

Code of Ethics and Business Conduct

ORBYT GLOBAL GROUP ("The Group") is committed to conducting business professionally, fairly, responsibly, ethically and in accordance with the highest ethical standards and prohibits all forms of bribery and corruption.

This Code of Ethics and Business Conduct (the "Code") contains the general rules of business conduct which the Board of Directors, officers, employees, and business partners, representing or acting on behalf, of The Group are expected to observe and applies to any and all subsidiaries and/or other business entities controlled by The Group worldwide.

All dealings with The Group customers, partners and competitors are conducted with the highest level of ethical behaviour and in compliance with the spirit and the letter of the applicable laws and regulations.

Compliance with laws

The compliance with all applicable legislation and business principles governing its activities and the observance with all internal procedures are essential for The Group to safeguard its reputation for honest business activities and integrity and to secure its interests. All business activities of The Group shall be carried out strictly in compliance with all applicable laws of any jurisdiction where its activities take place. Any violation of laws and regulations exposes The Group to risks, which may have significant financial and legal consequences.

Anti-bribery Principles

Principal commitments of The Group are preserving the highest standards of business ethics and safeguarding its reputation. The Group adopts a zero-tolerance approach towards bribery actions, from its Directors, officers, employees or partners, thus aiming at conducting commercial business in a professional and legal way.

This Policy outlines the following principles, which Directors, officers, employees and partners must adhere to:

- We do not tolerate any form of bribery or corruption. Making an offer or promise to offer or authorising or soliciting anyone to provide, directly or indirectly, benefits of any

nature to any individual (either in the public or the private sector) to refrain from their duties or to proceed, in violation thereof, to an act or omission, are prohibited.

- We do not provide any bribes or facilitation payments to any third party for the purpose of obtaining business advantage or gaining unfair profit.
- We do not accept, approve or give our consent to any bribes offered by anyone, aiming either to the promotion of our activities or for their own business in order to personally gain profit.
- We do not accept, receive or request any kind of gift or hospitality. Bribery is not limited to only monetary gifts or payments and it may include contractual rights, real estate, debt forgiveness, personal property, product or service discounts, loans, meals, hospitality, entertainment, travel expenditures, political and charitable contributions, and other interests arising from business relationships.
- We do not offer or promise to offer any personal benefits to influence a decision or trigger an action in favour of The Group.
- We do not engage in or involve in any way in any activities, which are or would be regarded as improper, illegal, or possible to result in bribery.

The compliance with these anti-bribery and anti-corruption rules and principles is an ongoing responsibility, binding on The Group and on any related third party, which has already or will establish a business relationship with the company. No individual shall have authority to engage in activities opposed to these principles, approve or excuse any such conduct in the course of The Group's activities.

Gifts

Gifts of minor value are acceptable, as a gesture of friendship, only to the extent that they are conform to the uses, of modest value and do not improperly affect a specific business transaction. A gift is given without expectation of consideration or value in return and may express common purpose and the hope of future business success.

Money laundering

The Group actively complies with all anti-money laundering and anti-terrorism laws and regulations in force, thus the company is not involved in financial transactions derived from

or to be used for criminal or terrorism activities. All business relationships involving financial transactions shall be verified, documented and accurately recorded on the company's books. The Group undertakes to take all necessary precautions to verify the reliability of these transactions, as well as the legitimate origin of the funds and the means used.

Commitments

The Board Members and each single Employee undertake the following commitments:

- Compliance with laws and regulations (national and international)
- Equal employment opportunities

The harassment involves any nonconforming behavior, based on the sex, race, age, religion, nationality or any other trait, protected under law as well as any inconvenient behavior, which affects the work conditions and the individual's performance or creates an intimidating, hostile or offensive environment.

Occupational Health and Safety

The Group is committed to providing a safe and healthy work environment to its personnel and to ensuring that all employees always carry out their tasks in a safe manner. The health and safety of the personnel is a fundamental value and primary concern of the Group, on that basis the Group establishes and maintains policies and procedures for the preserving of facilities' stability and employees' safety. Each employee is responsible for complying with all safety instructions and policies.

The consumption of alcohol, the possession, use, sale or offer of illegal drugs or substances in the Group premises are prohibited. The Group will terminate the employment contracts with employees who do not abide by this rule .

The Company evaluates the possible risks which may incur in the performance of work and take precautionary measures in order to limit and diminish the risks.

Human and labour rights

The Group respects the protection of human rights and supports basic labour rights as defined by the International Labour Organization. The Group is committed to maintaining

Zero tolerance towards racist behaviour, sexual harassment and child labor. Any action that violates the human rights principles, either directly or indirectly and any form of forced labour or child labour are not supported by the Group.

The Group grants equal opportunities to all employees, during the hiring or job applications evaluation, their employment and their performance appraisals.

Sexual harassment & violence in workplace

Sexual or any type of harassment and violence in workplace are not tolerated by The Group, which is committed to providing a work environment free of any discrimination on any ground and of harassment of any type, including where all members of personnel are treated with dignity, courtesy and respect.

The harassment, either in the form of verbal or physical conduct, involves any nonconforming behavior, based on the sex, race, age, religion, nationality or any other trait, protected under law as well as any inconvenient behavior, which affects the work conditions and the individual's performance or creates an intimidating, hostile or offensive environment.

Sexual harassment, is unwelcome, verbal, nonverbal or physical conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, including situations where a an intimidating environment is created against a person. Sexual harassment incidents include jokes or expressions of sexual content, without consent of the person which are addressed to, demonstration of material of sexual content (e.g. photographs, films), undesirable comments of sexual content, sexual proposals, offensive gestures, sexual assaults, forced sexual contact or embrace.

The Group has zero tolerance against such incidents, require high standards of conduct and encourage the reporting of offensive behaviours which violate this harassment policy. Thus, any person who suffers such harassment within the Group workplace caused by any co-worker, officer or partner or any person who has knowledge of or suspects any such actions can lodge a complaint in writing for investigation. Such complaints are submitted to the HR

or Legal department and all information pertaining to this complaint and its subsequent investigation will be strictly maintained by these departments.

All complaints shall be treated with confidentiality to the extent possible and on a need-to-know basis, and by no means shall they adversely affect the employment status of the person who files the complaint.

Complaint procedure

Upon receiving a complaint, the HR or legal officer will notify senior management and review the complaint, in collaboration with the legal counsel. An investigation will commence to determine whether the complaint is reasonably grounded and whether the alleged violation did occur. The competent individuals who are involved in the investigation shall ensure that the entire procedure will be carried out in a fair, efficient, sensitive and timely manner, observing confidentiality and data protection rules in all steps.

During the investigation, the HR officer together with legal counsel or upper management will interview the complainant, the alleged offender, and any witnesses to determine whether the alleged conduct occurred.

Upon conclusion of an investigation, the persons conducting the investigation will prepare a written report of the findings and will take appropriate disciplinary action.

The appropriate action will depend on the following factors:

- a) the severity and frequency of the conduct,
- b) prior complaints made by the complainant or against the offender,
- d) the quality of the evidence

If the investigation is inconclusive or concludes that no harassment occurred, the complaint is rejected.

If the investigation concludes that an incident of harassment took place, the upper management will decide what disciplinary actions will be taken and will inform the offender of the nature of the discipline and its execution.

The disciplinary actions and their duration may vary depending on the gravity and extent of the harassment:

- verbal or written warning
- adverse performance evaluation

- internal transfer to other position
- demotion
- dismissal.

Serious cases, including violence, will result in the immediate dismissal of the offender. Nothing herein shall prevent the complainant or the person suffering harassment from seeking legal remedies before the competent authorities (such as Labor Disputes Committee) and courts, before or in parallel with the internal procedures. ORBYT can provide any assistance and information, that may be required, and in such case the confidentiality obligation shall not apply.

Use of company's property

All employees shall protect the Group's assets and ensure its efficient use. Unless any person has the approval of management those assets, whether tangible or intangible, are to be used only upon authorization and only for the legitimate business purposes of the Group. No one is permitted to take or make use of, steal or knowingly misappropriate the assets of the company or any customer, including any confidential information of the Group for improper or illegal purposes. No one is permitted to destroy, remove or dispose of anything of value belonging to the Group without the consent of management.

Confidentiality

The Group owns, produces discloses a lot of sensitive information of confidential nature, while carrying out its activities. Every officer and employee are expected to protect such confidential information, pertaining to either ORBYT or its suppliers', customers' or any third party's activities.

Any unauthorised disclosure (not even to family members) or use of any sensitive information for any purpose other than on a need-to-know basis within the context of the activities of the Group shall be prohibited. The confidentiality obligation bounds the individuals throughout their employment or other relationship term and survives the termination for an appropriate period. In case of violation of the confidentiality obligation, the Group reserves the right to seek any legal remedies available to secure its interests.

Environment

The Group is committed to protecting the environment, therefore suitable measures are applied aiming at:

- encouraging recycling
- the elimination or the reduction of waste, where feasible,
- finding out beneficial uses of waste, that cannot be eliminated,
- the minimization of the cost and the impact of waste disposal.

Data Protection

The Group proceeds with the collection, processing, and management of its employees' or third persons' personal data only to the extent required under the employment or other relationship and in compliance with the applicable laws and regulations. The data collection purposes, the potential disclosure and the rights of the data subjects are included in the Privacy Policy of the company.

Conflict of interests

Any possible conflicts of interest concerning an employee and/or any family members must be communicated to the HR department or the Chief Executive Officer the soonest possible in order for the issue to be properly addressed.

The possible conflicts of interests can cover cases when employees or members of the management:

- personally benefit from business opportunities or use for their own benefit the company's property, private information or market position,
- obtain personal benefits as a result of their positions in the company, such as services, gifts, or entertainment, that exceed or are not reasonably related to the company's business activity, offered by representatives of other companies, which already have or are interested in a business relationship with the Group.
- hold any direct or indirect interest in a company, which maintains or intends to a business relationship with the Group or in other competitive company.
- adversely affect the company's reputation and its relations with third parties, through their actions.
- are involved in direct or indirect competition against the company.

These individuals commit to investigating the reported incidents and addressing the issue, according to the disciplinary proceedings provided in the Employment Regulation.

Implementation & Violation

The implementation of this Code and the communication of its content to all officers, employees and partners upon commencement of the employment or other relationship (agency/independent contractors/subcontractors etc) are the responsibilities of the Group. The directors, officers, employees shall adhere to the rules herein and refrain from any conduct or action, which could result in infringement of this Code.

An actual or suspected violation of attempt to violate this Code must be reported to the Head of each Department or to the Legal Department of the Group, which are responsible for reporting to the Board of Directors of the Group to investigate such reports and take any disciplinary and corrective actions. Any such report shall be treated as confidential to the extent permitted by law.

All third parties, which share business relationships with the Group, are required to use their best efforts to observe the principles of this Code, in the course of their business. the Group reserves the right to terminate any commercial and business contracts in case of violation.

Queries & Reports

Any queries related to this Code shall be addressed to the Legal Department of the Group. The Group reserves the right to amend this Code, from time to time, to ensure compliance with all legal requirements.