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CODE OF CONDUCT

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MESSAGE FROM THE GENERAL DIRECTOR

Welcome to our Code of Conduct (the Code). This comprehensive document has been meticulously crafted to serve as a guiding framework for all members of our entity, assisting them in making ethically sound decisions and upholding our core values and Business Principles.

At the heart of our company lie these fundamental core values and principles, which are non-negotiable. Adherence to them is a prerequisite for employment at ALCO, and any deviation from these principles is incompatible with our organizational culture.

While we all believe ourselves to be ethical, it is essential to acknowledge that our world and the business environment are in a constant state of flux. It is never prudent to assume omniscience or immunity from risk. The Code serves as a tool to underscore your individual responsibilities, enabling you to recognize and address risks pertinent to your specific role.

Whether you are a manager, employee, or contract staff member, I strongly encourage you to thoroughly read and implement our Code, thereby ensuring your contribution to nurturing an ethical culture and safeguarding ALCO's future.

Maintaining personal dedication to ethics and compliance is entirely within our control. Anything short of 100% compliance not only jeopardizes our performance but also exposes us to significant costs that could harm our bottom line and the hard-earned reputation we cherish. By faithfully adhering to this Code, you actively contribute to bolstering ALCO's credibility, competitiveness, and affordability.

View this Code as your compass, enabling you to continually refresh your knowledge and seek sound advice. You may come across unexpected risks or discover new challenges in your role. Avoid complacency, as it can lead to inadvertent rule-breaking and create unacceptable risk for yourself, your colleagues, or ALCO LLC.

Should you ever doubt your understanding or face uncertainties, I implore you to seek advice from the resources outlined in the following pages or directly contact the Compliance Officer.

Thank you for your unwavering commitment to ethics and compliance, which remains instrumental in upholding the values that define ALCO's identity.

Dunay KHASAYLI

General Director

1 | INTRODUCTION

1.1. ALCO LLC (the "Company") is committed to conducting its business operations with the highest standards of integrity, ethics, and compliance. This Code of Conduct outlines the fundamental principles and guidelines that govern the behavior of all individuals associated with ALCO LLC, including employees, contractors, consultants, suppliers, customers, and business partners.

1.2. The Code of Conduct serves as a comprehensive framework to ensure that all stakeholders act ethically, respect each other's rights, protect the Company's assets, and uphold the trust placed in us by our customers, shareholders, and communities.

1.3. Compliance with this Code of Conduct is not only a legal obligation but also a reflection of our core values and commitment to being a responsible and socially conscious organization.

2 | OUR CORE VALUES

2.1. Integrity

At ALCO LLC, integrity is the foundation of everything we do. We are committed to upholding the highest standards of honesty, ethics, and moral principles in all our business operations. We act with transparency, always seeking to do what is right, even when faced with difficult decisions. Integrity guides our actions, ensuring that we earn and maintain the trust of our customers, employees, shareholders, and the communities we serve.

2.2. Customer Focus

Our customers are at the heart of our business, and we are dedicated to understanding and meeting their needs. We strive to exceed their expectations by delivering high-quality products and services that add value to their lives and businesses. Listening to our customers, anticipating their requirements, and providing exceptional customer service are central to our commitment to customer focus.

2.3. Innovation

Innovation is the driving force behind our success. We encourage creativity, embrace change, and continuously seek new and better ways to serve our customers and improve our business processes. Our willingness to embrace innovation enables us to stay at the forefront of our industry, responding to evolving market demands and providing cutting-edge solutions.

2.4. Accountability

At ALCO LLC, we take ownership of our actions and decisions. We are accountable for the results we deliver, both individually and as a company. We hold ourselves to the highest standards of performance, taking responsibility for our successes and learning from our mistakes. Accountability fosters a culture of trust, collaboration, and continuous improvement.

2.5. Respect and Inclusivity

We value diversity and treat all individuals with respect, dignity, and fairness. Our inclusive work environment promotes collaboration, creativity, and a sense of belonging for every member of our team. We recognize and celebrate the unique contributions of our diverse workforce, understanding that diverse perspectives drive innovation and excellence.

2.6. Environmental Responsibility

Environmental responsibility is integral to our commitment to sustainability. We are dedicated to reducing our environmental impact and promoting sustainable practices across our operations. By conserving resources, minimizing waste, and supporting eco-friendly initiatives, we strive to protect the planet for future generations.

2.7. Social Responsibility

As a responsible corporate citizen, we actively contribute to the betterment of society. We engage with our communities and support initiatives that address social challenges, promote education, healthcare, and social welfare. Our social responsibility efforts are aligned with our core values, reflecting our dedication to making a positive impact on the world around us.

2.8. Employee Empowerment and Development

We believe that our employees are our most valuable asset. We are committed to empowering our team members, fostering a culture of learning and growth, and providing opportunities for professional and personal development. By investing in our employees' well-being and success, we cultivate a motivated and skilled workforce that drives our Company's achievements.

2.9. Safety and Well-being

Safety is our top priority. We are dedicated to providing a safe and healthy work environment for all employees, contractors, and visitors. We promote a culture of safety awareness, ensuring that everyone takes responsibility for their safety and the safety of others. We also prioritize employee well-being, recognizing the importance of work-life balance and supporting their physical and mental health.

2.10. Excellence

We pursue excellence in all aspects of our business. We set high standards for ourselves and continuously strive to improve our performance and achieve outstanding results. Our commitment to excellence is reflected in the quality of our products, the satisfaction of our customers, and the reputation we uphold in the marketplace.

3 | ETHICAL CONDUCT AND INTEGRITY

3.1. Honesty and Transparency: All individuals associated with ALCO LLC must conduct themselves with unwavering honesty and integrity in all business dealings. We are committed to providing accurate and transparent information to our stakeholders, ensuring that all communication is truthful and free from misrepresentation.

3.2. Conflict of Interest: Employees and stakeholders should proactively identify and avoid situations that may give rise to a conflict of interest between personal interests and the Company's interests. Any actual or potential conflicts of interest must be disclosed promptly to the appropriate authority to ensure transparency and ethical decision-making.

3.3. Insider Trading: Individuals with access to material non-public information about the Company are strictly prohibited from engaging in insider trading. This includes buying or selling securities based on such information, as it is illegal and undermines the integrity of financial markets.

3.4. Protection of Company Assets: All individuals are responsible for protecting the Company's assets, including physical property, intellectual property, and information. Misuse, theft, or unauthorized disclosure of assets is strictly prohibited, and appropriate safeguards must be implemented to protect sensitive data and intellectual property.

3.5. Intellectual Property: Respect for intellectual property rights is essential to fostering innovation and creativity. Employees must ensure that they do not infringe upon the intellectual property rights of others and must appropriately safeguard and protect the Company's intellectual property.

3.6. Confidentiality and Privacy: Employees must maintain the confidentiality of sensitive and proprietary information entrusted to them by the Company, its customers, or business partners. Personal information must be handled in accordance with applicable data protection and privacy laws.

4 | LEGAL COMPLIANCE

4.1. Compliance with Laws and Regulations: ALCO LLC and its employees must comply with all applicable laws, regulations, and industry standards in the countries and regions where we operate. This includes local, national, and international laws relevant to our business activities.

4.2. Antitrust and Fair Competition: The Company is committed to fair competition and antitrust compliance. Employees must not engage in anti-competitive practices, including price-fixing, bid-rigging, market allocation, or other activities that restrict competition or harm consumers.

4.3. Trade Compliance: ALCO LLC conducts its international trade activities in compliance with all applicable import and export laws, sanctions, and trade restrictions imposed by various countries and international bodies.

4.4. Data Protection and Privacy: The Company is committed to safeguarding the privacy and data protection rights of individuals, including employees, customers, and partners. Personal information must be handled in compliance with applicable data protection laws, and data breach incidents must be promptly reported and addressed.

4.5. Anti-Bribery and Corruption: The Company strictly prohibits bribery and corrupt practices in any form, whether involving public officials, private individuals, or business partners. All individuals must comply with anti-bribery laws, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Facilitation payments are strictly prohibited.

4.6. Political Contributions: The Company's funds or assets shall not be used for political contributions or to support political parties or candidates unless explicitly permitted by law and approved by appropriate Company authorities.

4.7. Government Contracts and Procurement: Employees involved in government contracts and procurement must comply with all applicable laws and regulations, avoid conflicts of interest, and ensure transparency and fairness in all dealings with government entities.

4.8. Tax Compliance: ALCO LLC and its employees must comply with all applicable tax laws and regulations, accurately report financial information, and pay taxes promptly and accurately.

5 | RESPECTFUL AND INCLUSIVE WORKPLACE

5.1. Diversity and Inclusion: We value diversity and strive to maintain an inclusive work environment where all individuals are treated with respect, dignity, and fairness, irrespective of their race, ethnicity, gender, age, religion, sexual orientation, disability, or any other protected characteristic. Discrimination or harassment based on these attributes is strictly prohibited.

5.2. Harassment and Bullying: ALCO LLC prohibits any form of harassment, bullying, or abusive behavior in the workplace. This includes verbal, physical, or written conduct that creates an intimidating, hostile, or offensive environment for others.

5.3. Workplace Safety: The Company is committed to providing a safe and healthy work environment for all employees. Employees must follow all safety guidelines, promptly report any safety concerns or incidents, and actively participate in safety training programs.

5.4. Work-Life Balance: We encourage a healthy work-life balance for employees, recognizing the importance of personal well-being and family responsibilities.

5.5. Substance Abuse: The use, possession, distribution, or sale of illegal drugs or alcohol abuse on the Company's premises or during work hours is strictly prohibited.

5.6. Dress Code and Personal Appearance: Employees are expected to maintain a professional appearance and adhere to the dress code or appearance guidelines specified by the Company.

6 | ENVIRONMENTAL RESPONSIBILITY

6.1. Sustainable Practices: ALCO LLC is committed to conducting its business in an environmentally responsible manner. We strive to minimize our environmental impact through sustainable practices, resource conservation, and pollution prevention.

6.2. Waste Management: All individuals are encouraged to reduce waste, recycle materials whenever possible, and dispose of waste responsibly, adhering to applicable waste management regulations.

6.3. Energy Efficiency: The Company promotes energy-efficient practices, the use of renewable energy sources, and the adoption of eco-friendly technologies to reduce our carbon footprint.

6.4. Environmental Compliance: ALCO LLC shall comply with all applicable environmental laws and regulations, seeking continuous improvement in environmental performance.

7 | RESPONSIBLE BUSINESS CONDUCT

7.1. Supply Chain Ethics: ALCO LLC expects its suppliers and business partners to adhere to similar ethical standards and comply with all applicable laws and regulations.

7.2. Responsible Sourcing: The Company is committed to responsible sourcing of raw materials, ensuring that suppliers meet ethical, environmental, and labor standards.

7.3. Product Quality and Safety: The Company is dedicated to delivering high-quality products and services that meet or exceed industry standards. Safety and compliance with relevant regulations are paramount.

7.4. Customer Privacy and Data Protection: ALCO LLC is committed to protecting the privacy and data security of its customers. Customer data must be handled in accordance with applicable data protection and privacy laws.

8 | REPORTING VIOLATIONS

8.1. Reporting Mechanism: All individuals associated with ALCO LLC are encouraged to report any suspected violations of this Code of Conduct promptly. Reports may be made through the Company's confidential reporting channels, such as the Compliance Officer or an anonymous hotline.

8.2. Non-Retaliation: ALCO LLC prohibits any form of retaliation against individuals who report concerns in good faith. The Company will protect the identity of whistleblowers and take appropriate action against any form of retaliation.

8.3. False Reports: Making false or malicious reports is strictly prohibited and may result in disciplinary action.

9 | CODE OF CONDUCT TRAINING

9.1. Training and Awareness: ALCO LLC will provide regular training on this Code of Conduct to all employees and stakeholders to raise awareness of its importance and significance. Training will include real-life scenarios and case studies to help employees understand the practical application of ethical principles.

10 | POLICY REVIEW

10.1. Review Frequency: This Code of Conduct shall be reviewed periodically to ensure its continued relevance and alignment with legal requirements and industry best practices.

10.2. Policy Effectiveness: The Company shall monitor the implementation and effectiveness of this policy to ensure its continued impact.

11 | COMPLIANCE AND DISCIPLINARY ACTIONS

11.1. Compliance Monitoring: The Company may conduct audits and investigations to ensure compliance with this Code of Conduct and applicable laws.

11.2. Disciplinary Actions: Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or business relationships. The severity of the violation, its impact on the Company and stakeholders, and the individual's history of compliance will be considered when determining the appropriate disciplinary action.

ALCO LLC expects all individuals associated with the Company to read, understand, and comply with this Code of Conduct. By adhering to these principles, we strengthen our corporate culture and uphold the reputation and values of ALCO LLC.

NOTES & INSTRUCTIONS

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