with our business partners and mutual added value is our priority.

#### 4.5. COMPLIANCE OF QUALITY OF GOODS AND SERVICES TO SET STANDARDS.

We favour business partners who can supply goods and services of the highest quality. In this way we rule out the output of our own brands using goods of substandard quality.

One of the most important aspects of quality assurance is effective communication with our suppliers. It includes compliance with requirements for: technical parameters of goods and services; certification of products and manufacturing; timely submission of accompanying documents for review; continuous incoming inspection of compliance with technical parameters and documents at the moment of acceptance of goods and services.

PROFITABLE PURCHASE LLC works with business partners who provide all the necessary documentation at short notice and allow network representatives into their manufacturing facilities in order to audit and verify compliance with high quality standards, business ethics and integrity, and prevent conflicts of interest.

## WE RECOGNISE THE INTRINSIC VALUE OF HONEST BUSINESS AND HOW IT HELPS MUTUAL GROWTH IN THE SHORT AND LONG TERM. THESE ARE NOT JUST WORDS. THEY ARE OUR VALUES. HONESTY AND INTEGRITY MATTER.

For us, integrity is a willingness to be open to new things, to be fair and to interact constructively both internally and with partners. We observe integrity in all things and demand the same from our partners. We do not support the risks of excessive profits, which may be the consequence of unethical actions or violations of the law.

We expect each of our business partners to make every effort to avoid or manage actual or potential conflicts of interest when entering into contracts and fulfilling contractual obligations.

#### 4.6. PREVENTING BRIBERY AND CORRUPTION

We expect each of our business partners to share the position of PROFITABLE PURCHASE LLC to ensure that corruption and the provision of improper benefits in order to gain advantages for their own favour are prevented. Our position is enshrined in the appropriate sanctions – in the event of a breach of these obligations, PROFITABLE PURCHASE LLC will immediately terminate any further cooperation.

If you have any information concerning the unfairness of our employees in determining the winner of a tender or regarding the integrity and ethical conduct of any of our partners, please report such cases immediately via the online form

It is also planned to conduct a quarterly survey among our partners to assess the quality of our cooperation.

We respect everyone's right to anonymity, so you are free to leave a message without giving your name. We guarantee that we will immediately launch an internal investigation regarding these reports.

#### 4.7. PROMOTING OBJECTIVE DECISION-MAKING BY EMPLOYEES.

PROFITABLE PURCHASE LLC is aware of the fact that displays of business hospitality and the occasional presentation of gifts to business partners are common practice. However, if they are offered frequently or are expensive, it may give the impression that there is a conflict of interest or that it is a bribe, or in fact be one. It is important that such gifts do not influence business decisions or give the impression that it may influence relationships and decisions.

Gifts and displays of business hospitality are inappropriate if the partners intend to use them to create obligations or hinder objective decision-making. Business partners may not, directly or indirectly, offer gifts, hospitality or other benefits to our representatives or employees in order to influence their decision-making.

Our company policy is that if we receive any item of value equivalent to more than UAH 200, it shall be transferred to the company. Such valuables are then donated to charity.

#### 4.8. CORPORATE SOCIAL RESPONSIBILITY

We strive to contribute to making the world a better place by making the best possible use of our company's resources. We expect our business partners to take a systematic approach to social responsibility management, helping to build a corporate culture that brings society together.

PROFITABLE PURCHASE LLC encourages the active participation of employees and business partners in improving the quality of life in society by actively supporting and encouraging voluntary participation in such social activities.

#### 4.9. ENSURING OBSERVANCE OF HUMAN RIGHTS AND PREVENTING FORCED LABOUR

We require business partners to respect and observe the human rights set out in the UN Universal Declaration of Human Rights, to avoid human rights abuses, and to respect the personal dignity, privacy and rights of every individual.

Business partners shall not tolerate any unacceptable behaviour or inappropriate attitudes in the society. Such a list includes: moral cruelty, physical abuse, inappropriate treatment of people with disabilities, modern-day slavery or sexual harassment etc. We and our partners shall ensure sustainable development goals No. 8 Decent Work and Economic Growth and No. 5 Gender Equality.

PROFITABLE PURCHASE LLC supports a policy that prohibits the use of forced labour and requires business partners to cease all cooperation with subcontractors who use forced labour and tolerate human rights violations along the entire relationship chain.

#### 4.10. OCCUPATIONAL SAFETY AND HEALTH

We require business partners to take care of the health of their employees and ensure safe working conditions in accordance with international standards and current legislation. Occupational health and safety requirements shall also apply to persons under the control of the business partners, including employees and contractors who work on the business partner's premises and subcontractors.

#### **BUSINESS PARTNERS SHALL:**

- take reasonable care of the health and safety of employees and the safety of other people who may be affected by their actions or omissions;
- cooperate to ensure compliance with work environment and health safety obligations and requirements;
- comply with work environment and health safety instructions and regulations, including instructions on the safe use of equipment;
- ensure that sufficient attention is always given to work environment and health safety issues, and to take personal responsibility for the consequences of their own actions and omissions;
- immediately report any work environment and health safety concerns, including any potential risk, hazard or equipment malfunction, even in cases where it appears minor or trivial;
- provide staff with accommodation and facilities, including accommodation for employees where necessary, that are safe and meet the basic needs of employees.

#### 4.11. PROTECTION OF CONFIDENTIAL INFORMATION AND PERSONAL DATA

PROFITABLE PURCHASE LLC requires its business partners to guarantee the protection of confidential information, personal data and other information, the dissemination of which could be harmful to the company, its employees, partners, customers and consumers. Collect, process, use, transmit and store such information or data only for the intended purpose for which it is required to do business and in accordance with legal requirements and relevant international standards.

## 5. PARTNER SELECTION PROCEDURE.

When selecting business partners we conduct special due diligence, applying a risk-based approach. All potential business partners shall successfully pass a full special anti-corruption due diligence process before entering into a contract. We expect partners to facilitate the due diligence process by providing transparent and comprehensive information regarding ownership structure, affiliates and transactions.

### WHEN REVIEWING A BUSINESS PARTNER'S QUOTATION THE COMPANY IS GUIDED BY THE FOLLOWING PRINCIPLES:



compliance with the declared technical parameters;



impeccable business reputation and experience of cooperation;



availability of own manufacturing facilities;



minimum price level, considering the highest quality of the product or service;



willingness to provide optimum financial conditions, in accordance with the terms of the technical documentation;



optimal delivery time;



customer focus and flexibility;



use of advanced technologies and modern materials, continuous development.

# 6. THE POLICY OF PAYMENT TERMS AND CONDITIONS FOR GOODS AND SERVICES.

The minimum possible period of payment deferral, which satisfies the requirements of PROFITABLE PURCHASE LLC, is specified in the contract concluded. All potential business partners are granted an unquestionable right to submit proposals specifying the maximum possible payment deferral period. When identifying a key partner, if offers with different payment terms have been made, the company will make a decision based on the price offered, subject to the payment terms and conditions.

## 7. PANDEMIC AND EMERGENCY PREPAREDNESS.

We pay special attention to risk management in the case of pandemics and emergencies, and to the development of effective measures to ensure the safety of people and products. We require our business partners to follow preparedness and response plans for pandemics and emergencies, health-related incidents and other emergencies that are foreseeable.

## 8. PARTNER AUDIT

PROFITABLE PURCHASE LLC can carry out periodic assessments of business partners to form a view as to whether their working practices meet our requirements. This can be done by collecting information via a questionnaire survey with additional information, conducting an on-site audit, interviewing subcontractors of the business partner, checking provided product samples, manufacturing business processes etc. We are moving towards achieving the Sustainable Development Goals, including Sustainable Development No. 17.

That is why we reserve the right to advise on the implementation of the LEAN manufacturing management concept, which we integrate into our own processes and consider to be effective. The business partner shall take immediate actions to rectify the situation if non-compliance with company norms and standards is identified. We shall be forced to terminate cooperation with the business partner if appropriate action is not taken.

