

## **Anti-Bribery Policy**

By committing to the establishing and implementing the Anti-Bribery Management System (ABMS) HRN ISO 37001:2016 company Vlahovic Group has expressed its commitment in fulfilling the requirements of the standard and aligning the business with the laws of the Republic of Croatia and international regulations governing the suppression of bribery and provides evidence that doing business is compliant with them.

- Compliance with the principles and rules set out in the Anti-Bribery Policy and relevant laws and regulations is binding on all employees, and the same is expected of all interest groups – customers, suppliers, and other business partners.
- Vlahovic Group maintains high ethical standards in business, protects a dignity and personal integrity of all employees and ensures transparency in its activities.
- Vlahovic Group maintains a zero-tolerance policy towards behaviours that violate any law or written rule on combating corruption and bribery.
- Any offering, promising, giving, receiving, or seeking financial or non-financial benefit of any
  value, directly or indirectly or as an incentive or reward to a person for a particular action or
  refrain from acting, is prohibited.
- Benefits may include but are not limited to money or cash equivalents, gifts, entertainment and recreation, travel, tickets, donations, sponsorships, discounts, loans, promises of employment and any trading in influence.
- The management system for combating bribery of Vlahovic Group complies with the requirements of HRN ISO 37001:2016.
- Any conduct that deviates from the rules and principles defined by the Anti-Bribery Policy will be sanctioned in accordance with applicable legal regulations, internal acts, and applied Codes of Ethics within Vlahovic Group.

The CEO decided on the appointment of an independent Anti-Bribery Compliance Function with the powers and responsibilities to control the implementation of the Anti-Bribery Management System, supporting Vlahovic Group employees in relation to bribery matters. All business activities and the implementation of the Anti-Bribery Management System, the implementation of activities ensure compliance with the requirements of HRN ISO 37001:2016 standard, about which more information can be found on the Vlahovic Group website.

The CEO of Vlahovic Group is responsible for communicating the Anti-Bribery Policy to all people working for or on behalf of Vlahovic Group and making it available to relevant interested parties.

In Zagreb, 11 January 2024

Natko Vlahovic, CEO

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