

## ANTI-BRIBERY POLICY

The management of KONČAR – Digital d.o.o. (hereinafter referred to as the Company) is dedicated and resolute in its commitment to adhering to the applicable requirements of the international standard ISO 37001 - Anti-Bribery Management System. The Company strives for continuous improvement of the system's suitability, adequacy, and effectiveness and seeks to define, monitor, and attain its objectives in order to mitigate the risk of bribery. The Company also ensures compliance with national legislation in all its business processes and interactions with stakeholders.

This Policy applies without exception to all processes within the Company and serves as a framework for implementing, maintaining, and continually improving the relevant system. Compliance with the principles and rules outlined in this Policy, as well as applicable laws and regulations, is mandatory for all employees. The Company expects its partners and other involved parties to also adhere to the principles and rules established in the Policy and to comply with relevant laws and regulations in their interactions with the Company.

Engaging in any form of promising, offering, giving, receiving, or seeking financial or non-financial benefits, whether directly or indirectly, with the purpose of incentivizing or rewarding Company employees, business partners, or any other stakeholders for specific actions or refraining from actions related to Company activities, which could be classified as bribery or any other illicit behaviour, is strictly prohibited. Any such attempt, proposal, or intention shall be reported through the designated procedure for reporting irregularities to the competent state authorities.

In order to accomplish the objectives outlined in this Policy, the Company has identified specific, measurable goals and established a framework in compliance with applicable laws and standards. The Company has also implemented procedures related to reporting and processing irregularities, protecting whistleblowers, and safeguarding the confidentiality of reported data. The Company fully supports the reporting of irregularities in good faith or based on reasonable suspicion and guarantees the protection of whistleblowers' rights without any form of retaliation or disadvantageous treatment.

The Compliance Monitoring Department has been entrusted with the responsibility of managing the Anti-Bribery Management System, operating within the scope of authority and responsibilities outlined by the ISO 37001 standard and in compliance with applicable laws of the Republic of Croatia. The Compliance Monitoring Department submits an annual report to the Management regarding the functioning and performance of the established system, including recommendations for improvement. The department has the necessary autonomy to enforce and implement anti-bribery measures effectively, without any conflicts of interest or undue influence.

The Company has made this Policy accessible to all employees, business partners, and other stakeholders through its website, providing versions in both Croatian and English languages.

In Zagreb, 5 October 2022

  
Goran Leci  
President of the Management Board

  
Stjepan Sučić  
Member of the Management Board