

CODE OF ETHICS

1. GENERAL PROVISIONS

1.1. The Code of Ethics ("Code of Ethics") of UAB HEAVY FINANCE ("Company") is a structured set of ethical standards for the Company's Employees and which also applies to Company's consultants, intermediaries and other persons, acting on behalf of Company.

1.2. This Code of Ethics is intended to regulate the principles of conduct in the performance of work duties and in representation of the Company both on and off duty, relations between Employees and Clients.

1.3. In order to be a trustworthy, transparent member of the community and to be self-demanding, the Company undertakes to work and behave responsibly, to conduct its business in a manner that is based on honest and ethical practices, and to comply with international standards on human rights, safe working conditions, environmental protection, and non-corruption.

2. DEFINITIONS

2.1. Capitalised terms used in this Code of Ethics shall have the meanings set out below, unless the context requires otherwise:

2.1.1. **Chief officer** – managing employee of the Company's administration, e.g., Company's manager (CEO), Chief Financial Officer (CFO), Chief Operating Officer (COO), etc.;

2.1.2. **Client** – the person using the services provided by the Company, crowdfunding project owner or investor;

2.1.3. **Company** – UAB HEAVY FINANCE, legal entity code 305576227, registered office address Birutės g. 18-1, Vilnius, Republic of Lithuania;

2.1.4. **Company's Manager** – sole governing body of the Company;

2.1.5. **Employee** – a natural person working for the Company under an employment or service contract.

3. BASIC PRINCIPLES OF ETHICAL BEHAVIOUR

3.1. The Company and its Employees are guided by the following fundamental principles in the conduct of their business:

3.1.1. **Integrity.** The Company and its Employees following generally recognized standards of moral behaviour, to perform duties honestly, decently, impeccably, principledly and responsibly;

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3.1.3. **Professionalism.** Company and its Employees strives to perform the work competently and to raise its professional qualifications;

3.1.4. **Responsibility.** Company and its Employees takes responsibility for decisions and consequences;

3.1.5. **Efficiency.** Company and its Employees aims to ensure that Company's activities goals are achieved in the most efficient way, with the smallest amount costs.

4. GENERAL DUTIES OF CHIEF OFFICERS

4.1. Chief officers in order to achieve the Company's operational objectives and to contribute to the fulfilment of the Company's functions, must, inter alia:

4.1.1. comply with the obligations laid down in the Articles of Association and other internal documents of the Company;

4.1.2. carry out its duties and functions within the limits of the rights set out in Articles of Association and other internal documents of the Company;

4.1.3. pursue the Company's objectives;

4.1.4. not to disseminate untrue and biased information about the Company and (or) the Chief officers and (or) Employees and (or) institutions with which the Company cooperates;

4.1.5. refrain from any action that may cause public distrust of the Company, its Chief officers and Employees, or distort the overall image of the Company;

4.1.6. strive to maintain a working atmosphere that is safe, transparent and respectful and equal opportunities are guaranteed;

4.1.7. encourage the best use of skills and care of Employees continuing professional development;

4.1.8. prevent conflicts and address the causes of disagreements;

4.1.9. comment reasonably and tactfully on errors or shortcomings in the work of Employees and objectively evaluate their performance;

4.1.10. not take advantage of one's position: not humiliating, not insulting and avoiding personalisation;

4.1.11. comply with any other requirements imposed on them by other internal Company's documents or procedures and national and international legislation.

5. GENERAL DUTIES OF EMPLOYEES

5.1 In order to achieve the Company's operational objectives and contribute to the fulfilment of the Company's functions, Employees shall, inter alia:

5.1.1. at all times, in the performance of their functions, strive to achieve the Company's operational objectives;

5.1.2. comply with the obligations set out in the legislation and in internal documents of the Company;

5.1.3. always maintain the highest standards of professionalism;

5.1.4. to develop his/her competence in areas useful to the Company's activities and objectives;

5.1.5. not to damage the name, prestige and reputation of the Company in society by his/her actions;

5.1.6. to carry out all assigned tasks with the utmost responsibility, avoiding any undue influence on the Company, its activities and its Employees;

5.1.7. not to disclose untrue and biased information about the Company or its Employees;

5.1.8. use the Company's assets, both tangible and intangible (e.g. intellectual property), solely for the purposes of the Company's activities, avoiding any use of the assets for personal and/or illegal purposes.

6. RELATIONS BETWEEN EMPLOYEES

6.1. Relationships between Employees shall be based on trust, honesty, friendliness and courtesy. Employees shall, to the best of their ability, at all times assist each other in their professional activities in relation to the activities of the Company.

6.2. All Employees, irrespective of their position in the Company, shall be obliged to work actively and jointly with other Employees to implement the decisions taken by the Organs.

6.3. Employees interacting with each other:

6.3.1. must not to disseminate false or defamatory statements about other Employees, nor to disseminate information that may incite discord among Employees;

6.3.2. any dispute between the Employees must first try to resolve it by mutual agreement. In the event that a dispute between them cannot be settled amicably, the Employee should first refer the matter to Chief officer of Employee department;

6.3.3. may at all times call upon each other for assistance and shall make reasonable efforts consistent with the objectives of the Company to provide such assistance;

6.3.4. shall exchange available and publicly accessible information to facilitate the full implementation of the provisions of the Code of Ethics and (or) the objectives of the Company;

6.3.5. shall not disclose confidential information about other Employees which has come to his/her knowledge as an Employee;

6.3.6. must avoid situations that could create a conflict of interest with other Employees of the Company. Employees must report unavoidable personal conflicts of interest to the Chief officer of Employee department;

6.3.7. must avoid situations involving harassment, discrimination, personal humiliation or insulting gossip, defamation of character and incitement to discord.

7. RELATIONS WITH CLIENTS

7.1. The quality of Clients service and operational efficiency are key to the Company's success. Employees know that the Client's impression of each of the Company's Employees is important.

7.2. The Company conducts its business in such a way that Clients have confidence in the Company. Employees shall conduct themselves in a caring, helpful and professional manner in their dealings with Clients.

7.3. The Company's Employees adhere to the requirements of the Clients service standard - respect, honesty, professionalism, fairness, punctuality and the priority of the Client's interests:

7.3.1. Employees behave in a manner that is free from prejudice, sympathy, antipathy or special consideration, and that does not give rise to the appearance of undue favouritism towards some, or of disregard or discrimination against others;

7.3.2. are impartial, communicating in a kind, non-confrontational and skilled manner;

7.3.3. avoid actions that could be perceived as an expectation of receiving gifts, bribes or other material benefits;

7.3.4. respects privacy, handle the Client's personal information responsibly, protect secrets and confidential information even after the end of the contractual relationship;

7.3.5. empathetic, responsive and responsible to the Client's needs, trying to pre-empt problems and resolve disputes and conflicts amicably.

8. USING AND PRESERVING THE COMPANY'S ASSETS

8.1. The company uses its assets: tools, materials, time, and other resources only for the purpose of achieving the company's business interests.

8.2. The Company preserves all Company's assets necessary for the conduct of its business and takes the necessary steps to prevent any misuse, waste or theft.

8.3. The Company is constantly looking for efficient solutions to optimise the use of available funds and other assets.

9. BREACHES OF THE CODE

9.1. In order to uphold the good name of the Company, Employees undertake to be guided by the Code of Ethics and the principles set out therein, and to conduct themselves in such a way that, from the point of view of a person acting in good faith, they may be relied upon and not be led to believe that there is a breach of the provisions of this Code of Ethics and of any other legal requirements.

9.2. Whether there has been a breach of the rules of ethical conduct shall be determined in each case on the basis of whether the conduct of the Employee has ensured the implementation of the provisions of the Code of Ethics.

9.3. The decision on the ethical violation and the measures to be taken shall be taken by Company's Manager.

10. FINAL PROVISIONS

10.1. This Code of Ethics shall be approved and (or) amended by order of the Company's Manager. Amendments to the Code of Ethics shall come into force on the date of the Company's Manager order, unless otherwise specified in the relevant order.

10.2. All Employees of the Company must be acquainted with this Policy by signature.