CHARITABLE ORGANIZATION
SPANBOND CHARITABLE FOUNDATION

Annex 1 to Order No. 5-org
dated 1 June 2026

APPROVED BY:
(signature / seal)
Oleksandra KARPENKO
CEO of the Foundation CO SPANBOND CF

БЛАГОДІЙНИЙ ФОНД "СПАНБОНД" Ідентифікаційний код

CONFLICT OF INTEREST PREVENTION POLICY
OF THE CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION

The CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION (hereinafter referred to as "SPANBOND") strongly condemns any conflict of interest and any violation of the legislation of Ukraine governing conflicts of interest. This Conflict of Interest Prevention Policy (hereinafter referred to as the "Policy") prohibits any conflicts of interest involving SPANBOND employees and any persons with whom SPANBOND cooperates or interacts.

Conflicts of interest involving the Founders of SPANBOND shall be governed by the applicable legislation of Ukraine and the Charter of SPANBOND.

1. GENERAL PROVISIONS

1. This Policy has been developed in accordance with the Charter of SPANBOND, other internal documents of SPANBOND and the applicable legislation of Ukraine.
2. This Policy establishes SPANBOND's approach to the identification, disclosure, management, prevention and resolution of potential or actual conflicts of interest.
3. This Policy is intended to establish proper regulation and oversight of the process of identifying, disclosing and managing potential and/or actual conflicts of interest, as well as standards and requirements binding upon the CEO and/or employees of SPANBOND.
4. The CEO and/or employees of SPANBOND shall avoid any situations or actions that may cause or create a risk of a conflict of interest or may affect the impartiality and independence of the consideration and adoption of decisions for the benefit and in the interests of SPANBOND.

2. DEFINITION OF A CONFLICT OF INTEREST

1. A Conflict of Interest means a conflict between a person's private interests and their official powers, which may affect the objectivity or impartiality of decision-making or the performance or non-performance of actions in the exercise of the official or representative powers granted to that person.

Types of conflicts of interest:

– Actual Conflict of Interest;

– Potential Conflict of Interest.

2. A Conflict of Interest exists where:

– an external interest affects or may affect the judgement or actions of the CEO and/or an employee of SPANBOND in the course of their professional activities;

– private interests conflict, appear to conflict or otherwise interfere with the interests of SPANBOND.

A Conflict of Interest may take various forms. It generally arises where the CEO and/or an employee of SPANBOND is able to influence SPANBOND's activities in a manner that may result in direct or indirect financial gain for that person, members of their family, business partners or third parties, or in the granting of improper or undue advantages to third parties to the detriment of SPANBOND.

3. A Conflict of Interest is not necessarily limited to financial opportunities, prospects or advantages. It may arise from financial benefits, including monetary and other material benefits, as well as non-financial benefits that cannot be quantified, such as an increase in reputation or professional standing.

3. PROCEDURES FOR IDENTIFYING AND DISCLOSING A POTENTIAL OR ACTUAL CONFLICT OF INTEREST

1. The CEO and/or employees of SPANBOND shall promptly disclose any potential or actual Conflict of Interest relating to any decision being considered or scheduled for consideration by SPANBOND.

2. The CEO and/or employees of SPANBOND shall provide advance notice of an actual and/or potential Conflict of Interest to their immediate supervisor, the CEO of SPANBOND and/or the Founders of SPANBOND, depending on the person in respect of whom the Conflict of Interest exists or may arise and the applicable reporting structure.

3. The CEO and/or employees of SPANBOND shall disclose any actual or potential Conflict of Interest, as well as any involvement they may have with an existing or prospective counterparty, client or supplier of goods or services, or any other circumstances that may result in competition between, or conflicting objectives of, their private interests and the interests of SPANBOND.

In exercising their powers, the CEO and/or employees of SPANBOND shall act solely within the limits of the authority granted to them and shall conduct themselves towards third parties in a manner that does not harm the business reputation of SPANBOND or that of other employees, the Founders or the CEO of SPANBOND.

4. The CEO and/or employees of SPANBOND shall disclose any private financial or other interest that may affect the performance of their duties, including the ownership by them, members of their family, close friends or partners of shares or interests in businesses, enterprises or organisations.

4. CONFLICT OF INTEREST PREVENTION PROCEDURES

1. Where an actual or potential Conflict of Interest arises, the CEO and/or the relevant employee of SPANBOND shall notify their supervisor or the relevant governing body thereof in writing and in any appropriate form before consideration of the relevant matter begins.
2. Following notification of a potential Conflict of Interest, the CEO of SPANBOND or, where the Conflict of Interest exists or may arise in relation to the CEO of SPANBOND, the General Meeting of the Founders of SPANBOND shall consider the circumstances as soon as practicable and make a decision regarding SPANBOND's entry into the relevant transaction.
3. Where the requirements established by this Section of the Policy are not complied with, a person who has an interest in SPANBOND entering into a transaction that may result in a Conflict of Interest shall be liable to SPANBOND in an amount equal to the losses incurred and/or may be dismissed and/or required to take other measures to restore SPANBOND's reputation.
4. Any employee and/or the CEO of SPANBOND who was required to report a Conflict of Interest or the risk of its occurrence but failed to do so shall be given an opportunity to explain the reasons for such failure.

5. LIABILITY

1. The CEO of SPANBOND and/or SPANBOND employees shall be liable for violations of this Policy in accordance with the Charter, the internal documents of SPANBOND and the applicable legislation of Ukraine.
2. Compliance with this Policy, including the process of identifying, disclosing and managing potential and/or actual conflicts of interest, shall be monitored by the CEO of SPANBOND. Compliance by the CEO of SPANBOND shall be monitored by the Founders of SPANBOND.
3. External oversight shall be exercised by the Founders of SPANBOND.

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Annex 1. Template Declaration of Absence of a Conflict of Interest

Annex 1
to the Conflict of Interest Prevention Policy
of the CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION
(approved and brought into force by Order No. 5-org dated 1 June 2026)

DECLARATION
OF ABSENCE OF A CONFLICT OF INTEREST
by an employee of the CHARITABLE ORGANIZATION SPANBOND CHARITABLE FOUNDATION
(EDRPOU Code 43584842)

I hereby confirm that I have no conflict of interest and that there are no circumstances that may prevent me from properly performing my official duties. I undertake to act solely within the scope of the authority granted to me and to conduct myself in dealings with third parties in a manner that does not harm the business reputation of SPANBOND or that of its other employees.

____
Full name

____
Signature

____
Date