

SOFTSERVE'S CONFLICT OF INTEREST POLICY AND DISCLOSURE FORM

In your capacity as an associate of SoftServe, you must act at all times in the best interests of SoftServe. The purpose of this policy is to help inform the associated about what constitutes a conflict of interest, assist the Management Team and the Board in identifying and disclosing actual and potential conflicts, and help ensure the avoidance of conflicts of interest where necessary. This policy may be enforced against individual associate as described below.

CONFLICT OF INTEREST POLICY

1. Associates have a financial duty to conduct themselves without conflict to the interests of SoftServe. In your capacity as associated, they must remove personal, individual business, third-party, and other business interests to the welfare and best interests of SoftServe
2. A conflict of interest is a transaction or relationship which presents or may present a conflict between Associates obligations to SoftServe and the associates personal, business or other interests.
3. All conflicts of interest are not necessarily prohibited or harmful to SoftServe. However, full disclosure of all actual and potential conflicts, and a determination by the Code of Conduct Council (or SoftServe's Executive Committee) if the disclosed or undisclosed.
4. All actual and potential conflicts of interests shall be disclosed by Associates to the SoftServe's Executive Committee through the annual disclosure form and/or whenever a conflict arises. The members of SoftServe's Executive Committee shall make a determination as to whether a conflict exists and what subsequent action is appropriate (if any). SoftServe's Executive Committee shall inform the Board of such determination and action. The Board shall retain the right to modify or reverse such determination and action, and shall retain the ultimate enforcement authority with respect to the interpretation and application of this policy
5. On an annual basis, all Associates shall be provided with a copy of the Code of Conduct policy and required to complete acknowledgment of receiving the document. Non-completion of the acknowledgment does not mean you would not be bound by the policy and any consequence.

THE FOLLOWING ARE EXAMPLE WHICH ARE NOT A CONFLICT OF INTEREST

- Going to the bank during work hours
- Going to the Doctors/Dentist during work hours
- Making personal calls during work hours

In general, SoftServe aims be a flexible company that supports the wellbeing of our associates and their families, and this policy is not intended to restrict work life balance.

A POTENTIAL CONFLICT OF INTEREST MAY BE REPORTED AT ANY TIME, USING THE COI DISCLOSURE FORM. THIS DISCLOSURE FORM MUST BE EMAILED/SHARED WITH BOTH YOUR MANAGER AND HRBP FOR PROPER REVIEW AND DETERMINATION ON POTENTIAL CONFLICTS SHARED. NOTE: HRBP please file in WorkDay

CONFLICT OF INTEREST DISCLOSURE FORM

I have read SoftServe's Conflict of Interest Policy set forth above and agree to comply fully with its terms and conditions at all times during my service as an associate at SoftServe.

If at any time following the submission of this form I become aware of any actual or potential conflicts of interest, or if the information provided below becomes inaccurate or incomplete, I will promptly provide this information in writing to both my Manager and HR Business Partner.

Disclosure of Actual or Potential Conflicts of Interest:

A potential or actual conflict of interest exists when commitments and obligations are likely to be compromised by associates other material interests, or relationships (especially economic), particularly if those interests or commitments are not disclosed.

This Conflict of Interest Form should indicate whether the associate has an economic interest in, or acts as an officer or a director of, any outside entity whose financial interests would reasonably appear to be taking time, focus, revenue away from SoftServe's interest.

The associate should also disclose any personal, business, or volunteer affiliations that may give rise to a real or apparent conflict of interest. Individuals with a conflict of interest should refrain from nominating a condition for screening.

Date: _____
 Name: _____
 Position: _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest:

- ☐ I have the following conflict of interest to report (please specify other nonprofit and for-profit boards you (and your spouse) sit on, any for-profit businesses for which you or an immediate family member are an officer or director, or a majority shareholder, and the name of your employer and any businesses you or a family member own:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge.

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