



ETIČKI KODEKS

KIM-TEC D.O.O.

I VLASNIČKI POVEZANIH DRUŠTAVA

30.01.2024.

CODE OF ETHICS

OF KIM-TEC D.O.O.

AND AFFILIATED COMPANIES

30/01/2024

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I. Opšte odredbe

Ovim Etičkim kodeksom utvrđuju se najviši standardi, pravila ponašanja te etička načela kojih su se dužni pridržavati odnosno u skladu s njima postupati u poslovanju svi zaposleni, partneri i saradnici KIM-TEC d.o.o. i vlasnički povezanih društava (u daljnjem tekstu zajedno: Društvo) te sva ostala lica, fizička i pravna koje su na bilo koji način povezana s poslovanjem Društva (dalje u tekstu zajedno: učesnici).

Etički kodeks Društva (dalje u tekstu: Kodeks) sastavljen je i donesen radi omogućavanja uvida svim zainteresovanim licima u etička pravila koja Društvo smatra ključnim za svoje uspješno poslovno delovanje, kako unutar tako i izvan Društva.

Društvo smatra veoma važnim da ovaj Kodeks bude osnovom svakodnevnog postupanja svih učesnika.

II. Sadržaj kodeksa

NAČELO POŠTOVANJA ZAKONA I DRUGIH PROPISA - ZAKONITOST RADA I POSLOVANJA

Svi zaposleni Društva dužni su pri obavljanju poslova pridržavati se važećih zakona i drugih propisa, odredaba ovog Kodeksa, opštih akata, pravilnika i procedura Društva, kao i Ugovora o radu te primjenjivati i provoditi najviše stručne, poslovne i etičke standarde i norme i na taj način osigurati zakonitost u radu i poslovanju u skladu sa poslovnim ugledom Društva.

Od direktora i menadžera Društva očekuje se da:

- poštuju načela Kodeksa, da se ponašaju u skladu s Kodeksom i promovišu osnovne vrednosti Društva na svim nivoima poslovanja te svojim postupcima pokazuju važnost pridržavanja Kodeksa;
- stvaraju radnu okolinu koja podstiče zakonito i etičko ponašanje i omogućava zaposlenim da postavljaju pitanja i izražavaju svoju zabrinutost oko mogućih povreda;

I. General provisions

This Code of Ethics sets out the highest standards, codes of conduct and ethical principles that must be adhered to or complied with in their business operations by all employees, partners and associates of KIM-TEC d.o.o. and affiliated companies (hereinafter collectively: the Company) and all other persons, natural and legal, in any way related to the business of the Company (hereinafter collectively: stakeholders).

The Code of Ethics (hereinafter: the Code) has been drawn up and adopted in order to provide insight to all interested persons into the ethical rules that the Company considers essential for successful business activities, both within and outside the Company.

The Company considers it extremely important that this Code be the basis of daily conduct of all stakeholders.

II. Content of the code

PRINCIPLE OF COMPLIANCE WITH LAWS AND OTHER REGULATIONS - LEGALITY OF WORK AND BUSINESS

All employees of the Company must comply with the applicable laws and other regulations, the provisions of this Code, general acts, company regulations and procedures, as well as the Employment Contract, and to apply and implement the highest professional, business and ethical standards and norms, thus ensuring legality in work and operations in accordance with the Company's business reputation.

Members of the Management Board, the Supervisory Board and Company managers are expected to:

- respect the principles of the Code, act in accordance with the Code and promote the fundamental values of the Company at all levels of business, and demonstrate the importance of adhering to the Code through their actions;
- create a working environment that encourages lawful and ethical

- podstiču blagovremeno sticanje potrebnog osposobljavanja zaposlenih vezano za sadržaj i primenu ovog Kodeksa i drugih važećih procedura i pravila Društva te na odgovarajući način prate postupke svojih zaposlenih;
- ne zataškavaju ponašanje suprotno Kodeksu te odmah izveštavaju ovlašćena lica o svim prijavama nezakonitih ili neetičnih radnji odnosno bilo kojih drugih radnji ili postupaka kojima se krše pravila Društva.

NAČELO POŠTOVANJA INTEGRITETA I DOSTOJANSTVA NAČELO NULTE STOPE TOLERANCIJE NA BILO KAKVU DISKRIMINACIJU, MOBBING I UZNEMIRAVANJE

Od radnika, rukovodioca i menadžera se očekuje da u okviru svojih nadležnosti osiguraju ostvarivanje prava, poštovanje integriteta i dostojanstva svih radnika bez diskriminacije ili povlašćivanja na bilo kojoj osnovi. Svako ponašanje suprotno od napred navedenog protivno je stavovima i praksama Društva.

Svi zaposleni, direktor, rukovodioci i menadžeri trebaju biti poštovani kao osobe u skladu sa zagaranovanim pravima na život, integritet i dostojanstvo.

Radnik, direktor, rukovodioci i menadžeri imaju pravo na zaštitu od uznemiravanja, odnosno svakog neželjenog ponašanja uzrokovanog rasom ili etničkom pripadnošću ili bojom kože, odnosno radi spola, jezika, vere, političkog ili drugog uverenja, nacionalnog ili socijalnog porekla, imovnog stanja, članstva u sindikatu, obrazovanja, društvenog položaja, bračnog ili porodičnog statusa, starosti, zdravstvenog stanja, invaliditeta, genetskog nasleđa, rodnog identiteta, izražavanja ili polne orijentacije a ima za cilj ili stvarno predstavlja povredu dostojanstva te uzrokuje strah, neprijateljsko, ponižavajuće ili uvredljivo okruženje.

Radnik, rukovodioci i menadžeri imaju pravo na zaštitu od polnog uznemiravanja, odnosno ponašanja koje predstavlja verbalno, neverbalno ili fizičko ponašanje seksualne prirode koje ima za cilj ili stvarno predstavlja povredu dostojanstva,

behaviour and allows employees to ask questions and express their concerns about possible infringements;

- encourage the timely acquisition of the necessary training of employees regarding the content and application of this Code and other applicable procedures and rules of the Company, and adequately monitor the actions of their employees;

- not conceal any conduct contrary to the Code and immediately inform authorised persons of all reports of illegal or unethical actions or any other actions or procedures that violate the rules of the Company.

PRINCIPLE OF RESPECT FOR INTEGRITY AND DIGNITY PRINCIPLE OF ZERO TOLERANCE TO ANY DISCRIMINATION, MOBBING AND HARASSMENT

Employees, members of the Management Board, the Supervisory Board and managers are expected, within their respective competencies, to ensure the exercise of rights, respect for the integrity and dignity of all employees without discrimination or privilege on any basis. Any behaviour contrary to the above is contrary to the views and practices of the Company.

All employees, members of the Management Board, the Supervisory Board and managers should be respected as persons in accordance with the guaranteed rights to life, integrity and dignity.

Employees, members of the Management Board, the Supervisory Board and managers have the right to protection against harassment, that is, any unwanted behaviour provoked by race or ethnicity or skin colour, or for reasons of gender, language, religion, political or other belief, national or social origin, property status, trade union membership, education, social status, marital or family status, age, health status, disability, genetic heritage, gender identity, expression or sexual orientation, that is aimed at or actually constitutes a violation of dignity and causes fear, hostile, degrading or abusive environment.

Employees, members of the Management Board, the Supervisory Board and managers have the right to protection from sexual harassment, that is, behaviour that represents verbal, non-verbal

koje uzrokuje strah, neprijateljsko, ponižavajuće ili uvredljivo okruženje.

NAČELO NULTE STOPE TOLERANCIJE NA MITO I KORUPCIJU

Zaposleni Društva i treća lica koja deluju u njihovo ime ne obećavaju, nude, daju ili odobravaju, direktno ili indirektno, mito ili bilo koju vrednost ikome, uključujući vladine službenike, zaposlene ili predstavnike iste, društva u vlasništvu ili pod kontrolom države, privatna lica ili zaposlene bilo kog poslovnog subjekta, čime bi nepropisno uticali na radnju ili odluku tog lica sa svrhom ostvarenja, očuvanja ili osiguranja bilo kakve neprimjerene koristi za Društvo.

Za dalje informacije upućuje se na Antikorupcijsku politiku poslovanja, koja se nalazi na linku https://www.kimtec.rs/wp-content/uploads/2024/02/antikorupcijska-politika-poslovanja-KIMTEC-2024_sign.pdf

NAČELO IZBEGAVANJA I PREVENCIJE SUKOB A INTERESA

Zaposleni Društva ne smeju dopustiti da lični interesi i odnosi dovode do situacija koje mogu uticati na mogućnost objektivnog prosuđivanja i etičkog i profesionalnog obavljanja radnih zadataka. Zaposleni Društva su dužni izbegavati svaki sukob interesa i po saznanju o mogućem postojanju istog, odmah obavestiti direktora i ovlašćene osobe na osnovu ovog Kodeksa. Ukoliko se utvrdi postojanje sukoba interesa pojedinog zaposlenog isti će biti izuzet od odlučivanja u predmetu u kojemu se nalazi u sukobu interesu i to na sopstveni zahtev ili na osnovu odluke direktora.

NAČELO POŠTENE TRŽIŠNE KONKURENCIJE

Društvo je predano načelu poštene tržišne konkurencije i u jednakoj meri očekuje poštovanje istog od strane svih svojih zaposlenih, poslovnih partnera i dobavljača. Svoje dobavljače i poslovne partnere Društvo ne ograničava na nedopušteni način u njihovom pojavljivanju na tržištu i posvećeno je stvaranju jednakih uslova za sve svoje poslovne partnere.

or physical behaviour of a sexual nature that is aimed at or actually constitutes a violation of dignity, which causes fear, hostile, degrading or abusive environment.

PRINCIPLE OF ZERO TOLERANCE TO BRIBERY AND CORRUPTION

The employees of the Company and third parties acting on its behalf do not promise, offer, give or approve, directly or indirectly, bribes or any value to anyone, including government officials, employees or representatives, companies owned or controlled by the state, private persons or employees of any business entity, which would improperly influence the action or decision of that person with the purpose of obtaining, preserving or securing any improper benefit for the Company.

For further information, reference is made to the Anti-Corruption and Anti-Bribery Policy, which can be found at the following link https://www.kimtec.rs/wp-content/uploads/2024/02/antikorupcijska-politika-poslovanja-KIMTEC-2024_sign.pdf

PRINCIPLE OF AVOIDING AND PREVENTING CONFLICTS OF INTEREST

The Company's employees must not allow personal interests and relationships to result in situations that may affect the ability to make objective judgments and to perform work duties ethically and professionally.

The Company's employees must avoid any conflict of interest and, upon the knowledge of the possible existence of such conflict, immediately inform the Managing director and authorised persons pursuant to this Code. If the existence of a conflict of interest of an individual employee is determined, the individual shall be exempted from deciding in the case in which the conflict of interest occurred, either at their own request or on the basis of a decision of the Managing director.

PRINCIPLE OF FAIR COMPETITION

The Company is committed to the principle of fair competition and expects equal commitment by all its employees, business partners and suppliers. The Company does not restrict its suppliers and business partners in their market appearance in an unlawful manner, and is committed to creating a level playing field for all its business partners.

NAČELO ODGOVORNOG UPRAVLJANJA IMOVINOM, POSLOVNIM FINANSIJAMA I POSTUPKOM NABAVKE

Zaposleni koji rade na poslovima upravljanja imovinom, finansijskim poslovima i poslovima nabavke dužni su se pridržavati i dodatnih etičkih načela prema specifičnim standardima struke.

Zaposleni koji rade na navedenim poslovima dužni su izbjegavati sve pokušaje uticanja na donošenje objektivnih i nepristrasnih odluka i u obavljanju poslova postupati odgovorno i s pažnjom dobrog stručnjaka.

Poslovi nabavke roba, usluga i radova obavljaju se prema načelu osiguranja očekivane vrednosti za uloženi novac.

NAČELO NULTE STOPE TOLERANCIJE NA PRANJE NOVCA I FINANSIRANJE TERORIZMA

Društvo kontinuirano sprovodi kontrolu novih potencijalnih poslovnih partnera kao i postojećih poslovnih partnera koristeći brojne alate i postupke kao i edukacijom zaposlenih kako bi prepoznali rizike u poslovanju i promptno informisali menadžment, i odgovorne službe. Pored toga je uspostavljen jak sistem upravljanja rizicima te pouzdan sistem internih kontrola kojima Društvo svodi rizike u poslovanju na najmanju moguću meru ili u potpunosti onemogućava njihovu pojavu i uticaj na realizaciju ciljeva Društva.

NAČELO STRUČNOSTI I ODGOVORNOSTI - PROFESIONALNOST U POSLOVANJU

Od svih zaposlenih i menadžera očekuje se odgovorno, savesno i profesionalno ispunjavanje svih obaveza prema kolegama, saradnicima, poslovnim partnerima i ostalim učesnicima.

Zaposleni i menadžeri dužni su izbjegavati bilo kakve aktivnosti koje mogu štetiti njihovoj struci, profesionalnosti i objektivnosti u radu i suzdržavati se od aktivnosti koje su suprotne interesima Društva.

Svako netačno prikazivanje činjenica, prikrivanje i zadržavanje podataka i informacija na osnovu kojih bi zaposleni ostvarili korist za sebe ili drugog ili naštetili interesima Društva strogo je zabranjeno.

PRINCIPLE OF RESPONSIBLE MANAGEMENT OF ASSETS, BUSINESS FINANCES AND PROCUREMENT PROCEDURE

Employees working in asset management, financial affairs and procurement activities are required to adhere to additional ethical principles according to specific industry standards.

Employees working in the specified areas must avoid any attempts of influencing objective and impartial decision-making and act responsibly and with due skill, care and diligence in the performance of their duties.

The procurement of goods, services and works shall be carried out according to the principle of ensuring the expected value for money.

PRINCIPLE OF ZERO TOLERANCE FOR MONEY LAUNDERING AND TERRORIST FINANCING

The Company continuously controls new potential business partners as well as existing business partners, using numerous tools and procedures and educating employees, in order to identify business risks and promptly inform the managers, the Management Board and responsible services. In addition, a strong risk management system and a strong system of internal controls have been established, whereby the Company minimizes risks to business operations or completely prevents their occurrence and impact on the realization of the Company's goals.

PRINCIPLE OF EXPERTISE AND RESPONSIBILITY - BUSINESS PROFESSIONALISM

All employees, and managers are expected to responsibly, conscientiously and professionally fulfil all obligations toward colleagues, associates, business partners and other stakeholders.

Employees, members of the Management Board, the Supervisory Board and managers must avoid any activities that may harm their profession, professionalism and objectivity in their work and must refrain from activities that are contrary to the interests of the Company. Any misrepresentation of facts, concealment or retention of data and information, by which employees would benefit themselves or others or harm the interests of the Company, is strictly prohibited.

Zaposleni i menadžeri su dužni da se prema kolegama, saradnicima i poslovnim partnerima odnose sa poštovanjem, kao i prema svim ostalim licima sa kojima stupaju u kontakt prilikom obavljanja poslova.

NAČELO POVERENJA I KOLEGIJALNOSTI

Zaposleni su dužni međusobno i u svom poslovanju postupati na način koji se zasniva na uzajamnom poverenju i uvažavanju, korektnosti i poštovanju ličnosti i dostojanstvu učesnika.

Poslodavac će osigurati sigurne uslove rada svim svojim zaposlenim i obezbediće im sve podatke, informacije i sredstva potrebna za kvalitetan rad, a već prilikom zaključenja ugovora o radu će im omogućiti da se upoznaju sa svim internim propisima, standardima i postupcima potrebnim za kvalitetno obavljanje poslova u skladu sa zakonskim okvirom.

NAČELO TIMSKOG RADA I PROFESIONALNE KOMUNIKACIJE

Društvo podstiče kulturu timskog rada koja je neophodna za efikasno i stručno obavljanje posla i istu su zaposleni obavezni razvijati i kontinuirano međusobno horizontalno i vertikalno komunicirati. Komunikacija se treba zasnivati na međusobnom uvažavanju i profesionalnom odnosu.

Radnici su obavezni da se u komunikaciji suzdržavaju od svakog oblika diskriminacije i izbegavaju poticanje ili širenje glasina i ogovaranje kao i stvaranje negativne radne atmosfere.

NAČELO POVERLJIVOSTI LIČNIH PODATAKA I INFORMACIJA U POSLOVANJU, SIGURNOST IT SISTEMA

Lični podaci o zaposlenim i kandidatima za radna mesta u Društvu kao i podaci i informacije o korisnicima usluga/proizvoda i drugim poslovnim partnerima dobijeni direktnim ili indirektnim putem poverljivi su i štite se u skladu sa važećim zakonskim propisima i aktima Društva.

U obavljanju svojih poslova zaposleni su dužni čuvati poslovnu tajnu bez obzira na način na koji su je saznali. Svi podaci o Društvu, njegovim zaposlenim, poslovnim partnerima, ugovorima,

Employees, members of the Management Board, the Supervisory Board and managers must treat their colleagues, associates and business partners with respect, and the same applies to all other persons that they come in contact with in their operations.

PRINCIPLE OF TRUST AND COLLEGIALITY

Employees must act with each other and in their operations in a way that is based on mutual trust and respect, fairness and respect for the personality and dignity of stakeholders.

The Employer shall ensure safe working conditions for all employees and make available to them all the data, information and resources necessary for quality work and, at the time of concluding the employment contract, shall make available to them all internal regulations, standards and procedures necessary for the quality performance of duties in accordance with the legal framework.

PRINCIPLE OF TEAMWORK AND PROFESSIONAL COMMUNICATION

The Company encourages a culture of teamwork, necessary for the efficient and professional performance of work, and employees are required to develop this culture and continuously communicate horizontally and vertically with each other. Communication should be based on mutual respect and professional relationship.

Employees must refrain from any form of discrimination in communication and avoid encouraging or spreading rumours and gossip or creating a negative working atmosphere.

PRINCIPLE OF CONFIDENTIALITY OF PERSONAL DATA AND INFORMATION IN BUSINESS, SECURITY OF IT SYSTEMS

Personal data on employees and candidates for positions in the Company, as well as data and information on users of services/products and other business partners, obtained directly or indirectly, are confidential and protected in accordance with the applicable legal regulations and Company acts.

In carrying out their duties, employees must keep business secrets, regardless of how they learned them. All information about the Company, its employees, business partners, contracts, products and processes is confidential and may only be used internally.

proizvodima i procesima poverljivi su i mogu se koristiti samo za internu upotrebu.

Strogo je zabranjeno svako odavanje podataka koje je zaposleni saznao prilikom obavljanja posla, a koje je u skladu sa važećim propisima i aktima Društva dužan čuvati, kako za vreme trajanja radnog odnosa, tako i nakon prestanka istog.

Društvo velike resurse ulaže u sigurnost IT sistema kako bi se osigurala usklađenost upotrebe informatičkog sistema društva sa pozitivnim propisima i internim aktima društva, ali i kako bi se zagarantovala kupcima i partnerima dostupnost, poverljivost i integritet njihovih informacija koje se nalaze u informatičkom sistemu Društva.

NAČELO NULTE STOPE TOLERANCIJE NA KONZUMIRANJE ALKOHOLA, DROGA I DRUGIH SREDSTAVA ZAVISNOSTI ZA VREME RADNOG VREMENA

Zaposleni su obavezni da se u svom radu pridržavaju pravila rada na siguran način i pritom se brinuti za ličnu sigurnost i sigurnost postrojenja i opreme, a obaveza je Društva da osigura uslove za siguran rad zaposlenih.

Konzumacija alkohola, droga i drugih sredstava zavisnosti tokom radnog vremena je strogo zabranjena, u skladu sa zakonom i Pravilnikom.

Nadređeni rukovodioci dužni su sprovoditi mere prevencije i preduzimati druge potrebne radnje radi sprečavanja unošenja, konzumiranja i rada pod uticajem alkohola, droga i drugih sredstava zavisnosti.

Zaposleni Društva mogu biti u svakom trenutku tokom radnog vremena podvrgnuti alko-testu u svrhu provjere poštovanja ovog člana Etičkog kodeksa. Alko-test sprovodi ovlašćeni zaposleni Društva po nalogu direktora. Isti zaposleni je ovlašćen pojedine zaposlene u slučaju sumnje uputiti u ovlašćenu zdravstvenu ustanovu na testiranje na droge odnosno druga sredstva ovisnosti.

Any disclosure of information learned by the employee while carrying out work, which must be kept confidential in accordance with the applicable regulations and Company acts, is strictly prohibited both during the employment relationship and after its termination.

The Company invests great resources in the security of IT systems in order to ensure compliance of the use of the Company's information system with positive regulations and internal acts of the Company, but also to guarantee customers and partners the availability, confidentiality and integrity of their information contained in the Company's information system.

PRINCIPLE OF ZERO TOLERANCE FOR THE CONSUMPTION OF ALCOHOL, DRUGS AND OTHER ADDICTIVE SUBSTANCES DURING WORKING HOURS

In their work, employees must comply with the rules of operation in a safe manner, taking care of personal safety and safety of facilities and equipment, and it is the Company's obligation to ensure safe work conditions for the employees.

The consumption of alcohol, drugs and other addictive substances during working hours is strictly prohibited, in accordance with the law and the Regulations.

Superiors are required to implement prevention measures and take other necessary actions to prevent the introduction, consumption and work under the influence of alcohol, drugs and other addictive substances.

Employees of the Company may be subjected to an alcohol test at any time during working hours for the purpose of verifying compliance with this Article of the Code of Ethics. The alcohol test is carried out by an authorised employee of the Company, as ordered by the Company's Management Board. The authorised employee shall be empowered to refer individual employees to an authorised health institution for drug or other addictive substances testing in case of doubt.

NAČELO ZAŠTITE ŽIVOTNE SREDINE I ZDRAVLJA LJUDI; POSLOVANJE USMERENO NA OČUVANJE PRIRODNIH RESURSA I ODGOVORNO ZBRINJAVANJE OTPADA ZASNOVANO NA ODRŽIVOM RAZVOJU

Svaki zaposleni je u svom radu obavezan brinuti se o mogućem štetnom uticaju radne sredine na zdravlje ljudi, kao i radnih aktivnosti na životnu sredinu.

Unutar samog radnog prostora Društva uspostavljen je sistem odvojenog sakupljanja otpada, čime Društvo utiče na smanjenje količine otpada na deponijama i generalo na podizanje svesti o značaju društveno odgovornog poslovanja u segmentu zaštite životne sredine.

Dodatan doprinos Društva zelenom poslovanju je višestruka upotreba ambalaže, naime prilikom raspakiravanja ambalaže proizvoda koje Društvo zaprima istu ne baca već je koristi za pakovanje drugih proizvoda u svrhu zaštite kod transporta.

Društvo kroz svoj model reverzne logistike također pridonosi smanjenju emisija CO₂, odnosno ako je proizvode moguće popraviti, popravlja ih i vraća na tržište, u suprotnom vraća ga proizvođaču ili ih upućuje na daljnji postupak recikliranja. Prilikom dizajniranja novog proizvoda sopstevnih robnih marki Društvo vodi računa o servisnoj podršci za proizvode odnosno da se u slučaju kvara proizvoda može vratiti njegova izvorna funkcionalnost/vrednost i produžiti životni vek proizvoda.

Društvo kontinuirano ulaže napore u unapređenje svog poslovanja zasnivajući isto na održivom razvoju, čime pridonosi pozitivnim rezultatima ekoloških, socioloških i upravljačkih pokazatelja. Društvo načelo održivosti primjenjuje u svakodnevnom radu i isto uključuje u svaku stratešku odluku.

NAČELO POŠTOVANJA LJUDSKIH PRAVA I NULTE STOPE TOLERANCIJE NA PRISILNI RAD I RAD DECE

U Društvu ljudska prava, radna prava i dobrobit ljudi su od iznimnog značaja usled čega je isto posvećeno implementaciji i poboljšanju politike i prakse za borbu protiv modernog ropstva i trgovine ljudima.

PRINCIPLE OF ENVIRONMENTAL PROTECTION AND HUMAN HEALTH; OPERATIONS AIMED AT THE CONSERVATION OF NATURAL RESOURCES AND RESPONSIBLE WASTE MANAGEMENT BASED ON SUSTAINABLE DEVELOPMENT

In their work, each employee is required to take into account the possible harmful impact of the work environment on human health, as well as the impact of work activities on the environment.

Within the premises of the Company, a system of separate waste collection has been established, whereby the Company aims to reduce the amount of waste at landfills and generally raise awareness of the importance of corporate social responsibility in the environmental protection segment.

An additional contribution of the Company to green business is the reuse of packaging; when unpacking received products, the packaging is not thrown away, but instead used for packing other products for the purpose of protection in transport.

Through its reverse logistics model, the Company also contributes to reducing CO₂ emissions, that is, if the products can be repaired, they are repaired and returned to the market, otherwise we return them to the manufacturer, or refers them to further recycling.

When designing a new product of its own brands, the Company takes into account the service support of the product, meaning that in the event of a malfunction of the product, its original functionality/ value can be restored and the product life span extended.

The Company continuously makes efforts to improve its operations and base them on sustainable development, thus contributing to the positive results of environmental, sociological and management indicators. The Company applies the principle of sustainability in its daily work and includes it in every strategic decision.

PRINCIPLE OF RESPECT FOR HUMAN RIGHTS AND ZERO TOLERANCE TO FORCED LABOUR AND CHILD LABOUR

Human rights, labour rights and the well-being of people are of utmost importance in the Company, which is why it is dedicated to the implementation and improvement of policies and practices to combat modern slavery and human trafficking.

Moderno ropstvo, sastavljeno od ropstva, prisilnog ili obaveznog rada i trgovine ljudima, je zločin koji za posledicu ima teške povrede ljudskih prava. Društvo ne praktikuje, niti toleriše moderno ropstvo u svom poslovanju ili lancu snabdevanja. Posebnu pažnju Društvo posvećuje etički ispravnom i poštenom postupanju u svim svojim politikama zapošljavanja, poslovanja i poslovnim odnosima i implementaciji i sprovedbi efikasne prakse kako bi se osiguralo da se u poslovanju Društva ne odvija bilo kakav oblik ropstva.

NAČELO TRANSPARENTNOSTI U POSLOVANJU I TRANSPARENTNOSTI U IZVEŠTAVANJU

Društvo pridaje veliku važnost transparentnom i istinitom izveštavanju i komunikaciji o poslovnim postupcima Društva spram investitora, radnika, partnera, javnosti i državnih institucija. Svaki pojedinac vodi računa o tome da se interni i eksterni izveštaji, beleške i ostala dokumentacija izrađuju u skladu sa važećim zakonskim odredbama i standardima i to uvek potpuno i tačno.

Saradnja Društva sa partnerima je poštena i transparentna i od njih u istoj meri Društvo očekuje transparentnost i integritet.

U svakoj transakciji Društvo proverava postoje li indikatori upozorenja na prevaru u poslovanju (tzv. red flags). Transakcija u kojoj je primećen takav indikator neće se sprovesti.

NAČELO USKLAĐENOSTI SA KONTROLOM UVOZA-IZVOZA, OGRANIČENJIMA I SANKCIJAMA

Društvo se strikno pridržava svih važećih pravila i zakona u vezi sa kontrolom uvoza i izvoza, uključujući restriktivne mere (tzv. sankcije).

Društvo neće, direktno ili indirektno, distribuirati robu bilo kojim pojedincima/subjektima koji se nalaze na tzv. SDN popisu ili bilo kojem drugom ekvivalentnom sankcionoj listi i/ili zemljama pod embargom SAD.

Detaljnije informacije su dostupne u Programu izvozne KIM-TEC d.o.o. i vlasnički povezanih društava 2023., koji se nalazi na linku www.kimtec.rs

Modern slavery, made up of slavery, forced or compulsory labour and human trafficking, is a crime that results in severe human rights violations. The Company does not practice or tolerate modern slavery in its business or supply chain. The Company pays special attention to ethically correct and fair conduct in all its employment, business and business relations policies, and to the implementation and deployment of effective practices to ensure that no form of slavery takes place in the Company's operations.

PRINCIPLE OF TRANSPARENCY IN BUSINESS AND TRANSPARENCY IN REPORTING

The Company attaches great importance to transparent and truthful reporting and communication on the Company's business procedures towards investors, employees, partners, the public and state institutions. Each individual takes care that internal and external reports, notes and other documentation are prepared in accordance with the applicable legal provisions and standards, and always completely and accurately.

Our cooperation with partners is fair and transparent, and we expect transparency and integrity from them to the same extent. In each transaction, the Company checks for indicators of business fraud, or red flags. A transaction in which such an indicator is observed will not be carried out.

PRINCIPLE OF COMPLIANCE WITH IMPORT/EXPORT CONTROL, RESTRICTIONS AND SANCTIONS

The Company strictly complies with all applicable rules and laws regarding import and export control, including restrictive measures (so-called sanctions).

The Company shall not, directly or indirectly, distribute the goods to any individuals/entities located on the so-called SDN list or any other equivalent sanctions list. For further information, reference is made to the KIM-TEC d.o.o. and Affiliated companies' Export Compliance Program (ECP), which can be found at the following link www.kimtec.rs.

III. Primena etičkog kodeksa

Poslovni partneri, dobavljači i ostali učesnici mogu podneti pritužbu na ponašanje zaposlenog za kojeg smatraju da je suprotno odredbama Etičkog kodeksa.

Zaposleni mogu podnijeti pritužbu protiv direktno nadređenih lica i/ili drugih zaposlenih, ukoliko smatraju da je njihovo ponašanje suprotno odredbama Etičkog kodeksa.

Pritužbe iz stavova 1. i 2. ovog člana podnose se pisanim putem na kontakt e-mail adresu: compliance@msan.hr ili telefonskim putem na broj dostupan i objavljen na intranetskim stranicama Društva za zaposlene odnosno na internetskoj stranici za sve treće zainteresovane strane.

Podaci o podnositelju prijave smatraju se poverljivim podacima. Podnošenje prijave od strane zaposlenog u dobroj veri ne može biti razlog za njegovo sankcionisanje. Društvo neće tolerisati bilo kakvu odmazdu prema učesnicima, a pogotovo zaposlenim, koji prijavljuju moguća kršenja ili izražavaju zabrinutost u dobroj veri. Svaka sumnja na odmazdu mora se prijaviti na istu e-mail adresu predviđenu za podnošenje pritužbi. Svako ko je odgovoran za odmazdu protiv pojedinaca koji prijave sumnju na neetično ponašanje, druge rizike neusklađenosti ili poslovne rizike bit će podvrgnut disciplinskim merama.

Postupanje na osnovu Etičkog kodeksa i ispitivanje pojedinih pritužbi ne sprečava sprovedbu mera iz nadležnosti Društva u vezi sa odgovornošću zaposlenog za povrede radnog odnosa, kao ni drugih propisanih oblika odgovornosti zaposlenog i u vezi sa unutrašnjim nadzorom kada su pojedinim ponašanjem ispunjene pretpostavke za primenu tih mera.

III. Implementation of the code of ethics

Business partners, suppliers and other stakeholders may file a complaint about the conduct of employees that they consider to be contrary to the provisions of the Code of Ethics.

Employees may file a complaint against their direct superiors and/or other employees, if they consider their conduct to be contrary to the provisions of the Code of Ethics.

Complaints referred to in paragraphs 1 and 2 of this Article shall be submitted in writing to the contact e-mail address: compliance@msan.hr or by telephone to the number available and published on the Company's intranet site for employees or on the website for all third parties interested.

Information about the person who files a complaint shall be considered confidential. The filing of a report by an employee in good faith cannot be a reason for sanctioning said employee. The Company will not tolerate any retaliation towards stakeholders, and especially employees, who report possible violations or express concerns in good faith. Any suspicion of retaliation must be reported to the same e-mail address provided for the submission of complaints. Anyone responsible for retaliation against individuals who reported suspected unethical behaviour, other non-compliance risks or business risks will be subject to disciplinary action.

Acting on the basis of the Code of Ethics and examining individual complaints does not prevent the implementation of measures within the competence of the Company's Management Board in relation to the liability of employees for violations of the employment relationship, as well as other prescribed forms of employee liability and in relation to internal control, when certain behaviours meet the preconditions for the implementation of these measures.

IV. Način objave i stupanje na snagu

Etički kodeks objaviće se na oglasnoj tabli i web stranici Društva, a stupa na snagu danom objave.



Vladimir Matijević, direktor

IV. Method of publication and entry into force

The Code of Ethics shall be published on the notice board and the Company's website and shall enter into force on the day of its publication.



Vladimir Matijević, direktor



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