computers, consumer electronics & integrated solutions

Program izvozne usklađenosti KIM-TEC d.o.o. i vlasnički povezanih društava / Export Compliance Program(ECP)

KIM-TEC d.o.o. and Affiliated Companies' Export Compliance Program (ECP)

Sadržaj

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Izjava o usklađenosti

Uloga Programa izvozne usklađenosti KIM-TEC d.o.o. i vlasnički povezanih društava (u daljnjem tekstu: Program) ogleda se u poštovanju i usklađenosti KIM-TEC d.o.o. (u daljnjem tekstu: Društvo) sa svim zakonima o kontroli izvoza i privrednim sankcijama Sjedinjenih Američkih Država (kao što su: U.S. export control laws, Export Administration Regulations - EAR), Europske unije i drugih primenjivih jurisdikcija (zajedno "Primjenjivi trgovinski zakoni"). Sve što je naznačeno u ovom Programu da se primenjuje za Društvo primenjuje se i za njegova vlasnički povezana društva.

Društvo izjavljuje i garantuje da se ne nalazi u zemlji ili teritoriju koji je predmet ili meta ekonomskih sankcija prema važećim trgovinskim zakonima niti je samo predmet istih sankcija.

Društvo se pridržava svih zakona protiv korupcije koji se primjenjuju u RS kao i na teritoriju EU, uključujući američki Zakon o korupciji u inostranstvu (U.S. Foreign Corrupt Practices Act) i Zakon o podmićivanju Ujedinjenog Kraljevstva (UK Bribery Act).

Društvo je donijelo Antikorupcijsku politiku poslovanja, koju periodično preispituje i kontinuirano unapređuje te održava, nadzire i sprovodi antikorupcijske politike, procedure i interne kontrole. Društvo ima nultu stopu tolerancije na mito i korupciju, strogo prati i kontroliše troškove ugošćavanja i poklone te sprovodi interne edukacije svojih zaposlenika.

Antikorupcijska politika poslovanja javno je dostupna na web stranici h.......... na srpskom jeziku odnosno ista verzija na engleskom jeziku h...........

Compliance Statement

The role of the KIM-TEC d.o.o. and Affiliated Companies' Export Compliance Program (hereinafter referred to as the "Program") is the adherence and compliance of KIM-TEC d.o.o. (hereinafter referred to as the "Company") with all export control and economic sanction laws of the United States (such as the US export control laws, Export Administration Regulations (EAR)), the European Union, and other applicable jurisdictions (collectively referred to as "Applicable Trade Laws"). All parts of this Program are equally applicable to the Company and its affiliated companies.

The Company represents and warrants that it is not the subject or target of, or located in a country or territory that is the subject or target of economic sanctions under the Applicable Trade Laws.

The Company complies with all anti-corruption laws applicable in the Republic of Croatia and the European Union, including the US Foreign Corrupt Practices Act and the UK Bribery Act.

The Company has adopted, periodically reviews, and continues to improve its Anti-Corruption Policy and maintains, monitors, and implements anti-corruption rules, procedures, and internal controls. The Company has a zero-tolerance policy towards bribery and corruption, closely monitors and controls hospitality and gift expenses, and conducts internal employee training.

The Company's Anti-Corruption Policy is made accessible on its website in Serbian (........) and English (h......).

Društvo je usklađeno s globalnim zakonima o tržišnoj konkurenciji koji uopšteno zabranjuju nameštanje cena, raspodelu tržišta i kupaca, ograničavanje proizvodnje ili opskrbu proizvodima/uslugama, grupni bojkot ili nameštanje ponuda.

Društvo se pridržava i usklađen je sa svim Primjenjivim trgovinskim zakonima, što uključuje, a ne ograničava se na:

- dobivanje i ispunjavanje zahtjeva svih dozvola za izvoz i ponovni izvoz
- provjeru poslovnih partnera te posredno krajnjih kupaca:
  - ➢ po državama:
  - o https://ofac.treasury.gov/sanctions-programs-and-country-information,
  - o https://sanctionsmap.eu/#/main

Društvo nema poslovnu saradnju direktno ili indirektno sa pojedincima, entitetima, zemljama ili teritorijima pod sankcijama SAD-a, EU ili bilo koje druge primjenjive jurisdikcije (uključujući Sjevernu Koreju, Kubu, Iran, Sudan, Sirija, Krim, Rusija, Bjelorusija, regije Donjecka i Luganska u Ukrajini),

- ➢ po subjektima/entitetima i osobama
- o https://sanctionssearch.ofac.treas.gov/
- o https://scsanctions.un.org/search/
- o https://www.gov.uk/government/publications/the-uk-sanctions-list
- o https://www.trade.gov/consolidated-screening-list
- o https://www.cbp.gov/trade/trade-community/programs-outreach/blocked-denied-debarred
- o https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list

The Company complies with global competition laws that generally prohibit price fixing, market and customer allocation, production or product/service supply restrictions, group boycotts, and bid rigging.

The Company adheres to and complies with all Applicable Trade Laws, including but not limited to:

- Obtaining and meeting the requirements of all export and re-export licenses
- Vetting business partners and, indirectly, end customers
  - ➢ By country:
  - o https://ofac.treasury.gov/sanctions-programs-and-country-information,
  - o https://sanctionsmap.eu/#/main

The Company does not engage in direct or indirect business cooperation with individuals, entities, countries, or territories under sanctions by the US, EU, or any other applicable jurisdiction (including North Korea, Cuba, Iran, Sudan, Syria, Crimea, Russia, Belarus, the Donetsk and Luhansk regions of Ukraine),

- ➢ By subject/entity and individual
- o https://sanctionssearch.ofac.treas.gov/
- o https://scsanctions.un.org/search/
- o https://www.gov.uk/government/publications/the-uk-sanctions-list
- o https://www.trade.gov/consolidated-screening-list
- o https://www.cbp.gov/trade/trade-community/programs-outreach/blocked-denied-debarred
- o https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list

Društvo nema poslovnu saradnju sa licima i entitetima (subjektima) sa kojima je zabranjeno poslovati bilo da se radi o navedenima na Popisu posebno označenih državljana i blokiranih lica – tzv. **SDN listi (Specially Designated Nationals and Blocked Persons**) ili licima odnosno entitetima sa ostalih američkih lista entiteta (**the Entity List** https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list) ili licima sa liste odbijenih fizičkih i pravnih licaa Denied Persons List (DPL), ili licima sa liste ukinutih osoba – tzv. "Debarred Parties List" ili bilo kojoj drugoj jednakovrednoj listi primenjivoj u zemljama u kojima Društvo posluje.

Društvo ne učestvuje u pružanju usluga niti proizvoda čija je krajnja upotreba zabranjena **(Prohibited End Uses),** kao što su nuklearna tehnologija, raketna tehnologija, hemijsko i biološko oružje, pomorski nuklearni pogoni, ono što je namenjeno za krajnju upotrebu u vojsci, oružje za masovno uništenje, aktivnosti povezane sa naftom i iskorištavanjem i proizvodnjom zemnog plina.

- pridržavanje svih zakona protiv bojkota koji su na snazi u jurisdikcijama u kojima Društvo posluje.

  - https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list

The Company does not engage in business cooperation with prohibited individuals and entities (subjects) from the **Specially Designated Nationals and Blocked Persons List (SDN List),** individuals and entities from the US **Entity List** (https://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list), individuals from the Denied Persons List (DPL), individuals from the Debarred Parties List, or any other equivalent list in force in the countries where the company operates.

The Company does not participate in providing services or products that may be used in **Prohibited End Uses**, such as nuclear technology, missile technology, chemical and biological weapons, maritime nuclear facilities, items intended for military end-use, weapons of mass destruction, oil-related activities, or natural gas exploitation and production.

- The Company adheres to all anti-boycott laws that are in effect in the jurisdictions where the Company operates.

Program korporativne usklađenosti i etike i Etički kodeks

Program korporativne usklađenosti i etike KIM-TEC d.o.o. i vlasnički povezanih društava osigurava uspešno, transparentno i regulisano poslovanje usklađeno sa različitim zakonima, propisima, smernicama i drugim pravilima kao i internim pravilima, procedurama, standardima, strategijama, odlukama Društva i ostalim čime Društvo uz jake procese upravljanja rizicima i sisteme internih kontrola, uspešno upravlja rizicima i minimizira ako ne i anulira njihov utjecaj na poslovanje Društva i realizaciju njegovih kratkoročnih i dugoročnih ciljeva i postavlja okvire dozvoljenog i etičkog ponašanja.

Društvo je svojim Etičkim kodeksom utvrdilo najviše standarde, pravila ponašanja te etička načela kojih su se dužni pridržavati odnosno u skladu s njima postupati u poslovanju svi zaposleni, partneri i saradnici Društva te sva ostala lica, fizičke i pravne koje su na bilo koji način povezane s poslovanjem Društva. Neka od načela postupanja odnose se na zakonitost rada i poslovanja; načelo poštivanja integriteta i dostojanstva zaposlenih, načelo nulte stope tolerancije na diskriminaciju, mobbing i uznemiravanje; načelo nulte stope tolerancije na mito i korupciju; načelo izbegavanja i prevencije sukoba interesa, načelo poštenog tržišnog takmičenja; načelo nulte stope tolerancije na pranje novca i finansiranje terorizma, načelo usklađenosti sa kontrolom uvoza-izvoza, ograničenjima i sankcijama i ostala načela.

Corporate Compliance and Ethics Program and Code of Ethics

Alongside robust risk management processes and internal control systems, the KIM-TEC d.o.o. and Affiliated Companies' Corporate Compliance and Ethics Program helps ensure successful, transparent, and regulated operations in compliance with various laws, regulations, guidelines, and other rules, as well as with internal rules, procedures, standards, strategies, Company decisions, and other means successfully leveraged by the Company to manage, minimize, and remove risks in the Company's operations and the fulfillment of its short-term and long-term goals, setting the framework for permissible and ethical conduct.

Through its Code of Ethics, the Company has identified the highest standards, rules of conduct, and ethical principles that are binding on all its employees, partners, and collaborators, as well as any other individuals and legal entities affiliated with the Company in any way. Some of the guiding principles include lawful employment and business, respect for the integrity and dignity of workers, a zero-tolerance policy against discrimination, mobbing, and harassment, a zero-tolerance policy against bribery and corruption, avoidance and prevention of conflicts of interest, fair competition, a zero-tolerance policy against money laundering and terrorism financing, compliance with import-export controls, restrictions, sanctions, and other principles.

Procena rizika

Društvo sprovodi „Strategiju upravljanja rizicima“ kao i „Pravilnik o sistemu upravljanja rizicima“ te na godišnjem nivou procenjuje rizike i dopunjava svoj Katalog rizika te u skladu sa navedenim donosi odluke o tretmanu pojedinih rizika u zavisnosti od njihovog uticaja na poslovanje odnosno na ostvarenje strateških ciljeva, ali i verovatnosti da se takvi rizici pojave.

Svaka poslovna saradnja znači određeni rizik i kada se radi o rizicima koji izviru iz trgovine i izvoza Društvo je svesno da je jedan od ključnih pokazatelja rizika koliko dobro poznaje svoje kupce, ali i uopšteno sve poslovne partnere te iz tog razloga kontinuirano procenjuje rizike koji se odnose na njegove poslovne partnere. Sledom navedenog, Društvo je donijelo dokumente „Pravila o postupku upravljanju kupcima“ i „Pravila o postupku upravljanja dobavljačima“ kojih se svi zaposleni Društva moraju strogo pridržavati i u skladu sa njima postupati.

Risk Assessment

The Company implements the Risk Management Strategy and the Risk Management System Regulations, carries out annual risk assessments, and updates its Risk Catalog, using them as a basis for its decision on treating specific risks based on their impact on its operations or the fulfillment of its strategic goals, as well as the likelihood of such risks occurring.

Every business collaboration involves a certain level of risk; when it comes to trade and export risks, the Company is aware that how well it knows its customers and business partners is one of the key risk indicators. For this reason, the Company regularly assesses risks relating to its business partners. Consequently, the Company has adopted its Customer Management Procedure Rules and Supplier Management Procedure Rules, which are binding for all Company employees.

Upozorenja - red flags

Crvene zastavice su upozorenja koja se ne smiju ignorisati i koja mogu uputiti na kršenje Primenjivih trgovinskih zakona, a time i neusklađenost izvoza:

A. Kupac (poslovni partner)

- Kupac je pridružen ili povezan s bilo kojim pojedincem ili subjektom na koje se primjenjuju sankcije.
- Kupac ili njegov zastupnik nerado pružaju standardne informacije o vlastitom identitetu, njegovom upravljanju i korisnicima.
- Dostupno je malo ili nimalo informacija na internetu o Kupcu.
- Upiti se primaju od pojedinaca koje se može kontaktirati samo putem broja poštanskog pretinca ili broja mobilnog telefona.
- Kupac je nedavno osnovan i ima na raspolaganju značajna finansijska sredstva, a nejasno je kako je došao u posjed tih finansijskih sredstava.
- Korporativna struktura Kupca uključuje holding društvo smešteno u offshore jurisdikciji.

Red Flags

Red flags are warnings that must not be ignored as they may indicate a violation of Applicable Trade Laws and non-compliance with exports:

A. Client (business partner)

- The Customer is associated or connected with individuals or entities subject to sanctions.
- The Customer or their agent is reluctant to provide standard information about their identity, management, and clients.
- Little or no information is available online about the Customer.
- Inquiries are received from individuals who can only be contacted through a mailbox number or mobile phone number.
- The Customer is a recently established business with significant financial resources, but it is unclear how they acquired these resources.
- The corporate structure of the Customer includes a holding company located in an offshore jurisdiction.

B. Proizvodi i usluge

- Kupac nije upoznat s korišćenjem robe ili usluga i/ili ne postavlja komercijalna ili tehnička pitanja koja se obično postavljaju tokom poslovnih pregovora.
- Roba ili usluge koje Kupac želi kupiti nisu u skladu sa informacijama poznatim o aktivnostima ili mestu poslovanja Kupca.
- Mogućnosti proizvoda ne odgovaraju poslovanju i onome čime se Kupac doista bavi;
- Kupac nerado nudi informacije o krajnjoj upotrebi artikla;
- Kupac odbija rutinske usluge instalacije, obuke ili održavanja
- Naručeni artikl nije kompatibilan s tehničkim nivoom zemlje u koju se otprema;
- Kupac se ne izražava jasno da li će kupljeni proizvod biti namenjen za sopstvenu upotrebu, za izvoz ili za ponovni izvoz.

C. Otprema/isporuka

- Kupac ili njegov zastupnik nerado pružaju standardne informacije o krajnjoj upotrebi robe ili usluga ili konačnom odredištu robe ili mestu gde se usluge pružaju.
- Neobični uslovi otpreme ili isporuke ili nije jasno hoće li doći do ponovne otpreme i gde;
- Špediterska tvrtka navedena je kao konačno odredište proizvoda;
- Ruta dostave nije uobičajena za proizvod i odredište;
- Datumi isporuke su nejasni ili su isporuke planirane izvan puta odredišta;
- Pakiranje nije u skladu s načinom otpreme ili odredišta (npr. pakiranje u plovidbi za dostavu unutar Europe).

Products and services

- The Customer is unfamiliar with the use of the goods or services and/or does not ask typical commercial or technical questions in business negotiations.
- The Customer wants to purchase goods or services that do not align with known information about the Customer's activities or business location.
- The product's capabilities do not fit the Customer's line of business and actual activities.
- The Customer is reluctant to provide information about the end-use of an item.
- The Customer refuses routine installation, training, or maintenance services.
- The ordered item is incompatible with the technical level of the country to which it is being shipped.
- The Customer is unclear about whether the purchased product is intended for their own use, for export, or for re-export.

C. Shipping/Delivery

- The Customer or their agent is reluctant to provide standard information about the end-use of goods or services or the final destination of goods or the location where services are provided.
- Unusual shipping or delivery conditions, or it is unclear whether there will be re-shipping and where.
- A freight forwarding firm is listed as the final destination of a product.
- The shipping route is not typical for the product and destination.
- Delivery dates are vague, or deliveries are planned for out-of-the-way destinations.

D. Uslovi plaćanja

- Uslovi plaćanja ili način plaćanja su neobični i odnose se npr. na plaćanje gotovinom kada je kupac spreman odmah platiti veliki iznos u gotovini (nebankarski transferi) kada bi uslovi prodaje obično zahtevali finansiranje;
- Kupac nudi plaćanje cene znatno iznad uobičajene tržišne vrijednosti za predmetnu robu ili usluge.
- Kupac insistira na korištenju banaka koje nisu dobro poznate ili na korištenju gotovine ili kriptovalute.

Provera poslovnih partnera, krajnje upotrebe i izvoznih licenci

Društvo prodaje, izvozi ili ponovno izvozi robu samo u one zemlje za koje poseduje dozvole.Društvo zaključuje ugovore i realizuje poslovnu suradnju isključivo sa poslovnim partnerima koji su se obavezali da robu nabavljenu od Društva prodati isključivo pravnim i fizičkim osobama/subjektima/entitetima koje se ne nalaze na primjenjivim sankcijskim listama odnosno zemljama ili teritorijima koje se ne nalaze pod sankcijama SAD-a odnosno EU-a ili druge primjenjive jurisdikcije te da istu robu neće koristiti u zabranjene krajnje svrhe.

- Packaging is inconsistent with the shipping method or destination (e.g., packaging for maritime transport for shipping within Europe).

D. Terms of payment

- Unusual payment terms or methods, such as when the customer is willing to immediately pay a large amount in cash (non-bank transfers) when the terms of sale would normally call for financing.
- The Customer offers to pay a price for goods or services that is significantly higher than the usual market value.
- The Customer insists on using obscure banks or paying in cash or cryptocurrency.

Verification of Business Partners, End-Uses, and Export Licenses

The Company sells, exports, or re-exports goods only to countries for which it possesses licenses.

The Company enters into contracts and conducts business exclusively with business partners who are committed to selling any goods obtained from the Company only to individuals, entities, and subjects that are not on any applicable sanction lists, or in countries or territories subject to sanctions by the US, the EU or other applicable jurisdictions, and who commit not to use the goods for prohibited end-uses.

Kontrole potencijalnih poslovnih partnera i naknadne kontrole

Prije započinjanja poslovne saradnje sa potencijalnim poslovnim partnerom, sprovode se brojne kontrole opisane u dokumentima Pravila o postupku upravljanja kupcima i Pravila o postupku upravljanja dobavljačima, sve u skladu sa poznatim standardom „Know your customer“.

Tek nakon što potencijalni partner prođe detaljne kontrole od strane odgovornih organizacijskih jedinica i lica, moguće je otvoriti novog partnera u bazi podataka i započeti poslovnu saradnju prema pravilima definisanim za nove poslovne partnere i u skladu sa sklopljenim ugovorima.
Prva kontrola poslovnih partnera nije i konačna budući da se kontrole sprovode kontinuirano i periodično.
U slučaju da se neki od kupaca nalazi na sankcijskoj listi, bez ikakvog odglaganja obaveštava se Direktor društva, pravna služba i financije, provjerava se poslovni odnos sa kupcem, proveravaju se kompletni podaci a kupca se blokira u sustavu i onemogućuje daljnja poslovna suradnja odnosno bilo kakva prodaja robe.

Controls on Potential Business Partners and Subsequent Checks

Before establishing a business collaboration with a potential business partner, the Company conducts various checks defined in its Customer Management Procedure and Supplier Management Procedure, in accordance with the established Know Your Customer standards.

A new partner may be added to the database and commence business collaboration only after undergoing detailed checks by responsible organizational units and individuals, based on the rules for new business partners and in accordance with duly executed contracts.

The initial check of business partners is not final and checks are repeated continually and periodically.

The Company’s Board, legal department, and finance department must be promptly informed if a customer appears on any sanction lists. The business relationship with the customer is identified, all data screened, and the customer is blocked in the system to prevent any further business collaboration or any sale of goods .

Trening zaposlenih

U skladu sa ovim Programom, Društvo edukuje svoje zaposlene i sprovodi interne treninge jednom godišnje odnosno češće prema potrebi. Pored zaposlenika, treninge prolazi menadžment i Uprava Društva.

Vođenje evidencije

Društvo poštuje sve zakone i propise prema kojima svu dokumentaciju vezanu uz poslovne transakcije čuva minimalno 5 godina odnosno neke dokumente čuva i trajno.

Sve računovodstvene evidencije Društva u skladu su sa zakonima i propisima RS, EU i ostalih zemalja u kojima Društvo posluje, kao i Međunarodnim računovodstvenim standardima te održavaju stvarno i istinito stanje poslovanja pojedinog poduzeća.

Društvo i svi financijski izvještaji, revidirani su od strane renomiranih revizijskih društava. Revizorski izveštaji su javno dostupni dokumenti na web stranici Agencije za privredne registre.

Employee Training

In accordance with this Program, the Company educates its employees and conducts internal training sessions once a year, or more frequently as needed. In addition to employees, training is also provided to the Company's management and Board.

Record-Keeping

The Company complies with all laws and regulations that require keeping all documents related to business transactions for at least 5 years. Some documents are kept permanently.

All Company's accounting records accurately and truthfully reflect the individual operations of each company and are compliant with the laws and regulations of the Republic of Serbia, the EU, and other countries where the company operates, as well as international accounting standards.

The Company and all financial statements are audited by reputable audit firms. Audit reports are publicly available on the Company's website at Serbian Business Registers Agency.

Radnje koje je potrebno činiti ili izbegavati

Društvo upućuje sve svoje zaposlene na radnje i aktivnosti koje je potrebno preduzimati odnosno izbegavati.

Potrebno je preduzimati sledeće	Potrebno je izbegavati i ne preduzimati
Shvatiti široku definiciju lica koje moraju poštovati sankcije i/ili kontrole izvoza.	Ne uključujte drugog učesnik Društva u posao u kojem je zabranjeno učestvovati u skladu s primjenjivim sankcijama i/ili kontrolama izvoza.
Utvrditi potencijalne sankcije i/ili probleme s kontrolama izvoza te pomoći drugim učesnicima da to učine (tj. navesti rizike).	Nemojte pretpostavljati da su sankcije i/ili kontrole izvoza relevantne samo unutar EU-a ili SAD-a i nemojte zatvarati oči pred crvenim zastavicama.
Postavljati pitanja i tražiti smernice od pravnog sektora Društva ili sektor za usklađenost.	Nemojte poduzimati mere u području sankcija i/ili kontrola izvoza kada vam nisu jasne informacije koje se odnose na određenu transakciju.
Upoznati strukturu, činjenične elemente i način izvršenja transakcija u kojima učestvujete.	Nemojte skrivati elemente transakcije i uvijek pružajte puni stepen transparentnosti u vezi sa svojim projektima svim uključenim učesnicima Društva.
Utvrditi može li bilo koji od zadataka pod vašim odgovornostima kršiti primenjive sankcije i/ili kontrole izvoza i odmah o tome obavestiti svog direktno nadređenog rukovodioca.	Nemojte izvršavati zadatak za koji imate razloga verovati da vam je zabranjeno obavljati je zbog primenjivih sankcija i/ili kontrola izvoza.

Actions to Take or Avoid

All Company employees are instructed on actions and activities that need to be taken or avoided.

Actions to Take	Actions to Avoid
Understand the broad definition of persons who must comply with sanctions and/or export controls.	Do not involve other Company stakeholders in business if involvement is prohibited under applicable sanctions and/or export controls.
Identify potential sanctions and/or export control issues and help other stakeholders do so (i.e., flag the risks).	Do not assume that sanctions and/or export controls are only relevant within the EU or the US, and do not turn a blind eye to red flags.
Ask questions and seek guidance from the Company's legal or compliance department.	Do not take actions in the field of sanctions and/or export controls when any information relating to a specific transaction is unclear to you.
Know the structure, factual elements, and manner of performance of the transactions you are involved in.	Do not hide elements of a transaction and always provide full transparency regarding your projects to all Company stakeholders involved.
Assess if any of the tasks under your responsibilities may violate applicable sanctions and/or export controls and immediately inform your line manager.	Do not carry out a task that you have reasons to believe is prohibited for you to carry out due to applicable sanctions and/or export controls.

Obavijestiti nadređene, Upravu, pravni sektor ili sektor za usklađenost Društva ako se radi o poslovnim zadacima zabranjenim u skladu s primenjivim sankcijama i / ili kontrolama izvoza.	Nemojte prisiljavati ili vršiti pritisak na bilo koga, bilo eksplicitno ili implicitno, da izvršava zadatke zabranjene primenjivim sankcijama i/ili kontrolama izvoza.
Osigurati da se poslovanje zabranjeno primjenjivim sankcijama i/ili kontrolama izvoza ne prosleđuje povezanim društvima ili društvima kćerima sa svrhom ili učinkom zaobilaženja primenjivih sankcija i kontrola izvoza.	Ni na koji način ne smijete podržavati aktivnosti kojima se, namerno ili kao rezultat aktivnosti, zaobilaze zabrane u skladu s primenjivim sankcijama i kontrolama izvoza.
Prepoznajte razliku između statusa subjekta za koji radite i vašeg individualnog statusa u skladu s primjenjivim sankcijama i/ili zakonima o kontroli izvoza.	Nemojte pretpostavljati da je status subjekta za koji radite uvijek jednak vašem ličnom statusu u skladu s primjenjivim zakonima o sankcijama i kontroli izvoza.

Notify your superiors, the Company's Board, legal department, or compliance department if you are dealing with business tasks that are prohibited under applicable sanctions and/or export controls.	Do not force or pressure anyone, either explicitly or implicitly, to perform tasks prohibited under applicable sanctions and/or export controls.
Ensure that business prohibited under applicable sanctions and/or export controls is not forwarded to affiliates or subsidiaries with the purpose or effect of circumventing applicable sanctions and export controls.	Never support any activities that circumvent the prohibitions under applicable sanctions and export controls, either deliberately or as a result of the activity.
Recognize the difference between the status of the entity that you work for and your individual status under applicable sanctions and/or export control laws.	Do not assume that the status of the entity that you work for is always identical to your personal status under applicable sanctions and export control laws.

Sankcije

Povreda ili samo pretpostavka povrede ovog Programa može biti štetna za ugled Društva u celini, kao i njegovih zaposlenih te izazvati reputacijsku, finansijsku i druge štete. Društvo, njezini zaposleni i predstavnici mogu biti izloženi krivičnim, građanskim i mandatnim kaznama, uključujući zatvor i/ili novčane kazne. Povredom ovog Programa ili zakona na kojima se on zasniva, zaposleni podležu disciplinskim merama, uključujući otkaz ugovora o radu.

Prijava povreda ili sumnjivih delatnosti

Društvo zastupa nultu toleranciju prema nezakonitim i/ili neetičnim radnjama odnosno postupcima koji krše ovaj Program, bilo od strane zaposlenih Društva ili poslovnih partnera.

Ako primetite nešto sumnjivo, prijavite to Vašem rukovodiocu, pravnoj službi ili sektoru za usklađenost lično ili anonimno. Vi ste odgovorni za prijavljivanje događaja za koje verujete da krše ovaj Program, pa i ako Vaš nadređeni krši isti.

Društvo neće tolerisati šikaniranje onoga tko u dobroj veri podnese prijavu ili sarađuje u postupku istrage, čak i ako se optužbe pokažu neosnovanim. Ukoliko primietite šikaniranje, prijavite ga.

Dužni ste sarađivati u istrazi, u suprotnom podležete disciplinskim merama.

U Beogradu, 30.01.2024. godine

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Vladimir Matijević, direktor

Sanctions

Any violation or any appearance of a violation of this Program can harm the image of the Company and its employees and cause reputational, financial, and other types of damage. The Company, its employees, and representatives may be subject to criminal, civil, and regulatory penalties, including imprisonment and/or fines. Any employee found violating this Program or underlying laws will be subject to disciplinary actions, including termination of employment.

Reporting Violations or Suspicious Activities

The Company advocates zero tolerance for illegal and/or unethical actions and behaviors of Company employees or business partners that violate this Program.

If you notice anything suspicious, report it to your supervisor, our legal department, or our compliance department personally or anonymously. You are responsible for reporting any events you believe may violate this Program, even if the violator is your supervisor.

The Company will not tolerate harassment of anyone who reports or cooperates in the investigation in good faith, even if the accusations prove to be unfounded. If you notice harassment, report it.

You are required to cooperate in the investigation; otherwise, you may be subject to disciplinary actions.

In Belgrade, January 30, 2024

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Vladimir Matijević, managing director

KIM-TEC d.o.o.

Viline vode bb, 11000 Beograd (Opština Palilula), Srbija