



# • Edvantis Code of Conduct

Our code of conduct outlines the mission of the company, the decision-making criteria, and the standards of behavior our employees should follow when working at Edvantis.

Since 2005

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# Introductory Words

**Welcome to Edvantis** — a mature software development vendor with a global presence in three countries. Our company has been building its reputation in the IT industry for over a decade by delivering high-quality development services and maintaining honest and open business relationships.

Since 2005, Edvantis has been hiring and nurturing qualified IT professionals who contribute to our principle of co-creation and customer success every day. Together, we have delivered **400+ successful projects** to our clients, which added to our experience and increased our knowledge base. The way Edvantis is today is a result of the shared efforts of our specialists, owners, and clients. This is something we greatly value.

Although our collective goal is the same for all Edvantis specialists, we recognize that each of us is an individual who responds differently to situations based on our unique experiences, beliefs, and values. Even though it does not cause any problems in most cases, there are some instances when it might, and that's where the code of ethics comes in.

In creating this code of conduct, we outlined our mission, values, criteria for making decisions, and the principles of behavior we expect our employees to stick to when at work. All of it contributes to our unity, which is an important foundation for building a strong organization!



# Our Mission Statement

We have chosen to focus on consistently delivering value in everything we do as a company. Our mission is to create value for:

- 01
- Our customers: by consistent delivery of results and problem-solving in a competent, professional, and transparent way. Quality and honesty have always been the hallmarks of our services and will remain so
- 02
- Our employees: by ensuring they feel safe, respected, and inspired to achieve more in their workplace. As a large and diverse team, mutual respect and dignity are our top priorities, and we hold each other to the same level of standards
- 03
- Our owners: by achieving the company's financial, organizational, and social objectives. Using our combined expertise, we strive to continually improve Edvantis so it can carve its name as a successful and influential organization in the IT industry
- 04
- Our society at large: by engaging in charity and implementing social responsibility practices in our company. We strive to give back to the communities in which we operate, whether that is by donating tangible goods or sharing our knowledge

We created this code of conduct so that the mission statement does not simply reside on paper, but also lives in the minds of all Edvantis specialists and owners, who will thus forth be referred to as **Edvantises**.



# Our Values

Our values are the enduring principles that we use to do business with integrity and achieve our goals.

- 01
- Customer Focus.** We have strong listening skills and know how to deal with challenging customers politely, which makes it easy to meet customers’ needs effectively
- 02
- Professionalism.** High-quality work standards, honesty, and integrity help us communicate effectively and appropriately in the workplace and always find a way to be productive
- 03
- Teamwork.** We are respectful and supportive of one another. We lead and learn from each other in service and knowledge
- 04
- Accountability.** It’s not only personal responsibility, it means being responsible for actions, and words, and owning up for results and outcomes
- 05
- Innovations.** Innovation refers to exploiting new ideas, combining creativity and problem-solving with functional and technical abilities

## Code of Conduct Overview

Edvantis' code of conduct contains a specific set of policies that outline the rules of behavior in very specific but often complex events that may arise among our employees at one time or another. Having these guidelines in place, helps Edvantises make informed decisions when they encounter situations that may cause employee, client, or company disputes. At Edvantis, we are responsible for shaping the company's image in the workplace, which is why we must take responsibility for our decisions at all times.

We expect all Edvantises to follow the legal and ethical standards laid out in this code of conduct as it impacts our reputation, workplace atmosphere, and employees' wellbeing. The disregard of our policies will result in disciplinary action. The nature of disciplinary action



will depend on the severity of the violation, with termination from the company being the worst-case scenario.

We hope this code of conduct will inform your decision-making process and help you realize when it is appropriate to raise management concerns.

## Principle 1: Responsibility to our clients

### 1.1. Quality and Consistency of Delivery

It is our commitment to deliver the results we promise. In this regard, we only accept work if we are confident that we have the resources and capabilities to meet the client's objectives and provide a positive impact.

From beginning to end, we aim for transparency and consistency in collaboration so that our partnership yields fruitful results. Therefore, we communicate our responsibilities, potential risks, and terms of co-creation. We ensure a transparent financial and time reporting process, as well as diligent business record-keeping.

We encourage all Edvantises to keep the same level of clarity when performing the work for all our clients (in terms of time tracking, reporting the work done, etc.).

**EXAMPLE OF BREACH:** Charging for work that has not been completed

### 1.2. Client Confidential Information

Edvantis takes proper steps to ensure that the information entrusted to us is secure. Signing NDA is standard practice before we begin our collaboration, and we strictly follow the General Data Protection Regulation.

To ensure the security of information at all company levels, we provide our specialists with the Information on [Security Policy and Anti-Phishing Training Guide](#). All employees should read these documents carefully and receive information security training.



Without clients' formal permission, it is forbidden to intentionally or unintentionally spread their confidential information. It can be potentially destructive to clients' products and services and disrupt their competitiveness in the market. Edvantis should only use the clients' information for professional purposes and not share it with anyone outside the company. Only those inside the company who need the information to execute their duties should be permitted access. Upon leaving the company, former Edvantises are not allowed by company policy to disclose confidential information of clients.

**EXAMPLE OF BREACH:** Selling clients’ information to their competitors

### 1.3. Data Classification

Data classification helps organize data to keep it secure, potentially preventing or limiting data breaches, hacks, and cyberattacks.

Data classification involves three classification labels:

Classification Label	Print Media/Hard Copy	Soft Copy
Public	No requirements.	No requirements.
Internal	«FOR INTERNAL USE ONLY» Classification labels and control statements appear on the bottom right corner of at least the first page of reports when necessary; they may be added on each subsequent page as desired.	«INTERNAL USE ONLY» «Internal Use Only» should appear on removable media labels when necessary.
Confidential	«CONFIDENTIAL» Classification labels and control statements should appear on the bottom right corner of at least the first page of documents; they may be added on each subsequent page if desired.	«CONFIDENTIAL» «Confidential» should appear on removable media labels.



# Principle 2: Respectful Working Environment

## 2.1. Equal Opportunities and Anti-discrimination

At Edvantis, we believe in fostering an environment of diversity and equality by respecting people for who they are and ensuring that there is no discrimination, abuse, or harassment. Discrimination, harassment, and bullying not only negatively affect performance at work, but also create an intimidating, hostile, or offensive environment that undermines the dignity and safety of employees.

**Discrimination** is the unfair or prejudicial treatment of people and groups based on characteristics such as race, gender, age, or other categories to which they belong or is perceived to belong. We do not tolerate any form of discrimination. We don't judge, offend or treat people disrespectfully based on their **race, color, descent, gender, sexual orientation, gender reassignment, political views\*, confession or religious beliefs, nationality, ethnicity, marital or civil partnership status, family/career responsibilities, pregnancy and maternity/paternity status, age, disability or impairment, profession or occupation, veteran status, physical peculiarity.**

Harassment is offensive conduct of an unwelcome nature based on any of the characteristics identified.

Harassment may take many forms, such as offensive or disparaging remarks, jokes, slurs, gestures, negative stereotypes, intimidating acts, and other verbal, non-verbal, visual, audio, electronic, or physical conduct.

There is no room for discrimination in any aspect of personnel practices, including recruitment, hiring, employment, compensation and benefits/remuneration, facilities and services, promotion, training, professional development, termination and references, discipline, and grievance. All these practices will depend exclusively on employees' professional skills and qualifications to perform the work.

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\*We do not discriminate against people based on their nationality and political views. However, we do not cooperate with **citizens of aggressor countries** and with people who support the idea of military invasion and violation of the sovereignty of Ukraine or any other sovereign country.

Discrimination, harassment, and bullying occur in a variety of ways, such as:

- Physical contact, remarks, or unwelcome gestures
- Spreading derogatory, offensive, or sexually explicit pictures or other materials online or by email
- A derogatory or offensive joke (explicit or innuendo)
- Verbal or physical abuse
- Threats
- Negative comments or discrimination based on age or family role
- Discriminating against pregnant people or mothers
- A derogatory or offensive joke (explicit or innuendo)
- Racial or ethnic slurs
- Misogynist comments
- Homophobic or transphobic comments or slurs

Edvantises must not participate in any of the above-mentioned actions.

**EXAMPLE OF BREACH:** Assuming the specialist is incompetent based solely on their gender/age/race rather than qualifications



## 2.2. Inclusivity

Inclusivity is our strategy that leverages diversity to ensure employees have equal opportunities in the workplace without any impediments due to diversity characteristics.

Edvantis work environment is an inclusive workplace that makes every specialist feel valued while also acknowledging their differences and how these differences contribute to Edvantis' culture and business outcomes. We promote diverse and inclusive perspectives and focus on inclusive practices that are woven into our culture, mission, and values.

Examples of inclusive practices at Edvantis:

01

**We communicate using inclusive language.** We recognize that our specialists have various identities, such as gender, sexual orientation, race, ethnicity, religion, and many other different aspects and backgrounds and we are intentional with the words or phrases we use and opt for neutral language. It means we avoid terms, slang, and expressions that leave out certain groups of people

02

**We gather and listen to feedback.** We always make sure that our specialists are heard by gathering their feedback on our workplace inclusivity efforts. We practice this by conducting employee surveys, encouraging honest 1:1 meetings, and creating platforms for anonymous feedback

03

**We integrate diversity and inclusion into our recruiting strategy.** We hire specialists solely for their professional qualities. We do not hire people based on their gender, age, religion, sexual orientation, nationality, etc. Our hiring process is transparent at all levels

04

**We invest in inclusive spaces in the workplace.** Even in the office plan, people and their needs are our top priority. We are creating an inclusive work environment where all people can feel comfortable and safe. We have open spaces for people with disabilities, quiet rooms for easily distracted people, elevators for people with disabilities, and the ability to work remotely for those who cannot visit offices

05

**We dedicate platforms for inclusive, non-work conversations.** We encourage our specialists to create different communication channels for their specific interests, backgrounds, cultures, and so much more. This enables Edvantises to freely express themselves and resonate with like-minded or similar peers



## 2.3. Safety and Health

Safety and health policies are part of Edvantis' commitment to a secure and comfortable working environment. To ensure our employees' health and well-being, we follow the following steps:

1. We offer basic health insurance to all Edvantis employees
2. In the office, all necessary precautions are taken to prevent COVID-19 from spreading (masks, disinfection, and increased desk-to-desk distance)
3. The company provides vaccines for Covid and encourages Edvantis to get vaccinated
4. Until the pandemic is resolved, we encourage and allow employees to work remotely

As a result, we expect our specialists not to put their colleagues' safety or health at risk. The following is not allowed in our workplace:

1. Storing, consuming, distributing, or being under the influence of alcohol or any other controlled substances other than those prescribed by a physician on company-owned or leased property, during working hours, while on company business, or while using company property\*
2. Visiting the office or another company property or event when suffering from a contagious illness (e.g. flu, cold, covid, etc)
3. Violently or psychologically abusing colleagues

It is required that every Edvantis specialist attends the required safety training and reports immediately any accidents, injuries, or unsafe practices.

**EXAMPLE OF BREACH:** Consuming alcohol during working hours

## 2.4. Social Media

At Edvantis, we believe that freedom of speech is a fundamental human right and understand that social media plays a critical role in today's communication. However, when you speak out on public issues or in a public forum, you do so as an individual and should not give the appearance of speaking or acting on Edvantis' behalf.

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\*The use of moderate amounts of alcohol at company-sponsored parties can be authorized with the prior consent of the functional head or director. An event manager must be assigned to the event. Alcohol cannot be served to anyone under the legal drinking age attending the event.

It is our responsibility to keep our social media actions under control and to properly communicate in public forums. As social network users, we must:

- Be aware that everything we say publicly as an Edvantis specialist can affect our company's reputation
- Be ethical and demonstrate when you speak on your behalf and do not communicate the company's opinion
- Seek advice from the Marketing Department or your manager if you have any doubts about whether you can write or comment on a particular newsworthy occurrence as an Edvantis specialist
- Do not disclose information that you do not have the right to disclose (namely, confidential information)
- Realize the potential consequences of your actions

**Never use** communications to:

- Lie about others
- Reveal confidential or material information
- Harass or discriminate against others
- Violate the privacy right of others
- Violate trademarks, copyrights, and trade secrets of others

Clients, colleagues, and regulators are increasingly monitoring such information.

**EXAMPLE OF BREACH:** Expressing political opinion using a working email

## Principle 3: Compliance With the Laws

### 3.1. Interaction With the Government

Edvantis is committed to complying with local laws, regulations, and codes. Our goal is to work fairly and honestly with government officials and other community members. We do not participate in any illegal activities and strongly encourage all our employees to do so as well.

Any government interaction relating to Edvantis must be coordinated by our management team. If you receive an inquiry or inspection from a government or regulatory representative, inform your manager immediately.

### 3.2. Personal Information Security

Personal Information generally means any information that identifies you as an individual, and any other information we associate with it.

Edvantis respects the privacy of all individuals including our specialists, clients, partners, and other third parties. We collect and use personal data following its values, applicable laws, and respect for privacy as a human right. We are all obliged to protect the privacy, confidentiality, and security of personal information and we should never provide information without the permission of the person.

**EXAMPLE OF BREACH:** Sharing personal correspondence of Edvantises in social media or networks

### 3.3. Company's Information Security

Edvantis' confidential information includes all non-public information that might be useful to competitors or that could be harmful to Edvantis if disclosed.

Edvantis is obliged to respect, protect, and securely handle all information it holds about its clients, suppliers, and personnel. Edvantis' legal obligations and its competitive position require that confidential information remain confidential and that we are diligent in our efforts to protect our intellectual assets.

Confidential information should be properly and securely stored, transmitted, and destroyed, and Edvantises must be mindful of the risk of discussing confidential information in public places. This means that Edvantises should not disclose or share information regarding internal Edvantises matters with anyone outside Edvantises, except as required in the performance of their employment duties.

It is never acceptable to discuss confidential information in a public place even if there are no classified documents in use. The security and confidentiality of the information could be compromised if someone overhears the conversation.



### 3.4. Prohibition of Corruption and Bribing (Gifts, Donations, and Hospitality)

Edvantis has a no-tolerance policy toward bribery and corrupt conduct in any form. Improper inducements involving government officials, clients, suppliers, business partners, and all other counterparties are strictly prohibited. We must all act with the utmost honesty, integrity, and transparency in all dealings with clients, suppliers, business partners, and government officials.

Bribery is the offering, giving, receiving, or soliciting of any item of value to wrongfully influence someone’s actions, or to secure an improper advantage. The results of bribery can be very serious for those who commit it.

Edvantises may not, directly or through others, offer or give any money, gift, amenity, or other things of value to an executive, specialist, or representative of any client, or any other organization, if doing so could influence or give the appearance of influencing the organization’s relationship with Edvantis.

It is not permitted to directly or indirectly promise, offer, or give anything valuable to a public official. Edvantis' policy is to deal fairly with government authorities and to comply with valid governmental requests and processes.

The donations may only be provided if Edvantis does not receive anything of value in return.

**EXAMPLE OF BREACH:** Giving money to a client's representative to win a contract

### 3.5. Gifts and Hospitality

Gifts and Hospitality — whether offered, promised, given, or received — must not improperly influence business decisions or standard processes. Edvantis’ specialists must never accept them to:

- influence official or government acts or decisions
- influence someone to violate a lawful duty
- influence someone to provide Edvantis with an improper or unfair business advantage

A gift can be an item, but it also can include event tickets or the provision of services when the gift provider is not otherwise involved in the event or service (e.g. the giver provided the tickets but does not accompany the recipient to the event). Entertainment is distinguished



from a gift as it typically involves meals, events, or other forms of entertainment (e.g. sporting events, concerts, shows) where the provider participates in the meal, event, or another form of entertainment.

## Gift Limits and Prohibitions

It is acceptable to extend or receive occasional gifts having a maximum retail value of USD 200 in total over the course of any one calendar year to or from the same person as a gesture of goodwill.

Extending or receiving certain business entertainment (e.g. attending a local cultural or sporting event or a celebratory meal with a business partner) can be appropriate. Provided that the entertainment is reasonable and customary and in the furtherance of a business relationship, the cost of the entertainment is not excessive, and it won't inappropriately bias future decision-making about working or create an appearance of impropriety.

Gifts in the form of cash payments are not allowed. It is prohibited to provide or receive cash as well as any cash equivalents (e.g. gift cards or loans) in any circumstances, regardless of amount.

It is prohibited to offer or give anything of value to a government official to get or keep business or gain an improper advantage.

## 3.6. Fair Competition

Edvantis believes in fair competition. Hence, we are responsible for dealing fairly with customers, competitors, and other third parties. We should avoid taking unfair advantage through manipulation, concealment, misrepresentation of key facts, or other unfair practices concerning our competitors.

Our specialists shouldn't discuss Edvantis' sensitive information with its competitors. Prices, terms of business, production plans, and market share fall into this category.

**EXAMPLE OF BREACH:** Disclosing Edvantis' pricing to competitors



### 3.7. Anti-money Laundering

For Edvantis to preserve its reputation and avoid criminal liability, it is extremely important that we do not link ourselves to other people's criminal activities. In particular, we must ensure Edvantis does not receive money laundering proceeds, as this can constitute a criminal offense. Our company only works with legal business clients who have legitimate sources of funds.

**EXAMPLE OF BREACH:** Working with clients whose wealth was illegally acquired

### 3.8. Conflict of Interest

Conflict of interest arises when a person’s position or responsibilities within their business unit presents an opportunity for personal gain above the normal rewards of cooperation. In other words, a conflict of interest exists when your interests interfere with the best interests of Edvantis.

You should raise, address, and remove yourself from business conflicts where:

- You exercise managerial influence over a person with whom you have a close, personal relationship, or you are in a direct managerial or reporting relationship with such a person
- You make business decisions about a company where a decision-maker and you have a close, personal relationship

### 3.9. Intellectual Property

Edvantis must respect the intellectual property rights of Edvantis, our Clients, and third parties, including but not limited to copyrights, patents, trademarks, and trade secrets. Inappropriate use of others’ intellectual property may expose Edvantis and you to legal liability and is strictly prohibited. The use of the intellectual property of third parties and open source can be allowed only after obtaining the appropriate consents and licenses, including prior approvals from all stakeholders and Legal.



# Principle 4: Edvantis Impact on Society

## 4.1. Charity

Giving back to the community we live in and helping those who lack access to basic human necessities is extremely important to us. Edvantis, as a company, strives to donate material goods and provide financial support to charity organizations.

However, we understand that any charitable act should be voluntary and cannot be forced on Edvantises. We do not expect Edvantises to make similar contributions if they do not wish to do so. We encourage charitable donations if they are motivated by personal desire, not by outside pressure.

**EXAMPLE OF BREACH:** Making negative remarks about Edvantis specialists if they refuse to participate in charitable activities

## 4.2. Sharing Our Knowledge and Investing in the IT Community

We are members of a thriving IT community, and we are interested in helping it grow even more. Through internships, workshops, and lectures at universities, we make sure to pass on our knowledge to future specialists and help them gain a better understanding of the IT field.

Our employees can participate in various volunteer activities that our company takes part in, including mentoring, developing training materials, and helping with internships. Both Edvantis and the employee must consent to such participation.

## 4.3. Sustainability and the Environment

Edvantis strives to reduce our negative impact on the environment. We recognize that environmental issues cannot be ignored, and the situation is worsening each year.



As a result, we have decided to do everything in our power to prevent ecological issues, at least in our area of residence. Our company begins with small steps and works towards recycling certain products (batteries), reducing waste, and promoting a sustainable mindset among our specialists.

**EXAMPLE OF BREACH:** Greenwashing

## Principle 5: Raising Concerns

You can always raise a concern with your Direct Manager or Human Resources Manager who are expected to listen carefully, respond respectfully, and take every concern seriously even if they disagree. They will show their commitment to solving the problem and take steps to protect the person’s confidentiality – avoid discussing the conversation with others on the team.

Any report of concern will be treated fairly by Edvantis, and we will not tolerate any discrimination. You don’t have to have all the details or be sure that something is wrong to raise an integrity concern. You can trust that we’ll treat your reports seriously, and if something needs to be fixed, we’ll act based on what we learn.

### The Role of Managers and How Managers Should Handle Concerns

As a leader, you have a special responsibility for setting the culture and the work environment on your team. The way you make decisions and handle concerns, different opinions, and even bad news, will set the foundation for trust with your teams, customers, and stakeholders. Your success and the success of your team depend on the trust you build together.

If someone comes to you with a concern, you have to listen and act. Handling concerns appropriately is critical to preserving trust.



# If Someone Raises a Concern, Take these Specific Steps:

- Remove distractions and listen carefully. Thank the person for speaking up and remember that they've just done something difficult and very important for the company
- Respond respectfully and take every concern seriously, even if you disagree. Show that you are committed to solving the problem
- Take steps to protect the person's confidentiality. Avoid discussing the conversation with others on your team. As a manager, you should feel empowered to resolve performance issues yourself, but you should escalate integrity concerns about business ethics

**EXAMPLE OF BREACH:** Ignoring concerns raised by employees when the violator has a higher job title

