

# Procedure of Due Diligence on Business Partners of ULTRA TECHNOLOGIES COMPANY

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Approved by:

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#### **CONTENTS**

1. Purpose and Scope	2
2. General	3
3. Procedure of partner due diligence	3
4. Responsibility	4
Exhibit 1. Questionnaire for ULTRA TECHNOLOGIES Business Partner	4

# 1. Purpose and Scope

- 1.1. This Procedure determines the rules and arrangements for due diligence on business partners of ULTRA TECHNOLOGIES COMPANY to avoid the risks of violation of business ethics principles (as specified in the Company's Anti-Corruption Program), impairment of goodwill and possible financial loss of ULTRA TECHNOLOGIES COMPANY.
- 1.2. The procedure of screening shall apply not only to new business partners but also in case of renewal of long-term cooperation agreements and contracts for cooperation with working business partners of the Company.
- 1.3. The Procedure is compulsory for all employees of ULTRA TECHNOLOGIES COMPANY in charge of the Company's relationship with business partners (customers, vendors, distributors, contractors, etc.)

#### 2. GENERAL

- 2.1. ULTRA TECHNOLOGIES COMPANY endeavors to have business dealings with well-established partners which are running legal business and trustworthy enough to avoid any legal, financial and reputational risks during the cooperation. For implementing this policy, the Legal Group of the Company shall carry out comprehensive screening of partner companies for their compliance with high standards of business ethics accepted in ULTRA TECHNOLOGIES COMPANY.
- 2.2. The Company shall carry out consultations for business partners on application of the Code of Business Ethics, if the need arises.
- 2.3. The Company has an established system for handling of applications and proposals (the Hotline) which helps to sort out the situations when compliance with high standards of business ethics is associated with confidentiality compliance for the source of information. Please refer to www.ultraintegrity.com for details.

## 3. PROCEDURE OF PARTNER DUE DILIGENCE

- 3.1. The designated employee of ULTRA TECHNOLOGIES COMPANY in charge of the relationship with the partner shall submit a questionnaire to the partner company for filling out and then pass the filled out questionnaire to the BIG and inform about the history of the Company's relationship (if any) with this partner or potential partner.
- 3.2. In the questionnaire, the potential partner provides answers to the questions about the background information including the corporate structure, available compliance procedures, relations with government officials (civil servants), investigations, violations and lawsuits, level of proficiency and business recommendations.
- 3.3. The BIG shall carry out due diligence of the partner company using the questionnaire filled out by the partner as well as conduct comprehensive analysis of the partner's activities, the history of cooperation with it, its goodwill, open-source information, namely, open public registries, mass media (Internet, press, TV, etc.).
- 3.4. Based on the results of such screening, the BIG shall provide recommendations on the possibility of cooperation with this contractor based on due diligence results. If any risks of incompliance of the partner company with the Company's policies are revealed, the BIG shall recommend the relevant unit manager (giving a report to the General Director) to avoid business relations with such potential partner.

## 4. RESPONSIBILITY

- 4.1. The employees of ULTRA TECHNOLOGIES COMPANY in charge of relations with the business partner shall be responsible for availability of the filled out questionnaire on the contractor according to **Clause 1.2 and 1.3**.
- 4.2. The Legal Group manager shall have the responsibility to ensure proper screening of business partners.
- 4.3. The Legal Group is responsible to conduct proper screening of business partners on annual basis, not later than 1st calendar quarter of each calendar year. After screening is done, the updated records should be reported to the General Director and Head of Business Integrity Group, Deadline is march 30th of each calendar year.

# **Exhibit 1. Questionnaire for Business Partner**

### Questionnaire for ULTRA TECHNOLOGIES COMPANY Partner

Each partner's compliance with the business ethics standards of ULTRA TECHNOLOGIES COMPANY and requirements of the domestic and international legislation is one of the conditions for having business dealings with ULTRA TECHNOLOGIES COMPANY. Partners of ULTRA TECHNOLOGIES shouldn't offer or pay for, whether expressly or implicitly, any valuables (including any gifts, trips, entertainment costs, charitable contributions, etc.) to employees or officers of regulatory bodies, government officials, members of political parties or international non-governmental organizations or political candidates to influence on any acts or decisions to be made by such employees, officials or candidates for promoting business interests of ULTRA TECHNOLOGIES, or promote business interests of the Company in any sphere by taking any other improper activities. Please, be aware that the ULTRA TECHNOLOGIES's Policy especially prohibits facilitating payments known as 'grease payments'.

For the purpose of implementation of a part of the guarantee process, we expect you to provide information about your company. All information provided will be treated confidentially and protected by the non-disclosure agreement to be executed between us. Your contribution to this process is important and highly appreciated. Information provided will be used by ULTRA TECHNOLOGIES with the concurrent study of publicly available data to ensure our relations entail no risk of non-compliance with ULTRA TECHNOLOGIES' Policy.

1. Name of Company:	
Address:	
Web-site of Company:	
Registration number/Individual taxpayer	identification number/VAT taxpayer number:
city/region of the entity and incorporation	orise, association, joint-stock company, etc.), country
Total staffing:	
2. Name of a person in charge of filling out	the Questionnaire to contact in case of any questions:
Phone:	
E-mail:	
<b>3.</b> Please specify the name(s) and position ULTRA TECHNOLOGIES.	on(s) of the person(s) in charge of the relationship with
Name	Position

in place?	ny nave a Code of Business E	tnics or a similar code o	r conduct to comply with
in place:	YES	NO	
If yes, please send a c	copy of such Code or give a lir	nk to the document at yo	our web-site (URL):
Officer or any othe applicable internation	ny have a Corporate Business r person who controls comonal statutory regulations ar HNOLOGIES COMPANY as a	npliance with the currend code of ethics includ	ent domestic legislation
	123		
If yes, please provide	e contact details of this emplo	oyee:	
Full name:			
Position:			
Address:			
Phone:			
Fax:			
E-mail:			
	ames of all employees, direc ny's shares (authorized capita		nold five percent (5%) o
Name		Position(s) (employee	e, director, owner)

government authority, state ho party or enterprise owned by the	spital or other health care facil	
	YES NO	
If yes, please specify these per organizations or parties.	sons, their positions and releva	nt administrations, authorities,
Name	Position in /towards the Company / specified branch	Administration / Authority / Organization / Party and position the person holds
<b>8.</b> Does any person specified employees or officials of any international NGO, political par political candidate?	administration, state hospital	or other health care facility,
	YES NO	
If yes, please specify the type of t	hese ties.	

<b>9.</b> Are there any legal proceedings pending against your Company for any unlawful activity, environmental offence, violation of labor protection rules or safety violation in the Company?
YES NO
If yes, please provide brief information about the nature of such proceedings and measures taken by the Company to resolve this situation.
<b>10.</b> Please specify if your company have been mentioned in any resolutions or had any arrangements with any public authority of any country and/or if any authority, court or judicial body, whether national or international, have initiated any proceedings against the Company in respect of any anti-corruption-related violations?
YES NO
If yes, please specify each such resolution, statement, order or court judgment on a separate sheet.
11. By signing below the Company certifies the following:
a) information provided above is true and authentic. If this statement is false, please provide your comments.
b) The Company confirms that it has read and agrees to abide by the ULTRA TECHNOLOGIES' Code of Business Ethics: www.ultraintegrity.com
Signature:
Date:
Please print the name:
Rank/Position: