

CODE OF CONDUCT

OUR FUNDAMENTAL VALUES IN ACTION







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About the Code of Conduct

THIS CODE WAS ISSUED FOR THE PURPOSE OF PROMOTING THE CORPORATE CULTURE OF DALEKOVOD GROUP THAT ENCOURAGES CONDUCT IN COMPLIANCE WITH THE COMPANY'S FUNDAMENTAL VALUES.

The Code provides the ethical rules to be complied with and the ethical requirements to be met by all persons to whom this Code applies. In addition, the Code clarifies ethical concerns that all stakeholders, in particular the employees, may encounter on a daily basis, as well as any violations they may commit in case they make an inappropriate decision. Each stakeholder is expected to familiarize himself with the contents of the Code, to be aware of his obligations, and to act in accordance with the fundamental values and ethical rules of Dalekovod Group because the conduct and actions of each one of us affect our collective reputation. By this Code of Conduct, we enhance our fundamental values, define our expectations for each stakeholder and provide our employees with guidelines for performing their activities, treating our investors, suppliers and other business partners, justifying our shareholders' trust, and for treating each other.





Our Mission.
Our Vision.
Our Fundamental Values.



Our mission is to conduct our business according to the highest global standards when performing our work in the area of engineering, manufacture and construction of electricity, road, railway and telecommunication infrastructure, offering a full service, innovative solutions and quick high-quality performance based on the principles of competitiveness and social responsibility, with a particular emphasis on the protection of people and the environment.

Our vision is to become a leading international company providing full high-quality services in the area of engineering, manufacture and construction of electricity, road, railway and telecommunication infrastructure, primarily by reinforcing our positions on international markets, obtaining new contracts and penetrating new markets relying on our longstanding tradition, knowledge, competitiveness, innovation and reliability.

Our fundamental values reflect what we are and what we strive to be. Our fundamental values are based on our employees, our care for the environment, lawfulness and ethics in work and business, and our treatment of stakeholders.

2.1. Employees

Hard work, honesty, modesty, teamwork and transparency are the key qualities each one of our employees is expected to have

Each employee is equally important irrespective of his job, the country he comes from and the company he is employed by within Dalekovod Group. We strictly condemn any discrimination and foster a culture of mutual respect. In our relationships with our employees, we pay special attention to their safety and health, personal and professional development, and the implementation of an employment policy based on clear criteria, thus encouraging an environment where employees are able to contribute and to foster and develop their own innovation and excellence.

2.2. Environmental care

Being aware of the importance of sustainable business, we promote the compliance with the most stringent technological and environmental standards to mitigate any risks of

adverse environmental impacts. We find technological solutions because our business is always focused on environmental protection and preservation of natural resources for the present and future generations.

2.3. Lawfulness and ethics in work and business

In our work and business, we comply with and implement the provisions of Croatian legislation and the regulations of each country we operate in. Our business is governed by the highest professional, business and ethical standards to ensure our business is lawful and ethical.

2.4. Our treatment of stakeholders

The basis of our corporate philosophy is to treat all stakeholders in a professional, but primarily fair manner. We treat our employees, shareholders, investors, partners, suppliers, competitors and other stakeholder groups such as the media and public, professionally, honestly and fairly, using our best efforts to build relationships based on mutual respect.





Responsibilities

GENERAL RESPONSIBILITIES OF EMPLOYEES/INDIVIDUAL RESPONSIBILITIES AND RESPONSIBILITIES OF MANAGERS/ETHICS VIOLATIONS

3.1. General responsibilities of employees

- Become familiar with the Code of Conduct and corporate policies and procedures.
- Comply with and promote the fundamental values of Dalekovod Group in daily business activities.
- Comply with all laws, regulations and corporate policies regardless of the job or the country where the employee is located or works. If any binding standard is obviously controversial, this should be discussed with the Legal Department. An employee shall not fail to disclose a person's failure to comply with any laws, regulations or Group's rules or procedures.
- Take all reasonable steps to prevent the counterparty, such as an investor, partner, supplier or any other stakeholder, from taking any action the employee believes they should not take.
- Report any suspected violation of the law, this Code of Conduct or any other Group's rules or procedures.

- Cooperate and provide full and accurate information in connection with any investigation of a disciplinary or any other violation

3.2. Individual responsibilities

- It is forbidden to offer, give or accept money or any other value having the characteristics of a bribe or illegal commission.
- In our relationships with other companies, use only the proper means of competition. Develop good relationships with customers and suppliers.
- Familiarize yourselves with the local laws and regulations applicable to Dalekovod's work and business in the countries where it operates.
- Protect the privacy of Dalekovod Group's customers, consumers, suppliers or any other third parties.
- Notify the employer of any personal interest that may result in a conflict with the company, including but not limited to financial interests, actions

and exchange of information, business opportunities, or any conflict of interest involving your family members or any other personal relations.

- Always use and share company's assets keeping in mind the interests of Dalekovod Group's shareholders. Such assets include but are not limited to office supplies, computers and communication systems, nonpublic information and intellectual property (e.g. patents or inventions, brands, trademarks and copyrights). If you are leaving the company, please return all company assets, including written information.
- Only use financial assets for business purposes.
- Individuals authorized to handle and being in possession of company information classified as "Strictly confidential", "Trade secret" or "For internal use only" shall always protect it against unauthorized disclosure.
- Refrain from spending your working time on activities or business not relating to your work.
- Refrain from taking or redirecting any assets of the company, any other person or any other company by using fraud, misleading or extortion.
- Use accurate and verified data when

creating company records. You should maintain such records as prescribed.

- In your relationships with other companies, only use the prescribed means of competition. Develop business relationships with customers and suppliers.
- Only collect information about Dalekovod's competition using prescribed means and never by theft, misrepresentation or by using another person for improper collection of such information.
- If you are authorized to deal with public officials, ensure that you are in compliance with the legislation of the relevant country in your dealings with such public officials or civil servants. Always ensure that no action you may take may be construed or perceived as illegal or as resulting in conflict of interest.
- In the course of performing your business activities, protect the environment by minimizing pollution, reducing your waste volume and comply with our sustainability policy.
- Comply with the corporate human rights policy in your daily activities.
- Only make decisions concerning human resources on the basis of their abilities and performance.

- Treat other people with respect and never take any action that may be construed as harassing, hostile or offensive.
- Carefully handle other people's personal data and property as you would want other people to handle yours.
- Always undertake preventive safety and health measures.
- Gifts may only be exchanged in exceptional situation, provided their value is symbolic.

3.3. Responsibilities of managers

Managers have a key impact on teamwork and are, in addition to the above listed responsibilities, responsible for:

- Setting high working standards;
- Regularly and clearly communicating information about business practices as they relate to the fundamental values of Dalekovod Group;
- Treating all employees equally regardless of their education, gender, ethnicity or the like;
- Being available to employees for the resolution of any ethics issues or concerns; and
- Appropriately responding to an employee's report of suspected conduct in violation of any laws, regulations or this Code.

3.4. Ethics violations

Ethics violations include a number of employees' actions relating to the violation of any laws, regulations or this Code. These violations include but are not limited to:

- Theft;
- Embezzlement;
- Conflict of interest;
- Bribery, extortion or inappropriate tips;
- Improper use of company's assets;
- Running personal errands during working hours;
- Concealing any noncompliance with any corporate procedure, standard or policy;
- Unauthorized disclosure of confidential information;
- Improper maintenance of company's official records;
- Providing false information;
- Any violation of any law or this Code;





Company Assets

PROPER PROTECTION AND USE OF COMPANY'S RESOURCES IS A BASIC RESPONSIBILITY OF EACH EMPLOYEE. COMPANY ASSETS MAY ONLY BE USED FOR BUSINESS PURPOSES AND INCLUDE PHYSICAL ASSETS, INFORMATION, DATA, RECORDS AND INTELLECTUAL PROPERTY.

Employees' responsibilities in connection with company assets are as follows:

- Only procure such assets that the company is allowed to hold and ensure that the company obtains a good price when purchasing its assets such as inventories or raw materials.
- Be careful when handling company assets to ensure that important resources do not lose their values as a result of abuse.
- Protect company assets against abuse or theft by other persons. Property and information should be kept in secure locations to prevent any unauthorized access thereto.
- Comply with the relevant security programs to protect physical assets against unauthorized use or removal, as well as against criminal offences or breaches of confidentiality.
- Only use company assets if properly authorized to do so, in accordance with the relevant corporate procedures, and in an appropriate and lawful manner.

4.1. Computers and communication systems

Company assets include but are not limited to computers and related equipment and networks (including internet access), software, telephone and voicemail systems, and personal digital devices. Employees shall protect resources and important company's data stored in its systems. Considering the sensitive information such computers may contain, employees shall comply with the corporate regulations and procedures relevant to computer encryption and their protection against theft. All information, knowledge and know-how remain property of the company and it is forbidden to make copies of, send or back up any data without authorization.

4.2. Confidential information

It is of key importance that all employees protect Group's information not made publicly available, which represent confidential information. Confidential

information includes all information and data representing a manufacturing secret, results of research or design activities, and any other data that may result in adverse consequences for the economic interests of Dalekovod Group if communicated to an unauthorized person. Examples of confidential information are: business plans, pricing and cost information, research and development plans and strategies, research data and inventions, and process and design information.

Any data representing a trade secret and any other confidential information may be disclosed to other persons subject to prior written consent. When disclosed to another person, confidential information must be classified according to the classification provided in the Confidentiality Policy. Where an employee detects any noncompliance with respect to the keeping and protection of confidential information or any activities intended to disclose such information, such employee shall immediately notify this to his supervisor.

Classification of company information

Dalekovod Group's information is classified by the Confidentiality Policy and may, according to the degree of secrecy, be:

- very secret,

- secret, or
- confidential.

4.3. Brand, trademark and copyright

Dalekovod protects its intellectual property it makes public by using trademarks, patents or copyrights. The Dalekovod brand is one of the most important assets of the company and all employees are required to ensure its protection.

To preserve company's brands, trademarks and copyrights, all employees should:

- be familiar with and properly use the Dalekovod Brand Identity System;
- consider any potential abuse of Dalekovod's brands by its contractors, customers, suppliers or competitors, as well as online abuse; and
- report any abuse of the brand to the Corporate Communications Department.

Employees are required to respect and properly use other persons' registered trademarks and copyrights.

4.4. Records and reporting

All information generated by the company shall be deemed records, irrespective of how it is maintained. Examples of records

include financial, accounting, technical and sales reports, such as personal files, healthcare information, safety and environmental protection information, marketing information and business plans.

Records relating to accounting transactions and financial reporting must be in compliance with the accounting policy of the company and generally accepted accounting principles and standards. Employees shall not intentionally make any entries that are false, distorted, misleading, intentionally incomplete or limited. Noncompliant accounting and documentation or false financial reporting violates the company's policy and regulatory accounting standards. As a result of such actions, the company and the responsible employee may be subject to civil and criminal sanctions. Employees shall share the responsibility for the maintenance of records and their compliance with the required prescribed controls.

Reporting and reimbursement of expenses

Employees' travel and expenses must be in accordance with the business needs and corporate regulations and procedures. The company does not intend for its employee to suffer a financial loss or obtain gain as a result of his business

trip and associated expenses. Each employee is expected to spend company money carefully.

An employee submitting or approving a travel expense or entertainment expense report shall ensure that:

- the expenses are appropriate and reasonable;
- each expense report is submitted promptly; and
- the receipts and explanations properly demonstrate the reported expenses.

Departure from the company

A departing employee shall:

- immediately return all company assets, including physical materials and information assets of Dalekovod Group such as computers, mobile phones, telephone cards, access cards, keys, business cards and electronic data carriers;
- not copy or take away copies of Dalekovod's information at the time of leaving the company; and
- refrain from disclosing any nonpublic company's information after leaving the company.

Failure to comply with these obligations may result in civil or criminal sanctions.



A person in a grey suit is seated at a desk, their arm resting on the surface. In the foreground, a pair of black-rimmed glasses lies on a document featuring a blue bar chart. The background is softly blurred, showing another person in a dark suit. The overall color palette is cool, dominated by blues and greys, with a small graphic of overlapping red, blue, and green triangles in the top-left corner.

Gratuity, Entertainment and Payments

WE STRIVE TO BUILD OUR RELATIONSHIPS WITH OUR INVESTORS, SUPPLIERS AND OTHER BUSINESS PARTNERS. WE DO NOT USE GRATUITY OR ENTERTAINMENT TO INFLUENCE ANY BUSINESS DECISIONS OF OTHER PERSONS AND DO NOT MAKE ANY ILLEGAL PAYMENTS.

5.1. Gratuity and entertainment

The company does not encourage giving or receiving of gratuity. In case of entertainment or in a rare case when gratuity is given or received, the employee shall ensure that such gratuity or entertainment:

- is in compliance with the customary regional business practices;
- has a clear business intention;
- has a symbolic value;
- cannot be perceived as bribe or illegal payment;
- does not have an improper influence on the business relationship; and
- is not in violation of any applicable law or ethical standard.

5.2. Bribe and commissions

Bribe and commissions are illegal. Any offer to pay any value to influence a business decision or public action may be considered bribe or commission. The employee shall never offer, request or demonstrate his willingness to accept such payment. Certain gratuities may also be treated as bribe. It is forbidden to pay any unofficial compensation to public officials.

5.3. Payments for products and services

Sales commissions, rebates, discounts and bonuses represent normal business payments. Illegal or unethical payments are not allowed while regular payments must be in accordance with the applicable foreign exchange controls and tax regulations.

Any payments made or received by the company must be:

- reasonable in value and associated with the relevant goods or provided services and industry standards;
- competitively justified;
- properly documented, defining the nature and purpose of the transaction;
- made by a bank remittance or credit in favor of the business entity specified in the original sale contract or invoice, according to the payment terms defined by the contract;
- payable to the relevant business entity rather than its individual officers, employees, agents or another business entity;
- prepared and sent to such place of business or remitted to such bank account of the entity specified in the original sale contract or invoice; and
- in compliance with the standard written commercial terms, including paid commissions, rebates, discounts or benefits.

If you have any doubt as to the legality of a payment, please seek approval from the Legal Department and Finance Department.



Conflicts of Interest

EMPLOYEES ARE REQUIRED TO ENSURE THAT THEIR PERSONAL ACTIVITIES AND INTERESTS ARE NOT IN CONFLICT OF THEIR RESPONSIBILITIES TO THE COMPANY.

Conflict of interest may include:

- external work, employment or any other activities;
- using internal information and insider trading;
- business information;
- substantial financial interest of an employee or his family member in an external company dealing, wanting to deal or competing with the company;
- personal gain to an employee's family member resulting from such employee's role in the company; and
- any other arrangement or circumstance, including family and other relations, that may prevent the employee from acting in company's best interest;

It is contrary to the company policy for a manager to supervise a member of his family or to have an inappropriate relationship with an employee he supervises and you are required to report such situations and other similar situations to the Legal Department.

Each employee is required to notify any issue in connection with conflict

of interest to his manager or the Legal Department.

6.1. Family members and personal relationships

Immediate family members include employee's spouse, parents, grandparents, siblings, step children, adoptees, supported children without parents, step parents, adopters, persons that the employee is legally required to support, and persons in common-law marriage with the employee. In certain situations, a relationship with a person who is not a family member may also constitute a conflict.

The employee's supervisor should review each individual situation.

6.2. Substantial financial interest

"Substantial financial interest" shall mean any direct or indirect overall interest of an employee or his family member in an external enterprise dealing, wanting to deal or competing with the company. As a minimum standard, "substantial financial interest" is defined as the greater of:

- 1% of any class of principal securities of a firm or corporation;
- 10% interest in a nonpublic company, partnership or consortium; and
- 5% of the total property or gross income of the employee.

6.3. Reporting and resolving potential conflict of interest

Employees shall immediately report to the Management Board any potential conflict of interest in writing as soon as such potential conflict of interest occurs or is considered.

The company shall treat all such reports confidentially, except to the extent necessary to protect company's interest. The Management Board shall consider such issues with the Legal Department and shall take all actions necessary to eliminate potential conflict of interest.

6.4. External employment, work or activities

Potential conflict of interests regarding employee's activities outside the company are:

- serving as director, officer, partners, consultant, manager, or in any other technical capacity or key role in an organization dealing or likely to deal or competing with the company.
- acting in the capacity of broker, agent or any other intermediary for another party in any transaction actually or potentially involving the company or its interests;
- having another employment relationship, including running a separate company, if this interferes with the employee's duties in the company;
- using company's assets or information or a person's position in the company for personal gain;
- using company's equipment or facilities in connection with any external activities, unless authorized by the employee's supervisor;
- performing any activities relating to external work during the working hours; and
- having meetings with representatives of competitors without notifying the supervisor.

Employees should consider all potential situations with their supervisors before they occur to ensure they do not result in actual conflict of interest.

6.5. Insider trading

"Insider information" is nonpublic information sufficiently relevant to affect, if published, the price of company's

securities. For example, they may include information about anticipated earnings, mergers, acquisition, major product launches, development of intellectual property or litigation. Employees shall not trade any company's securities based on internal information or convey such information to other persons who may use them for trading company's securities. This restriction applies to the trading of Dalekovod's shares, as well as shares of any other company for which employees may have insider information.

As a general rule, employees should wait one workday after insider information is published before trading Dalekovod's shares or shares of any other company for which they have insider information. Employees with access to insider information are not prohibited to receive bonuses in stock as part of Dalekovod's bonus scheme. However, employees should not engage in any transactions based on the market, such as selling shares or changing selected investments if they are in possession of insider information. Managers should comply with a special procedure for obtaining consent to such transactions and shall consult the Legal Department before trading company's shares. In case of any concerns regarding stock trading, please contact the Legal Department.

Examples of internal information

- The company is expecting a new valuable contract to be signed and it is still confidential.
- The company is considering making a large investment in a smaller competitor that is a public company.
- The company intends to award a major contract to another public company.

6.6. Business opportunities


While working for Dalekovod, employees will be involved in the development of business opportunities for the purpose of attaining company's business targets. Employees shall not obtain any inappropriate gain from such situations. Specifically, employees shall not:

- personally use a business opportunity resulting from the use of company's assets or information or a person's position in the company; and
- directly or indirectly compete for any business opportunities that company strives for.

Examples of business opportunities:

- The company is interested in acquiring a local property that someone may buy first and then sell it to the company.

Your business unit is developing a process that may be useful to other companies.

A man in a white dress shirt and a patterned tie is seated in an airplane, looking out of a window. The image is used as a background for the text.

ANY LOCATION WHERE DALEKOVOD OPERATES MAY HAVE DIFFERENT LAWS AND REGULATIONS AND UNIQUE METHODS OF CONDUCTING BUSINESS. FOR THE PURPOSE OF PRESERVING THE FUNDAMENTAL VALUES AND STANDARDS OF DALEKOVOD, LOCAL LAWS AND CUSTOMS SHOULD BE COMPLIED WITH. EACH EMPLOYEE SHALL BE FAMILIAR WITH AND UNDERSTAND THE APPLICABLE LAWS AND REGULATIONS THAT HELP PRESERVE THE REPUTATION OF DALEKOVOD AS A RESPONSIBLE INTERNATIONAL CORPORATION.



Cross-Border Operations

7.1. Compliance with export controls

Employees should understand and comply with national and international laws and other rules applicable to the exportation of products, services and technologies from one country to another. Such export rules do not apply exclusively to the transfer of products between countries – they also may restrict the following:

- use of business knowledge outside the employee's country, such as providing technical assistance to other parties;
- transferring technical data to a person in another country, for example by using the internet, e-mail, conversations, meetings and database access. This restriction applies to exchanging information with company's employees in another country and with persons not employed by the company; and
- transferring company assets by using certain technology, such as a computer taken by an employee on a business trip to another country.

7.2. Customs and import

Customs rules protect domestic industries in each country, trading security and rights, at the same time preventing any prohibited items from entering the country. Such rules apply to transactions between Dalekovod, its affiliates and branch offices, and between Dalekovod and external companies. The rules require that Dalekovod define precise classification, the value and country of origin of all its imports. Employees should be able to demonstrate by proper documentation that Dalekovod has exercised reasonable care to ensure that all its imports are in compliance with the applicable laws. This regulation requires that employees provide full, accurate and detailed information in connection with each imported product, the place of its production and its full cost.

24.00
TOTAL VOLUME
823.149





Competition Practices

DALEKOVOD COMPETES ON THE MARKET TO SATISFY ITS CUSTOMERS' NEEDS AND INCREASE THE VALUE OF ITS STOCK. HOWEVER, WE SHOULD ALWAYS REMEMBER THAT THE COMPANY IS SUBJECT TO COMPLEX COMPETITION LAWS APPLICABLE IN THE COUNTRIES WHERE WE OPERATE. ALL COMPETITION LAWS IN PLACES WHERE DALEKOVOD OPERATES PROHIBIT ANY ARRANGEMENTS OR ACTIONS THAT UNREASONABLY LIMIT TRADING OR IMPAIR COMPETITION.

Violations of competition law include arrangements between competitors for the purpose of:

- determining prices or establishing other terms and conditions of sale (for example, credit terms);
- boycotting particular suppliers or customers;
- allocating customers, products, territories or markets; or
- limiting the production or sale of products.

Such competition law violations and other similar violations thereof may result in serious sanctions for the company and the individuals involved.

Employees must understand and implement the applicable rules, especially if a person's job involves interaction with competitors, suppliers, customers or distributors, collection of information about competition or participation in trade associations. Employees should in particular ensure that their activities are not misinterpreted.

8.1. Competition information

Competition information is important for the business success of the company and there are numerous legal and ethical ways to collect information regarding competitors. Employees should always adhere to the corporate guidelines. When collecting competition information, employees should meet the following requirements:

- It is not allowed to misrepresent yourself or the reason why they are asking for information.
- It is not allowed to fraudulently obtain information from or about any competitor.
- Please consult the Legal Department if you are not sure which is the proper way to collect competition information in a responsible manner.

8.2. Relations and conducting business with the government

General relations with public officials

When conducting business with the government of a country, employees should understand and respect its rules of business. Giving even small gratuities or cheap meals to public officials may be inappropriate or illegal and may easily be treated as bribe or commission, even if you did not intend to influence a certain action. There may be exceptions, but employees should always first consult the Legal Department.

Conducting business with the government

In case of direct or indirect procurement for a government, employees should understand the rules of the relevant country with respect to the interaction with potential or current suppliers, especially during procurement procedures. Dealing with government agencies is not always the same and dealing with corporations. Some practices that are acceptable among private companies are not acceptable to government agencies. Laws concerning dealings with the government are often complex and serious civil and criminal sanctions may be imposed in case of their violation. In case of any doubt or concern, employees should contact the Legal Department.





Environmental Protection and Sustainability

Dalekovod's mission is sustainable growth and creating share and social value while reducing our environmental impacts. Management is responsible for training and motivating employees for complying with all relevant laws and regulations and all employees must comply with the applicable environmental laws.





Human Rights

Dalekovod strives to protect and enhance human rights in all segments of its business and tends to select its partners among companies governed by the same principles. Dalekovod's human rights policies are based on providing the highest criteria concerning safety and health, ethical conduct and respect for human rights and employees' rights. Each employee is responsible for complying with the regulations and laws applicable in the countries where Dalekovod operates. Management is responsible for training and motivating employees so that they could understand and comply with the applicable laws.





External Communication

For the purpose of providing an accurate and complete description of company's activities, only authorized individuals are free to speak on behalf of the company with journalists, research analysts, public officials, law enforcement officers or any other external parties. In addition, employees should not disclose any nonpublic information to individuals who are not employees of the company without an authorized business need. If an employee did not obtain a prior approval to talk to external parties, all inquiries should be forwarded as follows:

Parties concerned	Department
Public officials or regulatory officers	Legal Department
Media or journalists	Corporate Communications/Public Relations
Financial research analysts	Finance Department
Law enforcement or external lawyers	Legal Department





Internal Communication

DALEKOVOD MAY ONLY ACCOMPLISH ITS MISSION WITH FULL COMMITMENT AND COOPERATING SPIRIT OF ITS EMPLOYEES. SUCCESS FOR ALL STAKEHOLDERS WILL ONLY BE ACHIEVED THROUGH MUTUAL RESPECT, ACKNOWLEDGEMENT OF EACH COWORKER'S CONTRIBUTION AND FAIR AND EQUAL TREATMENT OF EACH PERSON.

12.1. Equal opportunities and non-discrimination

Dalekovod does not discriminate against any employee or job applicant on the basis of their age (within the statutory limits), race, religion, color, sex, disability, ethnic origin, marital status, sexual orientation or gender identity in relation to all terms and conditions of employment, including recruitment, promotion, degradation, engagement, termination of employment, amount of salary or any other form of remuneration, or selection for training.

12.2. Relations between employees

The company does not tolerate any kind of harassment because it potentially interferes with the work of the individual concerned and creates an intimidating and offensive working environment. Harassment may include insults or derogatory comments, offers of employment benefits in exchange for any inappropriate services, and any other form of offensive behavior. Harassment may include behavior directed to or by an employee of Dalekovod, its employees, customers, suppliers and other business partners. Inappropriate use of company's computers and communication systems includes participating in sexual, racial and other types of harassment and

discrimination, and access to sexually oriented or any other inappropriate materials. Inappropriate use of company's electronic communication resources, irrespective of the medium, constitutes a serious violation and the offender will incur disciplinary liability. Where an employee suspects any discrimination or harassment, he should report it to the person responsible for the Protection of Employee Dignity.

12.3. Privacy and personal data

The company aims to ensure the privacy of its present and former employees and security of their personal data. Dalekovod informs its employees about personal data collected by the company and of the methods of and reasons for their use, such as administration of benefits, remuneration or access to and security of computer systems. Employees are expected to comply with the relevant company policies and procedures and protect personal data of their coworkers and partners.

12.4. Personal use of company assets

Facilities, equipment and services such as offices, telephones, computer equipment and internet and intranet access should only be used for

company's business. To protect the security and reputation of the company and its employees, prevent any criminal activities and information security of Dalekovod, the company reserves the right to monitor communication at the workplace and across the company and to search company property in accordance with the applicable laws.

12.5. Safety and health

Dalekovod believes that all workplace injuries may be prevented. The company aims to have a zero rate of such accidents. We also promote employee

safety outside the workplace. Each employee is responsible for complying with the applicable safety and health laws. Management is responsible for training and motivating employees for understanding and complying with the applicable safety and health laws.

12.6. Making prudent decisions

When faced with a difficult situation where the appropriate response may not seem clear to you, the following questions may help determine which course of action would be proper.

Which potential ethics issue am I faced with?

- Could I potentially violate:
- a law or regulation?
 - any fundamental values of Dalekovod?
 - the Code of Conduct of Dalekovod?
 - any rule, policy or procedure of Dalekovod?
 - any ethical standard of my profession?
 - my personal sense of ethical conduct?

What are my specific responsibilities in this situation?

- What are my ethical responsibilities as an employee of Dalekovod?
- What are the ethical responsibilities of my job?
- Do I have ethical responsibility as part of a professional or trade group?

Whom could this issue affect?

- Customers?
- Shareholders?
- Suppliers?
- Coworkers?
- Local community?
- My family or me personally?

Which resources may help me resolve this issue?

- Relevant laws and regulations (for assistance, please contact the Legal Department)
- Fundamental values of Dalekovod
- Dalekovod's policies and procedures
- Professional standards

Which possible course of action should I consider?

- What would the shareholders think of my actions?
 - What would my family think of my actions?
 - Which effect would my actions have if the facts appeared on the front page of a newspaper?
 - How would other people want to be treated?
 - How would I explain my actions to a coworker?
-

12.7. Receiving assistance and expression of concerns

The company provides resources that help each employee faced with ethical and other similar issues difficult to resolve.

The employee's manager or supervisor is the first and best resource as this person is aware of employee's duties. If such manager or supervisor is not available or if the employee feels uncomfortable confiding in his manager, the following resources are also available:

- Legal Department or Finance Department
- Corporate Communications
- Human Resources, especially with respect to jobs and policies, such as those concerning discrimination, harassment and employee privacy
- Employee Dignity Officer

Employees are entitled to request to remain anonymous and the company will use its best efforts to protect its employee's anonymity to the extent possible and legal.

12.8. Resolution of potential serious violation of employment duties

Corrective actions and investigations

To ensure quick and consistent implementation of the Code of Conduct, the company shall investigate all reported cases of serious breach of employment duties, such as violation of any laws, regulations or company's policies or procedures. Where an employee is found to have seriously violated his employment duties, such individual shall accept the punishment, including termination of employment and potential initiation of a civil or criminal proceeding. Intentionally falsely accusing a person of a violation shall be treated as a serious violation of employment duties.

Availability of the Code of Conduct

ALL EMPLOYEES ARE REQUIRED TO FAMILIARIZE THEMSELVES WITH THE CONTENTS OF THE CODE OF CONDUCT, WHICH IS AVAILABLE ON COMPANY'S NOTICEBOARDS AND WEBSITE. EACH NEW EMPLOYEE IS REQUIRED TO EXAMINE THE CODE OF CONDUCT, WHICH SHALL BE PROVIDED TO HIM ON HIS FIRST DAY ON THE JOB.



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