



## **SPRIT CAPITAL INVESTMENTS CODE OF ETHICS**

Employees and agents of Sprit Capital Investments (hereinafter – SCI), (hereinafter – Representatives), must adhere to the standards of professional conduct set forth in this Code of Ethics, recognizing that SCI’s reputation and the trust of its clients depend on the honesty and professionalism of its Representatives. Every Representative must familiarize themselves with this Code of Ethics and apply its principles in their professional activities.

### **1. Trust and Integrity:**

- 1.1. Representatives shall perform their duties honestly, accurately, and with a high sense of responsibility, recognizing that any mistakes they make may cause significant material and moral harm to the Client and SCI, and may also undermine public trust in SCI and the industry.
- 1.2. Representatives shall treat SCI, clients, prospective clients, and colleagues with respect.
- 1.3. Representatives are prohibited from engaging in fraudulent or misleading activities that could negatively affect SCI’s reputation, including the provision of false information to clients or interested parties.
- 1.4. In both professional and private life, a Representative must refrain from any behavior or actions that could bring disrepute to SCI or cast doubt on the honesty and reliability of the Representative or SCI.

### **2. Confidentiality:**

- 2.1. A Representative has the right and obligation to maintain confidentiality, i.e., not to disclose any information obtained while performing their professional duties.
- 2.2. Representatives must ensure the confidentiality of all transactions and communications.

### **3. Professional Competence:**

- 3.1. Representatives must strive to continuously improve their professional knowledge and skills to provide clients with the highest quality services.
- 3.2. Representatives must be aware of applicable laws, regulations, and industry standards to ensure compliance and competence in the provision of professional services.

### **4. Conflict of Interest:**

- 4.1. Representatives shall seek to avoid conflicts of interest; however, if conflicts of interest cannot be avoided, they must fully inform all parties involved of the situation and organize their work in a way that does not discriminate against any of the parties.

### **5. Client Relations:**

- 5.1. Representatives must act in the best interests of the clients, providing them with accurate and objective information to enable well-informed investment decisions.



- 5.2. A Representative is obligated to act as a prudent and diligent custodian, ensuring that professional services are provided with due care and professionalism.
  - 5.3. Representatives must avoid any actions that could jeopardize client trust in SCI.
  - 5.4. Representatives must treat clients with appropriate respect, regardless of the client's gender, age, race, nationality, religious affiliation, or any other potentially discriminatory factors.
  - 5.5. While performing professional activities, representatives may provide advice to clients based only on professional experience, investment offer documentation, and facts available to them. If a representative is not sufficiently competent in the matters under discussion, they should either consult with other professionals or advise the client to do so.
  - 5.6. A Representative must clearly indicate to the client the limits of their competence—identifying which topics fall under the scope of a professional investment broker's expertise.
  - 5.7. Representatives must not express personal opinions to clients that are not based on professional experience, investment documentation, and facts available to them regarding any investment offers.
6. Compliance with legal acts:
    - 6.1. Representatives must comply with applicable legal acts and industry standards and refrain from participating in any activities that contradict laws or industry requirements.
7. Advertising:
    - 7.1. Representatives may inform the public about their professional activities, ensuring that all the information provided is truthful, accurate, and consistent with their actual capabilities and level of professional knowledge. Representatives may use social media for advertising purposes, provided the content, even if not labeled as advertising, complies with this Code of Ethics.
    - 7.2. Representatives' advertising must comply with laws related to consumer protection, as well as with laws preventing unfair competition and unfair commercial practices.
    - 7.3. The content of representatives' advertising must not:
      - 7.3.1. be false, misleading, intrusive, or express superiority over other colleagues;
      - 7.3.2. violate confidentiality rules;
      - 7.3.3. create the impression of guaranteed investment returns.
8. Reporting violations:
    - 8.1. SCI encourages all interested parties to report any violations of this Code of Ethics.
    - 8.2. SCI will promptly investigate such reports and take appropriate corrective action.
    - 8.3. SCI will terminate cooperation with representatives who commit serious violations of this Code of Ethics.