

Annex 1

APPROVED BY
the Order of the Chief Executive Officer of Telco Central Asia LLP
dated January 22, 2021 # 007-II-21

**CODE OF CONDUCT OF EMPLOYEES
OF
TELCO CENTRAL ASIA LIMITED LIABILITY PARTNERSHIP**

1. OUR COMMITMENT TO THE PROFESSIONAL CONDUCT STANDARDS

The Code of Conduct explains the standards for behavior that employees of Telco Central Asia LLP (hereinafter referred to as the Company, Aspo Group or Aspo) shall adhere during performance of their duties. It will provide recommendations when employees have to make personal and ethical decisions. This Code of Conduct shall be applied to all employees and all activities of Aspo Group.

In our Company, we consider that ethical and responsible operation is not only correct as a whole, but also correct for our business. The Code of Conduct (the Code) of Aspo is the basis for a proper business management.

We comply with all applicable laws and regulations in all our activities. Business ethics for us begins with our Code of Conduct and routine methods of work.

The Code of Conduct describes the principles that help us making ethically sound decisions. We need to know the Code of Conduct, to act correctly and understand the importance of this.

Making the right choice, we protect the value that we create in Aspo every day. Demonstrating ethical behavior, we create our image as a reliable partner, supplier, customer and employer.

Being a member of the United Nations Global Compact, we value the ten principles related to human rights, labor, environment and countering corruption.

As employees of Aspo we shall:

- Read, understand and comply with our Code of Conduct.
- Inform of its concerns if we suspect misconduct.
- When you are unsure in accuracy of your actions, you should advise with managers or the legal department of Aspo, which is responsible for regulatory compliance.

Moreover, the Manager of the Company shall:

- Provide an example.
- Communicate our guideline to compliance with the regulatory requirements and Company policy to its employees and take the time to discuss their application to our team.
- Create an atmosphere where members of our team can speak their concerns freely.
- Listen to concerns of the team members and inform the management about any suspicions of misconduct of which they become aware.
- Provide mentoring and support of their employees to meet the abovementioned expectations.

2. OUR EMPLOYEES AND OPERATING ACTIVITY

2.1 Respect of employees and observance of human rights

Aspo aspires at observance of the human rights according to the United Nations Guiding Principles on Business and Human Rights. We provide worthy working conditions. We do not accept the use of involuntary or child labor in no circumstances.

Nondiscrimination, diversity and inclusion

Aspo treats everyone with respect and acknowledgment. All our employees shall respect the right of everyone to freedom of thought, convictions, right to freedom of speech, confession and the right to peaceful assembly. We do not admit any discrimination on the basis of education, personal skills, position, personality, living mode, employment chronology, ethnicity, religion, gender, sexual identity, age, national origin, abilities or other characteristics of an employee. This applies to all employees, including temporary employees, migrants, students, employees with an employment contract, regular workers, and all other employees or prospective employees.

Aspo respects social and cultural diversity and aimed at creation of accepting and harassing-free working climate.

Well-being, occupational health and safety

Aspo cares for wellbeing and health of our employees. We never seek a compromise solution on safety issues and work only with partners who share our commitment to occupational health and safety issues. We are responsible for occupational safety at any time and we shall observe the relevant occupational health and safety laws and also safety rules and standards of our Company. The responsibilities of managers include instruction, control and support of their employees to ensure occupational safety.

2.2 Responsible attitude to the environment and product security

Aspo is careful with the environment and aimed to mitigation of the environmental impact of its activity. We are responsible for safe intended use of our products and their compliance with the regulatory requirements.

3. PROFESSIONAL CONDUCT

3.1 Intolerance to corruption and bribery

We do not accept any form of corruption or bribery. We never offer or pay bribes or allow bribes to public officers or individuals, and also, we never ask or take bribes.

Particularly, we shall not give or offer anything of value with the purpose of inappropriate impact on business decision to conclude a deal, keeping a deal, or obtaining unfair advantage. We cannot do this directly or indirectly, i.e. through a third party acting on behalf of Aspo. Moreover, we shall not directly or indirectly ask for or accept anything of value affecting or looks like impact on our ability to maintain an open mind in our business decisions. Expression “anything of value” shall be understood in a broad sense: it includes any payments, loans, discounts, contributions to political or charitable purposes, reimbursement of expenditures, gifts, gift certificates, catering services, entertainment, travel, employment or trainings, business opportunities, services or other advantages.

We make sure that gifts and hospitality always correspond to clear business purpose, were clearly registered, are of reasonable value and correspond to the nature of business relationship. Any requests and offers of any improper payments, privileges, gifts or hospitality shall be rejected. Also, they should be immediately reported to the individual responsible for provision of regulatory compliance (compliance) of Aspo.

We actively compete within the framework of the applicable competition legislation in a fair and ethical manner. Each employee of Aspo shall comply with the competition laws, regulations and internal rules.

3.2 Protection of assets of the Company and information

Tangibles and intangibles

In our routine work, we are responsible for the assets of Aspo and its business partners, such as machinery, equipment, raw materials, vehicles, information and mobile devices, cash, intellectual property and information. We shall handle with care and protect them against damage, losses, theft and improper use.

All our employees shall take the appropriate steps to protect the confidential information of our Company and our business partners. We treat the confidential information with care and submit it only to those who is entitled to access to information and who need it for performance of its work.

We follow our corporate policies and procedures to protect data against threats and unauthorized and illegal use. We respect personal privacy of our colleagues, stakeholders and their representatives as we treat their personal data in accordance with the current legislation and policy of the Company.

Information disclosure and confidential information

Being public Company, we shall comply with the applicable laws and regulations of the stock exchange, disclosing information of Aspo. Public statements in mass media on behalf of Aspo can be made only by the designated employees of the Company. We aim to observe the rules and regulations concerning market abuses and official information such as trading constraints and information disclosure.

Making decisions and documentation

Our decisions shall be made in the best interests of Aspo. Procedures of legal and financial procedures are used throughout our Company and we are obliged to follow them. These procedures include appointment of authorized individuals, establishment of monetary limits and separation of duties. All business operations shall be accurately and fairly recorded in our books and records. Accurate records and reporting allow us comply with our legal and regulatory requirements, for example, in respect of taxation.

3.3 How to avoid conflict of interests

Each of us shall act in the interests of Aspo Company. This means that each of us shall avoid conflict of interests among others. The conflict of interests arises when your personal interests come into collision with the interests of Aspo. Even conflict of interests can damage the Company and our image.

4. OUR SHAREHOLDERS

Business partners

We aim to productive, ethical and transparent relations with our suppliers, agents, distributors, customers and contractors. We expect our partners to comply with all applicable laws and regulations and to comply with our Code of Conduct for suppliers.

Provision of regulatory compliance in the area of trade and anti-money laundering

We conduct activities in the international sales environment, which implies import and export of products, other goods, services and information from one country to another one. We comply with all applicable laws and regulations affecting our activity. Regulations include, but are not limited to, embargoes and sanctions, import and export customs regulations, export control, customs valuation, country of origin, and preferential sales conditions.

We do not conduct activities in violation of the current legislation on money laundering, terrorism and financial crimes.

5. REGULATORY COMPLIANCE RELATED TO EVERYONE

Each of us is responsible for observance of single ethical standards of Aspo. If we inappropriate behavior, we shall inform about it, and also listen to concerns of others. It is not assumed that someone has already informed of a risk or problem.

Possibility to impart apprehensions - Whistle blowing

We support a culture where everyone is entitled to freedom of speech. We provide employees with a safe, reliable and confidential method to express their concerns and to announce their issues when usual channels are unavailable or inappropriate.

All employees shall immediately inform of any violations of the law, this Code of Conduct, our Guidance on regulatory compliance or other policies of Aspo that they suspect or witnesses of which they are,

- to their supervisors or Managing Director of the Company,
- a representative of the Legal Department, Human Resources Department or Internal Audit Department of Aspo, or
- use the Channel of Aspo to report about illegal activity by email: secretary.board@aspo.com.

This allows us to solve and correct problems in a timely manner, preventing their repetition in the same or another subdivision of the Company.

We exercise due diligence towards reports of misconduct, process personal data in a proper manner, and keep reports confidential to the fullest extent possible.

We do not accept prosecution as applied to any person who reports in good faith of suspected misconduct or participates in an investigation to eliminate suspicion of misconduct. Examples of harassment include demotion, dismissal, rejection of professional advancement, cutting of wages, and any types of threat, abuse or harassment. Any individual who undertakes repressive actions for information on violation, regardless of its position, will be subject to disciplinary actions.

Violations of our Code, including untimely reporting of a known violation of the Code or false reporting of a violation, can lead in disciplinary punishment up to and including termination of employment.