Approved by Order No. *01-23*
dated *August 12, 2025*
Director of Rioni Capital LLC
______________ Badri Gobechia

Rioni Capital

ANTI-CORRUPTION POLICY

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1. GENERAL PROVISIONS

1.1. Terms and Definitions

Term	Definition
Client	A legal entity, individual, or sole proprietor receiving services from the Company under a brokerage agreement, an individual investment account agreement, and/or a custody agreement.
Compliance Procedure	A set of measures representing either an independent process or one integrated into other processes, duly regulated, implemented on a continuous basis, and aimed at ensuring the Company's compliance with applicable law, regulatory requirements, and at organizing mechanisms for identifying, analyzing, and assessing corruption-related risks, in order to provide comprehensive protection for the Company.
Counterparty	A natural or legal person entering into a contract with the Company, including agents and partners, and not being a Client.
Corruption Offense	An act (or omission) by a Company Employee, duly established to contain elements of corruption, for which administrative or criminal liability is provided under Georgian law.
Corruption	Abuse of office, bribery, acceptance of a bribe, abuse of authority, commercial bribery, or other unlawful use by a Company Employee of his/her official position contrary to the legitimate interests of the Company, society, and the state, for the purpose of obtaining benefits in the form of money, valuables, property, services of a pecuniary nature, or other property rights for themselves or third parties; or unlawful provision of such benefits by other persons to a Company Employee. Corrupt acts also include the above committed in the name or interests of the Company.
Personal Interest	The possibility for a Company Employee, or persons closely related by family or affinity (parents, spouses, children, siblings, adoptive parents, adopted children, as well as in-laws), or other individuals/entities closely connected by property, corporate, or other relations, to derive income in the form of money, property, proprietary rights, services, completed works, or other advantages.
Governing Bodies of the Company	The sole executive body (CEO), the Board of Directors, and the General Meeting of Partners.
Applicable Anti-Corruption Legislation	Georgian anti-corruption laws and applicable norms and requirements of international anti-corruption legislation.
Employee	Any natural person engaged in an employment relationship with the Company, including the Company's Chief Executive Officer.
Company Management	Managers and other Company Employees authorized to make independent decisions on matters of day-to-day management of the Company.

1.2. Abbreviations

Abbreviation	Meaning
Company	Limited Liability Company "Rioni Capital"
INDs	Internal Normative Documents of the Company
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism
Policy	This Anti-Corruption Policy
ICRM	Internal Control and Risk Management Unit of the Company

1.3. Scope of Application

1.1.1. This Policy defines the main goals, objectives, and principles of the Company's anti-corruption system.

1.1.2. The Policy forms part of the Company's risk management system and sets out managerial and organizational foundations for preventing corruption, minimizing and/or eliminating the consequences of corruption offenses, defining participants, tasks, functions, powers, and responsibilities, including in relation to third parties such as individuals, legal entities, governmental and municipal authorities, and their representatives.

1.1.3. The Policy is mandatory for all Employees, Company Management, and Governing Bodies, as well as representatives of the Company (agents, consultants, and other third parties) whenever such obligations are specified in their contracts.

1.1.4. The Company expects Employees and Management, regardless of position, to adhere to the approaches and requirements of this Policy, subject to the reservations and limitations set out in Section 9 of this Policy.

1.1.5. The Company and its Employees may not engage Counterparties, including consultants, agents, or other third parties, to perform actions that would violate the provisions of this Policy.

1.1.6. The owner (process organizer) of the Policy is the Internal Control and Risk Management Unit (ICRM).

2. OBJECTIVES AND TASKS OF THE ANTI-CORRUPTION SYSTEM

2.1. This Policy has been developed to identify, prevent, and minimize instances of unlawful, unethical, or corrupt behavior by Company Employees. It is aimed at fostering a uniform understanding among all Employees and Management of what constitutes corrupt acts, their forms, and manifestations, in order to prevent and suppress situations and actions that could potentially breach Applicable Anti-Corruption Legislation.

2.2. The primary objectives of the Company's anti-corruption system are:

- To establish the principles and rules of anti-corruption compliance within the Company;
- To ensure that Employees and Governing Bodies are aware of and comply with Applicable Anti-Corruption Legislation and the principles and requirements of this Policy;
- To create effective mechanisms, procedures, controls, and other measures aimed at preventing corruption and minimizing the risk of the Company, its Employees, or Governing Bodies becoming involved in corrupt practices;

- To promote a culture of ethical conduct and intolerance toward all manifestations of corruption, including the development of a unified standard of anti-corruption behavior among Employees;
- To integrate anti-corruption principles into strategic and operational management at all levels of the Company's activities;
- To ensure that Employees, Clients, Counterparties, and Governing Bodies share a common understanding of the Policy's principles;
- To keep the Company's Governing Bodies informed of corruption-related offenses and the measures taken to combat corruption;
- To apply disciplinary, civil, or criminal liability for committing corruption offenses.

3. CORPORATE ANTI-CORRUPTION CULTURE

3.1. Key Rules Declared by the Company

The Company adheres to the principle of absolute intolerance ("zero tolerance") towards bribery and corruption and undertakes to act with professionalism, fairness, and integrity in business relations, when entering into transactions, and to implement effective systems to combat corruption.

The Company operates in compliance with international law, anti-corruption legislation in all jurisdictions where it conducts business, and Georgian legislation governing its activities both domestically and abroad.

3.2. Company Guarantees

- The Company's partners shall not criticize Company Management for any loss of profit caused by adherence to this Policy.
- No Employee shall suffer adverse consequences for reporting to Management or the Company's Governing Bodies information or suspicions regarding potential violations of this Policy.
- Compliance with this Policy shall not result in negative consequences for Employees or Counterparties in terms of future employment, cooperation, or contracting.

4. PRINCIPLES OF ANTI-CORRUPTION COMPLIANCE

The key principles of anti-corruption compliance are:

- **Rejection of corruption in all forms and manifestations** ("zero tolerance") in day-to-day operations and strategic projects, including in relations with shareholders, Clients, Counterparties, government officials, local authorities, and political parties.
- **Support of state anti-corruption policy.**
- **Direct involvement of the Company's Governing Bodies** in promoting a corporate culture of rejecting corruption at all levels.
- **Priority of preventive measures** to avoid corruption.
- **Employee engagement** in anti-corruption efforts, fostering a position of rejection and intolerance of corrupt behavior in all forms.
- **Organizational measures** aimed at identifying and managing conflicts of interest.
- **Implementation and regular updating** of procedures to prevent and prohibit corruption and bribery.
- **Monitoring the effectiveness** of implemented anti-corruption procedures, including compliance oversight.
- **Inevitability of liability** for committing corruption offenses.

5. CORRUPT OFFENSES

In accordance with Applicable Anti-Corruption Legislation, the following are recognized as corrupt offenses:

- **Bribery (giving a bribe):** Providing or promising to provide any financial or other benefit with the intent to induce a person to improperly perform their official duties — i.e., under conditions more favorable to the bribe-giver and/or in violation of procedures established by Georgian law and/or the Company's INDs.
- **Bribery (receiving a bribe):** Receiving, or agreeing to receive (directly or through an intermediary), any financial or other benefit for the improper performance of one's official duties — i.e., under conditions more favorable to the giver and/or in violation of procedures established by Georgian law and/or the Company's INDs.
- **Mediation in bribery:** Direct transfer of a bribe on behalf of the giver or the receiver, or otherwise assisting the bribe-giver and/or bribe-receiver in reaching or executing an agreement to give or receive a bribe.
- **Commercial bribery:** The unlawful transfer of money, securities, property, property-related services, or other proprietary rights to a person performing managerial functions within the Company, for the purpose of inducing them to act (or refrain from acting) in the interests of the giver or others, where such acts (or omissions) fall within the official authority of that person or can be influenced by their position.
- **Bribery of public officials:** Providing or promising to provide any financial or other benefit to a public official with the aim of influencing the performance of their official duties in order to obtain or retain business, or secure competitive or other advantages for the Company.
- **Misuse of powers by Company Management or Employees:** Using opportunities related to their position or authority for personal gain or for the benefit of third parties, to obtain financial or other benefits/advantages not provided for by Georgian law and/or the Company's INDs, which may result in a breach of law or cause damage to the Company.
- **Other acts or omissions** classified as corruption offenses under Georgian law.

6. KEY MEASURES FOR PREVENTION AND PROHIBITION OF CORRUPTION

Anti-corruption compliance within the Company is expressed in the activities of the Governing Bodies and Employees, within the limits of their authority, aimed at:

- Establishing **intolerance to corruption** in any form.
- Building **corporate and social responsibility** in the field of anti-corruption.
- Preventing corruption-related offenses.
- Combating corruption by **detecting, preventing, stopping, disclosing, and investigating** corrupt acts.
- Minimizing and/or eliminating the consequences of corrupt offenses.
- Holding accountable those who committed corrupt offenses.

The Company's approaches to identifying, assessing, and reassessing risks of corruption-prone areas are defined in the Internal Normative Documents (INDs) regulating the risk management and monitoring process.

The assessment and reassessment of risks is based on:

- **Risk identification.**
- **Risk analysis.**
- **Development of risk mitigation measures** and control over their implementation.

For effective detection, assessment, and minimization of corruption risks, the Company applies the following approaches:

- Setting legislatively defined and/or contractually established requirements for Company officers and candidates for managerial positions.
- Assessing and processing any information received regarding intentions or facts of corruption offenses, or any attempts to induce Employees to commit such acts.
- Establishing rules for handling **gifts and representation expenses.**
- Defining procedures for disclosure of information and its evaluation to prevent actual or potential **conflicts of interest.**
- Maintaining **complete and accurate accounting** and documentation of all Company payments.
- Setting procedures for **due diligence of Counterparties**, including evaluation, analysis, and selection, as well as rules for interaction with them.
- Conducting **anti-corruption reviews** of the Company's INDs, other internal documents, and contracts to be executed.
- Communicating the rules and requirements of this Policy to all Employees.
- Conducting **mandatory training** followed by testing of Employees to assess their knowledge and understanding of the key provisions of this Policy and applicable anti-corruption laws.
- Enforcing liability against persons who committed corruption-related offenses.
- Ensuring the **openness and transparency** of the Company's activities (subject to restrictions on the disclosure of confidential information).

The Company's Management, in evaluating, promoting, and transferring Employees, takes into account information regarding their long-term, impeccable, and effective performance, with emphasis on compliance with anti-corruption requirements, proper execution of compliance procedures, and adherence to ethical standards.

6.1. Reporting of Violations

6.1.1. Any Employee who has doubts about the compliance of their actions with this Policy, or observes the actions (or omissions) or proposals of other Employees, Counterparties, or third parties interacting with the Company that may constitute violations, is obligated to report this to the Internal Control & Risk Management Department (ICRM).

6.1.2. If Clients or Counterparties of the Company detect violations (including potential violations) of applicable laws by Employees, or decide to report violations committed by other persons, they may submit such information to the Company using any method established under the Company's Client Complaints Handling Principles.

6.1.3. The Company ensures that stakeholders are informed of its zero-tolerance stance towards corruption by posting relevant information (Appendix No. 1) on its official website. Information provided to ICRM is treated as confidential. The Company guarantees confidentiality for any report submitted by an Employee, Client, or Counterparty.

- An Employee shall not be sanctioned if a report of possible corruption offenses was made in good faith but was not confirmed after investigation.
- However, if such a report was made with malicious intent, knowingly false, or with the purpose of slander, gaining preferences, or avoiding responsibility, the Employee will be subject to measures under this Policy and applicable law.

The Company guarantees that all reports provided to ICRM will be reviewed, but does not guarantee that every submission will receive a formal reply.

6.1.4. For any questions related to the application of this Policy, interested parties may contact ICRM.

6.1.5. ICRM maintains a **systematic record** of all reports received.

6.2. Due Diligence in Business Operations, Including with Counterparties and Clients

6.2.1. The Company makes all reasonable efforts, given the circumstances, to minimize the risk of violations of applicable anti-corruption laws when establishing business relations with Clients and Counterparties that were or may be involved in corrupt practices. In this regard, the Company shall:

- Conduct checks of the **business reputation** of potential Counterparties, their shareholders, and beneficial owners, including for their tolerance towards corruption and the presence of internal anti-corruption policies and procedures.
- Inform potential Counterparties about the Company's anti-corruption principles and requirements, including by incorporating anti-corruption clauses into contracts and agreements.
- Take into account the willingness of potential Counterparties to comply with anti-corruption requirements and to cooperate in preventing corruption in their operations.

6.2.2. The anti-corruption clause is intended to ensure mutual understanding by the parties that corrupt practices are unacceptable, and to establish readiness to take reasonable measures to prevent them.

- Adoption of the anti-corruption clause by Counterparties and Clients carries a **reputational and ethical function**, serving as an instrument for identifying risks even before an offense occurs.
- By accepting the clause, the parties undertake to report any corruption-related incidents and to conduct checks to confirm or refute the risks, thereby increasing preventive effectiveness.

From a legal standpoint, the anti-corruption clause itself does not entail sanctions. In case of a corruption offense, the liable party is subject to measures under applicable law.

If a Counterparty or Client disagrees with the standard anti-corruption clause, amendments may be negotiated within the Company's contract approval framework.

If the Counterparty or Client refuses to conclude a contract containing the anti-corruption clause, but the relationship cannot be avoided, the Company may require an official letter providing:

- A motivated refusal to accept the clause, or
- A written assurance of compliance with applicable anti-corruption laws and refusal to engage in any acts violating such laws.

This letter must be attached to the contract approval process for decision-making.

If such a Counterparty or Client later commits a corruption offense, the prior refusal letter may serve as evidence that the Company took all reasonable preventive measures.

6.2.3. If a Counterparty or Client refuses the clause, or amends it, this information must be provided to ICRM for systematic tracking.

6.2.4. Employees are prohibited from entering into any **side agreements** (written or oral) with Counterparties that are not included in the contract text, annexes, or otherwise approved under the Company's procedures.

6.3. Prevention of Corruption in the Form of "Trading in Influence" Through Client Accounts

6.3.1. The Company pays special attention to the risk of Clients using its services to conduct transactions with a corruption component.

6.3.2. The Company takes all necessary measures to:

- Identify Clients,
- Collect additional information about Clients and their transactions,
- Prevent suspicious transactions linked to corruption.

Compliance with the **AML/CTF Internal Control Rules** is a key condition to prevent such cases.

6.3.3. Any suspicions or intentions of Clients to engage in corruption-related activity while using their investment accounts (or in the course of other Company services) must be reported by Employees to the specialized AML/CTF division.

6.4. Procurement of Goods and Services

6.4.1. To strengthen anti-corruption controls in procurement, the Company follows principles of **fairness, transparency, open competition, and objectivity**.

- Procurement is conducted via competitive procedures defined by the Company.
- An exhaustive list of cases where procurement from a single supplier is allowed is set by the Procurement Policy.

6.4.2. Employees engaged in procurement must not have any **personal interest** (direct or indirect), and must not accept:

- Travel expenses paid by potential suppliers,
- Bribes to conclude contracts,
- Tickets to entertainment events (sports, theater, opera, etc.),
- Any valuable benefit arising from decisions in favor of third parties that would result in personal gain for the Employee or others.

6.5. Hiring of Former Government and Municipal Officials

In accordance with Georgian law, if the Company signs an employment or civil contract with an individual who previously held certain government or municipal positions, within two years after their termination of service, the Company must notify their last employer or representative.

For the purposes of this Policy, this requirement also applies to former employees of the **National Bank of Georgia**.

6.6. Prevention of Conflicts of Interest

6.6.1. The types of conflicts of interest and their management are defined in the Company's **Conflict of Interest Policy.**

6.6.2. Employees must:
- Disclose actual or potential conflicts of interest as soon as they become aware of them,
- Take measures to avoid any possibility of conflict of interest,
- Minimize the risk of conflicts of interest in the performance of their duties.

In cases where a conflict of interest cannot be eliminated, the **interests of the Company prevail.**

6.7. Gifts and Representation Expenses

6.7.1. The Company recognizes that business gifts and representation expenses, including business hospitality, are a normal part of business practice.
- However, such gifts must never serve as a **hidden reward** that could negatively affect the Company's reputation.
- Gifts to family members or close relatives of Employees exceeding **300 GEL in value** are strictly prohibited if linked to the Employee's official duties.

6.7.2. Business gifts and hospitality offered or received by Employees must meet all of the following criteria:
- Directly related to legitimate business purposes (e.g., project presentations, contract execution, traditional holidays),
- Reasonable and proportionate, not extravagant,
- Not disguised remuneration for services or favors,
- Must not create reputational risks if disclosed publicly,
- Must comply with this Policy, business ethics, and applicable law.

6.7.3. Employees are prohibited from offering, requesting, or accepting gifts or hospitality that:
- Aim to influence decisions that would otherwise be unlikely without such benefits,
- Violate applicable anti-corruption law or Company rules,
- Are given in a personal capacity rather than on behalf of the Company,
- Create reputational or legal risks for the Company,
- Take the form of cash, securities, precious metals, or luxury goods,
- Are not reasonable in value, purpose, or context.

6.7.4. Employees must notify ICRM and their direct supervisor by email:
- No later than the next business day after becoming aware of a violation of section 6.7.3,
- No later than the next business day after receiving a gift/hospitality worth more than 300 GEL,
- In advance, if in doubt about whether a gift or hospitality complies with section 6.7.2.

6.8. Facilitation Payments

The Company strictly prohibits **facilitation payments**—unofficial payments made to expedite or secure routine services.

6.9. Political Contributions

6.9.1. The Company does not finance or support political parties, organizations, or movements in order to gain commercial advantage.
6.9.2. Employees may not make political donations on behalf of the Company without prior approval from the Partners.
6.9.3. The Company does not participate in political campaigns. Employees may participate personally as private citizens but cannot use the Company's name or branding.

6.10. Interaction with Public Officials

The Company refrains from covering expenses for public officials or their close relatives (e.g., travel, lodging, meals, entertainment, PR campaigns) in order to gain commercial advantages or benefits.

6.11. Charitable Contributions

6.11.1. The Company does not provide charity, sponsorship, or financial aid with the direct or indirect purpose of influencing decisions by government representatives, NGOs, or other parties.
6.11.2. Information on charitable projects and sponsorships must be transparent and publicly available.

- Prevention of falsified reporting and forged documents:
- The Company strictly complies with accounting rules, ensuring all business operations are documented by primary accounting records.
- Misrepresentation or falsification of accounting, management, or other records is prohibited.
- All financial transactions must be recorded accurately, completely, and in detail.
- Employees responsible for accounting are liable for preparing full and accurate reports on time.
- Intentional misrepresentation or falsification of reports is punishable under law.

7. MAIN FUNCTIONS AND AUTHORITIES OF THE COMPANY'S GOVERNING BODIES, DIVISIONS, AND EMPLOYEES WITHIN THE ANTI-CORRUPTION SYSTEM

7.1. General Meeting of Partners

7.1.1. The General Meeting of Partners exercises overall control over the organization of the Company's anti-corruption system and the measures adopted by the Company in this area.
7.1.2. Approves this Policy and all subsequent amendments.
7.1.3. Annually reviews reports on:

- The effectiveness of the Company's anti-corruption approaches and principles under this Policy,
- The results of significant corruption incidents identified during internal investigations.

7.2. Sole Executive Body of the Company

7.2.1. Manages operational anti-corruption matters.

7.2.2. Approves internal regulatory documents (IRD) related to anti-corruption issues, except for those within the competence of the Board of Directors.

7.3. Internal Control and Risk Management Department (ICRM)

7.3.1. Participates in the development of anti-corruption methodology and is responsible for updating this Policy.
7.3.2. Identifies areas, activities, and business processes with a high risk of corruption.
7.3.3. Implements anti-corruption procedures and measures.
7.3.4. Conducts anti-corruption review of IRDs during their approval process.
7.3.5. Notifies the Sole Executive Body of any facts or indications of corruption involving Employees or members of the Company's governing bodies.
7.3.6. Reports to the General Meeting of Partners on corruption cases as part of its overall risk management reporting.
7.3.7. Initiates or participates in internal investigations related to anti-corruption matters.
7.3.8. Prepares training materials on anti-corruption compliance.
7.3.9. Provides consultations to Employees on anti-corruption issues.
7.3.10. Submits to the CEO and Partners, at least annually, reports covering:

- Significant deviations in Employee behavior from the principles of this Policy,
- Violations of compliance procedures identified during internal audits,
- The overall status and effectiveness of the Company's anti-corruption system.

7.3.11. Immediately informs the CEO of any anti-corruption findings where damages caused by an Employee's actions/inactions exceed **10,000 GEL**.

7.4. All Company Employees

7.4.1. Cooperate with ICRM on all anti-corruption matters.
7.4.2. Strictly comply with applicable anti-corruption legislation and this Policy.
7.4.3. While performing their duties or acting on behalf of the Company in any jurisdiction, Employees must comply with:

- Georgian anti-corruption laws,
- Local foreign laws,
- International anti-corruption standards.

7.4.4. Fulfill their responsibilities under the anti-corruption framework within their roles.
7.4.5. Report to ICRM any known violations of this Policy.
7.4.6. If uncertain about the permissibility of certain actions or about provisions of this Policy, Employees must seek clarification from their direct supervisor and/or ICRM.

8. LIABILITY FOR NON-COMPLIANCE (IMPROPER COMPLIANCE) WITH THIS POLICY

8.1. All Employees, regardless of their position, bear personal responsibility for adhering to the principles and requirements of this Policy, as well as for the actions (or inactions) of their subordinates that violate these principles and requirements.

8.2. Employees found, through an internal investigation, to have violated the requirements of this Policy may face disciplinary measures up to and including dismissal, as well as civil liability.

8.3. Individuals found guilty by a court of violating applicable anti-corruption laws may be subject to administrative or criminal liability in accordance with applicable legislation, internal regulatory documents (IRD), organizational and administrative rules, and their employment contracts with the Company.

9. FAMILIARIZATION WITH THE REQUIREMENTS OF THE POLICY

9.1. Procedure for Familiarization

9.1.1. Every Employee must become familiar with this Policy. The procedure for familiarization is established by order of the Company's CEO.

9.1.2. Every Partner of the Company confirms their familiarity with this Policy by either approving it or signing the Familiarization Sheet (Appendix No. 2).

9.1.3. Responsibility for ensuring Employee familiarization with this Policy (including updates) rests with:

- The Company's CEO,
- The Company's Human Resources Department.

9.1.4. The Company regularly conducts anti-corruption and anti-bribery training sessions for Employees.

10. FINAL PROVISIONS

10.1. This Policy may be amended to reflect new trends in international and Georgian corporate governance practices, including in the event of changes to Georgian legislation. Should any provision of this Policy conflict with applicable Georgian law, the provisions of Georgian law shall prevail.

10.2. By publishing this Policy or parts of it on its official website, the Company publicly declares its rejection of corruption, encourages compliance with the principles and requirements of this Policy by Clients, Counterparties, and Employees, and promotes anti-corruption awareness in society and among its Employees through information-sharing and training.

10.3. Based on the principle of reciprocity, the Company cooperates with state and regulatory bodies in the following areas:

- Identifying individuals suspected or accused of committing corruption offenses, locating them, and identifying other persons involved;
- Identifying property obtained through corruption offenses or used in committing such offenses;
- Exchanging information on anti-corruption matters;
- Coordinating efforts to prevent and combat corruption.

Appendix No. 1
to the Anti-Corruption Policy
of LLC "Rioni Capital"

Form of Client Notification published on the Company's official website

LLC "Rioni Capital" (hereinafter – the "Company") adheres to the principle of **zero tolerance** toward bribery and corruption and undertakes to act with professionalism, fairness, and integrity in business relationships and transactions. For this purpose, the Company has developed and implemented internal procedures, established reporting channels, and conducts specialized training programs for its Employees.

If you have information regarding actions of a Company Employee that may be classified as violations of anti-corruption principles, or if you believe it necessary to inform the Company about violations committed by other persons, you may do so by submitting a report (complaint) through any of the methods disclosed by the Company on its official website in the section *"Information on LLC Rioni Capital for Recipients of Financial Services."*

We recommend including the following information in your report:

- Full name of the Employee of the Company;
- Description of the situation (actions) of a corrupt nature or indications of personal interest;
- Your contact details (full name, address, telephone, e-mail).

You may choose not to provide your contact details—anonymous reports will also be considered on equal terms.

LLC "Rioni Capital" guarantees that all information submitted through electronic communication channels or by phone will be reviewed, but does not guarantee that a response will be provided for each individual report received by the Company.

Appendix No. 2
to the Anti-Corruption Policy
of LLC “Rioni Capital”

Familiarization Sheet

of a Partner of LLC “Rioni Capital” with the Anti-Corruption Policy

I, ____ (Full Name),
hereby confirm that I have read and understood the Anti-Corruption Policy, approved by the Minutes of the General Meeting of Partners of LLC “Rioni Capital” dated **..***20*__ No.___, and I undertake to comply with it.

__________________________ “_” __________ **20**
Signature