



Argus Grievance Procedure

Dear Colleagues,

Dear Clients,

Dear Partners and Friends of ARGUS Group of Companies,

We are very happy that at most part we have a good work relationship within the company and due to good service quality, our clients are happy with our services.

However: Mistakes may occur.

Hereby, we encourage any employee or partner of ARGUS Group of Companies, who feels under pressure to act in a way that runs counter to the Code of Conduct, or who witnesses violations of the same, to inform our Compliance Office (compliance@argus.ua). We want to act according to our ethical standards, and we encourage you to report any misconduct to us. Thereby, we ensure that we will not undertake unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay.

We ensure that colleagues who report wrongdoings in good faith are provided protection against any retaliation for making such reports, such as shielding them from unwarranted or otherwise inappropriate disciplinary measures, and that matters raised are examined and acted upon without undue delay. This means that Argus' employees that choose to report alleged abuses committed by other Argus' employees will be protected against potential reprisals. This also means that, in some cases, special attention will be given to confidentiality in case, for example, one Argus' employee chooses to report abuses by other member of Argus. Also, you may file your complaint anonymously or you may ask a trusted representative to file a complaint on your behalf.

We will respect your confidentiality requests, and we will consult you at all stages, such as by asking you how much information can be shared with others.

Upon reception of a complaint under compliance@argus.ua our compliance officer will ...

- Confirm timely the reception of your complaint (if you indicate your contacts).
- Discuss further steps with you. Thereby, the Compliance Officer will reinsure, if your name, the name of witnesses etc. may be forwarded to the ARGUS Board of Directors.
- Inform the ARGUS Board of Directors on your complaint (after having received your approval) and report on your complaint without indicating your name to the ARGUS Board of Directors.

ARGUS Board of Directors will decide within 3 days after having received your complaint, if your complaint concerns an act of criminal nature and has to be forwarded to the law enforcement bodies of Ukraine or if your complaint concerns internal regulations of ARGUS Group of Companies.

If your complaint may be handled internally, ARGUS Board of Directors will decide on further steps; thereby, ARGUS Board of Directors may involve support of Arbitration Officers or Arbitration Court of the German Chamber of Commerce, Kyiv.

If further investigations/feed-backs are necessary, ARGUS Compliance Officer will come back to you to discuss the issue with you in more detail. He will take care that your complaint stays anonymously, if you insist on that.

Our Compliance Officer shall take care that you get a feed-back on your complaint within a 15 days period.

President

Dr. Christof Rheinbay