

CODE OF ETHICS FOR THIRD PARTIES

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INTRODUCTION

Dear suppliers and business partners,

with more than 30 years of successful business operations, AKD d.o.o. proudly builds long-term relationships based on trust, responsibility, and shared success. Our core values - innovation and excellence, reliability and security, integrity, people, and care for future generations - guide everything we do.

The Code of Ethics for Third Parties reflects our commitment to these values and sets out our expectations for all partners with regard to adhering to the highest ethical, social, and environmental standards. We believe that, by jointly adhering to these principles, we can contribute to sustainability, innovation, and a secure business environment for future generations.

Thank you for your commitment and contribution to building a responsible and successful partnership.

PURPOSE

This Code of Ethics for Third Parties ("Code") establishes the fundamental guidelines and standards for business cooperation between AKD d.o.o. ("Company") and its external partners. Its purpose is to ensure that all participants in the supply chain, including suppliers, manufacturers, service providers, subcontractors, and partners, operate in accordance with ethical principles, legal frameworks, and socially responsible practices.

The Code is designed to create a common foundation for ethical, transparent, and lawful business conduct, taking into account national and international standards. By accepting this document, third parties acknowledge their responsibility to safeguard the integrity and reputation of business operations conducted in cooperation with the Company and undertake to apply its principles in their day-to-day activities.

The Code is not merely a set of rules, but also forms the basis of AKD's Procurement Policy and General Terms and Conditions of Purchase, and clearly defines the Company's objectives in terms of sustainable development, responsible business conduct, and ethical procurement. Acceptance of the Code by third parties is a prerequisite for participation in the Company's procurement processes and for the establishment and maintenance of business relationships.

This Code is based on relevant legal frameworks, internationally recognized standards, and best practices, providing a structured approach to ethical and sustainable business conduct. It complements contractual relationships with suppliers and partners by clearly defining their obligations and expectations.

The Code is not merely a precondition for business cooperation, but also a key tool for strengthening trust, supporting sustainability, and respecting the rights of all involved parties. Its acceptance ensures consistency in standards of conduct throughout the entire supply chain, while at the same time supporting a shared commitment to ethical business practices and social responsibility.

BUSINESS PRINCIPLES

Business principles form the foundation of responsible, sustainable, and transparent operations, providing guidance for identifying, managing, and mitigating risks that may arise in business relationships and activities. AKD consistently adheres to these principles in its business operations and considers them essential for preserving integrity, trust, and professionalism.

We expect our suppliers and business partners to share this commitment and align with these principles, thereby jointly ensuring the safeguarding of legal, ethical, and social values and contributing to sustainable and responsible business conduct.

INTEGRITY AND ETHICS IN BUSINESS

Bribery and Corruption

AKD has zero tolerance for bribery and corruption in any form. Third parties with whom we cooperate are required to operate in accordance with the highest ethical standards and all applicable laws and regulations on the prevention of bribery and corruption, including, but not exclusively, the laws of the Republic of Croatia, European Union regulations, and international standards such as the OECD Anti-Bribery Convention, the OECD Guidelines on Anti-Corruption and Integrity in State-Owned Enterprises, or the United Nations Convention against Corruption.

Third parties must not offer, give, request, or receive any form of bribe, unlawful advantage, inappropriate gift, commission, or financial or non-financial benefit for the purpose of securing or retaining business advantages. Mediation or facilitation of such activities through third parties, agents, or intermediaries is also strictly prohibited.

All gifts, hospitality, or other benefits must be proportionate, transparent, and in compliance with applicable laws and the Company's internal policies. Gifts or services that could influence impartial decision-making or create the appearance of a conflict of interest are not permitted.

Third parties should have policies, controls, and procedures in place to ensure compliance with this principle. This includes regular employee training, whistleblowing and reporting systems, transparent record-keeping, and the implementation of internal controls that effectively prevent the risk of corruption.

Any suspicious activity related to bribery or corruption must be reported through the Company's designated channels. Third parties are required to fully cooperate during any audit or investigation conducted by AKD to ensure compliance.

Conflict of Interest

Third parties with whom we cooperate are required to avoid all situations that could lead to an actual, potential, or perceived conflict of interest. Third parties must take all reasonable measures to identify and manage situations that could give rise to a conflict of interest.

Third parties are required to notify the Company without delay if an actual or potential conflict of interest arises or if a situation is identified that could create the perception of inappropriate conduct.

AKD reserves the right to assess and, where necessary, take appropriate measures to eliminate conflicts of interest. This includes reviewing the business relationship or, in more serious cases, terminating cooperation with third parties that fail to take the necessary steps to resolve conflicts of interest.

Protection of Confidential Information

Third parties cooperating with the Company are required to respect the principle of confidentiality and ensure the protection of all confidential information which they have been granted access to during the business relationship. Confidential information includes all business, financial, and technical information that is not generally known to the public, regardless of whether it is in tangible or intangible form and regardless of how it became known during the course of the business cooperation. Confidential information shall also include any other information, knowledge, and experience that has not been disclosed to the public in written or oral form and whose misuse or disclosure could result in harmful consequences for a contracting party or any of its affiliated companies or contractual partners.

The contracting parties agree that confidential information shall be used exclusively for the purposes of the business cooperation or performance of a contract concluded with AKD and shall not be used for any other purpose without the prior written consent of the contracting party that lawfully controls the confidential information. The contracting parties shall not disclose to third parties any confidential information or documents of which they have become aware in their capacity as a contracting party or under any related contract, in particular information relating to negotiations and decisions of the contracting parties in this regard. The obligation of confidentiality shall not apply in the event of presenting the contract or related documents to banks. In addition, each contracting party may disclose confidential information to members of the legal, accounting, or tax advisory professions who are bound by professional secrecy, when and insofar as this is necessary to protect the contracting party's legitimate interests. The obligation of confidentiality shall also not apply if confidential information must be disclosed on the basis of binding legal regulations or decisions of courts or administrative authorities, to the extent legally required.

In the event of an actual or suspected loss of confidential data or unauthorized access, the third party shall immediately notify AKD and cooperate in taking measures to minimize the consequences thereof and prevent future incidents.

Personal Data Protection

Third parties cooperating with the Company are required to comply with all applicable laws and regulations on the protection of personal data, including the General Data Protection Regulation (GDPR), as well as all other local laws and regulations governing privacy protection and data security.

Third parties shall ensure that all personal data are processed lawfully, fairly, and transparently, and for purposes that are clearly defined and limited to what is necessary.

Third parties shall not share personal data with third parties or process such data beyond the agreed purposes without the prior written consent of the Company.

AKD reserves the right to conduct inspections and audits to ensure that third parties act in compliance with applicable personal data protection standards.

Prevention of Money Laundering, Terrorist Financing, Sanctions Violations, or Illegal Activities

Third parties cooperating with the Company are required to comply with all applicable laws and regulations aimed at preventing money laundering, terrorist financing, violations of international sanctions, and other illegal activities. This includes national and international laws, regulations, and guidelines issued by competent authorities.

Third parties are required to take all reasonable measures to ensure:

- that their business processes are not used for money laundering or as support for illegal activities;
- that appropriate due diligence is conducted for their business partners, clients, and transactions, including identity verification and verification of the origin of funds, in order to reduce the risk of engaging in business cooperation with prohibited entities or individuals;
- compliance with all applicable international sanctions, including, but not exclusively, sanctions imposed by the United Nations (UN), the European Union (EU), the U.S. Office of Foreign Assets Control (OFAC), the U.S. Bureau of International Security and Nonproliferation (US-NSN), the U.S. Department of the Treasury (US-TREAS), the U.S. Department of State (US-DOS), and HM Treasury (UK), as well as all other locally and regionally applicable sanctions lists.

Third parties shall not, directly or indirectly, participate in transactions involving illicit funds, conduct business with entities or individuals appearing on sanctions lists, or in any way facilitate the financing of terrorist activities.

In the event of suspected money laundering, terrorist financing, or sanctions violations, third parties are required to immediately notify AKD and provide full cooperation in the investigation. Any delay in reporting suspicious activities or lack of cooperation may have serious consequences, including the termination of the business relationship and legal sanctions.

Third parties should maintain transparent and accurate financial records to ensure full traceability of transactions. We also expect that they implement internal policies and training programs so that their employees understand the risks associated with money laundering, terrorist financing, and sanctions.

Insider Trading

Third parties cooperating with the Company are required to comply with all applicable laws and regulations on the prevention of insider trading. Inside information is defined as information that is not publicly available and

that could significantly affect the price of shares, bonds, or other financial instruments. This includes, but not exclusively, information on financial results, announcements of mergers and acquisitions, changes in management structure, significant contracts, strategic plans, or other material events relating to AKD or its clients.

Third parties shall not engage in trading financial instruments or provide advice to others on the basis of inside information they possess. Any action that violates this principle may have serious legal consequences, including criminal sanctions, termination of the business relationship, and liability for damages.

Fair Competition

Third parties cooperating with the Company are required to comply with all applicable laws and regulations on competition, including antitrust laws, and to ensure that their business practices support fair and free market competition.

Third parties shall ensure that their employees and representatives understand and comply with competition laws and policies; they shall not use unethical methods to gain a competitive advantage, including the unauthorized collection of competitors' confidential information, and shall avoid actions that could create the perception of distortion of competition or violation of antitrust laws.

SOCIAL ENVIRONMENT

Respect for Human Rights

Respect for human rights is a key part of the Company's business and a cornerstone of our commitment to integrating ESG criteria into all aspects of our operations. Third parties cooperating with the Company are required to act in accordance with international human rights standards and to promote them in all of their business activities and relationships.

This obligation includes respect for the fundamental human rights principles set out in:

- The United Nations (UN) Universal Declaration of Human Rights;
- The Fundamental Conventions of the International Labour Organization (ILO), including the prohibition of forced labor, child labor, and discrimination;
- The United Nations Guiding Principles on Business and Human Rights (UNGP);
- The United Nations Global Compact (UNGC) and the OECD Guidelines for Multinational Enterprises.

Third parties shall ensure that their business operations:

- are not involved in human rights violations, whether directly or through their suppliers, subcontractors, or business partners;

- provide safe, fair, and humane working conditions for all employees, including respect for freedom of association, the right to collective bargaining, and fair remuneration;
- prevent all forms of forced, compulsory, and child labor;
- ensure equality and equal rights for all, regardless of race, gender, age, religion, national origin, disability, sexual orientation, or other personal characteristics.

Third parties are required to identify, assess, and manage risks related to human rights throughout their entire supply chain. We expect that they conduct human rights due diligence to ensure compliance with this principle and take appropriate measures to remedy any identified irregularity or risk.

Discrimination

AKD is committed to ensuring equal opportunities, respecting diversity, and creating an inclusive working environment as part of its broader strategy of integrating ESG principles into its business operations. Third parties cooperating with the Company are required to operate in accordance with the highest standards of equality, prevent any form of discrimination, and actively promote equality in all aspects of their activities.

Third parties shall ensure that:

- their recruitment practices, working conditions, promotions, training, and all other aspects of employment are fair, transparent, and based solely on abilities, experience, and performance, and not on personal characteristics;
- they take active measures to identify and prevent all forms of discrimination within their organizations and value chains;
- they promote an inclusive environment in which all employees feel safe, respected, and treated equally.

The Company does not tolerate any form of discrimination, abuse, harassment, or unfair treatment in business relationships and expects third parties to share this commitment.

Occupational Health and Safety and a Safe Working Environment

Third parties cooperating with the Company are required to ensure a safe, healthy, and sustainable working environment for their employees, subcontractors, and other individuals involved in their business activities.

Third parties are required to:

- comply with all applicable occupational health and safety laws and regulations, and observe international standards and guidelines, such as those defined by the International Labour Organization (ILO);
- identify, assess, and effectively manage risks related to occupational health and safety, including the prevention of injuries, occupational diseases, and other adverse impacts on employee health;

- ensure a working environment that meets all safety standards, including appropriate equipment, work tools, ventilation, lighting, and other conditions that enable safe and healthy work;
- provide regular employee training on safety procedures, rules of conduct, and the use of personal protective equipment, and ensure that all employees are aware of the risks associated with their business activities.

Special attention should be paid to preventing accidents and emergency situations and ensuring appropriate emergency measures, including evacuation plans and access to first aid; protecting vulnerable groups of employees, including pregnant women, older persons, and employees with disabilities, in order to provide them with a safe and appropriate working environment; and ensuring regular assessment of the working environment through inspections, audits, and monitoring of safety conditions.

Third parties should ensure clean, well-maintained, and hygienic working conditions, including sanitary facilities, drinking water, and appropriate rest areas, where applicable, and organize regular training and education for employees on safety procedures, hygiene practices, and the proper use of work equipment.

Working Hours and Remuneration

Third parties cooperating with the Company are required to ensure fair and equitable working conditions for their employees, including compliance with all rules relating to working hours, appropriate remuneration, and benefits that meet basic needs and contribute to employee well-being.

Third parties shall ensure compliance with working hours regulations, including the right to breaks, rest, and paid leave, as well as fairly regulated overtime with appropriate compensation.

Remuneration shall be paid in a timely and transparent manner and in full, and the minimum amount shall comply with statutory requirements or standards set out in a collective agreement.

Child Labor

Third parties cooperating with the Company are required to strictly comply with international standards and laws prohibiting child labor, including International Labour Organization (ILO) Convention No. 182 of 17 June 1999, which provides for the prohibition and immediate measures to secure the elimination of the worst forms of child labor.

In accordance with Article 3 of this Convention, suppliers shall refrain from:

- a. all forms of slavery or practices similar to slavery, such as the sale and trafficking of children;
- b. the enticement, recruitment, or exploitation of a child for prostitution or other forms of sexual exploitation;
- c. the offering, sale, or facilitation of the involvement of children in illicit activities, in particular the production and trafficking of drugs;
- d. all forms of work which, by their nature or the circumstances in which they are carried out, are likely to

jeopardize the health, safety, or morals of children.

Suppliers may employ only employees who are at least 15 years of age, unless local laws require a higher minimum age. In exceptional cases, the employment of children aged 14 is permitted in developing countries in accordance with ILO Convention No. 138, provided that such employment does not jeopardize their education and development.

Voluntary Labor

Third parties cooperating with the Company are required to ensure that all work performed by their employees is entirely voluntary, in accordance with the Forced or Compulsory Labour Convention, International Labour Organization (ILO) Convention No. 29 of 28 June 1930, as well as all applicable laws and regulations. Forced or compulsory labor, or any form of labor involving threats, withholding of personal documents, restriction of freedom of movement, or debt bondage is strictly prohibited.

Suppliers are required to ensure that employees have the freedom to choose their employment, work solely of their own free will, and are able to discontinue their employment at any time in accordance with local laws. All contracts must be transparent, clearly defined, and in line with the principles of fair and responsible treatment of employees.

Diversity and Equality

Third parties cooperating with the Company are required to promote diversity and ensure equality in all aspects of their business operations. This includes providing equal opportunities to all employees and job applicants, regardless of race, skin color, sex, gender identity, age, religion, sexual orientation, nationality, disability, or any other personal characteristic.

Suppliers are required to create an inclusive working environment in which all individuals are treated with respect and dignity. Discrimination, harassment, or any form of unfair treatment of employees is strictly prohibited.

Diversity and equality apply not only to recruitment, but also to working conditions, career advancement, training, and decision-making. We expect third parties to actively work on identifying and removing barriers to equal participation of all groups in the workplace.

Freedom of Association and Collective Bargaining

Third parties cooperating with the Company are required to respect employees' rights to freedom of association and collective bargaining, in accordance with international standards, including the conventions of the International Labour Organization (ILO), as well as all applicable laws in the countries in which they operate.

Employees must be allowed to freely establish or join trade unions and other organizations of their choice,

without fear of discrimination, retaliation, or other adverse consequences. Suppliers are required to respect employees' right to collective bargaining and to engage in good faith in negotiations on working conditions, salaries, and employees' rights, where applicable.

Community Impact

Third parties cooperating with the Company are required to recognize and responsibly manage their impact on the communities in which they operate. A sustainable and ethical relationship with local communities is the foundation of socially responsible business conduct and an important part of ESG integration.

We expect third parties to actively cooperate with local communities, ensuring transparent communication and stakeholder engagement in decision-making processes that may affect them. Special attention must be paid to vulnerable groups, including minorities, women, children, and marginalized groups.

ENVIRONMENT AND SUSTAINABILITY

Environmental Protection

Third parties cooperating with the Company are required to ensure high standards of environmental protection and sustainability in all aspects of their business operations, in compliance with relevant international agreements and regulations. This includes responsible management of chemicals, waste, and resources in accordance with applicable laws and best practices.

Suppliers are required to:

- Implement responsible waste management, including the collection, storage, and disposal of waste in accordance with applicable laws and regulations, and reduce its environmental impact;
- Comply with the prohibition of transboundary movement, export, and import of hazardous waste without appropriate authorization, in accordance with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of 22 March 1989;
- Refrain from the production, use, and release of chemicals prohibited by international standards, including persistent organic pollutants, as defined in the Stockholm Convention on Persistent Organic Pollutants of 23 May 2001;
- Ensure the safe handling, storage, and disposal of chemicals;
- Avoid the use of and progressively abolish substances that deplete the ozone layer, in accordance with the Montreal Protocol on Substances that Deplete the Ozone Layer of 16 September 1987.

Suppliers should implement policies and procedures that ensure effective resource management and reduce the negative environmental impact of their activities, including the use of sustainable technologies and the reduction of harmful emissions.

Sustainability - Emission Reduction Targets and Action Plan

Third parties cooperating with the Company should align their business operations with the principles of sustainability and actively contribute to greenhouse gas emission reduction targets in line with global efforts to achieve net-zero emissions. This strategy is based on internationally recognized standards and objectives, including the Paris Agreement on climate change, and requires continuous commitment to responsible resource use and reducing the carbon footprint.

Suppliers should have an environmental management program, actively work on reducing greenhouse gas emissions, reducing production waste and promoting waste separation and recycling.

The Company expects third parties to focus on sustainable energy management, continuously optimize energy processes, improve efficiency, and raise awareness of responsible energy management, which is particularly important in the contemporary macroeconomic and geopolitical circumstances.

The Company expects third parties to take all reasonable measures to reduce deforestation and land degradation and to contribute to biodiversity by implementing measures to preserve natural resources and protect ecosystems. Particular emphasis is placed on cooperation with the Company and other partners to ensure sustainable supply chains and reduce emissions throughout the entire business cycle.

INFORMATION SECURITY

Third parties cooperating with the Company are required to ensure high standards of information security in order to protect confidential information, client data, and business data to which they have access.

Suppliers are required to:

- Implement technical and organizational measures to protect information from unauthorized access, loss, unauthorized disclosure, or destruction, including security policies, encryption, access-controlled systems, and regular monitoring of security threats.
- Ensure that employees and third parties cooperating with the supplier understand and comply with information security rules and protocols.
- Restrict access to confidential information exclusively to authorized persons who require such data to perform business tasks.
- Update systems in a timely manner and apply security patches to prevent vulnerabilities in the IT infrastructure.

Particular responsibility applies to the protection of the Company's data, its clients' data, and the data of third parties with whom the Company cooperates. Suppliers are required to cooperate in investigations and implement the necessary corrective measures to prevent the recurrence of incidents.

COMPLIANCE WITH THE CODE

In situations where a third party, through its actions or conduct, deviates from the standards set out in the Code, our intention is, whenever feasible, to direct efforts toward jointly finding a solution. However, if a third party demonstrates irreparable or continuous non-compliance with the legal, ethical, social, and environmental principles we promote, we will be forced to terminate further cooperation.

We regularly verify compliance with the provisions of the Code through a systematic approach using various tools and methods. This includes due diligence, contractual assurances, audits, and inspections of supplier facilities. Where necessary, other appropriate measures may also be taken to ensure adherence to our standards and rules.

We expect openness and accountability from third parties, as well as the submission of accurate and truthful information required for this process.

In the event of a breach of the Code, the third party is required to take all necessary measures in a timely manner to remedy the irregularities. In addition, they are required to notify us of any recorded or suspected breaches of standards, including actions of their employees, representatives, or related entities, unless there are legal obstacles to such reporting.

In order to correct any potential irregularities, we expect full cooperation with the designated person from our Company.

REPORTING IRREGULARITIES

If you suspect a breach of the principles set out in this Code or are aware of irregularities that jeopardize legal, ethical, or social standards, we invite you to report your concerns through the available channels to the Confidential Person:

1. **By e-mail** - by sending an e-mail to: nepravilnosti@akd.hr. This channel enables fast and reliable communication with the Confidential Person,
2. **by telephone** - using the phone numbers of the Confidential Person or their deputy,
3. by requesting a **meeting** for the purpose of submitting a report,
4. **by post** - the mailing should be marked "for the Confidential Person", with the following address stated: AKD d.o.o., Savska cesta 31, 10000 Zagreb,
5. **anonymously** via e-mail, by telephone call, or via the mailbox for reporting irregularities at the Company's premises

We would like to emphasize that we strictly oppose any form of retaliation against individuals who, in good faith, report suspected irregularities or unethical conduct. Your report, even if it ultimately proves to be unfounded, will be valued if it is submitted honestly and responsibly.

ACCEPTANCE OF THE CODE

By accepting this Code, third parties cooperating with the Company and its clients express their consent and commit to:

- complying with all requirements, principles, and expectations established in this Code;
- providing accurate, complete, and timely information at the Company's request in order to facilitate compliance assessment and due diligence;
- complying with all applicable laws, regulations, and standards in the countries in which they operate;
- promoting and protecting human rights in accordance with the United Nations (UN) human rights principles, the labor standards established by the International Labour Organization (ILO), the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the principles of the United Nations Global Compact (UNGC).

This obligation forms the basis of responsible and sustainable business conduct and serves as a guarantee of commitment to shared values and high standards of ethical conduct. By accepting the Code, third parties actively contribute to building long-term, transparent, and reliable business relationships with the Company.

In Zagreb, 30 June 2025

CEO

<illegible signature>

Jure Sertić