



Etlworks

Code of Conduct

Purpose and Scope

This Code of Conduct outlines Etlworks's expectations measured against the highest possible standards of ethical business conduct. Committing to the highest standards helps Etlworks hire great people, build great products, and attract loyal customers.

From time to time, Etlworks may update this Code of Conduct. This policy is guided by requirements specific to Etlworks including applicable laws and regulations.

We expect all Etlworks personnel to review, understand, and abide by this Code of Conduct in all matters related to Etlworks.

Respect in the Workplace

All personnel must respect their colleagues. Etlworks will not allow any kind of discriminatory behavior, harassment, or victimization.

Etlworks prohibits retaliation against any personnel who report or participate in an investigation of a possible violation of Etlworks's Code of Conduct, policies, or the law. If you believe you are being retaliated against, please contact Artem Avdonin, another senior manager, or anonymously at security@etlworks.com.

Personnel must use company assets as outline in the Acceptable Use Policy. This includes safe handling of trademarks, copyright, and other property (information, reports, etc.).

Safe Workplace

Etlworks is committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring any type of weapon to work including guns, explosives, or knives. If you become aware of a violation of this policy, you should report it to a member of management immediately. In the case of potential physical violence, contact the authorities immediately.

Workplace Visitors

Workplace safety is very important to Etlworks. As Etlworks visitors access workplace premises, Etlworks should ensure that visitors are not a threat to the workplace and are not exposed to danger.

Equal Opportunity Employment

Etlworks is an equal opportunity employer. Etlworks thrives on diversity and are committed to creating an inclusive environment for all personnel.

Professionalism

All personnel must show integrity and professionalism in the workplace.

Job Duties and Authority

All personnel should fulfill their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers must not abuse their authority.

We encourage mentorship throughout Etlworks.

Communication and Collaboration

Personnel should be responsive and open for communication with their colleagues, supervisors, and team members. Personnel should be friendly and collaborative and not disrupt the workplace or hinder their colleagues' work.

Benefits

Etlworks expects employees to not abuse their employment benefits. Please reach out to Human Resources for questions pertaining to company benefits.

Compliance with Law

Personnel must comply with all applicable laws including environmental, safety and fair dealing laws. Etlworks expects everyone to be ethical and responsible during Etlworks business dealings.

Conflict of Interest

Conflicts of interest occur when an employee, contractor, or job applicant's personal interests may not align with company needs or interests. We expect you to avoid any personal, financial, or other interests that might hinder your capability or willingness to perform your job duties. If you believe that a conflict may occur, please contact your manager immediately.

Types of conflicts of interest may include:

- Personal investments
- Outside employment, advisory roles, board seats, and starting your own business
- Business opportunities found through work
- Inventions
- Accepting gifts, entertainment, and other business courtesies

Internet and Social Media

Personnel should never share any intellectual property or the status of any of their assignments on social media.

When representing the company, personnel should always be respectful and avoid speaking in specifics about their work. Personnel should never post discriminatory, offensive, or other illegal language on social media.

Exceptions

Etlworks business needs, local situations, laws, and regulations may occasionally call for an exception to this policy or any other Etlworks policy. If an exception is needed, Etlworks management will determine an acceptable alternative approach.

Enforcement

Any violation of this policy or any other Etlworks policy or procedure may result in disciplinary action, up to and including termination of employment. Etlworks reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. Etlworks does not consider conduct in violation of this policy to be within an employee's or contractor's course and scope of work.

Any employee or contractor who is requested to undertake an activity that he or she believes is in violation of this policy must provide a written or verbal complaint to his or her manager or any other manager of Etlworks as soon as possible.

The disciplinary process should also be used as a deterrent to prevent employees and contractors from violating organizational security policies and procedures, and any other security breaches.

Responsibility, Review, and Audit

Etlworks reviews and updates its security policies and plans to maintain organizational security objectives and meet regulatory requirements at least annually. The results are shared with appropriate parties internally and findings are tracked to resolution. Any changes are communicated across the organization.

This document is maintained by Artem Avdonin.

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