



ANTI-BRIBERY POLICY

Agencija za komercijalnu djelatnost proizvodno, uslužno i trgovačko d.o.o. (hereinafter: AKD) as a company of special interest to the Republic of Croatia, have established and is maintaining and continuously improving the anti-bribery management system. By decision to implement ISO 37001:2016 Anti-Bribery Management System, AKD has expressed its commitment to fulfill the requirements of the standard and to assure full compliance of its business operations with the relevant laws of the Republic of Croatia and international anti-bribery regulations.

Adherence to the principles and rules set out in the AKD's Anti-Bribery Policy and following all relevant laws and regulations that regulate best anti-bribery practices is mandatory for all employees of AKD and its subsidiaries as well as for all other stakeholders - customers, suppliers and other business partners.

AKD maintains high ethical standards in its business endeavor, respects the dignity and personal integrity of each employee and ensures transparency in all its business operations.

AKD gives top priority to implementation of anti-corruption and anti-bribery mechanism in all its business operations and expects all business partners to play an active role in this important process.

The AKD applies a zero-tolerance standard to any sign of corruption and bribery.

It is prohibited to offer, promise, give, accept or solicit financial or non-financial advantage of any value, directly or indirectly or as an inducement for a person acting or refraining from acting in relation to the performance of that person's duties.

Advantage of any value include, but are not limited to, money or cash equivalents, gifts, entertainment and recreation, travel, tickets, donations, sponsorships, discounts, loans, employment promises, and any trading in influence.

AKD's anti-bribery management system meets all the requirements of the HRN ISO 37001: 2016 standard. In accordance with all applicable laws, AKD has established procedures for internal reporting of irregularities, appointment of a trusted person for internal reporting of irregularities and his or her deputy, procedures for protection of whistleblowers and data-keeping in the processes of reporting irregularities from unauthorized disclosure. AKD supports any reporting of irregularities in good faith or on the basis of common sense and guarantees the protection of the whistleblower and protection of his/her rights and safeguards him or her from retaliation.

The Management Board of AKD has appointed an independent Anti-Bribery Compliance Function with powers and responsibilities to control the implementation of the Anti-Bribery Management System, to provide support to AKD's employees on issues related to bribery and to answer questions raised in the course of implementation of the Anti-Bribery Management System. The Anti-Bribery Compliance Function further carries all relevant activities and takes measures that ensure compliance of the Anti-Bribery System with the requirements of the standard HRN ISO 37001: 2016. Last but not least, the Anti-Bribery Compliance Function reports regularly to the Supervisory Board, the Management Board and all other compliance functions about AKD's Anti-Bribery Management System.



The Anti-Bribery Policy is an integral part of the AKD Anti-Bribery Management System and it integrates the AKD's Code of Ethics and the AKD Anti-Corruption Program. The rules and principles set out in this Policy provide a framework for setting, reviewing and meeting the goals set in order to deter and prevent bribery and meet the strategic goals of AKD.

Any behavior that deviates from the rules and principles defined by the Anti-Bribery Policy will be sanctioned in accordance with applicable laws, internal acts and the AKD's Code of Ethics.

Zagreb, July 7, 2021