

Code of Ethics and Professional Conduct



Magonova & Partners Agency strives to promote honesty and ethical behavior across its workforce of employees, directors, managers, and agents (hereafter referred to as the "Representatives"), ensuring compliance with global business regulations, especially those of the United States and Ukraine. We uphold that maintaining a rigorous ethical standard is a crucial asset that solidifies relationships with our business associates, clients, Representatives, and every party engaged with the Agency. This dedication is embodied in our Code of Ethics and Professional Conduct (hereafter referred to as the 'Code').

The Code establishes the corporate values and ethical standards for the Agency, grounded on universally recognized principles and norms of international law while incorporating the best global practices. Adhering to the clear and transparent guidelines outlined in the Code preserves our Agency's impeccable business reputation and ensures optimal working conditions, thereby positively affecting relationships among employees. Developed based on universally recognized principles, international norms, and the Agency's internal regulations, the Code applies uniformly to all Representatives, irrespective of their positions or duties.

THE PRIMARY GOALS OF THE CODE

- Establishing corporate standards of business ethics for the Agency and providing guidance to all Representatives in complex ethical scenarios.
- Guiding all Representatives to comprehend, endorse, and adhere to common principles of business ethics.
- Cultivating a supportive environment that respects each individual and promotes opportunities for personal development.
- To ensure that all Representatives fully understand and adhere to our ethical standards, we have established specific guidelines that outline expected behaviors and decision-making processes.

ETHICAL CONDUCT DURING THE WAR IN UKRAINE

Magonova & Partners Agency is committed to maintaining the highest ethical standards during the ongoing war in Ukraine. All Representatives are expected to:

- Engage in actions that prioritize the well-being and safety of affected communities, and support humanitarian efforts within legal and ethical guidelines.
- Ensure all communications are accurate, truthful, and sensitive to the situation, avoiding any exploitation of the crisis or the spread of disinformation.
- Uphold human rights in all interactions, avoiding actions that could harm civilians.
- Refrain from any actions that could negatively impact the Ukrainian military, including the dissemination of information about military tactics, movements, or any other details that could compromise Ukraine's strategic operations.
- Adhere to international laws, including those related to war and humanitarian aid, ensuring full legal compliance.
- Actively resist the spread of disinformation by ensuring that all information shared is verified and credible, and by discouraging the dissemination of unverified or false narratives.
- Contribute to Ukraine's recovery and reconstruction efforts, working collaboratively with local and international partners.

SPECIFIC GUIDELINES

Reporting Illegal or Unethical Behavior

Representatives must report any observed illegal or unethical behavior to their supervisors and cooperate fully in internal investigations of such incidents. We are committed to taking all necessary measures to protect anyone who reports such behavior in good faith from any potential repercussions. Reports of illegal or unethical conduct can be submitted anonymously via email at government@magonova.com. All reports will be reviewed, investigated, and addressed with the utmost confidentiality.

SPECIFIC GUIDELINES

Observance of Legal Protocols

At Magonova & Partners, we diligently observe all aspects of international law, with special attention to the legal systems of the United States and Ukraine. Representatives are obligated to maintain the same level of compliance. Each Representative is personally accountable for adhering to the standards and restrictions dictated by applicable laws, regulations, and rules, particularly those related to accounting and auditing. If there is any doubt regarding potential violations through actions or inaction, Representatives should consult their respective supervisors to secure authorization for legal advice.

Fair Business Practices

We manage our business dealings with unwavering integrity and ethical principles, ensuring the welfare of our partners and clients in compliance with accepted professional standards. All Representatives are required to uphold honest, ethical, and just relations with clients, customers, suppliers, competitors, and other colleagues. Taking undue advantage via manipulation, hiding information, misuse of privileged details, falsifying facts, or engaging in any other unscrupulous practices is unacceptable.

Anti-Corruption and Bribery

Magonova & Partners is steadfastly committed to opposing bribery and corruption in any form that seeks to achieve undue competitive advantage or benefits. Our representatives are categorically barred from participating in activities or collaborating with business partners, clients, or other individuals in ways that contravene the principles set out in this Code or anti-corruption laws applicable in Ukraine and the United States. The exchange of gifts and invitations between our representatives and business partners, clients, or other third parties that fail to adhere to legal guidelines, could be seen as compensation for particular services, or could jeopardize objective decision-making is entirely forbidden.

SPECIFIC GUIDELINES

Fairness and Non-Discrimination

Our Agency staunchly opposes any form of harassment, bullying, or behavior that could be perceived as demeaning. We unequivocally reject all discrimination, attitudes, or actions that contravene the principles of tolerance. Discrimination based on gender, age, social status, nationality, sexual orientation, ethnic origin, religious and political beliefs, marital status, or health conditions is unacceptable. We are committed to providing equal opportunities for development and growth to all our personnel, irrespective of these factors, and endeavor to maintain a comfortable working environment for everyone.

Health and Safety

We strive to create a comfortable working environment while ensuring the highest standards of occupational safety, life protection, and health for our Representatives. It is imperative that each Representative complies with all pertinent safety regulations and laws, promptly reporting accidents, injuries, or unsafe circumstances.

Drugs and Alcohol

The possession or use of unlawful substances by Representatives is unequivocally prohibited in the workplace, during the execution of services, or in any situation where they represent the Agency. The consumption of alcohol on premises is not allowed. Nonetheless, during offsite business meetings, alcohol can be consumed as long as it is appropriate to the occasion, done moderately, and aligns with local traditions and regulations.

Confidential Information and Data Protection

We collaborate with business partners and clients in full accordance with information security rules, encompassing personal data protection, confidentiality, and trade secret preservation. We guarantee strict compliance with all relevant laws and regulations pertaining to the safeguarding of confidential information. All Representatives must consistently meet the highest protection standards.

SPECIFIC GUIDELINES

Environmental Protection

Magonova & Partners, together with all its representatives, are committed to driving persistent improvements in environmental protection. The Agency upholds an unwavering zero-tolerance stance on any infringement of global environmental standards, guidelines, or legal requirements.

Documentation

All Agency records, particularly those that delineate the creation of business affiliations with clients, partners, regulatory entities, competitors, and representatives, are devised and authorized in adherence to the stipulations of this Code.

Employee Relations

Relationships among Agency employees, irrespective of rank or department, are founded on mutual respect and support, transparency, and a cooperative spirit. Any manifestation of disrespect or abusive behavior is intolerable.

Supervisory and Subordinate Relations

The relationships between supervisors and subordinates adhere to the principles of transparent leadership. Supervisors offer equal opportunities for all subordinates to fulfill their duties, support their initiatives, comprehend the nuances of their work, share accountability for results, and ensure fair and impartial evaluation of their performance.

Conversely, the relationships from subordinates to supervisors are founded on respect, discipline, and adherence to the organizational hierarchy. This includes the diligent execution of both specified job functions and other management tasks that may not be explicitly detailed in job descriptions but are essential to the Company's operations.

COMMITMENT TO ENFORCEMENT

At Magonova & Partners, we are wholly committed to upholding the ethical standards outlined in this Code. We believe that preserving the integrity of our operations hinges on strict adherence to these principles by all representatives. To ensure compliance, we have implemented clear procedures for monitoring and addressing any violations of the Code.

Any violation of this Code, whether intentional or accidental, will be treated with utmost seriousness and could lead to disciplinary actions, including termination of employment or contract. We encourage all Representatives to promptly report any suspected breaches to their supervisor or through our anonymous reporting channels.

ETHICAL USE OF TECHNOLOGY

Magonova & Partners places high importance on the ethical employment of technology and data. Representatives are required to use technology prudently, protecting both personal and corporate information, while ensuring that social media activity positively represents our organization. Instances of technological misuse—including unauthorized system access, data breaches, or inappropriate social media use—will be dealt with following our strict enforcement guidelines. All digital interactions by Representatives must adhere to the highest principles of integrity and respect, whether they are internal or external communications.

ETHICAL USE OF ARTIFICIAL INTELLIGENCE (AI) AND EMERGING TECHNOLOGIES

Magonova & Partners adopt advanced innovations such as artificial intelligence with a steadfast commitment to ethical use. This involves guaranteeing that our AI practices respect privacy, prevent bias, and remain transparent to all stakeholders. Every representative involved in creating, deploying, or using these technologies is accountable for upholding ethical principles and compliance with regulations.