



Letter from CEO

Dear colleagues,

MERA's Code of Conduct is your guide for conducting business with integrity and building productive, long-term relationships with our customers, suppliers, and each other. By following these guidelines, we build success for our company and ourselves, while making sure our performance keeps getting better every day.

Please take a brief moment to read and understand these principles, and consciously strive to apply them in your work each day.

Alex Bogachek, CEO

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Introduction

This Code of Conduct describes the fundamental principles of MERA's business conduct and proves MERA's commitment to the highest level of integrity, ethics and quality. MERA shall abide in letter and in spirit by these guidelines to assure fair and respectful relationships with our customers, partners, suppliers, and employees. All employees and suppliers must be aware of and comply with this Code of Conduct.

* This Code of Conduct is based on the United Nation Global Compact's principles derived from The Universal Declaration of Human Rights, The International Labor Organization's Declaration of Fundamental Principles and Rights at Work, and The United Nations Convention Against Corruption. <http://www.unglobalcompact.org>

Human rights

We support and respect the principles set out in the Universal Declaration of Human Rights. MERA does not discriminate on the basis of race, color, sex, sexual orientation, marital status, pregnancy, parental status, religion, political opinion, nationality, ethnic

background, social origin, social status, disability, age, or union membership. All our employees are treated with respect and dignity.

We strive to foster a corporate environment of diversity and equal opportunity, where career promotions and rewards are based on individual performance and professional abilities. We ensure that we are not complicit in human rights abuses. Corporal punishment, physical or verbal abuse, or other unlawful harassment, and any threats or other forms of intimidation are strictly prohibited.

Labor standards and principles

Employees with the same experience, performance and qualifications have the right to receive equal pay for equal work with respect to those performing the same jobs under similar working conditions. Wages, terms, and hours must be fair and reasonable and comply with all applicable laws.

MERA does not actively recruit personnel employed by customers, and we ask customers to follow the same principle.

Employees are free to leave the company after reasonable notice as prescribed by the local labor laws and established rules. No forced, bonded, or compulsory labor is allowed. No passports, identification or education certificates may be withheld from personnel at any time.

MERA does not support the use of child labor. The MERA Human Resources department guarantees that none of our employees are under legal age. The requirements of ILO Convention No. 182 are respected in the company.

Work environment

A healthy and safe working environment is provided for employees, in accordance with international standards and local laws. The workplace and housing facilities are safe and without risk to health, have tolerable temperature and noise level, adequate ventilation, sufficient lighting, clean toilet facilities and drinking water. Occupational health and safety practices comply with applicable laws and aim to provide the best working environment possible to help our employees be productive and maximize their skills.

Business ethics

MERA values its reputation, complies with its obligations, and observes all applicable acting laws, norms of ethics, and rules of fair business. MERA builds long-term, trust-based relationships with its customers. Hence, MERA is committed to upholding to the highest standards of quality, efficiency, and transparency.

Fairness, and honesty are principles we follow at all levels of the organization, and each employee strives to achieve their best. MERA fosters open and friendly corporate environment which promotes fellowship among colleagues and commitment to the company's success.

Information security

MERA complies with all local and international information security requirements. All employees are under non-disclosure agreements to protect client information, and are required to follow strict confidentiality processes and procedures.

Protecting corporate assets

MERA employees undertake to safeguard the company's assets, both tangible and intangible, including information, intellectual property, and reputation. MERA's assets are to be used solely for authorized MERA business purposes, and are to be protected against any loss, theft, damage or misuse.

Intellectual property rights

MERA makes a great effort to protect customers' intellectual property rights and to avoid IPR infringement in the course of our service provision. IPR infringement is a product, creation or invention protected by IP laws exploitation, copying or otherwise using without having the proper authorization, permission or allowance from the person who owns those rights.

A high level of awareness among the personnel regarding IPR is supported to avoid the risk of infringement. A list of forbidden actions regarding IPR is communicated to the employees. In the course of software development it is forbidden to copy and modify without the owner's and project manager's permission any of 3rd party objects protected by IP laws – programming code, databases, components, scripts, modules, libraries, plug-ins, text, images, etc.

Anti-corruption and anti-bribery

No form of extortion or bribery, including improper offers for payments to or from employees or organizations, is tolerated at MERA. Our employees may not offer or accept gifts, benefits, reimbursements, or entertainment that would constitute a violation of laws or that could affect company business.

No one may directly or indirectly demand, accept, offer, or give any kind of bribe, kickback or any other unlawful or unethical benefit to employees or other representatives or associates of MERA or any third party. Any such offer or proposed arrangement must be reported immediately to company management.

Conflict of interest

We actively avoid situations in which personal interests interfere or appear to interfere with an employee's independent judgment. If such a conflict of interest arises, it must be disclosed immediately to the employee's manager.

Environmental management

MERA supports a proactive approach to addressing environmental issues and undertakes initiatives to promote greater environmental responsibility.

Ethics escalation policy

If a MERA employee sees a violation of the Code of Conduct, business ethics or applicable legislation, he/she can report the issue to one of the following persons:

1. his/her department head,
2. head of HR department,
3. head of legal department.

Employees who report the violations in good faith shall not be discriminated or retaliated against as a result.