

Dear colleagues,

At KING ICT, we are building a culture of trust and cooperation – a culture in which each and every member of our team has the opportunity to show their best. It is in that spirit that the Code of Corporate Ethics and Conduct has been written.

The KING ICT Code is a document that clearly outlines the spirit of KING ICT, and how the company should be presented on the market and in society, in the best interest of KING ICT, our employees and our partners.

The Code represents a collection of values and rules, by which each of us, individually and collectively, can achieve our set goals in accordance with the corporate policies of KING ICT. The Code also provides guidelines for resolving situations that at first glance may not seem completely clear.

The decision to hire you as an employee, or contract you as an associate of our company conveys a great deal of trust in the fact that you can bring values, knowledge and skills to the company, and that you are prepared to abide by and apply the rules of conduct that are contained within this Code.

It is up to you to show that our decision to select you was the right one.

Thank you for your attention,

Plamenko Barišić

1. ABOUT THE CODE OF CORPORATE ETHICS AND CONDUCT

The Code of Business Ethics and Conduct lays down the fundamental organizational values of the company, for the purpose of promoting our principles of moral, professional and socially acceptable values.

The aim of the Code is to outline our highest ethical and moral standards in all areas of activity of KING ICT employees, in our relations with associates, customers and the environment in which our business unfolds.

For the successful execution of the rules from this Code, the cooperation and active participation of all KING ICT employees and associates is imperative.

This Code applies to all employees, subsidiaries and affiliated companies of KING ICT. The Code also applies to business and operations undertaken by KING ICT in all countries in which KING ICT operates.

2. VALUES OF OUR COMPANY

- Excellence
- Initiative
- Innovativeness
- Integrity
- Togetherness and respect

3. ETHICAL PRINCIPLES

Legality of our work and operations

For our company to abide by all legal regulations, our own rules and decisions, it is important that all employees fully participate.

For each individual, it is important to:

- familiarise themselves with the laws and other regulations that pertain to their work post and the tasks they perform
- abide by all the said regulations and rules
- in the case of uncertainty, seek the assistance of colleagues or superiors

Legality in the performance of our tasks and duties is the obligation of us all – without exception.

Expert, professional and unbiased approach

In performing daily tasks for the company, it is important to:

- apply best knowledge and skills in the profession, which implies dedication to the job, responsibility and interest in ensuring success, both personal and of the company
- be creative and enterprising
- respond to business challenges with a prior assessment of risk, in the spirit of the general principles of company operations
- take responsibility for your work and tasks entrusted to you, and stimulate others to conduct themselves responsibly
- keep all business documentation properly and in a timely manner
- protect the interests of the company, but not at the detriment to our customers
- take a courteous, just and professional approach towards our customers, business partners, colleagues and the public
- always act objectively, regardless of your personal relationship with customers or others, as confirmation of your professional and unbiased business conduct

All employees have equal opportunities to succeed, and their position in the company relies exclusively on the results of their work, and the success of each individual.

Respecting human rights

Our attitudes towards colleagues, customers and partners are based on respect and dignity. Accordingly, all forms of direct or indirect discrimination are excluded, based on bias or prejudice such as:

- race, skin colour, gender, sexual orientation, gender identity, language, religion, political or other beliefs, national or social origin, social status, status, age, health condition of that person or members of their family

In communications, exclude all forms of violence, disturbance or violations of other protected human rights, such as:

- freedom of public action, right to information, right to privacy, right to further education and training, right to a different opinion, right to market competition, etc.

Always treat others in the way you wish to be treated by them. Be conscious of the fact that your rights cease at the moment when you violate someone else's rights.

Attitude towards KING ICT as a company

In your daily work and conduct, the following are important:

- recognize situations of possible conflict of interest in which your personal interests or the interests of persons related to you may affect your business conduct, disclose such circumstances to your superiors and legal support and take recommended actions to eliminate the possible conflict of interest or, if needed, manage such situations in an
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appropriate and transparent manner

- express your loyalty, respect and support for colleagues and the company through your conduct and work
- implement the company business policy and represent the company worthily in front of customers, business partners and the public
- protect company property as though it was your own

With the aim of good interpersonal relations and a sense of community, it is important to:

- share new knowledge and good ideas with colleagues and associates
- contribute to the company's reputation, not only during working hours, but also in your free time, everywhere

To achieve the fundamental principles of the company's business policy, it is important to:

- reject every form of or attempt of bribes or corruption, or favour based on personal interests and subjective assessment
- protect company information and abide by the provisions of the "Policy on the organization of information security" and decisions implemented by this Policy
- report any threats to or irregularities in information security
- protect business secrets even after leaving the company

Relationship towards the community

Our company is part of the local communities and the countries in which we operate. This means that in our work we are required to protect not only the interests of our company, but also the broader interests. In that sense, we return a share of values that we have created to the community, as a sign of gratitude for the conditions and opportunities provided to us.

We do this by:

- assisting orphans, the sick, elderly and infirm, support gifted pupils and students; this requires the sensitivity, support and activity of all our employees

With the aim of conserving the environment, we aim to lead by example in reducing our detrimental impacts on the environment, preventing pollution, and ensuring the rational consumption of resources and energy.

As one of our fundamental principles, the legality of operations, we abide by the law and regulations in everything we do, and in so doing show our respect for the community in which we operate.

Relationship with the public

Our company has a reputation, its name and place in the public eye, which we have earned through our work and conduct.

It is important to be fair, open and accessible to the public, for all matters of interest to citizens and the community.

In our relationship with the public, every employee and associate is required to separate their personal opinions and attitudes from the company's policies and positions and to explicitly express this.

In order to ensure this rule is respected, company employees conduct themselves in line with the fundamental and ethical principles listed within this Code.

Prohibition of corruption and bribery

KING ICT believes in fair and transparent business. We do not tolerate any form of corruption or bribery. We comply with all regulations that prevent and sanction corruption. Given our international presence and partners, we also comply with all relevant international anti-corruption regulations such as the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA) and German Criminal Code.

KING ICT, its employees, subsidiaries and affiliates do not promise, offer, give or authorize, directly or indirectly, a bribe or anything of value to anyone, including government officials, government employees or representatives thereof, government-owned or controlled companies, private individuals or employees of any business entity, in order to inappropriately influence action or decision of that person with the purpose of realizing, preserving or securing any inappropriate benefit for KING ICT.

We prohibit all forms of money laundering, which includes the concealment or diversion of ill-gotten gains, or the conversion of such funds into legal assets.

We expect our employees and partners to report any suspicions regarding money laundering and corruption to us.

Antitrust and Competition Laws

We respect antitrust and competition laws and are aware of their importance for ensuring fair conditions of market competition, preventing unfair business practices and protecting consumers.

We strictly prohibit any participation in actions that are incompatible with fair market competition, such as agreements to fix or control prices, bid-rigging, boycotting suppliers or customers, and other.

Trade Compliance Laws and Regulations, Prohibition of Boycotts

We comply with all applicable domestic and global trade, export, import and economic sanctions regulations. We pay close attention to compliance with global trade regulations, especially those issued by the UN, the EU, the United Kingdom and the USA, and we know that our cooperation with international partners depends on this.

We do not tolerate participation in illegal international boycotts; all boycott requests must be reported immediately. We are all responsible for complying with trade regulations, and legal support will help you with questions.

Relations with the state, employees and officials in the public sector

We strictly comply with the laws, rules and regulations governing the procurement of goods and services and the execution of contracts with public and state bodies. Penalties for non-compliance with public procurement regulations are severe and include prison sentences, fines and bans from doing business.

We do not make donations to political parties and avoid all situations that may lead to a conflict of interest. We do not participate in illegal lobbying and adhere to domestic and international regulations regarding lobbying. In case of any questions or doubts, our legal support is at your disposal.

2. REPORTING IRREGULARITIES

If you suspect illegal or unethical actions or any actions or procedures that violate our rules, procedures, the Code or the law, we invite you to make a report to the Compliance Officer at compliance@king-ict.hr.

We will maintain, to the fullest extent permitted by law, the confidentiality of information about anyone seeking advice or reporting questionable conduct and/or potential injury. We will carefully examine the allegations in the application. We strictly prohibit retaliation against the reporting person.

3. IMPLEMENTATION OF THE CODE

All employees, expert associates, trainees, interns (pupils and students), who act on behalf of and for the account of the company in any way, are responsible for implementation of this Code.

4. ENTRY INTO FORCE

This Code enters into force as of the date of its signing, and it will be published on the company website.

Chairman of the Management Board:
Plamenko Barišić

Date of entry into force: 11.7.2022.

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