

CODE OF CONDUCT

FOREWORD

The Code of Conduct represents the values that guide the way we do business. Additionally, it's created to promote our commitment, as a company, to expect ethical behavior from anyone employed by us, directly or indirectly.

SoftServe's leadership team is committed to creating a work environment built upon mutual cooperation and respect for one another. Everyone must be treated with dignity and respect, not tolerating any form of harassment or discrimination.

What does the Code mean to me personally?

SoftServe is a "people business" – you are the foundation of the services we provide. Each of us is responsible for how we interact with one another, our customers and our community. Ensuring our behavior is moral, including how others may perceive our behavior, is instrumental as we strive to develop, hire and retain the best people. Once we have the best people, the people who share our values and ideals, we encourage them and provide opportunities to grow.

While this policy may not provide answers to all possible questions or ethical dilemmas that may occur at SoftServe, our associates must seek guidance from their Manager or HR in any situation which is questionable.



Chris Baker, CEO

PURPOSE AND SCOPE

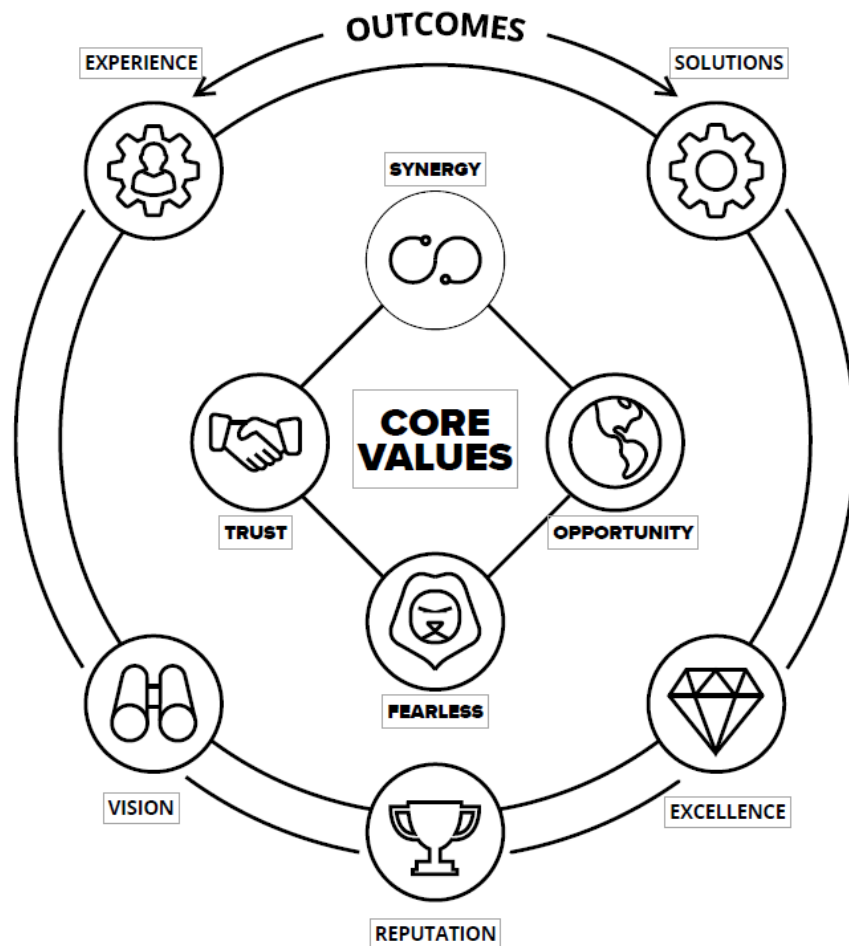
The Code of Conduct (“Code”) outlines expected behaviors for our associates, those who work with us, our customers, our financial stakeholders, including with the governments of the countries in which we function as well as the communities and the environment in which we operate. We also expect that those who deal with us are aware that this Code supports everything we do and that accordingly, we expect they act in a manner consistent with our Code.

It is the policy of all companies operating under brand “SoftServe” (“SoftServe”) to comply with our Company Values, standards of behavior and this Code. This Code of Conduct applies to all physical persons who are engaged directly or indirectly by SoftServe.

OUR COMPANY VALUES

Our Company Values define who we are. Soft stands for main people-oriented values we share. Serve stands for core client-oriented values we foster.

Our Mission is to enable talented people to change the world.



Core Values: People-oriented values we share

SYNERGY - The power of collaboration while working towards **common goals**



- We are the team that drives the company success
- We are always results-driven
- We get together to create valuable solutions for the customers
- We strive for making the company better for each of us
- We always support each other
- We collaborate day-to-day to reach common goals
- We share own knowledge and seek out the input of others
- We complement each other to make our team stronger
- We respect individuality but always align our ambitions with the company goals

OPPORTUNITY - Personal **growth and development** enhanced by people-oriented corporate culture



- Our desire for professional and personal development fulfills us
- We seize each opportunity, which energizes and sparkles our inner selves
- We strive for making the best of each case
- We provide our Clients with opportunities to propel innovations and make a difference
- We foster conditions to boost people development
- We provide equal (fair and transparent) opportunities for People within the Company
- We encourage the initiative because it leads to new opportunities

FEARLESS - The brave spirit of meeting new **challenges** and driving **change**



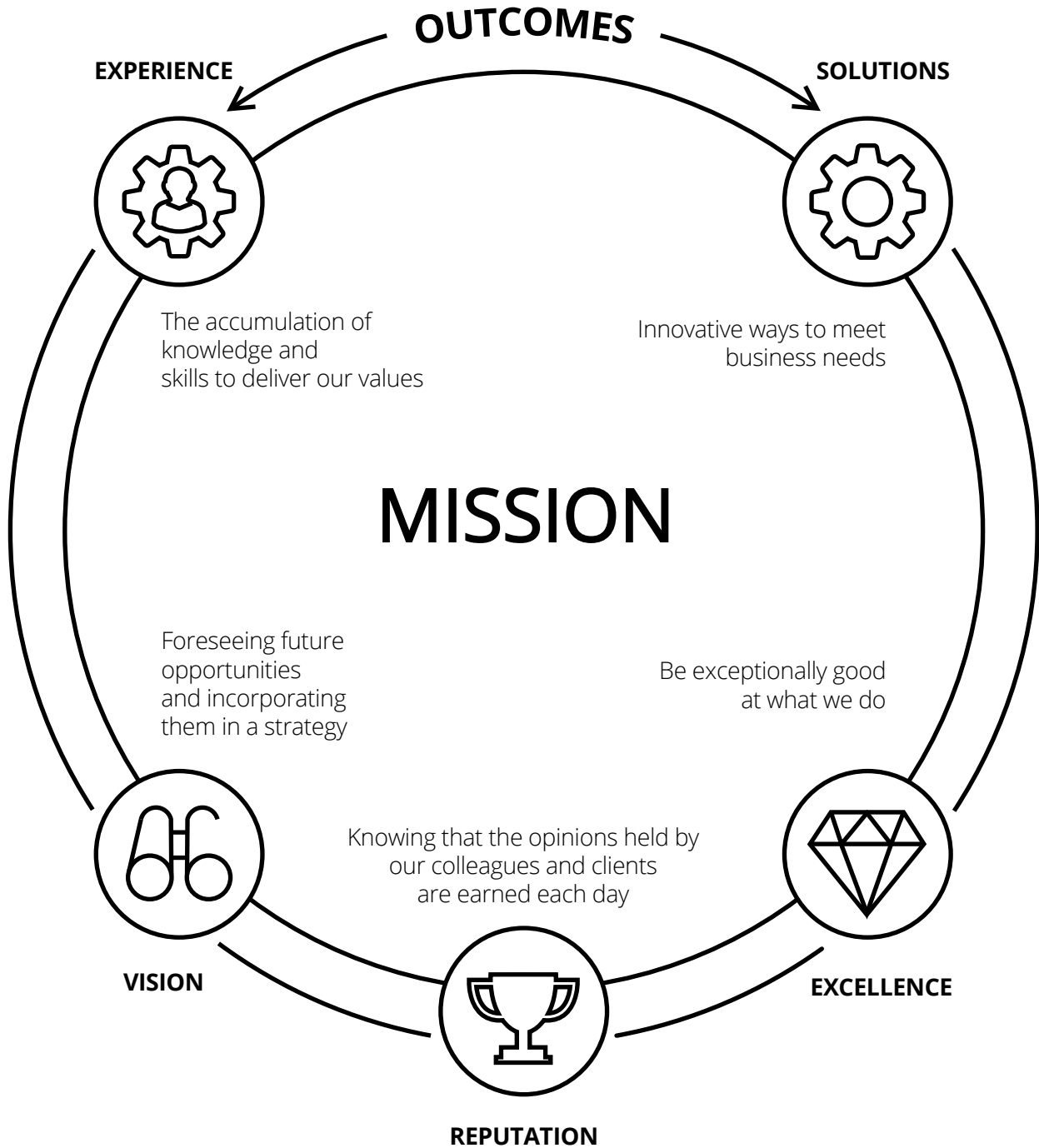
- We perceive challenges as new opportunities for our success
- We are eager for disruptive changes that bring innovations
- We see changes as opportunities, not threats
- We pursue our goals, follow and achieve them, no matter which obstacles appear along the way
- We are willing to raise our voices for things we care and believe in
- We communicate risks fearlessly and embrace them consciously

TRUST - The firm belief in **integrity, ability** and **character**



- We believe that mutual trust is a foundation of success
- We build long-term partnerships with our People and Clients
- We foster honesty, openness, and transparency for the benefit of common goals
- We believe that transparency together with synergy builds the strongest teams
- We rely on each other and always have a shoulder to lean on.
- Integrity and trustworthiness are essential parts of what we offer to our Clients.

OUTCOMES: Client-oriented values we foster



INTEGRITY OF RECORDS AND PUBLIC REPORTING

Associates shall not misrepresent or omit any information that would compromise the integrity of our records, internal/external communications and report, including financial statements. Prior to disclosing any company or business-related information, proper authorization must be secured. This includes disclosures through any forums or media, including social media.

Associates must ensure the integrity of personal data or information, including protecting all confidential information and intellectual property of SoftServe. Data must be secured and not

shared with anyone without proper approvals and ensure sharing is on a “need to know” basis.

Separately, SoftServe safeguards our associates personal data and we closely control appropriate usage of employee data such as picture, name and location within internal systems needed to conduct business.

The lost, theft or destruction of any confidential information or intellectual property and data of SoftServe must be reported immediately upon discovery.

CONFLICT OF INTEREST

Associates are expected to always act in the interest of our company and ensure that any business or personal associations do not create a conflict of interest with their roles and work obligations within our company.

A conflict of interest could be any known activity, transaction, relationship or service engaged in by an associate, his/her immediate family, relatives or a close personal relationship which may cause concern that the employee could not or might not be able to fairly perform his/her duties to SoftServe.

Taking employment, accepting a position of responsibility or running a business outside

employment with SoftServe, in your own time, with or without compensation, could interfere with your ability to perform your work obligation or create conflicts of interest. Such activity must not be with any customer, supplier or competitor of our company. You must notify and seek approval for any such activity as per this clause and in accordance with applicable company policies and law.

Should any conflicts arise or suspect they will arise, the associate must immediately report to their manager and/or HR department.

CONFIDENTIALITY

Associates shall protect SoftServe's confidential information, such information includes all nonpublic information that might be of use to our competitors, or harmful to us or our clients or vendors, if disclosed. Confidential proprietary information and data are important corporate assets in the operation of its business and prohibits the use or disclosure of this information to any unauthorized persons (internal or external) except when disclosure is authorized or legally mandated.

Confidential information must be marked accordingly, disclosed only on a need-to-know basis, when required by law or necessary to further SoftServe's business activities. Likewise, associates should not accept any information provided by a third party that is represented or appears as confidential without proper non-disclosure agreement(s) executed.

EXAMPLES, WITHOUT LIMITATION:

methodology overview, coding and other standards, case studies, document templates, employee contacts and curriculum vitae, business plans, customer data, designs, concepts, prototypes, documents, drawings, engineering information, financial analysis, infrastructure (hardware and network configurations), inventions, market information, marketing plans, processes /guidelines/metrics and baselines, IT procedures, security measures, products, pricing, payment, scheduling and estimation information, product plans, development tools, research, services, specifications, software, source code, trade secrets, user credentials for access to SoftServe systems: user names, passwords, PIN codes] etc..

NON-HARASSMENT

SoftServe does not tolerate harassment which may include threats, threatening behavior, intimidation, assaults and similar conduct, including sexual harassment. Any threats or concerns about safety or the safety of others should be immediately reported to Human Resources. Firearms are not permitted on any SoftServe facility.

Sexual harassment, which involves the solicitation of sexual favors or the initiation of any unwelcome sexual advance by one SoftServe Associate toward another will not be tolerated. Sexual harassment may also involve other sexually-related physical or verbal conduct, or the creation of a work environment that is hostile, intimidating or offensive to an individual or group because of gender. All associates must be alert to the possible presence of sexual harassment in the workplace and steps must be taken to prevent sexual harassment. Complaints about sexual harassment can be made to the CHRO.

EQUAL OPPORTUNITY AND NON-DISCRIMINATION

As an Equal Opportunity Employer, we provide equal opportunities to all our associates and to all eligible applications for cooperation within SoftServe.

It is SoftServe's policy that we do not unfairly discriminate on any ground, including race, religion, caste, color, ancestry, marital status, gender, age, nationality, sexual orientation, ethnic origin, veteran status, disability or any other category protected by applicable law. Every associate is an important contributor to SoftServe's success. SoftServe works as a team to produce quality services that meet or exceed quality commitments and the reasonable expectations of our customers. In so doing, SoftServe is committed to hiring, promoting and compensating associates based on their qualifications and demonstrated ability to perform job responsibilities and to prevent any form of discrimination. It's expected that we treat one another with courtesy, dignity and respect. SoftServe firmly believes that a high-quality, diverse workforce is the key to maintaining our competitive advantage.

If an associate believes that he or she is subject to conduct in any form which is not conducive to a productive and safe work environment, he/she should report such condition or conduct immediately to the supervisor or HR.

ANTI-CORRUPTION & LEGAL COMPLIANCE

Our associates, and those representing SoftServe, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits/gifts that are intended or perceived to obtain undue favors for the conduct of our business.

BUSINESS COURTESIES, GIFTS AND GRATUITIES

A business courtesy is a gift (whether in money or other thing of value) provided to a business partner. In certain situations, the exchange of limited, non-cash business courtesies may be appropriate. SoftServe does not seek to improperly influence the decisions of its clients or suppliers by offering business courtesies, and SoftServe requires that the decisions of all associates not be affected by having received a business courtesy.

As a general rule, we may accept gifts or hospitality from a business associate, only if such a gift:

- Has a modest value and does not create a perception (or an implied obligation) that the giver is entitled to preferential treatment of any kind
- Would not influence, or appear to influence, our ability to act in the best interest of our company
- Would not embarrass our company or the giver if disclosed publicly.

Gifts which are never appropriate and should not be given or accepted:

- Cash, gold or other precious metals/gems, high value item, etc.
- Items which are prohibited under applicable law
- Gifts which are in the nature of a bribe, payoff, kickback
- Gifts in the form of services or other non-cash benefits such as a promise of employment.

ANTI-CORRUPTION LEGISLATION

Many jurisdictions, where SoftServe operates have adopted anti-corruption legislation, there includes, but not limited to the United States Foreign Corrupt Practices Act, UK Bribery Act, Ukraine's antic-corruption legislation etc. Please note that some of these acts prohibit giving anything of value to officials or political parties of foreign governments in order to obtain or retain business or to gain any improper advantage.

WHISTLEBLOWER POLICY

A whistleblower, as defined by this policy, is an associate of SoftServe who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower ("associate") is not responsible for investigating the activity or for determining fault or corrective measures.

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting. If an associate has knowledge of or a concern of illegal or dishonest fraudulent activity, the associate should refer to SoftServe's **Whistleblower Policy** for full details on the policy, including how to report concern and exercising sound judgment to avoid baseless allegations.

COMMUNICATION GUIDELINES – SOCIAL MEDIA

We respect our associates' right to privacy and we have no concern with their conduct outside of the work environment, however, we expect appropriate judgement must be exercised to ensure that the conduct does not impair work performance, create a conflict of interest or adversely affect SoftServe's reputation.

Likewise, it's important that all associates understand appropriate usage of our logo and Company Name within the various social media platforms. Please review the **Social Media Policy** to ensure you're compliant.

COMPLIANCE WITH CODE OF CONDUCT

If you know of or suspect a violation of applicable laws, rules or regulations, or as outlined in the Code of Conduct, you must immediately report that information to Vice President Legal or Human Resources. No one will be subject to retaliation for reporting, in good faith, a suspected violation. “Good faith” means having a reasonable belief that the information you have provided is truthful. It does not mean having ‘all the evidence’ about the potential violation or case reported.

Violations of this Code may result in disciplinary action, up to and including termination. The Board shall determine, or shall designate appropriate individuals, to thoroughly investigate any reported violations and take appropriate action(s) based upon their findings. The Board shall include VP Legal, CHRO and others deemed appropriate based upon allegations.

ASSOCIATE ACKNOWLEDGEMENT

I acknowledge that I have received the SoftServe Code of Conduct. I have read and acknowledge that I am required to comply with the guidelines provided and that failure to do so may subject me to disciplinary actions.

Further, I acknowledge that I am required to re-read and re-acknowledge this policy on an annual basis.

If I have questions or concerns about a violation or potential violation, I understand the appropriate channels to report any concerns. Additionally, I understand and agree to hold myself accountable in maintaining the highest ethical standards as SoftServe has committed.