



Code of Conduct

Message from the CEO

I genuinely believe that you have to go all-in to create a workplace culture of integrity.

And it's every leader's responsibility to not only talk the talk, but walk the walk. This is what I'm doing every day at Provectus, by upholding our stated values and the company's ethical standards. And this is what I strongly encourage all our employees to join me in doing.

Because only together we can help Provectus excel and thrive.

Today, I'm kindly asking each of you to contribute to reading and reflecting on Provectus' Code of Conduct.

Let's promote Provectus' strong ethical culture and values.

Committed and united.

Yours,

Stepan Pushkarev,

Co-founder and Chief Executive Officer, Provectus



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Purpose

The primary goal of Provectus' Code of Conduct is to foster inclusive, collaborative, and safe working conditions for all Provectus staff.

As such, Provectus is committed to providing a friendly, safe and welcoming environment for all staff, regardless of gender, sexual orientation, ability, ethnicity, nationality, socioeconomic status, and religion (or lack thereof).



Who must follow it?

The Code of Conduct applies to all of us. This includes:

- full-time staff
- part-time staff
- independent contractors

The Code of Conduct is to be upheld during all professional functions and events, including but not limited to:

- Business hours at the Provectus office
- While working remotely and communicating on Provectus platforms and tools with other staff, customers and providers
- During Provectus-related extracurricular activities and events
- While attending conferences and other professional events on behalf of Provectus.

We expect all Provectus staff to abide by this Code of Conduct in all business matters -- online and in-person -- as well as in all one-on-one communications with customers, providers, and staff pertaining to Provectus business and while using social media.

Provectus Culture

Our values define how we behave. While we come from different backgrounds and cultures, our values are what we have in common. They guide how we work with our clients and with each other, influence the type of work we do, and hold us accountable to do our best. They govern our actions and determine our success. The decisions we make are a reflection of our values and beliefs:

Obsession



We are incredibly passionate about our clients and the technologies we build to help them solve the world's biggest problems.

Transparency



We have open and honest communication about everything. We work in such a way that makes it easy for everyone to see what actions are being taken and who's accountable.

Ownership



We take the initiative to bring about positive results. It means not waiting for others to act, and caring about the outcome as much as an owner of the company would. We take accountability for the results of our actions – and do our best to deliver the highest quality in a timely manner.

Partnership



We know that we won't thrive without recognizing one another's strengths. To us, collaboration means listening and evolving together, helping and supporting each other for the sake of a collective goal; reciprocity.

Both the right skills and values are important (not one or the other)



We require our employees, contractors, and candidates to have the right skills as well as adhere to our values. **Provectus's cultural fit and a company-first mentality are must-haves. We don't tolerate high performers and promising candidates who are not aligned with our culture and values.** A candidate might not meet every value, but **we welcome candidates as long as they are willing and able to adapt to our values** they may not share at the beginning of our common journey.

Acceptable and Expected Behavior

The following behaviors are expected and requested of all Provectus staff:

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| <ul style="list-style-type: none">• Communicating with colleagues, customers and providers in a professional manner. Using welcoming and inclusive language. In doing so, you contribute to the positive environment and longevity of Provectus.• Our working language in Provectus is English, all employees should communicate in English in all staff emails, public channels. Everyone should respect colleagues' or clients' preference to communicate in English.• We all have responsibility to protect and enhance the value of Provectus's assets and to use them properly and as authorized - the same way you would treat your own property. Provectus's assets include our facilities, equipment, materials, technology, money, information, physical property and intellectual property. Never misuse or steal Provectus's assets. Report lost or stolen assets to helpdesk@provectus.com or #itproblems slack channel.• Exercising consideration and respect in your oral and written communication and actions at all times. Being respectful of differing viewpoints and experiences. | <ul style="list-style-type: none">• Remembering and prioritizing the well-being of the overall company and Provectus goals when making decisions.• We work in multinational teams and expect from our colleagues to collaborate and communicate with respect regardless of gender, sexual orientation, ability, ethnicity, nationality, socioeconomic status, and religion.• Attempting collaboration before conflict.• We trust by default: we assume positive intent amongst our teammates. In any controversial situation we clarify directly with the team member and base our decisions on facts rather than biased opinions.• Focusing on what unites us, not what divides us: we work as one team and in our communication and cooperation with others we concentrate on what we have in common, not where we disagree. Any disagreements we solve amicably and with mutual respect.• Giving and gracefully accepting constructive and actionable feedback. |
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Acceptable and Expected Behavior

- Accepting accountability and responsibility, apologizing to those affected by our mistakes, and learning from the experience.
- Refraining from demeaning, discriminatory, or harassing behavior and speech.
- Remember that Provectus events may be shared with members of the public and Provectus customers; please be respectful to all participants of these events at all times.



Unacceptable Behavior

The following behaviors are considered harassment and are unacceptable within our community:

- Violence, threats of violence, violent or slur language directed against another person.
- Sexist, racist, homophobic, transphobic, ableist, or otherwise discriminatory jokes and language.
- Posting or displaying sexually explicit or violent material at a workplace in any Provectus's facilities or platforms.
- Posting or threatening to post on any internal or external platforms other people's personally identifying information ("doxing").
- Personal insults, particularly those related to gender, sexual orientation, race, nationality, religion, or disability.
- Inappropriate photography or recording.
- Inappropriate physical contact. You should have someone's consent before touching them in any manner.
- Unwelcome sexual attention. This includes sexualized comments or jokes; inappropriate touching, groping, and unwelcome sexual advances.
- Deliberate intimidation, stalking, or following (online or in person).
- Advocating for, or encouraging, any of the above behavior.
- Repeated harassment of others. In general, if someone asks you to stop, then stop.
- Other conduct which could reasonably be considered inappropriate in a professional setting.

Social Media

If employees or contractors chose to include Provectus in any of their social media profiles or publications, they must be mindful that every post is in some way a reflection of the company.

We will not put at risk Provectus' brand and reputation we've all worked so hard to build. At the same time, we encourage employees or contractors to take pride in their work in Provectus.

Employees and contractors shall not make any communication to any third party that is reasonably likely to, disparage, create a negative impression of, or in any way be harmful to the company's business or business reputation of the company.

Do's

- Be mindful of what you are posting, both personally and professionally
- Remain professional in social media
- Remember your personal and professional personas are intertwined on social media, just as they are in real life
- Before any actions on Social Media remember that you are part of a global and diverse team
- Be proud you work for Provectus

Dont's

- Don't post any controversial posts or comments, that may negatively impact Provectus
- Don't share or show any proprietary and/or confidential information

Provectus reserves the right to ask any staff member to delete the post, or comment from the private social media account if the post or comment may negatively impact Provectus.

Policy in the time of Russian aggression against Ukraine

Provectus condemns Russian aggression against Ukraine and has ceased Russian operations, doesn't have economic relations with Russia. We do not tolerate people who support Russian aggression and express it in any way either during team meetings, 1-on-1 communication, interview process or in social media.

We strongly recommend refraining from visiting occupied territories (i.e. Crimea).

At the same time, **we do not discriminate against colleagues or candidates of any nationalities and provide equal opportunities during the employment, promotion, and compensation review processes.** Please also mind the Unacceptable behavior clause above when communicating with other colleagues on the Russian aggression's topics.

Conflict resolution

In case of any potential or actual conflict, we will first try to solve it amicably on an individual level with involvement of the mediators of the conflict, **following the next steps:**

1. If you experience any triggers or are involved in any potential or actual conflict with another team member, as the first step, talk to your manager and People Business Partner.
2. After that People Business Partner or Director of People Operations will reach out to the line manager of the team member who is the other party of the conflict and conduct 1-on-1 conversation with them.
3. As the next step, both parties will have a conversation with involvement of the mediators of the conflict: i.e. Line Managers, Engineering Managers/Practice Leaders/ Delivery Managers and People Business Partner or Director of People Operations.
4. Parties of the conflict will do their best to mitigate the triggers of the conflict, implement the corrective actions recommended by the mediators, and solve the conflict amicably.

Conflict resolution

Such conflict resolution shall be in line with “Acceptable and Expected Behavior”, in particular:

- Attempting collaboration before conflict.
- Exercising consideration and respect in your oral and written communication and actions at all times. Being respectful of differing viewpoints and experiences.
- Prioritizing the well-being of the overall company and Provectus goals over any particular team or individual goals.
- Accepting accountability and responsibility, apologizing to those affected by our mistakes, and learning from the experience.

Until resolving the conflict, it is expected to withhold any respective posts to company public channels, social media and communications to third parties.

Provectus reserves the right to delete any post, or comment from the public channels and ask team members to delete the post from the private social media account if the post or comment may negatively impact Provectus.

In case of gross misconduct – please refer to the “Reporting Violations” section.



Political Activities

Provectus remains impartial to all political parties at all levels of government in all countries. Provectus will not endorse, support or make contributions or payments to any political parties or candidates.

Individuals may personally contribute or volunteer their personal time to political activities. **Do not make any political contribution as a representative of Provectus, and do not use work time or assets in support of political parties or candidates** – using work time or assets would be the equivalent of a contribution. Provectus will not reimburse you for any personal contributions you make.



Weapons Policy

No weapons will be allowed at Provectus events, office locations, or in other spaces covered by the scope of this Code of Conduct.

Weapons include but are not limited to guns, explosives (including fireworks), and large knives such as those used for hunting or display, as well as any other item used for the purpose of causing injury or harm to others.

Anyone seen in possession of one of these items will be asked to leave immediately and will be subject to punitive action up to and including termination and involvement of law enforcement authorities. Provectus staff is further expected to comply with all governmental laws on this matter.

Consequences of Unacceptable Behavior

Unacceptable behavior from any Provectus staff, including those with decision-making authority, will not be tolerated.

Anyone asked to stop unacceptable behavior is expected to comply immediately.

If a staff member engages in unacceptable behavior, Provectus leadership may take any action deemed appropriate, up to and including suspension or termination.



Reporting Violations

If you are subject to or witness unacceptable behavior, or have any other concerns, please notify the People and Culture department via hr@provectus.com as soon as possible.

It is a violation of this policy to retaliate against any person making a complaint of Unacceptable Behavior or against any person participating in the investigation of (including testifying as a witness to) any such allegation. Any retaliation or intimidation may be subject to punitive action up to and including termination.

Disciplinary Action

Employees and contractors who violate this policy may face disciplinary consequences in proportion to their violation.

Provectus management will determine how serious a contractor's or employee's offense is and take the appropriate action.



Responsibility

In the spirit of our value Ownership, each team member must adhere to the Code of Conduct.

It is the People and Culture department's responsibility to ensure this policy is followed.

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Thank you!



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