

# ULTRA TECHNOLOGIES COMPANY Whistleblowing Policy

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Approved by:

Abdul Gurbanov, General Director

## 1. INTRODUCTION

ULTRA TECHNOLOGIES COMPANY is committed to conducting its business safely and with honesty and integrity. All our staff are expected to maintain the highest possible standards. One aspect of this is to have the courage to speak up if you are worried that things may be going wrong. The aim of this policy is to encourage staff to report any suspected wrongdoing as soon as possible, to explain how to raise these concerns, and to ensure that staff are confident that their concerns will be taken seriously and confidentiality will be respected.

### 2. SCOPE

### This Policy applies to:

1. all directors, officers, employees and any other person whose work is supervised by ULTRA TECHNOLOGIES COMPANY as though that person were a ULTRA TECHNOLOGIES COMPANY Personnel); and

2. all ULTRATECHNOLOGIES COMPANY operations, including all legal entities and business area units, and ULTRATECHNOLOGIES COMPANY operated joint ventures.

# 3. WHAT IS WHISTLEBLOWING?

Whistleblowing is the reporting of information that relates to suspected wrongdoing or dangers at work. This may include the following examples:

- Danger to health and safety;
- · Criminal activity;
- Breach of ULTRA TECHNOLOGIES COMPANY's internal policies and procedures including our Code of Conduct;
- Bribery and corruption;
- Damage to the environment;
- Miscarriage of justice;
- Failure to comply with any legal or professional obligations or regulatory requirements;
- Fraud;
- Negligence;
- Conduct likely to damage our reputation;
- Harassment;
- Discrimination;
- Unauthorized disclosure of confidential information;
- The deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern in good faith relating to any of the above, or any other conduct likely to damage the interests of ULTRA TECHNOLOGIES COMPANY if you have any genuine concerns related to suspected wrongdoing or danger affecting any area of our activities, you should report it. In some jurisdictions, there are legal obligations to report certain conduct or indeed the failure to report could be perceived as approval of or involvement in such conduct. If you have any questions relating to the specific requirements in your operation, please direct your query to the Head of Business Integrity Group or the General Manager.

# 4. RAISING A CONCERN

All ULTRA TECHNOLOGIES COMPANY Personnel have a responsibility to notify the appropriate persons where they become aware of wrongdoing or potential wrongdoing. Wherever possible, ULTRA TECHNOLOGIES COMPANY Personnel are encouraged to report concerns relating to suspected wrongdoing or danger internally first.

In order to improve compliance function, we created the Business Integrity Group (BIG). A dedicated compliance infrastructure, with senior corporate officers responsible for compliance, is obligatory for our business. The responsible corporate officers have appropriate authority within the company, adequate autonomy from management, and sufficient resources to ensure that the company's compliance program is implemented effectively.

The team of ICG currently represented by:

- 1) Zaur Mammadzada, advisor to General director on international relations, Head of BIG
- 2) Niyameddin Alili Head of Finance, member of Strategic board, member of BIG
- 3) Safiya Nezametdinova Head of Human Resources, member of Strategic board, member of BIG

If you are not sure, please consult one of BIG members on how to report certain urgent issues. At the same time you can get a consultation from BIG members on matters of business ethics and integrity compliance.

We hope that in most cases you will be able to raise any concerns with your team leader, this is normally the best way. If you feel that they have not addressed your concern, or if you prefer not to raise it with them for any reason, or if you wish to stay anonymous, you could use either the www.ultraintegrity.com web service or apply to BIG members directly. Also you may apply using printed paper form that is available at ULTRA TECHNOLOGY COMPANY offices.

We will promptly (within 48 hours) and fairly consider each inbound message.

Summaries of cases will be presented to the ULTRA TECHNOLOGIES COMPANY Strategic Board on a quarterly basis.

## 5. EXTERNAL DISCLOSURES

The aim of this policy is to provide an internal mechanism for reporting any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally. The law recognizes that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It is only appropriate to contact the media with respect to ULTRA TECHNOLOGIES COMPANY related matters through ULTRA TECHNOLOGIES COMPANY's PR/Communications Manager.

## 6. PROTECTING OUR EMPLOYEES

We think it is important to speak up and do the right thing and encourage our ULTRA TECHNOLOGIES COMPANY Personnel to do so. We do not tolerate retaliation against genuine whistleblowers and take all claims of retaliation seriously. Acts of retaliation are acts of misconduct that could result in disciplinary actions and dismissal. If you believe that you are a victim of retaliation for whistleblowing, you should report it to Business Integrity Group or Legal Group.

### 7. FOR FURTHER INFORMATION

If you have any questions about this Policy, please contact one of the BIG members. This Policy may be amended and updated from time to time. The latest version of this Policy can be accessed through <a href="https://www.ultraintegrity.com">www.ultraintegrity.com</a> web service online. Amendments to this Policy may be made only by the ULTRA TECHNOLOGIES COMPANY General Director.