

Business Partner Code of Conduct

This Business Partner Code of Conduct (Code) establishes basic requirements and responsibilities for each Cellfie Business Partner. Cellfie reserves the right to reasonably modify this Code from time to time.

Our Business Partners

Cellfie is committed to building a best-in-class supply chain and requires **Business Partners** (vendors, suppliers, agents, contractors, consultants, intermediaries, resellers, distributors, third party service providers) to reduce risk to our business by following all applicable laws, observing the highest ethical standards, and meeting or exceeding the requirements established in this Code.

Applicability

This Code applies to Business Partners and their subsidiaries, subcontractors, and agents who act as licensed/authorized re-sellers of their products and services to Cellfie. We require our Business Partners to demand their next tier of partners to acknowledge the principles of this Code, as well.

General Principles

We know that working sustainably, respecting human rights, and operating with the highest standards of ethical conduct and professional integrity improve long-term business performance. We are committed to these principles and require our Business Partners to share our commitment and to comply with this Code, which has been developed considering best practices in the information and communications technologies sector.

Compliance with Law

Cellfie complies with applicable laws. Neither we nor our Business Partners will undertake any activity or accept any risk that would result in unethical outcomes or a violation of applicable laws.

Where the applicable laws and this Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest standard consistent with applicable local laws will apply.

Bribery and Corruption

Cellfie will not tolerate any form of corruption or bribery and strictly prohibits kickbacks, fraud, theft, extortion, and embezzlement of any kind. Each Cellfie Business Partner must comply with all applicable anti-bribery laws and maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Neither money nor anything of

value may be given, offered, requested, promised, or accepted by any Business Partner, directly or indirectly through another party, to gain an improper advantage to or related to *Cellfie*.

Business Partners are expected to maintain their own anti-bribery compliance program to prevent and deter wrongdoing or possible violations of law within their own businesses.

Gifts and Hospitality

Business Partners will not, directly or indirectly, offer gifts, hospitality, or other benefits to *Cellfie* employees or representatives with the intent to improperly influence them and will not offer to *Cellfie* employees any gifts or hospitality, regardless of amount, during contract negotiation, bidding, tender, or award.

Ethical Conduct

Ethical conduct requires that we do what is right, not just follow the law. *Cellfie* operates on ethical principles and expects its Business Partners to operate likewise—with us and in any way related to our business. Simply stated: integrity and honesty matter.

The specific requirements set out in the Code are the minimum standards for our Business Partners. We encourage our Business Partners to go beyond these standards, particularly where local laws and regulations are either weak or seldom enforced.

A Business Partner that fails to adhere to the standards of this Code may not be viewed favourably when awarding further work and may be terminated from some or all business relations.

Due Diligence Process

Cellfie conducts appropriate, risk-based due diligence when selecting Business Partners. Business Partners must undergo and successfully complete anti-bribery due diligence prior to engagement, and are required to cooperate with *Cellfie's* due diligence process. Business Partners must accurately complete all questionnaires, provide requested documentation, and transparently disclose information related to ownership and affiliated parties.

Confidentiality and Data Security

Business Partners will

- keep confidential any information relating to *Cellfie* customers, business activities, contracts, projects, financial situation, or performance unless specific written permission is obtained from *Cellfie*;
- protect the reasonable privacy expectations of persons with whom they do business;
- comply with privacy and information security laws and regulatory requirements when personal information is collected, processed, and transmitted;
- ensure customer data is kept secure and customer privacy is not breached;
- maintain appropriate data security and data security systems; and
- supervise appropriately their employees who interact *Cellfie's* data and customer data.

Anti-competitive Behavior

Business Partners will not violate or conspire to be part of any violation of competition laws or anti-trust regulations. Business Partners will uphold fair business, advertising, and competition standards.

Conflicts of Interest

A “conflict of interest” occurs when a personal interest of a Business Partner (or someone closely related to a Business Partner) conflicts with an interest of the *Cellfie*. Conflicts of interest can be actual (the conflict exists) and potential (a situation exists or is foreseeable in which a Conflict of Interest might arise). Business Partners should avoid conflicts of interest that may affect *Cellfie*’s business relationship. When a conflict of interest cannot be avoided, the Business Partner must report it to the *Cellfie* employee sponsor or *Cellfie* Compliance Office.

Intellectual Property

Business Partners will respect *Cellfie*’s intellectual property rights and will transfer technology in a manner that protects intellectual property rights.

Money Laundering

Business Partners will firmly oppose all forms of money laundering and take steps to prevent financial transactions from being used to launder money.

Prohibition on Oral Contracts

Cellfie prohibits oral contracts with Business Partners. Prior to commencing work, *Cellfie* and its Business Partners must agree in writing to terms and conditions of each transaction or engagement.

International Trade and Economic Sanctions

Business Partners will abide by applicable international trade (including import and export/reexport controls) and economic sanctions laws and regulations. Business Partners will not do business with parties or in jurisdictions where applicable laws or regulations prohibit it.

Program for Compliance with this Code

Business Partners will comply with all topics of this Code. If a formal compliance program does not exist, the Business Partner should develop a program or system and strive for continuous improvement.

Reporting

Business Partners are required to promptly report any suspected or known violations of this Code. If you have questions about this Code or believe that someone may have violated it, please contact *Cellfie* Compliance at compliance@cellfie.ge. Alternatively, you may submit a concern at IDC@cellfie.ge. All reports are duly reviewed and, if appropriate, investigated. *Cellfie* will not

tolerate retaliation against any person who is trying to do the right thing by raising a concern. A person who makes a good faith report about potential misconduct who experiences retaliation or other adverse action for raising a concern should report this immediately via the channels identified above.

Annual Corporate Responsibility

Cellfie reserves the right to report publicly on the implementation of this Code through its annual Corporate Responsibility Report. Reporting will not identify individual Business Partners, and any case studies will be anonymized so that the identities of Business Partners cannot be determined, unless previously agreed upon.