

CODE OF ETHICS

ECCOS-INŽENJERING d.o.o.

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1. INTRODUCTION

The company ECCOS-INŽENJERING d.o.o. (hereinafter: Eccos) was founded on December 1, 1998, and since then, through the engagement of its employees, business partners and satisfied clients, it has been constantly working to improve the quality of services, expand its business, and to maintain trust, as well as visibility and recognition in the Republic of Croatia and beyond.

From its start in 1998 in Zagreb until today, Eccos has developed into a high-tech company that develops and implements sophisticated solutions in the fields of electrical engineering, automation and security. Eccos is a highly professional and technologically advanced company with extensive experience in projects of technical protection, audiovisual communications, parking systems, development of software solutions, data centers, automation, energy efficiency and electrical engineering. Our solutions are intended for building systems in industry, construction, financial institutions, energy, transport, healthcare, education, tourism, and other sectors.

Eccos provides its clients with safe services and products, adapted to their needs and the needs of society as a whole, all with the aim of improving the quality of life, progress and the common good.

Regarding relations with business partners and public institutions, Eccos has developed a partnership based on mutual respect, responsibility and readiness for positive changes.

The Code of Ethics provides support and assistance to all Eccos' employees in performing their daily work, and in complying with applicable regulations and company acts in order to ensure a high level of professionalism and mutual respect. By introducing this Code of Ethics, Eccos has committed to professionalism, reliability, flexibility, competence and loyalty in its business operations.

Eccos' business policy represents business cooperation, reliable partnership and openness in communication, and accordingly, a direct and responsible approach to solving possible disagreements and conflicts resulting from cooperation and business.

When resolving internal and external conflicts or disputes, contractual or non-contractual, whenever possible and justified, Eccos gives priority to amicable resolution through direct negotiations, conciliation (mediation), or other similar extrajudicial methods.

With this Code of Ethics, Eccos strives to raise awareness of legitimate, fair and transparent business and conduct, with the aim of ensuring the reliability and quality of the products and services provided, therefore all employees are obliged to comply with it.

2. SCOPE OF THE CODE OF ETHICS

This Code of Ethics applies to the entire Eccos organization and is valid without a time limit.

The members of the Management Board are responsible for any amendments to this Code of Ethics, in accordance with new social and business challenges, and for the purpose of improving the business quality.

It applies to both employees and members of the Management Board, as well as to all business partners, suppliers, customers and other third parties.

This Code of Ethics represents a framework for any form of conduct, implies adherence to applicable laws and internal rules, requires adherence to moral, ethical and social standards and principles, and supports transparent company management.

Every employee is obliged to follow the principles of conduct, act responsibly and refrain from any behavior that could harm the company's reputation.

The Code of Ethics is available to all interested parties in printed form on the company's notice board, and to employees in electronic form in the company's internal shared folder.

In case of ambiguities and questions related to the Code, employees can contact the Head of Legal Affairs Department and the Data Protection Officer.

3. BUSINESS ENVIRONMENT AND EMPLOYEES

Eccos is oriented towards a professional and pleasant working environment, as well as competent, friendly and motivated employees, therefore the main goals of the HR strategy are finding, engaging, educating and long-term cooperation with all employees.

The foundation of Eccos' business policy is professionalism, honesty, understanding, trust, flexibility, fairness and equal opportunities.

As an employer, Eccos is oriented towards encouraging employees to achieve a healthy work-life balance, as well as towards diverse and unpredictable life and professional situations of its employees, providing them with secure and long-term jobs. In this way, we achieve the satisfaction of the employees, which greatly affects the improvement of the quality of the services provided by Eccos, and ultimately the satisfaction of the clients.

Eccos pays great attention to respecting and protecting human rights.

Respect for human rights is a fundamental obligation of all Eccos' employees, but also of all Eccos' suppliers who are required to respect fundamental human rights and freedoms in their supply chain. These rights include a number of civil, political, economic and social rights, such as the right to human dignity, the right to freedom and security, the right to favorable working conditions and fair wages, etc. We are particularly focused on the protection of particularly vulnerable social groups such as women, children, minors and people with disabilities.

4. CONDUCT ACCORDING TO THE LAW

Eccos' business activities are based on the laws of the Republic of Croatia, the European Union and other countries in which it conducts business.

Compliance with the law is expected of all Eccos employees, as well as all business partners with whom Eccos cooperates in any way. This refers in particular to compliance with labor laws in order to achieve maximum protection of employees and their rights in business processes, especially about legislation regulating occupational health and safety, as well as compliance with laws and by-laws that establish the obligation to ensure the protection of personal data of all persons in business process.

All employees are obliged to act in accordance with the laws and Eccos acts, performing their work in a just, fair and moral manner.

5. TREATMENT OF COLLEAGUES, CLIENTS, BUSINESS PARTNERS AND PUBLIC AUTHORITIES

Eccos is guided by the principle of mutual respect, appreciation and loyalty in relation to colleagues, clients, government services and institutions.

The managerial staff of Eccos has the obligation to promote a harmonious and positive working environment, and is an active example of everyday business and professional conduct based on respect for all employees, providing help and support in any problematic situations.

Other Eccos' employees have an obligation to nurture and encourage a decent and professional behavior towards managerial staff, colleagues, clients, government services and institutions.

The rules of conduct of Eccos' employees are based on the principles of high ethical values, protection of clients' interests, loyalty and trust.

In communication with business partners, government services, institutions, and the media, employees are obliged to conduct in accordance with the law and contracts, with mutual respect and in accordance with Eccos' standards, considering the reputation of the company and all its associates.

6. FUNDAMENTAL BUSINESS PRINCIPLES

6.1. For clients, a competent, reliable and dependable partner

Employees are obliged to take care of their clients, provide them with professional service and foster a relationship of trust.

6.2. Acting with the aim of increasing client satisfaction

Employees are required to provide information and advice to current and prospective clients regarding Eccos' products and services.

6.3. Acting with the aim of product and service innovation

Through their activities, employees should contribute to generating ideas for expanding and introducing new products and services.

6.4. Increasing productivity, professionalism, responsibility and expertise at work

In the interest of Eccos and greater client satisfaction, employees should be oriented towards increasing Eccos' productivity.

While fulfilling obligations from the employment, employees should act professionally and responsibly, paying due attention to the tasks they perform, and perform their work professionally and at the highest possible level.

6.5. Principle of equal opportunity

Eccos is guided by the principle of equal opportunity for everyone, regardless of cultural and ethnic origin, nationality, religion, race, gender, age, social status, sexual orientation and worldview.

6.6. Prohibition of discrimination on any basis

Any form of discriminatory behavior is strictly prohibited, and in the event of such behavior, employees are obliged to report it to the managerial staff.

6.7. Prohibition of insults and harassment

Eccos does not tolerate and prohibits offensive behavior and treatment, as well as expressions of hate towards colleagues, partners and clients on any basis. Employees are obliged to report any form of possible offensive behavior and harassment to the managerial staff.

Sexual harassment will not be tolerated under any circumstances, including statements and behavior that may cause discomfort to the person towards whom it is directed. Eccos expects its employees to report any form of insult and harassment to the managerial staff, who are obliged to protect employees' dignity.

6.8. Prohibition of negative comments in public

Any negative public comment that could harm Eccos' reputation, reliability and business will not be tolerated.

6.9. Amicable resolution of misunderstandings and conflicts

Eccos is committed to amicable resolution of misunderstandings, conflicts and any disagreements in its entire business environment.

6.10. Environmental responsibility and sustainable development

Eccos is environmentally aware and conducts in accordance with the principle of environmental protection and care for future generations. Eccos' commitment to environmental protection confirms the policy of environmental protection and rational energy management according to the requirements of the ISO 14001:2015 and ISO 50001:2011 standards.

Accordingly, Eccos encourages its employees to be environmentally conscientious, especially in terms of handling the equipment and resources at their disposal (saving energy and materials, reducing and recycling waste, etc.).

6.11. Caring for the community and the common good

Caring for the community and the common good is high on Eccos' list of priorities. Through its business activities, Eccos plans and invests financial and human resources in the improvement, especially of local communities, by donating funds to various associations, hospitals, etc., and by sponsoring talented individuals and humanitarian events. Special attention is paid to the health protection of children and minors, as well as the development of sports, artistic and other talents.

6.12. Occupational health and safety

The highest level of attention is paid to the organization of the health and safety of employees in the workplace in the context of fulfilling the obligations of employment, as well as to the safety of all other persons who participate in the execution of Eccos' business processes. The highest level of security is also ensured by the implementation of special high protection standards provided by the ISO 45001:2018 and SCCp standards.

6.13. Transparency and prohibition of corruption

In its business activities, Eccos promotes zero tolerance for corruption and transparent business practices. All its employees and business partners are required to report any form of corrupt conduct, as well as to refrain from any corrupt and similar actions.

6.14. Principle of fair competition

In relation to the competition, the company adheres to practices and principles of fair competition, thus contributing to the creation and maintenance of constructive and fair market competition.

7. CONFIDENTIALITY AND PERSONAL DATA PROTECTION IN ACCORDANCE WITH GDPR

Eccos' business operations are based on data confidentiality and are in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as well as the information security policy according to the requirements of the ISO 27001:2013 standard.

Eccos handles the data of its employees, business partners and clients in a careful and confidential manner, in accordance with contracts, regulations, applicable laws and regulations of the Republic of Croatia and the European Union.

For this purpose, Eccos adopted the Work Regulations, Data Confidentiality Regulations, and Computer and Information Security Regulations. All valid regulations are available to employees in the company's internal shared folder, as well as in printed form kept by the Head of the Legal Affairs Department and the Personal Data Protection Officer. The regulations clearly define the method of collecting, processing and storing personal data, and represent a comprehensive policy aimed at recording the main obligations of all employees and business partners who are expected to strictly adhere to the clear instructions and obligations described in the regulations.

Any unauthorized use or misuse, breach of contract, violation of laws, regulations, standards, procedures and other Eccos' acts constitutes a violation thereof, and may be grounds for initiation of disciplinary and criminal proceedings for compensation of damages caused to the company.

7.1. Person responsible for personal data protection – Data Protection Officer

The responsible person is the person appointed by the company's management, and within a certain framework is responsible for monitoring and ensuring the compliance of personal data processing with the EU Regulation and the above-mentioned regulations.

Eccos has appointed an officer for the protection of personal data with clearly defined responsibilities and powers in accordance with the EU Regulation and the Act on the Application of the General Data Protection Regulation.

All requests for access, amendments, deletion and complaints regarding the protection of personal data can be sent to the email norme@eccos.com.hr.

8. COMPLAINT MANAGEMENT

In order to ensure legal, transparent and fair business operations aimed at the continuous improvement of services and relations in Eccos, any complaints from employees, business partners and clients are timely checked, processed and resolved.

8.1. For employees

Resolving conflicts arising from possible conflicts between employees, and in cases of complaints arising from the employment, is primarily the responsibility of the immediate superior. If a satisfactory solution is not found at that level, the employees can contact the Management Board members Krešimir Paić and Silvio Preglej (kresimir.paic@eccos.com.hr; silvio.preglej@eccos.com.hr). In compliance with the legal provisions, Eccos has appointed two persons of different gender who, in addition to the Management Board, are authorized to receive and resolve complaints related to the protection of employees' dignity. Eccos, as the Employer, i.e., the person authorized to receive employee complaints, is obliged to investigate the complaint, and take all necessary measures appropriate to the individual case in order to prevent continued harassment or sexual harassment, if found to exist.

8.2. For business partners

All complaints are resolved by the members of the Management Board or persons authorized by the Management Board in writing or orally to represent them.

8.3. For clients

All complaints are resolved by employees who are in direct contact with clients. Clients can also send their complaints to the members of the Management Board.

9. CONFLICT OF INTEREST AND PROHIBITION OF CORRUPTION

9.1. Conflict of interest

Eccos strives to avoid possible conflict of interest between the company and employees, and between clients and employees.

Eccos and its employees act in accordance with usual business practices, performing activities only in the areas assigned to them, not putting their own interests in the foreground, acting independently, objectively and in the best interest of clients and the company.

In case of performing additional work, employees are obliged to inform the manager and/or the Board, and before starting the activity, obtain the appropriate approval from the employer in order to avoid conflict of interest. Additional work includes any type of employment or self-employment outside of the employment relationship with the company.

Employees are obliged to inform their superiors about any possible conflict of interest.

Eccos' employees are prohibited from seeking or receiving benefits (any object or service of material or non-material nature) either for themselves or for a third party within the scope of business relation. In the event of the occurrence of such activities, employees will be sanctioned by extraordinary termination.

9.2. Prohibition of corruption when negotiating business deals

When negotiating business deals, the company will not ask for, accept, or give benefits or gifts that would serve the purpose of bribery. The contract, as well as the entire business relationship, is based expressly on the joint obligation of the contracting parties to do everything in their power to prevent corruption. The contracting parties will first ensure that:

- for delivery and/or ordering of goods and/or services of any kind, they will not seek or offer, give, or receive, attempt, support or conceal any inappropriate payments or benefits of any other kind for personal purposes or for the purpose of privileging third parties, especially not for the reason of entering into a contract or to keep the contract in force ("corruption case");
- the procurement of goods and/or services of any kind will be equally transparently created and carried out for each potential bidder, above all regarding all fees, agreements or possible conflicts related to the procurement;
- in the event of a breach of contract, the sanctions determined by the Law and the provisions of the contract will be applied consistently.

The contracting parties will ensure that all employees and other advisers are involved in the prevention of corruption, especially those who were or will be involved in drafting contracts, negotiating and concluding contracts, as well as that the provisions of this article will fully apply to them.

If a case of corruption occurs or is suspected, both contracting parties undertake to ensure that the employees affected and/or the employees who have learned about such a case forward the relevant information to the email kresimir.paic@eccos.com.hr and/or silvio.preglej@eccos.com.hr. The personal data of persons who disclose relevant information will be kept confidential and will not be forwarded to other services or persons.

In the event of a case of corruption caused by one of the contracting parties, the other contracting party has the right to immediately terminate the negotiations and terminate the concluded contracts with immediate effect.

9.3. Giving gifts, providing services and other benefits

Gifts, favors and other benefits for the benefit of current and potential clients, suppliers, consultants, or service providers are acceptable only for legitimate business reasons. In any case, such services must be in accordance with the law, and require the permission of the immediate superior. All consequential costs must be booked separately in accordance with valid company procedures. It is not permitted to solicit or structure negotiations based on any gifts, favors or other benefits.

9.4. Political contributions and activities

Eccos as a company does not make political contributions nor does participate in political activities.

However, if an employee personally makes a contribution, it must be clear that these donations are not related to Eccos. Eccos respects the individual's right to participate in political activities of his own choice, as long as the participation is clearly on a personal basis, and as long as it does not affect the employee's obligations to the company. If the employee is involved in political activities, these activities must not be associated with Eccos or use the Eccos name, logo, symbols, or anything that makes the company recognizable. In addition, employees may not conduct political activities on company premises or use any other company property for such purposes.

Under no circumstances will Eccos be held responsible for the political activity of its employees. The participation of employees in politics will in no way imply the political position of the company.

9.5. Money laundering

Eccos adheres to all applicable legal regulations of the Republic of Croatia and the European Union against money laundering and terrorist financing. Money laundering is, among other things, the process of concealing illegally acquired funds with the aim of keeping the illegal origin of the funds hidden. Eccos undertakes all available measures and steps in evaluating the integrity of its business partners and clients.

10. PROTECTION OF HUMAN RIGHTS

The entire activity of Eccos is based on the principles of transparent, legal and fair business and its improvement, with a special emphasis on improving the quality of business, the advancement of its employees, as well as the common good. As a holder of ISO and SCCp certificates, Eccos constantly works to improve its processes, as well as in-depth analysis of each process and their impact on the protection of human rights.

10.1. Protection of human rights

The protection of fundamental human and civil rights is the basis of Eccos' business activities. Eccos has adopted regulations and decisions, and established mechanisms for the protection of human rights and their improvement, especially for the protection of the rights of its employees.

In order to protect the dignity of every employee, prohibit discrimination, protect the right to equality and equal opportunities for all employees, internal procedures for reporting, investigating and sanctioning violations of employees' rights have been established. Special attention is paid to informing employees about their right to freedom of association and the right to join a trade union, the right to be informed and consulted in the company, the right to collective bargaining and action, as well as the right of employees to fair and just working conditions, which protect health, safety and dignity of employees.

All Eccos employees are obliged to respect any diversity among themselves, in particular to respect others' right to freedom of thought, conscience and religion, the right to cultural, religious and linguistic diversity, as well as the right to protection of personal data, and freedom of expression and information.

10.2. Protection of the rights of children and minors

Employment of children is prohibited at Eccos. High standards of protection and safety of minors are applied in the case of employment, internship, or student work.

Eccos participates in various initiatives and projects related to the promotion of the protection of children's rights, especially their health, by participating in various humanitarian actions, donations to hospitals, associations for the protection of children's rights, and the like.

Children's rights are also protected indirectly by improving the quality of working conditions of employees - parents, and by various financial supports and benefits.

10.3. Protection of particularly vulnerable groups

The organization has established mechanisms to ensure equality and to improve the quality of life and working conditions of a particularly vulnerable group of employees. Eccos promotes the employment and integration of people with disabilities, as well as elderly people and pensioners, and adopts internal measures aimed at ensuring quality working conditions and professional involvement in Eccos' business.

Eccos provides special protection to pregnant women, nursing mothers, parents and adoptive parents in the form of working conditions that promote the work-life balance, as well as additional material and financial resources.

11. ENVIRONMENTAL PROTECTION AND ENERGY EFFICIENCY

11.1. Environmental protection

All employees and business partners of Eccos are obliged to comply with the legal regulations and internal acts of Eccos that relate to environmental protection. Every employee is obliged to act according to internal procedures within the framework of ISO 9001; 140001; 50001 standards in order to reduce the harmful impact on the environment to the greatest extent possible.

When making strategic decisions related to the business of Eccos, the company Management Board considers sustainable development and reduction of the negative impact of business processes on the environment. Within the scope of business planning, the Management Board sets specific annual goals that reflect the policy of environmental protection, efficient waste management, reduction of energy consumption and greenhouse gas emissions.

11.2. Energy efficiency

The concept of rational management of electricity and other energy sources implies systematic and continuous monitoring and management of consumption with the aim of its optimization, i.e. consequent savings and reduction of the total costs of maintenance of facilities. At the same time, it represents a significant contribution to environmental protection through reduction of harmful impacts.

Eccos offers its business partners a system for monitoring the consumption and quality of energy (Enterprise Energy Management System – EEMS) and other energy sources (gas, water, steam, etc.), enabling them to comprehensively monitor and manage the energy they use.

In addition to the above, by establishing additional standards covered by the ISO 50001 standard, Eccos achieves significant success in energy quality control and supervision, and provides prerequisites for significant energy savings, which has a direct positive effect on the environment.

12. DOCUMENT REVISION

Revision	Date	Amended by	Description of amendment
01	May 15, 2018	Anita Jerković Data Protection Officer	Initial document
02	September 25, 2023	Lara Nusdorfer Head of the Legal Affairs Department	Revision

Zagreb, May 2023