APPROVED
By the Order of the CEO
of Ukrainian Energy Exchange
Limited Liability Company
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Corporate and Social Responsibility Policy

of Ukrainian Energy Exchange

Limited Liability Company

(new edition)

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1. General provisions

1.1. The Corporate and Social Responsibility Policy of Ukrainian Energy Exchange Limited Liability Company (hereinafter referred to as the "Policy") has been developed to ensure effective management in the conduct of professional activities on organized commodity markets and other activities by Ukrainian Energy Exchange Limited Liability Company (hereinafter referred to as the "Exchange"); it outlines the key directions and approaches of the personnel management policy—aimed at upholding respect for the rights, freedoms, and interests of employees—in order to fulfill the Exchange's mission and achieve the strategic goals declared by its management.

1.2. The Policy covers corporate ethics and culture (including employee business conduct) as well as HR and social policies (specifically regarding decent working conditions, social protection, healthcare, occupational safety, gender equality, etc.).

1.3. The policy applies to all Exchange employees without exception, including those engaged on an outsourcing or outstaffing basis.

In the event that, under national law, the Exchange may engage certain persons for cooperation based on agreements (contracts) other than employment contracts, the Exchange shall extend the application of this Policy to them to the fullest extent possible.

1.4. The primary objective of this Policy is to enhance the efficiency of the management system—including by establishing clear business conduct principles regarding interactions with colleagues, stakeholders, competitors, the state, and society—and to create an effective personnel management system for the Exchange that is aimed at maximizing profit and ensuring competitiveness, based on economic incentives and social guarantees, and also fosters a harmonious balance between the interests of employees and the employer, ensures the resolution of personnel and social issues concerning the Exchange and its staff, and guarantees gender equality and non-discrimination in all its forms.

1.5. In this internal document of the Exchange, the terms set forth below shall be understood to have the following meanings:

stakeholders – individuals, legal entities, or groups of persons who have a direct or indirect interest in the Exchange's activities and results, and who influence the Exchange and its operations and/or are affected by the Exchange (employees, counterparties, clients, public authorities, civil society organizations, etc.);

client – a legal entity (resident or non-resident) or an individual entrepreneur that receives services from the Exchange in connection with the Exchange's professional activities on organized commodity markets and is a non-permanent member of the Exchange, as well as in cases established by legislation and/or the Rules of Ukrainian Energy Exchange Limited Liability Company, another person who, in accordance with legislation and/or the Rules of Ukrainian Energy Exchange Limited Liability Company, has been granted the right to trade on the Exchange and access to the electronic trading system(s) for that purpose, as well as persons to whom the Exchange provides

other services that may be combined with professional activity on organized commodity markets, including, in particular, participants in over-the-counter transactions (parties to an over-the-counter contract), etc.;

counterparty – an individual entrepreneur or a legal entity from which the Exchange purchases or intends to purchase goods, works, or services to meet the Exchange's needs for its own business operations (including professional activities on organized commodity markets), or with which the Exchange maintains gratuitous contractual relations or a relationship of actual cooperation without the intention of making payment;

1.6. The main objectives of the Exchange's policy are:

- ensuring the implementation of the management strategy of Ukrainian Energy Exchange Limited Liability Company through 2030;
- high quality of services provided by the Exchange;
- high quality and efficiency of the Exchange's business processes;
- high corporate culture and ethics;
- high level of staff qualification at the Exchange and the creation of opportunities for their further development;
- social protection of staff and ensuring staff motivation;
- equal opportunities for all employees in achieving career advancement and remuneration;
- equality of rights and freedoms for all employees;
- occupational safety and staff health;
- ensuring gender equality and preventing any form of discrimination.

1.7. The Policy is based on the following principles:

- transparency;
- adherence to proper business conduct and high ethical principles of doing business;
- proper working and employment conditions (prohibition of any forced labor, adherence to minimum age requirements for employment, prohibition of employee discrimination on any grounds, proper formalization of employment agreements (contracts) with employees (prohibition of employing unregistered workers, prohibition of concealing employment relationships by entering into agreements other than employment or civil-law contracts)), adherence to working time schedules and overtime regulations, granting of leave, official wages (payment for services/work under civil-law contracts), prohibition of wage delays and reductions (except in cases prescribed by law), compliance with other requirements of Ukrainian labor legislation, etc.);
- proper occupational health and safety (safe and healthy working conditions, conducting safety training and briefings, maintaining logs, providing employees with personal

protective equipment, and compliance with Ukrainian occupational health and safety legislation);

- respect for the interests of the Exchange's employees and other stakeholders;
- respect for the rights and interests of women, youth, and persons with disabilities; prevention of violations or restrictions of their rights and interests, etc;
- public participation and stakeholder engagement (informing stakeholders, stakeholder consultations, grievance redress mechanism, fostering stakeholder cooperation).

1.8. The Exchange recognizes that achieving the stated goals will require additional investment in both human capital and the further development of the effective operations of the HR department (the structural unit responsible for HR matters)—which participates in implementing the adopted policy—as well as in enhancing its role and status and improving its information and technical support.

1.9. To achieve the goals set forth in clause 1.6. of this Policy, the Exchange:

- strictly adheres to legal requirements and implements best practices in corporate social responsibility and sustainable development;
- ensures equal opportunities and conditions for the career and professional development of all employees, including regarding remuneration opportunities;
- creates and continuously improves decent working conditions, guided by safety, operational, sanitary-hygienic, aesthetic, and social factors;
- ensures social protection for employees in accordance with current legislation, and facilitates effective personnel management, the optimization of HR operations, and workforce stability;
- continuously works to improve performance at all levels and ensures an effective approach to utilizing human resource potential;
- supports staff training and development systems, and invests in employees' professional training and personal development;
- builds and maintains a high level of employee loyalty;
- shapes and strengthens the Exchange's corporate culture;
- promotes gender equality within the team, as well as equal rights and opportunities for all employees;
- ensures awareness of gender policy and its implementation;
- implements mechanisms for trusting communication between employees and the administration and ensures the proper resolution of personnel disputes and complaints.

2. Corporate Ethics and Culture

2.1. The Exchange strives to adhere to the following principles of corporate ethics and culture in all aspects of its operations:

- respect – treating people equally and kindly, regardless of their race, religion, gender, sexual orientation, physique, age, or country of origin. The opportunity to express oneself freely and share ideas with confidence, without prejudiced judgment;
- integrity – preventing conflicts between personal interests and professional activities, fulfilling obligations by both employees and the Exchange, operating within the law, and combating corruption;
- professionalism – deep knowledge of one's field of work, a responsible and conscientious attitude toward job duties, high-quality and timely execution of assigned tasks, and continuous professional development;
- responsibility – fulfilling obligations to clients, counterparties, employees, government authorities, and other stakeholders; accepting responsibility for the outcomes of decisions made, as well as for professional growth and the creation of comfortable and safe working conditions;
- constructiveness – rational and purposeful interaction, prioritization, and respect for the work and time of others;
- employee development – creating conditions for employee self-improvement and providing opportunities for career growth within the framework of an equal opportunities policy.

2.2. The Exchange fosters polite and respectful relationships among employees, an atmosphere of cooperation, mutual understanding, and stability, the sharing of experience and information, and effective teamwork to achieve the best results.

2.3. Exchange employees cooperate with one another and build relationships with stakeholders, the Exchange's competitors, and other parties, guided by the principles of honesty and non-discrimination. Achieving results through unscrupulous or illegal methods is unacceptable.

2.4. Exchange employees strictly adhere to the legislation of Ukraine, ensure full, accurate, timely, and clear disclosure of information in Exchange reports and documents submitted to management and to the supervisory and regulatory bodies prescribed by law, and convey full, reliable, and comprehensive information to their immediate supervisors.

2.5. The use of the state symbols of the occupying country, as well as any symbols and images associated with it, by Exchange employees and within the Exchange's premises is strictly prohibited.

2.6. The Exchange condemns any form of discrimination, including within relationships between employees—which must be based on principles of mutual respect and assistance—and prohibits discrimination based on skin color, race, sex, gender identity, sexual orientation, ethnic, social, or

foreign origin, religious, political, or other beliefs, trade union affiliation, health status, disability, marital or financial status, etc.

2.7. The Exchange strongly condemns sexual violence and sexual harassment and declares a zero-tolerance policy regarding such conduct.

2.8. The Exchange prohibits any form of harassment, including in relationships between employees.

2.9. In the event of any instances of oppression, discrimination, harassment, or solicitation in any form by an Exchange employee, the employee subjected to such actions is required to immediately notify their direct supervisor of the matter. In the event that this fact is confirmed, the head is required to initiate the dismissal of the employee(s) of the Exchange found at fault, in accordance with the current legislation of Ukraine.

2.10. Any conduct that creates a threatening, hostile, or humiliating atmosphere for an employee or other persons present on the Exchange's premises or grounds is considered a violation of this Policy and may constitute grounds for liability as prescribed by law (including disciplinary, administrative, or criminal liability, depending on the specific circumstances).

2.11. Employees are required to conscientiously observe internal labor regulations and rules regarding fire and information security, and to maintain order at their workstations.

2.12. Exchange employees are required to maintain a neat appearance while at their workplaces and to avoid wearing clothing featuring symbols, images, drawings, slogans, or any markings that could cause offense, dissatisfaction, or any form of moral harm to other employees, counterparties, Exchange clients, or other stakeholders.

2.13. The Exchange does not prescribe specific dress codes or business attire requirements for its employees; it respects their need for self-expression and is understanding regarding their choices of clothing. At the same time, an employee's appearance must not be provocative or sloppy. The exchange asks to adhere to generally accepted ethical norms when choosing clothes and accessories that allow you to look authoritative, confident, solid, emphasize professional status and strengthen the trust of colleagues, customers, counterparties and other interested parties.

2.14. Exchange employees are required not to disclose or use the Exchange's confidential, commercial, insider, or official information for personal or other purposes. The disclosure of information regarding the Exchange's activities must not violate the Exchange's information security requirements or the legislation of Ukraine.

2.15. The Exchange prohibits any forms of corruption and the receipt of undue advantage within the meaning of anti-corruption legislation, including bribes.

2.16. Exchange employees are prohibited from accepting or providing donations or rewards for the simplification of formalities or the receipt of certain advantages, as well as in cases where the acceptance or provision of donations would create the impression on the part of the donor or recipient that such actions would—or are intended to—influence decisions concerning them.

2.17. If an Exchange employee receives an offer of an improper advantage in any form in exchange for any action or inaction related to the Exchange's operations, the employee must reject such an offer, report the matter to their immediate supervisor, and await further instructions from management.

2.18. Exchange employees must not accept or provide gifts or acts of business hospitality if the provider or recipient might perceive that doing so could influence decisions concerning them. All Exchange employees are prohibited from accepting any gifts from current or potential suppliers (contractors, subcontractors, or other service providers or performers of work), regardless of value, including promotional items or the payment of bills. Giving or accepting cash or cash equivalents as gifts is prohibited, with the exception of exchanges between employees on occasions such as birthdays, weddings, the birth of a child, etc.

2.19. To avoid a conflict of interest, Exchange executives are prohibited from accepting gifts from subordinates under their direct or indirect supervision, except for gifts marking a birthday, marriage, or the birth of a child, provided the gift's value does not exceed the subsistence minimum for able-bodied persons—as established by the Law of Ukraine "On the State Budget of Ukraine"—on the date the gift is accepted.

2.20. In other cases, Exchange employees may accept or give gifts that align with generally accepted standards of hospitality, except in cases provided for by the Law of Ukraine "On Prevention of Corruption" and this Policy. The total value of gifts or acts of business hospitality received from a single person (or from persons related to one another) during the year must not exceed two subsistence minimums.

2.21. Exchange employees are required to avoid conflicts of interest, refrain from taking actions or making decisions in situations involving a conflict of interest, and notify the Exchange of situations where conflicts of interest may arise and of the existence of a conflict of interest.

2.22. While performing their functional duties, employees are required to be guided by the interests of the Exchange.

2.23. In order to prevent the occurrence of a conflict of interest, the Exchange:

- hires family members of employees based on general selection criteria and impartiality;
- establishes a prohibition on family members working in a direct reporting relationship;
- monitors conflict-of-interest situations based on employee declarations (using the form in Annex 2) and takes appropriate measures to eliminate or minimize the impact of the conflict of interest; The Exchange reserves the right to restrict employees from holding executive positions in other unaffiliated commercial organizations if doing so could give rise to a conflict of interest or interfere with the performance of their duties;
- requires employees to notify of: an intention to combine their work with other forms of employment or entrepreneurial activity; an intention to acquire an equity interest in legal entities, where the ownership stake amounts to 10% or more; an intention to join the

governing bodies of another legal entity; hiring of an employee's family member or other relative; emergence of new affiliated persons of the employee; appearance of signs of a conflict of interest during the execution of a transaction by the Exchange; intention to accept or provide gifts or business hospitality exceeding the permissible amount established by this policy;

- reviews the information received in employees' declarations and, in the absence of grounds for a conflict of interest or other valid factors that could negatively affect the Exchange's operations, reputation, or interests, approves the employee's declaration.

2.24. Employees are prohibited from consuming alcohol, narcotic substances, or toxic or psychotropic drugs, and from participating in games of chance, during working hours or within the premises or on the territory of the Exchange. The Exchange acknowledges that the implementation of the aforementioned will have a negative impact on the employees' ability to properly perform their duties and on their safety, as well as on the efficiency and productivity of other employees and the Exchange as a whole. The Exchange reserves the right to require employees to undergo a medical examination or a test for alcohol or drug use if there is a reasonable suspicion of such use in the workplace.

2.25. Employees are prohibited from bringing weapons, ammunition, or other explosive materials into the premises or onto the territory of the Exchange, except in cases provided for by the current legislation of Ukraine or the internal regulatory documents of the Exchange.

2.26. Employees ensure the preservation of the Exchange's property and assets, treat them with care, and use them exclusively in the interests of the Exchange.

2.27. Intangible assets created or developed by Exchange employees in the performance of their functional duties are the property of the Exchange to the extent that they do not contradict applicable legislation or concluded agreements (contracts).

2.28. Employees are required not to compromise the security system during data transmission over the network, not to disclose their individual access passwords, not to allow other persons to use their computer hardware and software, and not to use the Exchange's property and assets for illegal activities.

2.29. Employees are strictly prohibited from using the Exchange's assets and property to store or disseminate pornographic materials; materials promoting violence, hatred, terrorism, discrimination, or intimidation; as well as obscene or degrading materials.

3. The Exchange's HR Policy

3.1. A priority of the Exchange's HR policy is to build a highly motivated team of professionals possessing modern key competencies and practices to ensure the achievement of the Exchange's business goals.

3.2. The main functions of the Exchange's personnel policy are:

- defining the key rules and principles for personnel management and human capital development at the Exchange, in alignment with the Exchange's business strategy;
- meeting the Exchange's need for qualified personnel by ensuring high-quality and timely recruitment, hiring, and professional development of staff;
- ensuring the necessary level of staff motivation through the development of modern and effective systems of financial and non-financial incentives;
- ensuring effective management and the achievement of the Exchange's strategic goals by staff through the development of performance planning and assessment procedures based on a competency model and key performance indicators;
- utilization of the Exchange's organizational structure, designed to maximize the efficiency of business processes;
- recording and monitoring the number of personnel in order to plan costs and rationalize the use of resources;
- fostering leadership development at the Exchange through the design and implementation of relevant programs, employer branding, corporate culture, etc.

3.3. To ensure the successful development of the Exchange and the achievement of its business vision and strategic goals, a performance management system is established, enabling active and effective management of performance at all levels—from the individual employee to the Exchange as a whole. To this end, the Exchange:

- formulates and regularly communicates the business vision, strategic development directions, and key goals and objectives of the Exchange to all employees, ensuring that everyone understands the Exchange's development trajectory as well as the requirements and expectations placed upon them;
- determines a balanced set of indicators based on corporate-wide goals and objectives that reflect the Exchange's performance;
- establishes an effective system for collecting and processing information to objectively determine the extent to which set goals and objectives have been achieved;
- establishes a clear and transparent system for utilizing assessment results, determining their impact on pay increases, career advancement, decisions regarding rotation and reassignment, or the identification of training and development needs;
- regularly informs staff about priority tasks, goals, and the methods for achieving them;
- monitors external and internal changes, analyzes their causes, factors, and impact, and makes necessary adjustments to the performance management system, the system of indicators, and established goals in a timely manner.

3.4. For the Exchange, it is important not only to achieve high performance results but also to consider the manner in which they were (or will be) achieved. When evaluating employees, in addition to tracking results achieved within the framework of management by objectives and tasks, the extent to which employees demonstrate commitment to corporate values and traditions is also taken into account.

3.5. The Exchange pays special attention to the onboarding of new employees, as well as to fostering an understanding among staff that achieving results is a corporate value. Such an approach will enable the Exchange to manage more effectively in non-standard situations, in the absence of clear rules and procedures.

3.6. During the hiring process, the Exchange verifies the candidate's data and may use other available sources to conduct a preliminary check of the candidate's integrity and business reputation.

3.7. Hiring is formalized by an order of the Exchange's CEO, with which the employee is acquainted against their signature. The basis for issuing the order is an application for employment or a written employment agreement (contract). An employment agreement (contract) is concluded with the employee in writing in cases provided for by legislation. In any case, before the employee begins work, the Exchange must inform them of the terms of the employment agreement (contract) in writing and obtain their signature acknowledging this.

3.8. The Exchange does not collect or store original employee identification documents or employees' personal belongings.

3.9. The Exchange takes and will continue to take appropriate measures to hire and retain persons with disabilities, as well as representatives of underrepresented and vulnerable population groups.

3.10. Employees have the right to resign at their own request in the manner and form prescribed by the legislation of Ukraine. An employee's resignation shall not result in the forfeiture of wages for time worked or other applicable benefits or payments.

Personnel policy regarding the optimization and stability of the workforce and ensuring the effective use of personnel.

3.11. The Exchange's vision regarding human resource planning:

- determining the alignment of qualification requirements with specific positions and jobs to enhance the efficiency of the personnel recruitment system;
- sourcing and selecting personnel for vacant positions based on requirements regarding candidates' qualifications and professional competence, as well as their personal, professionally significant psychological and social qualities;
- employee recruitment is conducted from both external and internal sources;
- the principle of staff rotation is applied during employee selection;

- selection for vacant positions is conducted on a competitive basis;
- the terms of the competition are established separately for each category of employees in consultation with the manager. The competition is conducted based on transparency, non-discrimination, gender equality, and objectivity in the selection process and results;
- the requirements of the Labor Code of Ukraine are observed when hiring employees; where necessary, a probationary period is established to assess the employee's professional knowledge and skills;
- all newly hired employees undergo an onboarding process and an introduction to the Exchange’s operations;
- the professional adaptation of newly hired employees is carried out at the workplace in accordance with individual plans, utilizing mentorship;
- other principles and criteria for employee selection—such as prior collaboration with the manager, family ties, friendships, personal relationships, etc.—are not permitted;
- interaction with a target group of leading educational institutions is continuously developing to attract talented graduates and establish practical training sites for them.

3.12. The procedure for searching for, selecting, and hiring new employees is governed by the legislation of Ukraine and the Exchange’s internal documents, taking into account this Policy and its principles.

3.13. In all cases, the primary criterion for personnel appointments is their objective expediency and the candidate’s potential and/or proven effectiveness, professional level, and skills.

3.14. The Exchange recognizes the need not only to recruit personnel possessing the necessary knowledge and skills but also to ensure their most effective utilization. To this end, the Exchange:

- maintains employee awareness of their job duties as set out in job descriptions and requires their performance within the scope of the employees' competencies;
- establishes rules of conduct governed by the internal labor regulations;
- develops an integrated system for employee career planning and active career management at all organizational levels, covering both "managerial" and "technical" career paths;
- coordinates the career planning system with the remuneration system and the staff training and development system;
- employs "vertical" and "horizontal" employee rotations that have proven effective;
- introduces variety into the work and provides employees with opportunities to gain new experience in order to maintain their interest and work motivation, develop their understanding of related business areas, and meet the company's needs for filling existing vacancies.

3.15. Mass layoffs of employees initiated by the employer (collective dismissal) shall be carried out in the manner and according to the procedures prescribed by the legislation of Ukraine. The Exchange shall make efforts to avoid instances of mass layoffs.

3.16. In the event of a need for a mass layoff (collective dismissal), the Exchange shall develop a plan for such dismissal that is proportionate to the scale of the anticipated layoff; it shall conduct consultations with employees, employee representatives, employee organizations, and government authorities (where required), including discussions on ways to avoid the layoff or reduce the number of employees subject to dismissal, ways to mitigate the consequences of the dismissal, criteria for selecting employees for dismissal, and the amount of severance pay. The exchange will also analyze all possible alternative solutions (an analysis of the number of jobs that can be preserved and the costs associated with implementing the respective alternative solution).

3.17. During the process of mass redundancy (collective dismissal), employees have the right to file complaints in the manner and form prescribed by the legislation of Ukraine—specifically, to submit complaints to the Employment Center regarding the selection of a specific employee for dismissal, providing grounds for why that employee should be retained, or complaints concerning the mass redundancy (collective dismissal) process itself).

3.18. In the event of a mass layoff (collective dismissal), employees shall receive all prescribed payments in the manner and form stipulated by the legislation of Ukraine, with the provision of proof that the relevant payments have been made.

Personnel policy regarding the creation and development of the staff training and development system.

3.19. The need to optimize costs and enhance operational efficiency requires greater output from the Exchange’s employees and the demonstration of a higher level of professionalism on their part.

3.20. To meet its need for highly qualified personnel, the Exchange focuses primarily on the ongoing training and development of the necessary skills and competencies among its employees, as well as on the recruitment and development of "young professionals"; this necessitates specific requirements for the corporate personnel training and development system.

3.21. To determine training needs, the Exchange regularly conducts personnel assessment and certification procedures, namely:

- performance assessment is conducted for all employees at appropriate intervals;
- the performance of units is evaluated on a monthly basis as part of tracking and monitoring the effectiveness of current task execution;
- the performance of managers is evaluated annually;
- Expert assessments are conducted selectively based on the manager's recommendations, and individual development plans are drawn up based on the assessment results.

3.22. Training is planned and conducted with the aim of preparing personnel to carry out the tasks assigned to the Exchange and enhancing the professional level of the staff.

Personnel policy regarding approaches to building staff loyalty.

3.23. The objective of the personnel motivation and incentive system is to ensure the sustained commitment of every Exchange employee to achieving planned performance targets—both in terms of individual work and collective results—and, where possible, to improving upon those planned outcomes.

3.24. The fundamental component of the Exchange's employee motivation and incentive system is the financial remuneration mechanism, which links compensation to work results.

3.25. The fundamental principle of financial remuneration is equal pay for equal work, which implies an identical level of wages for employees who hold positions of equal complexity and importance, demonstrate the same level of performance, and possess the same level of knowledge, experience, and competencies.

3.26. Employee remuneration consists of a fixed, guaranteed salary component—the base salary—and a variable component that reflects the performance of the employee, their department, and the Exchange as a whole.

3.27. The amount of the base salary depends on the position category and the tariff grade, which is determined based on the assessment of the employee's qualification level. The variable component of the remuneration is paid as a bonus based on the employee's performance results. The remuneration procedure for Exchange employees is governed by the Exchange's internal documents.

3.28. The Exchange regularly analyzes inflation and changes in the purchasing power of its employees' base salaries, and makes necessary decisions based on market dynamics and the Exchange's financial capabilities.

3.29. The Exchange does not make any deductions from employees' wages other than those prescribed by the legislation of Ukraine. The Exchange notifies employees of the deductions to be made from their wages and provides them with information regarding the gross amount payable and the amount of deductions.

3.30. The Exchange ensures the recording of working time and the proper and timely calculation of wages.

3.31. The Exchange grants and provides benefits to employees in the amount, in the manner, and by the means prescribed by the legislation of Ukraine.

Personnel policy regarding the development and maintenance of corporate spirit, and cooperation with employee organizations.

3.32. The Exchange strives to build relationships of trust and partnership with its employees. The development and strengthening of corporate spirit should be fostered through Exchange-wide initiatives aimed at instilling in employees a sense of community, a feeling of belonging to the company, and a commitment to loyalty and reliability in their work.

3.33. Creating a positive image of the Exchange, both internally and externally, will foster the development and spread of a corporate spirit and a positive socio-psychological atmosphere within the workforce.

3.34. The Exchange strives to build an active community of colleagues and create an inspiring, healthy, and socially welcoming work environment.

3.35. The Exchange facilitates the establishment and operation of employee organizations in the manner and form prescribed by the legislation of Ukraine.

3.36. In the event that such organizations are established, the Exchange creates appropriate and equal conditions for fruitful cooperation with all employee organizations and guarantees the involvement of representatives of employee organizations in resolving all important issues concerning the Exchange’s activities.

3.37. When cooperating with employee organizations, the Exchange is guided by the legislation of Ukraine.

3.38. Exchange employees are free to form and/or join employee organizations; the Exchange does not interfere with the employees' respective rights nor impede their exercise. The Exchange does not discriminate against employees in connection with the formation of or joining an employee organization.

3.39. Employees have the right to discuss matters concerning employee organizations directly at their workplaces outside of working hours—before the start of work, after the end of work, and/or during scheduled breaks. Subject to financial feasibility, the Exchange may provide funding to employee organizations at its own expense.

4. Social Policy and Partnership

4.1. Social responsibility and adherence to the principles of sustainable development are key values of the Exchange, which strives to ensure a comprehensive and balanced approach to business development and the observance of societal interests.

4.2. The Exchange is committed to ensuring decent and safe working conditions for its employees and strives to improve their quality of life; it also works to establish strong partnerships aimed at fostering the socio-economic and cultural-educational development of the regions where it operates.

4.3. The Exchange implements social projects aimed at engaging and uniting the population to address community development issues and improve the quality of life.

4.4. The Exchange's internal social policy is aimed at enhancing the prestige of working at the Exchange by improving the well-being and social protection of employees.

4.5. The Exchange recognizes and supports a healthy work-life balance for its employees and respects their rights and obligations outside the work environment. The Exchange acknowledges that everyone has the right to rest and leisure, including reasonable limitations on working hours and paid leave.

4.6. The Exchange sets the following goals for its social policy:

- Ensuring health – providing employees with access to timely and high-quality medical care, including psychological support, as well as opportunities to maintain physical health, and steadfastly promoting a healthy lifestyle;
- quality education and development – ensuring employee access to professional development courses in both their primary area of work and related fields of competence;
- maintaining work-life balance – full-time employment, providing hybrid work options for all employees while taking their personal circumstances into account and upholding the principle of work-life balance, and respecting employees' personal time, space, and lives;
- well-being – understanding and caring for employees' rational internal values and needs;
- sense of security – the Exchange (as a reliable and caring employer) fosters a sense of confidence and safety among employees by implementing appropriate measures, creating a sense of cohesion (where the employee feels part of the company and, on a subconscious level, feels a heightened sense of responsibility for their work), and deepening cooperation with employee organizations;
- decent work and economic growth – ensuring fair remuneration for work and opportunities for its increase, and enhancing the Exchange's image in the eyes of both employees and the public;
- charity – a willingness to get involved in providing help where it is needed;
- gender equality and attention to women's needs – equal conditions for employees to fully realize their potential and develop, regardless of gender, and the provision of additional opportunities to address specific gender-related needs and parenthood;
- partnership development – partnering with communities, educational institutions, and authorities to improve living standards, education, awareness, and development opportunities; promote energy efficiency and responsible consumption; and build a transparent and competitive economy, among other goals.

4.7. As the financial efficiency of its operations improves, the Exchange expands (and will continue to expand) its social protection program. In particular, the Exchange funds social policy initiatives, guided by such principles as:

- the principle of economic expediency, whereby the Exchange's social obligations must not substitute for the state's social obligations, and their financing must not hinder the Exchange from fulfilling its obligations to its participants (founders), as well as to business partners and investors, where applicable;
- the principle of sufficiency, whereby the Exchange will fund, from its own resources, a level of additional insurance services that is reasonably necessary and consistent with the market practices of other employers in the industry;
- the principle of promoting a healthy lifestyle, which entails encouraging a healthy lifestyle among Exchange employees;
- the principle of development, whereby the Exchange allocates sufficient funding for the development of its employees.

4.8. To achieve the specified goals and comply with the principles of the Exchange:

- establishes partnerships with healthcare institutions to secure discounts for Exchange employees, and organizes free medical check-ups and volunteer blood donation events for interested staff members;
- collaborates with medical insurance companies to develop the best and most optimal insurance plans for the Exchange's employees;
- collaborates with training companies and centers to provide employees with opportunities for professional development; implements professional training and development programs and courses; monitors free educational and informational events in the field and informs employees about them to encourage participation and the enhancement of their expertise; and creates an electronic "Knowledge Base" archive containing informational and educational materials for staff;
- creates the conditions and technical capability for employees to work both from the office and from home;
- conducts explanatory and methodological work among employees to foster a commitment to a healthy lifestyle;
- collaborates with health resort and sanatorium facilities to enable employees and their family members to vacation at such establishments;
- establishes partnership programs with sports centers;
- organizes cultural, sports, and entertainment corporate events involving employees, as well as retreats, recreational activities for employees and their families, etc;

- strictly adheres to legislation regarding overtime and extended working hours, and optimizes work processes to minimize instances of overtime; the Exchange declares that overtime work will be voluntary and compensated at the rate prescribed by law;
- deepens cooperation with civil society organizations and key stakeholders in the sphere of social policy, as well as with workers' organizations;
- allocates a sufficient volume of funding (commensurate with its financial position) to achieve the goals and principles of social policy;
- facilitates the work of the employee responsible for social matters, who monitors social issues within the workforce, ensures the implementation of social policy, and addresses employees' social needs in a timely manner.

4.9. Subject to financial feasibility, the Exchange may implement interest-free loan programs for employees and participate in charitable projects.

5. Equal opportunities policy, gender policy

5.1. The equal opportunities policy and gender policy are integral components of the Exchange's social policy. The individual and their rights constitute the highest value; these rights are universal, inherent, indivisible, and inalienable for the entire Exchange team.

5.2. The Exchange ensures respect for human rights, including those enshrined in the Constitution of Ukraine, the Universal Declaration of Human Rights, and UN conventions. In creating a favorable working environment, the Exchange ensures its compliance with the requirements of recognized international conventions, particularly the fundamental conventions of the International Labour Organization.

5.3. The Exchange develops the potential of the Ukrainian exchange market by fostering the potential of its people, while upholding the principles of equal opportunity and cultural diversity that drive innovation and business success.

5.4. The Exchange guarantees equal, non-discriminatory treatment in its relations with employees, business partners, counterparties, clients, and other stakeholders - regardless of race, nationality, origin, ethnicity, religion, skin color, language, political views, social, property, or marital status, age, sexual orientation, gender identity, health status, or other distinctions - and does not collect any data regarding these characteristics of its employees, except where such collection is expressly required by law.

5.5. The only requirement for every company employee is the possession of professional qualities corresponding to their position. Therefore, the Exchange strictly adheres to the principles of fairness and impartiality at all stages of employment - including hiring, payroll processing, the payment of

remuneration and compensation, professional training, appointment to new positions, and termination.

5.6. The Exchange ensures the identification of migrant workers, including those engaged through third parties, and guarantees them equal treatment with other workers, including regarding wages, benefits, etc.

5.7. The Exchange upholds the principles of gender equality - from its governing bodies to every employee's workplace - and guarantees equal opportunities and treatment regarding hiring and employment; equal remuneration for work of equal value, including compensation and benefits; training, promotion, transfer, and termination; equal access to safety and social security; equality in career development and work-life balance; and fair and equal treatment for all employees.

5.8. Gender balance fosters the development of the Exchange as a European-standard company, characterized by a democratic management principle and respect for fundamental civil liberties.

5.9. The Exchange’s gender and diversity policy is based on the following principles:

- equality of opportunity and treatment in employment relations;
- equal remuneration for work of equal value;
- equal access to workplace safety and hygiene and to social security;
- equality in career development;
- work-life balance that is fair for both men and women;
- zero tolerance for sexual or any other forms of harassment.

5.10. In its operations, the Exchange upholds gender equality, whereby all individuals have equal opportunities to develop their professional capabilities and make choices free from restrictions stemming from societal stereotypes, entrenched perceptions, and biases regarding gender roles. Gender equality means that the different behaviors, aspirations, and needs of people are valued, assessed, and encouraged equally. Gender equality implies fair treatment for all people. This may involve equal or differentiated treatment, but is considered equivalent in terms of rights, benefits, obligations, and opportunities.

5.11. The Exchange focuses its efforts on achieving workplace equality by implementing the following initiatives and measures:

- facilitating the decision-making process by considering diverse viewpoints from individuals with varied experiences and professional skills;
- compliance with anti-discrimination legislation and equal opportunities;
- ensuring fair and equal wages, working hours, and bonuses for work of equal value;
- regular review of salary levels;

- adherence to the principle of equal opportunities in the hiring and dismissal of employees, except in cases provided for by law;
- ensuring equal representation of both women and men among the staff of the Exchange's structural unit responsible for human resources matters;
- encouraging the hiring of women and men for positions not considered "typical" for their gender;
- provision of professional development opportunities such as formal or informal professional information exchange, activities to expand the client base, and equal opportunities for mentorship (a training method where a new employee partners with a more experienced colleague to learn from their experience) for men and women at all levels, including women in roles atypical for women;
- implementation of specific, verifiable actions aimed at creating a work-life balance;
- permission for employees to take unpaid leave exceeding the statutory duration for their own health care and medical treatment, as well as for the health care of their dependents, including family planning, consultations, and reproductive health care;
- prohibition of discrimination based on marital status, parentage and reproductive status when making decisions on hiring and promotion of employees;
- establishing a safe work environment to create a proper setting and foster ethical staff behavior;
- provision of separate toilets and, where necessary, separate changing rooms for women and men.
- deepening cooperation with civil society organizations and key stakeholders in the sphere of gender policy.

5.12. In order to ensure the implementation of gender policy, the Exchange undertakes to:

- conduct training and workshops for employees, particularly managers, on the implementation of the human rights policy;
- analyze one's own achievements in gender policy;
- systematically evaluate your achievements in terms of best practices.

5.13. The Exchange strictly maintains the confidentiality of all information regarding the HIV status and health condition of employees. The Exchange supports the voluntary nature of testing and will not in any way compel new or existing employees to undergo HIV/AIDS screening or testing, unless there is a legal basis for such testing.

5.14. The Exchange plans to develop and implement a gender assessment of draft internal documents to prevent the inclusion of discriminatory provisions that do not comply with the principle of ensuring equal rights and opportunities for women and men.

5.15. The Exchange strives to enhance its appeal as a socially responsible employer that upholds the principles of respecting human rights and preventing discrimination in any form.

5.16. An employee has the right to notify the designated gender issues officer of any violation of the policy set forth in this section, as well as any other violation that is not explicitly described in this section but may exhibit characteristics of a violation of the policy set forth in this section.

5.17. The authorized person shall review such notification and take responsive measures in the manner and form prescribed by the legislation of Ukraine and the internal documents of the Exchange.

6. Occupational Health and Safety Policy

6.1. The safety of employees' health and lives is one of the Exchange's key priorities in the conduct of its operations.

6.2. The Exchange’s occupational health and safety policy is an integral part of the Exchange’s social policy and is based primarily on the requirements of the Law of Ukraine "On Occupational Health and Safety" and other regulatory legal acts of Ukraine, as well as on international occupational health and safety standards (ISO 45001) and the recommendations of the International Labour Organization.

6.3. The main principles of the Exchange's activities in the field of occupational safety are:

- prioritizing the life and health of the employee over any of the Exchange’s business processes;
- shared responsibility—from employer to employee—for workplace safety at the Exchange as a whole. The functional occupational safety duties, rights, and responsibilities of each manager (official) are clearly defined in the Exchange’s job descriptions or other internal documents (regulations, orders, etc.);
- risk-oriented approach: conducting an in-depth analysis of risks and hazards at workplaces;
- employee training and development on occupational health and safety matters;
- compliance with legislation and key international standards;
- readiness for rapid and progressive changes aimed at the sustainable development of the Exchange in the field of occupational health and safety;
- openness and informedness of stakeholders, as well as readiness for productive cooperation.

6.4. To implement these principles, the Exchange assumes the following obligations:

- guarantee compliance with all norms established by the legislation of Ukraine and international legal acts in the field of occupational safety and health protection;

- enhance the safety of service delivery processes for clients;
- ensure the continuous improvement of the Exchange's occupational health and safety activities and management system, and implement occupational health and safety measures in accordance with best national and global practices;
- plan and finance occupational health and safety measures;
- organize training and professional development courses, and raise the awareness of Exchange employees regarding occupational health and safety;
- ensure proper access to public information regarding the Exchange's activities in the field of occupational health and safety.

6.5. The commitments undertaken by the Exchange form the basis for establishing long-term strategic goals in the field of occupational health and safety. Such goals are:

- identification of hazards and assessment of associated risks at each workplace within every organizational unit of the Exchange;
- involving all Exchange employees in activities to create safe and healthy working conditions;
- minimization and elimination of the risk of accidents at the Exchange and occupational diseases among employees;
- minimizing the number of workplaces with hazardous and harmful working conditions and implementing all necessary measures to maximally reduce the impact of negative factors (if any) on workers;
- increasing the effectiveness of the use of collective protection equipment;
- continuous improvement of the occupational health and safety management system and compliance with key occupational health and safety indicators.

6.6. To achieve strategic goals in the field of occupational safety, the Exchange provides:

- maintaining an effective occupational health and safety management system based on the requirements of applicable legislation, international occupational health and safety standards, and the Exchange's corporate standards;
- development and implementation of comprehensive occupational health and safety measures and plans to achieve established working conditions and safety standards in accordance with regulatory requirements, international standards, and recommendations, and to improve the existing level of occupational health and safety;
- analysis of the results of hazard identification and the assessment of associated risks at each workplace within each structural unit of the Exchange;
- allocation of sufficient organizational, material, human, and financial resources to ensure the fulfillment of assumed obligations;

- implementation of the best available technologies and practices in the field of occupational health and safety;
- compliance with the requirements of Ukrainian legal and regulatory acts regarding occupational safety and health when developing procurement policies, technologies, materials, and equipment, and during the performance of work and services by contractors;
- conducting an analysis of the occupational health and safety status and ensuring the Exchange's safe operation in compliance with occupational health and safety legislation;
- planning and implementing activities aimed at preventing accidents at the Exchange and occupational diseases among employees;
- conducting and promoting scientific research aimed at improving energy efficiency and reducing the negative impact of work processes on the Exchange's employees;
- raising the standard of service delivery and the educational and professional level of occupational health and safety personnel;
- cooperation with government agencies, public institutions, enterprises, and organizations to ensure safe and healthy working conditions at the Exchange.

6.7. Should an employee require psychological assistance and support, upon the employee's request to an authorized person, the Exchange shall engage appropriate specialists to provide qualified assistance to the employee.

7. Communication channels. Complaint handling mechanism.

7.1. The Exchange appoints a person responsible for the implementation of this policy. All Exchange employees must immediately inform the designated responsible person and their immediate supervisor of any suspected violation of the terms of this policy.

7.2. The Exchange ensures the functioning of communication channels (hotlines) with the mandatory publication of the relevant telephone number and email address for receiving messages/appeals (including anonymous ones, both internal (from Exchange employees) and external (from other interested parties)) regarding violations of this policy by employees and other persons acting in the interests of the Exchange (hereinafter referred to as complaints). All such complaints are kept confidential unless the complainant specifies otherwise.

7.3. Complaints are reviewed by the person responsible for the implementation of this policy in the manner and according to the procedure prescribed by the legislation of Ukraine, and taking into account the provisions of this policy.

7.4. The Exchange maintains records of and stores all received complaints and decisions made following their review.

7.5. Filing a complaint with the Exchange does not preclude the use of other grievance mechanisms (recourse to the courts, competent authorities, etc.).

7.6. If necessary, a commission may be established to consider the complaint; the regulations governing the commission and its composition shall be approved by an order of the Exchange's CEO.

7.7. When considering a complaint, all the circumstances and facts stated in it are checked. For the purpose of considering the complaint, explanations from other employees of the Exchange or copies of the necessary documents may be requested and examined.

7.8. The complaint must be reviewed within a period not exceeding one month from the date of its receipt by the Exchange.

7.9. The Exchange notifies the employee or other person who filed the complaint of the results of the complaint review and takes measures to remedy the identified violations.

7.10. In the event that the complaint filed by an employee or another person is not upheld, said employee or person has the right to appeal to the Chairman of the Exchange Committee with a request to review the resolution taken. The review is conducted in accordance with the general procedure established by this section.

7.11. Complaints regarding gender-based or sexual violence constitute a special category of complaints. Such complaints may be submitted anonymously to the Deputy Chairman of the Exchange Committee. Such complaints are processed according to standard procedures but in a confidential manner, with security measures ensured for the person who filed the complaint.

7.12. The Exchange adopts best practices for handling complaints regarding gender-based or sexual violence.

7.13. The Exchange declares and ensures that no negative consequences or enforcement measures will be applied to employees, employee organizations, or other interested parties for filing complaints.

8. Policy on Engagement with Stakeholders and the Media

8.1. The Exchange recognizes its significance in safeguarding state interests regarding the operation of transparent and competitive organized commodity markets, the further liberalization of energy markets, and the attraction of investment into the energy and oil industries—as well as other sectors of the Ukrainian economy that rely on exchange quotations (and other indicators of exchange activity) and/or whose enterprises participate in organized commodity markets. Therefore, the Exchange strives to build and maintain stable, constructive relationships with government authorities, regulators, law enforcement agencies, local self-government bodies, and other stakeholders, based on the principles of legality, integrity, professionalism, partnership, mutual trust, respect, and unwavering commitment to obligations.

8.2. The Exchange values the development and maintenance of partnerships based on long-term cooperation, mutual benefit, respect, trust, fairness, and objectivity, and conscientiously fulfills its obligations under agreements (contracts) with counterparties and clients.

8.3. The Exchange and its employees do not cooperate with criminals, terrorists, or with countries, organizations, and individuals subject to international or Ukrainian sanctions, and are required to take appropriate action upon identifying such persons.

8.4. In its interaction with stakeholders, the Exchange:

- provides information required by law in response to requests from state authorities, to the extent and in the manner prescribed by the legislation of Ukraine, and does not conceal, delay, or distort such information;
- ensures effective and systematic interaction taking into account the expectations and interests of all parties and under the conditions of effective dialogue;
- ensures an effective mechanism for reviewing and resolving inquiries, proposals, and complaints from stakeholders;
- provides reliable information about its activities in a transparent and understandable manner;
- conducts a thorough selection of business partners and counterparties, and strives to work with those who have an impeccable reputation;
- strives to avoid conflict situations and resolves all misunderstandings through negotiations and reaching compromise positions;
- does not participate in any form in political actions, political campaigning, or political activity, and does not finance political parties/organizations or candidates for elected office;
- does not allow employees to campaign in favor of any political parties or candidates during the working day;
- avoids unfounded criticism of state authorities, local self-government bodies, their employees, and holders of elected office.

8.5. The Exchange is open to cooperation with the mass media (hereinafter referred to as the "Media") and builds its relationships based on the principles of openness, transparency, promptness, and a readiness for dialogue.

To this end, the Exchange designates a person responsible for media relations and a specific group of individuals authorized to speak publicly on behalf of the Exchange in the media and at other events attended by media representatives, as well as to discuss the Exchange’s activities with the media.

Exchange employees must avoid statements or remarks that could be perceived as the Exchange’s official position or affect its reputation; furthermore, they are not authorized to provide the media

with information or documents regarding the Exchange's operations, or to make statements concerning the Exchange's current or projected financial status, unless they have the appropriate authority to do so.

9. Final Provisions

9.1. Exchange employees are required to take appropriate measures to prevent violations of the Policy.

9.2. All Exchange employees must be made aware of this Policy upon their hiring by the Exchange and must sign an employee undertaking in the form set out in Annex 1. Information provided by Exchange employees in accordance with the appendices to this Policy is confidential, is not subject to disclosure to third parties, and is intended for internal use. All employees are informed of changes to the policy, which is public and published on the Exchange's official website. Failure by an employee, for any reason, to sign the undertaking in the form of Annex 1 does not exempt such employee from the obligation to comply with the terms of this Policy.

9.3. All internal documents of the Exchange, as well as the measures and procedures employed by the Exchange to implement this Policy, are developed and executed in accordance with the legislation of Ukraine.

9.4. Amendments and additions to this Policy are approved by the CEO and formalized by issuing this Policy in a new version. The adoption of a new version of this Policy terminates the validity of its previous version.

9.5. In the event that any part of this Policy is inconsistent with the legislation of Ukraine, including due to the adoption of new regulatory legal acts, this Policy shall remain in effect only to the extent that it does not conflict with the applicable legislation of Ukraine.

9.6. Matters not regulated by this Policy shall be governed by the legislation of Ukraine and the relevant internal documents of the Exchange.

9.7. This Policy enters into force upon its approval by the CEO.

9.8. Compliance with and implementation of the provisions of this Policy are overseen by the Exchange Committee, the CEO, and the Exchange's management.

CEO _____ Oleksandr KOVALENKO

ANNEX 1
to the Corporate and Social Responsibility Policy
of the Ukrainian Energy Exchange
Limited Liability Company

Obligations of an employee of Ukrainian Energy Exchange LLC

I,_____
_____, (Full name, position title) hereby confirm that I have read the Corporate and Social Responsibility Policy of the Ukrainian Energy Exchange Limited Liability Company, approved by the CEO dated _____._____._____ , and the Environmental Policy of the Ukrainian Energy Exchange Limited Liability Company, approved by the CEO dated _____._____._____, (hereinafter referred to as the Policies) and undertake to strictly comply with the provisions of these Policies. I agree that this obligation constitutes an integral part of my employment agreement (contract) and that its violation may result in disciplinary action and other forms of liability in accordance with the law.

By signing this undertaking, I unequivocally understand, confirm, and agree that this undertaking extends to all possible future amendments and additions to these Policies (including their restatement in a new version) that may be made in the future and posted on the official website of Ukrainian Energy Exchange Limited Liability Company: https://www.ueex.com.ua/, – to this end, I undertake to monitor the Exchange's official website for any potential amendments or additions to these Policies (including their restatement in a new version).

In case of my disagreement with the changes/additions to these Policies or their new editions, I undertake to notify the Ukrainian Energy Exchange Limited Liability Company about this in writing within 2 (two) working days from the date of publication of the relevant changes/additions to these Policies or their new editions.

Failure to provide notice of disagreement with changes/additions to these Policies or their new versions implies my commitment to strictly adhere to the provisions of these Policies, taking into account any changes/additions thereto or new versions thereof.

Date ____ / ____ / _____

_____ / _____ /
signature *(surname, name, patronymic)*

ANNEX 2
to the Corporate and Social Responsibility Policy
of the Ukrainian Energy Exchange
Limited Liability Company

Declaration of Conflict of Interest

(This document is confidential, not subject to disclosure to third parties, and intended for internal use)

Date	
Name	
Position	

№	*Question*	*Answer (No/Yes + comment)*
1	Do you have any affiliated legal entities? If the answer is "Yes," please specify the name of the legal entity, as well as the following information: - Does the specified legal entity have a business relationship or is it conducting negotiations with Ukrainian Energy Exchange LLC? - Is the specified legal entity a competitor of Ukrainian Energy Exchange LLC? - Do you have a conflict of interest between your personal interests and your official duties at UEEX LLC? If the answer is "Yes," is it possible to resolve it?	
2	Are you or members of your family members of governing bodies (management board, supervisory board, etc.), an executive, a member of an audit commission, an advisor, or an authorized representative: - in a legal entity that has a business relationship or is conducting negotiations with Ukrainian Energy Exchange LLC? - in a legal entity that is a competitor of	

	Ukrainian Energy Exchange LLC? If the answer is "Yes," please provide the full names of such individuals, along with their positions and the names of the legal entities in which they perform executive, supervisory, or representative functions.	
3	Do you hold any concurrent employment? If the answer is "Yes," please list the positions held concurrently, specifying the names of the other employers.	
4	Are you or members of your family planning any transaction that could give rise to a conflict of interest? If the answer is "Yes," provide the full name of such person and specify the subject matter of the planned transaction that may give rise to a conflict of interest.	
5	Have you received, during the current year, any gifts, tickets to events, or other tangible or intangible assets from third parties with whom Ukrainian Energy Exchange LLC has or plans to have business relations? If the answer is "Yes," identify such persons and state the approximate value of the assets received from them.	
6	Do any of your family members or other relatives work at Ukrainian Energy Exchange LLC? If the answer is "Yes," please provide the full names and positions held by such individuals.	
7	Are any members of your family public figures? If the answer is "Yes," please provide the full names of such individuals.	

Before completing this declaration, I have familiarized myself with the Corporate and Social Responsibility Policy of Ukrainian Energy Exchange Limited Liability Company and the Licensing Conditions for Conducting Professional Activities on Organized Commodity Markets, approved by Resolution No. 276 of the National Securities and Stock Market Commission dated May 13, 2021.

I confirm the accuracy of the information provided in the declaration and grant permission for the processing of personal data and the verification of this information.

Date ____ / ____ / _____

_____ / _____ /

signature (*surname, name, patronymic)*