



APPROVED

SIA Zabbix
Member of the Board Aleksejs Vladiševs

SIA “ZABBIX” CODE OF ETHICS

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1. GENERAL PROVISIONS

- 1.1. The Code of Ethics (hereinafter referred to as the Code) of SIA Zabbix (hereinafter referred to as the Company) contains principles, norms and recommendations of professional ethics for all employees and subcontractors of SIA Zabbix - employees under an employment contract, trainees under an internship contract and natural persons who are independent contractors under a company contract (hereinafter referred to as employee/employees).
- 1.2. The Code of Ethics is intended to set out the ethical principles, rights, duties, responsibilities and standards of ethical behaviour of employees, which form the basis for the Company's professional conduct and external and internal communications.
- 1.3. The Code of Ethics is not a comprehensive description of values, ethical principles and standards of behaviour. In their personal and professional conduct, employees shall also respect generally accepted values, ethical principles and norms of conduct, as well as the laws and regulations of the Republic of Latvia.
- 1.4. To promote compliance with the Code of Conduct, SIA Zabbix has an Ethics Committee to help assess the conduct and ethical climate of its employees and recommend possible improvements.
- 1.5. The Code of Ethics is binding on every employee and subcontractor of SIA Zabbix - employees under an employment contract, trainees under an internship contract and natural persons who are independent contractors under a company contract. The management of the Company promotes ethical attitudes.
- 1.6. Violations of this Code may result in disciplinary action as well as moral sanctions (for example, a public apology).

2. COMPANY VALUES AND EMPLOYEE ETHICS

2.1. Respect:

- 2.1.1. The Company respects human rights.
- 2.1.2. Employees are free to express their personal opinions both in the workplace, provided it does not harm the dignity of colleagues, and in their free time, provided it does not bring the company into disrepute.
- 2.1.3. Everyone's fundamental rights and freedoms are respected regardless of race, ethnicity, religion, age, gender, sexual orientation, political affiliation, marital status, income and disability, if any.
- 2.1.4. Offensive behaviour, including bullying, harassment, violence and the distribution of offensive verbal, printed or electronic material is strictly prohibited. Harassment is the subjection of a person to conduct that is objectionable from that person's point of view, for example¹, because of that person's membership of a particular gender, including conduct of a sexual nature, where such conduct has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.
- 2.1.5. Child labour is completely prohibited.
- 2.1.6. Employees are respectful of people with different backgrounds and recognise diversity as a potential for the company, as well as respecting and treating all colleagues equally, regardless of their position in the company.

2.2. *Fairness and justice:*

- 2.2.1. Transparency and accessibility of documents is ensured under Latvian law. All non-confidential information about the Company that is not confidential is disclosed to customers and the public.
- 2.2.2. The Company's record-keeping is impartial, accurate and fair.
- 2.2.3. Employees shall carry out their duties honestly, diligently and responsibly, taking principled action in any case of misconduct.
- 2.2.4. Employees shall comply with laws and regulations and shall not engage in any illegal activity that discredits their position or the Company.
- 2.2.5. In the performance of their duties, employees shall not take advantage of their official position for their own personal gain or that of another person, without any conflict of interest.
- 2.2.6. Employees shall not tolerate ethical risks and shall contribute to their assessment and prevention.
- 2.2.7. Employees shall observe non-discriminatory and equal treatment, the rule of law and fairness for all. Employees self-critically recognise and correct their own mistakes, apologise for unethical behaviour, and do not take advantage of the ignorance and mistakes of others.

2.3. *Loyalty:*

¹ For example, a woman who feels that a colleague's jokes about women, ambiguous compliments and "accidental" touching offend her and are unwelcome from her point of view can complain to the Ethics Committee about gender discrimination.

- 2.3.1. Employees are committed to the Company's objectives and core values, and recognise that their work together contributes to the achievement of the Company's objectives, as well as to cooperation with other companies and institutions.
- 2.3.2. In the performance of their duties and outside working hours, employees, in particular senior management, act in accordance with the Company's values in order to preserve and enhance the Company's reputation.
- 2.3.3. Loyalty means not only fulfilling assigned duties and instructions, but also creative participation, professional support and advice in relations with the Company's management and colleagues.
- 2.3.4. Employees shall be loyal to the Company's objectives and shared values in their actions and public statements. The expression of official opinion of SIA Zabbix is only permitted with the relevant authorisation of the management.
- 2.3.5. In their dealings with other persons, employees shall take care of the reputation and prestige of the Company by refraining from expressions which might cast doubt on the loyalty, civic and moral standing of the employee.
- 2.3.6. Defamation or criticism of the Company's policies or management and employees, which is expressed publicly (i.e., in the mass media, social networks, etc.), or any criticism directed at a person's personal characteristics is unethical and unacceptable.

2.4. *Responsibility:*

- 2.4.1. Employees are provided with a salary, working hours, social guarantees in accordance with Latvian law and appropriate working conditions specific to each business sector (criteria include: noise level, workplace temperature, ventilation, lighting, sanitary facilities).
- 2.4.2. Employees perform their duties responsibly and professionally, using their knowledge, skills, abilities and experience to achieve the best possible results and to ensure the efficiency and quality of the company's work.
- 2.4.3. Employees are aware of the requirements and conditions of their job and the contribution they make, and therefore feel personally responsible for the quality of their work in achieving the company's common goals.

3. PREVENTION OF CONFLICTS OF INTEREST

- 3.1. If the possibility of a personal or Company conflict of interest arises through the use of authority entrusted to the person or through the use of Company capital or other resources for personal gain, report immediately to a manager or take appropriate decisions independently to put an end to the situation.
- 3.2. Employees shall inform management and ask to be excused from performing their duties or participating in the decision-making process in situations where the decision may affect, or may be suspected of affecting, the personal or pecuniary interests of the employee or members of his family, or the pecuniary interests of the organisation with which the employee is associated or of its investors.
- 3.3. The Company does not tolerate the use of an employee's position or the Company's resources for private interests.

- 3.4. Employees shall not accept any material or immaterial benefits or other advantages (donations and gifts, loans or offers of services and other benefits) from persons or organisations with whom they have or have had a business relationship. Flowers, souvenirs or representational items of low value shall not be considered a gift for the purposes of the Code of Ethics if the total monetary value of the souvenirs or representational items received by the staff member during the year does not exceed EUR 50.00.
- 3.5. No special favours or the provision of information to former employees of the Company shall be tolerated outside the procedures for dealing with third parties.

4. CULTURE OF BEHAVIOUR, PROFESSIONALISM AND COLLEGIALITY

- 4.1. Relations between staff members shall be based on fairness and benevolence, which shall not allow any discriminatory action on the grounds of different nationality, sex, age, physical ability, sexual orientation, political, philosophical or religious beliefs.
- 4.2. Employees shall maintain principled and fair relations with their colleagues and peers, fostering a climate of respect, benevolence and culture in the work environment. Intrigue and manipulation are unacceptable. With self-respect, employees admit their mistakes and make amends.
- 4.3. Employees respect each other, avoid disrespectful insults when criticising, and base their criticism on facts, their honest interpretation and their reasoning. Employees comply with professional etiquette, think carefully about their words, and do not use words, gestures or innuendo that are not businesslike and may be offensive to the dignity of others.
- 4.4. The employee ensures that new colleagues are successfully integrated into the work of the Company and does not refuse advice and practical assistance.
- 4.5. Achieving the Company's objectives is the primary responsibility of the whole team and every employee, so everyone evaluates their own performance first, not that of other employees, takes no responsibility for results they cannot achieve, and makes constructive suggestions for improvement where they exist. If the employee does not know how to perform a work task, their duty is to immediately seek assistance from another competent employee.
- 4.6. Employees demonstrate professional values and the Company's work culture through behaviour, appearance and position appropriate to a formal work environment. The manager has the right to give verbal warning if the employees look and/or clothing is not appropriate for the work environment and situation. If the circumstance is of material importance at the time or has an impact on the employment relationship, the manager has the right to send the employee to change, and the employee has the right to request an explanation of the situation when instructed to do so by the manager.
- 4.7. In the process of discussing a decision, employees apply the principle of collegial deliberation, i.e. decisions are discussed with as many alternative options as possible. Collegial decision-making is also allowed (voting procedure may be used). However, the collegial consultation ends when the decision is taken and the principle of personal responsibility is applied. Thus, any doubts or objections are expressed only during the negotiation procedure, after the decision is made, it must be complied with.
- 4.8. Discussions are held in a spirit of openness, understanding and collegiality, listening to what others have to say and arguing in good faith.

- 4.9. Conflicts within and outside the Company are resolved by employees through constructive cooperation, facilitating a meaningful resolution of the situation. Only constructive conflicts are allowed in the Company, and only if the conflict cannot be resolved in any other way. The main characteristic of a constructive professional conflict is that a person's personality is not offended. Disputes can only be about differences of opinion and not about personal grievances. The responsibility for finding common ground and resolving the conflict lies with both parties. If the conflicting parties cannot find common ground, a third party (mediator) may intervene. Once a decision has been taken, the conflict shall be deemed to have ended and the parties shall be bound by the decision.
- 4.10. Employees do not take selfish advantage of the subordinate-manager relationship, incompetence, mistakes or inexperience of colleagues.
- 4.11. Employees honestly admit their unethical or wrongful behaviour and make amends. An employee is not punished for a mistake that he or she honestly admits, but the situation is analysed so that it does not happen again. Humiliating one's colleagues, public criticism and cynical attitudes are unacceptable.
- 4.12. Rewards and penalties are based on performance and results, not on personal qualities.
- 4.13. The Company encourages public recognition of employees for their performance, creativity and initiative. Point out errors in the work process in person.
- 4.14. Positive evaluations of other people's work are made as publicly as possible, and negative evaluations are made as individually as possible.
- 4.15. Employees avoid situations outside working hours that do not conform to generally accepted norms of behaviour and thus have a negative impact on the image of the Company and the status of the employee.

5. COMMUNICATION ETHICS AND INFORMATION

- 5.1. Employees shall respect confidentiality in all their activities and shall take care to protect information at all levels of the Company's operations. Employees shall also act in good faith and respect the confidentiality of any information that may accidentally come into their possession in the course of their employment with the Company.
- 5.2. Employees are aware that the official information in their possession is intended solely for the purpose of carrying out the Company's work and therefore its use for any personal gain is strictly prohibited. This also applies to any potential benefit that third parties may derive from the information disclosed by employees.
- 5.3. The Company's contact with the media shall be through a designated department or employee of the Company, with equality of media in both timing and content. This is necessary to provide the public with clear, unambiguous and reliable information about the Company's policies and their implementation.
- 5.4. Only employees who have been authorised to do so by the Company's management shall express the Company's official views.
- 5.5. Employees shall refrain from publicly expressing views that are contrary to or incompatible with the Company's business objectives. When publicly expressing a different position on an issue, personal views must be firmly and unequivocally distinguished from the official position of the Company.

- 5.6. If there is a misunderstanding of communication within the Company or with partners, the Company must immediately correct it by clarifying the true information. Making mistakes, admitting them honestly and justifying the truth is a human part of ethical behaviour.
- 5.7. Employees shall avoid risks to the Company's and their personal reputation in their communications, including on social media. Negative comments on social networks (incitement to hatred; incitement to violence; use of swear words; offensive comments against a person's race, ethnicity, religion, age, gender, sexual orientation; spreading immorality) are considered a gross violation of the Code of Ethics.
- 5.8. Social media is a term for websites based on user participation and user-generated content. These include social networking sites and other sites that focus on collaboration and communication between users. Social media can be divided into the following types: microblogs, collaboration tools (forums, messengers), social networks, online games, virtual worlds and content communities. Examples of social media sites:
- online discussion forums;
 - collaborative spaces (e.g. Wikipedia);
 - media sharing services (e.g. YouTube);
 - social networking systems (e.g. Facebook, LinkedIn);
 - micro-blogging applications (e.g. Twitter);
 - online games;
 - virtual worlds.
- 5.9. The Company recognises that employees can use social media in their personal lives outside working hours. The Code of Ethics is not intended to discourage or unduly restrict employees' personal expression or online activities.
- 5.10. Using sites like Facebook, Twitter and LinkedIn has become an important part of life for many people. They usually provide a very positive platform for expressing thoughts and interests and communicating with families, friends, professional networks and other groups. Personal use of these tools develops skills that have potential value in many workplaces, such as writing on the web and engaging in online dialogue.
- 5.11. However, employees must be aware of the potential harm to the Company in certain circumstances through personal use of social media if the employee can be identified as an employee of the Company. Accordingly, the employee must comply with the Code of Behavior to ensure that the risk of such harm is minimised.
- 5.12. Any inappropriate use of social media outside the workplace, such as negative or defamatory comments about the Company, the Company's customers or employees, may result in disciplinary action if it brings the Company into disrepute or exposes the Company to potential liabilities.
- 5.13. Employees must not publish content that could lead to defamation, discrimination or other damages claims.
- 5.14. A Company's reputation is largely shaped by the behaviour of its employees, and everything our employees publish reflects how the Company is perceived. Employees must use social media in a way that does not damage the Company's reputation. Social media can be used in a way that adds value and helps employees, our customers or our partners to perform well and solve problems; improves the Company's services; creates a sense of community; or helps to promote the Company's objectives and values.

- 5.15. If you have doubts about something you are about to publish, don't do it. What you upload/upload will be available for a long time.
- 5.16. The employee is personally responsible for the content that the employee posts on any social media platform.
- 5.17. These rules manage the risks that may arise from the use of social media:
- Do not use your Company email address to register on social media sites for personal use;
 - When using social media for personal purposes, you must not state or imply that you are speaking on behalf of the Company. If an employee wishes to create a personal blog, website or other web presence, the employee must use a disclaimer that protects the Company, such as "these are my personal views, not those of my employer";
 - The employee may speak freely about the Company. However, cases where the Company's reputation may be at stake may constitute misconduct or gross misconduct and the employee may be subject to disciplinary action;
 - Employees shall not disclose any confidential information relating to the business of the Company or to their employment with the Company;
 - You should always respect other people's privacy and feelings. Employees must obtain the permission of the persons involved before posting contact details or images. Anything that is published on the internet is in fact a permanent public record that can be seen and used by the employer or potential employer. Care must be taken not to use abusive language or language that could be seen as abusive to others;
 - Employees should carefully consider whether it would be appropriate to befriend someone using social media for personal use where there is a professional/client relationship and/or where this could create a potential conflict of interest;
 - Viewing and updating websites, blogs or other social networks used for personal purposes only must not take place during working hours (except for work breaks);
 - If any member of the media or press contacts an employee about posts the employee has made on social media, the employee should immediately contact the Company's Human Resources Department for advice and support.
- 5.18. Any misuse of social networking sites that negatively impacts the Company, including what may be considered harassment, bullying or online harassment, may be considered a disciplinary offence. It may also be a disciplinary offence for employees to use language that is racist, homophobic, sexist or otherwise prejudicial to the Company.
- 5.19. Defamation or criticism of the Company's policies, solutions, products, services, employees or management is considered unethical and unacceptable.

6. IMPLEMENTATION OF THE CODE

- 6.1. The Code of Ethics is available to all employees of SIA Zabbix and to the public.
- 6.2. It is the responsibility of each employee to carry out his/her work tasks in accordance with the Company's Code of Ethics and other Company rules and guidelines.
- 6.3. Managers set an example for employees by their attitudes and actions, and answer employees' questions about ethical dilemmas when they arise.
- 6.4. Any natural or legal person may file a complaint with the Company's Ethics Committee regarding ethical violations by any employee. Questions (applications) for consideration

shall be submitted in writing, with sufficient reasons and information. Submissions must not be anonymous.

- 6.5. Deliberate disregard of the basic ethical principles may constitute conduct unbecoming an employee, which may give rise to a question of moral or disciplinary responsibility and sanctions.
- 6.6. Cases of non-compliance with the basic principles of the Code of Ethics shall be reviewed by the Company's Ethics Committee, which shall assess the conduct in question. The Ethics Committee shall be established by order of the Head of the Company.
- 6.7. Training on the Code of Ethics is provided to employees, including managers. External experts may also be brought in to improve the training process. Types of training can include:
 - 6.7.1. The Code of Ethics is available on the Company's website and on local and internal electronic information resources, and is independently reviewed by employees.
 - 6.7.2. The Company organises seminars and workshops for both new and experienced employees.
- 6.8. The Code of Ethics is regularly reviewed and updated as necessary by the Company's Ethics Committee.