



Infoprojekt d.o.o. - Ethics and Business Conduct policy

1. Overview

Infoprojekt d.o.o. is committed to protecting employees, partners, vendors and the company from illegal or damaging actions by individuals, either knowingly or unknowingly.

Infoprojekt d.o.o. will not tolerate any wrongdoing or impropriety at any time. Infoprojekt d.o.o. will take the appropriate measures act quickly in correcting the issue if the ethical code is broken.

2. Purpose

The purpose of this policy is to establish a culture of openness, trust and to emphasize the employee's and consumer's expectation to be treated to fair business practices. This policy will serve to guide business behavior to ensure ethical conduct.

3. Scope

This policy applies to employees, contractors, consultants, temporaries, and other workers at Infoprojekt d.o.o., including all personnel affiliated with third parties.

4. Policy

4.1 Executive Commitment to Ethics

4.1.1 Senior leaders and executives within Infoprojekt d.o.o. must set a prime example. In any business practice, honesty and integrity must be top priority for executives.

4.1.2 Executives must disclose any conflict of interests regard their position within Infoprojekt d.o.o..

4.2 Antitrust and Competition Laws

4.2.1 Compliance with antitrust or competition laws is required at all times. Infoprojekt d.o.o. not agree with any competitors to fix or control prices, either by agreeing directly with a competitor or any other method, such as through third parties; Infoprojekt d.o.o. will not abstaining from bids or submitting noncompetitive or "courtesy" bids; boycott suppliers or customers; divide or allocate markets or customers.

4.2.2 These agreements are against Infoprojekt d.o.o. policy and should be equally avoided in discussions with partners as well as representatives of other companies. Infoprojekt will refrain from discussions with competitors about prices, costs, profits or profit margins, production volumes or bids for a specific customer's business.

4.2.3 Infoprojekt d.o.o. will avoid sales tactics or other arrangements with customers or suppliers such as predatory pricing below cost, exclusive dealing contracts, bundled or tie-in sales, agreements with customers or suppliers about minimum resale prices, and discriminating between competing customers.

4.3 Trade Compliance Laws and Regulations

- 4.3.1 Infoprojekt d.o.o. will fully comply with all applicable US and global trade laws and regulations.
- 4.3.2 Infoprojekt d.o.o. will conform to global trade laws and regulations to ensure no technology, data, information, program, and/or materials resulting from services (or direct product thereof) will be imported or exported, directly or indirectly, in violation of these laws, or will be used for any purpose prohibited by these laws and regulations.

4.4 Employee Commitment to Ethics

- 4.4.1 Infoprojekt d.o.o. employees will treat everyone fairly, have mutual respect, promote a team environment and avoid the intent and appearance of unethical or compromising practices.
- 4.4.2 Every employee needs to apply effort and intelligence in maintaining ethics value.
- 4.4.3 Employees must disclose any conflict of interests regard their position within Infoprojekt d.o.o..
- 4.4.4 Employees will help Infoprojekt d.o.o. to increase customer and vendor satisfaction by providing quality products and timely response to inquiries.
- 4.4.5 Employees should consider the following questions to themselves when any behavior is questionable:
 - Is the behavior legal?
 - Does the behavior comply with all appropriate Infoprojekt d.o.o. policies?
 - Does the behavior reflect Infoprojekt d.o.o. values and culture?
 - Could the behavior adversely affect company stakeholders?
 - Would you feel personally concerned if the behavior appeared in a news headline?
 - Could the behavior adversely affect Infoprojekt d.o.o. if all employees did it?

4.5 Company Awareness

- 4.5.1 Promotion of ethical conduct within interpersonal communications of employees will be rewarded.
- 4.5.2 Infoprojekt d.o.o. will promote a trustworthy and honest atmosphere to reinforce the vision of ethics within the company.

4.6 Maintaining Ethical Practices

- 4.6.1 Infoprojekt d.o.o. will reinforce the importance of the integrity message and the tone will start at the top. Every employee, manager, director needs consistently maintain an ethical stance and support ethical behavior.
- 4.6.2 Employees at Infoprojekt d.o.o. should encourage open dialogue, get honest feedback and treat everyone fairly, with honesty and objectivity.
- 4.6.3 Infoprojekt d.o.o. company management provided to make sure the ethical code is delivered to all employees and that concerns regarding the code can be addressed.
- 4.6.4 Infoprojekt d.o.o. will conduct periodic training programs and conduct periodic reviews for employees to ensure they are complying with both your code of conduct.

4.7 Unethical Behavior

- 4.7.1 Infoprojekt d.o.o. will avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- 4.7.2 Unauthorized use of company trade secrets & marketing, operational, personnel, financial, source code, & technical information integral to the success of our company will not be tolerated.

4.7.3 Infoprojekt d.o.o. will not permit impropriety at any time and we will act ethically and responsibly in accordance with laws.

4.7.4 Infoprojekt d.o.o. employees will not use corporate assets or business relationships for personal use or gain.

4.8 Improper Payments, Money Laundering, and Economic Boycotts

4.8.1 Infoprojekt d.o.o. will not offering, promising, authorizing, directing, paying, making, or receiving any bribes, kickbacks, or payments of money or anything of value (directly or indirectly) to improperly obtain business or any other advantage. Infoprojekt d.o.o. also prohibits all forms of money laundering, which involves disguising, channeling unlawfully obtained money, or transforming such money into legitimate funds. The above prohibition applies as well to:

- Government and public sector, which includes public utilities, higher education, public healthcare entities, and public international organizations and their employees or officials
- Political parties or candidates for political office
- Business entities partially or wholly owned or controlled by government interests (often referred to as state-owned enterprises) and their employees or officials
- Privately held commercial companies and their employees
- Any other third party

4.9 Dealing with Government

4.9.1 Infoprojekt d.o.o. will strictly observe the laws, rules, and regulations that govern

4.9.2 the acquisition of goods and services by any governmental entity and the performance of government contracts. Infoprojekt d.o.o. will submit accurate invoices to the government and comply with all laws regarding invoicing and payments.

4.9.3 Infoprojekt d.o.o. will establish and maintain appropriate internal controls to ensure compliance with all applicable local country laws concerning prohibitions on offering anything of value to government and public sector employees or officials.

4.10 Lobbying of Government Officials

4.10.1 Infoprojekt d.o.o. will not lobby of Government Officials or make any activity that attempts to influence laws, regulations, policies, and rules.

5. Policy Compliance

5.1 Compliance Measurement

The Infoprojekt d.o.o. will verify compliance to this policy through various methods, including but not limited to, business tool reports, internal and external audits, and feedback.

5.2 Exceptions

None.

5.3 Non-Compliance

An employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.