

CODE OF CONDUCT

Acting with honesty and integrity will ensure our sustainability

Dear Employees,

Regard to the fact that EZ engineering provides engineering and mechanical engineering design services in various sectors of International automotive, aviation, railway industry and shipbuilding, appears a need to publish the principles on which we operate. That's our code of conduct. He sets out the standards of responsible behaviors I expect you all to follow in each and every part of our company. Responsible business conduct is not new to us. Acting responsibly has been instrumental in building our global reputation as a trusted partner and employer. However, we operate in an increasingly challenging environment, which combined with our international scale, exposes us to ever higher levels of scrutiny.

It has therefore never been more important to ensure all our activities are conducted with the utmost integrity.

Your personal and collective commitment to the standards set out in the Code is most important for our overall efficiency.

Code of Conduct brings a number of our long standing practices and policies together in one place. There are references throughout the document to Group Policies and who to contact for guidance, help and advice.

It is incumbent on you all to read the Code thoroughly to ensure you clearly understand what is expected of you and adhere to the behaviors outlined in all your day to day activities.

Marko Zovko
CEO

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What you need to know about the Code of Conduct

What is our Code of Conduct?

Our Code of Conduct is a summary of a number of long standing practices and policies relating to both individual and business conduct brought together in one document.

The Code of Conduct sets out the standards of responsible behavior that all employees of EZ Engineering are expected to follow. The Code of Conduct is designed to support everyone in living up to these behaviors.

Who should follow the Code of Conduct?

The Code applies to every employee in EZ Engineering, regardless of role, location or geography, including all businesses that operate under a different trading name. We must all always follow the standards and behaviors set out in the Code of Conduct.

In addition, all third party agents, contractors and consultants who are employed by us must also work within the standards and behaviors outlined in the Code when conducting business on our behalf.

Why is the Code of Conduct important?

With the increasingly challenging external environment and our enhanced scale we are subject to ever higher levels of scrutiny. We must ensure all our activities are conducted with the utmost integrity.

The Code of Conduct is a key element of our internal control framework, to ensure that we have the appropriate controls in place to support employees in how they fulfil their roles whilst conducting business in EZ Engineering's name.

Our internal control framework is made available in a collection of documents, the Code of Conduct being one of them.

Does the Code contain everything I need to know?

The Code of Conduct provides information to highlight certain international laws, trading sanctions and regulations that are relevant to our business. It cannot describe every law, policy, process or situation that you may encounter.

At the end of each topic covered in the Code there are references to Group Policies and where to access other guidance materials. In addition there are details of who directly to ask for help and advice.

Colleagues around the business have knowledge and experience of different topics and seeking their advice will help you make an informed and correct decision.

What can I do if I have a query or concern?

The Code of Conduct cannot describe every situation you may encounter. If you are unsure, there are a number of ways to seek help and advice.

If you have concerns as to what course of action you should take in any given situation, it might help if you ask yourself:

- Is it legal?
- Is it ethical?
- Is it in line with EZ Engineering Code of Conduct?
- Am I setting a good example?
- Have I consulted my colleagues who have knowledge of this topic to help me make an informed decision?

What about the role of managers and supervisors?

We all have a role to play in creating a working environment that promotes integrity, teamwork and trust.

Working with Functional and Regional Directors and other senior managers around the business, our Management is responsible for driving good corporate and individual conduct across the Group.

Those who manage or supervise others have additional responsibilities:

- making sure the Code of Conduct is provided, explained and understood by employees, including new temporary or contract workers;
- providing guidance on how those they manage can follow the standards and behaviors set out in the Code of Conduct;
- setting a personal example to promote the standards and behaviors outlined in the Code of Conduct;
- ensuring team members receive appropriate training and guidance to enable them to comply with the Code of Conduct;
- listening to concerns and supporting those raising concerns.

What about different laws and regulations that exist in different markets?

The requirements of our Code of Conduct must take precedence except in situations when the standards defined within our Code of Conduct conflict with a specific local law.

Only in these exceptional circumstances, when a local law dictates a stricter standard than our Code of Conduct, the local law must be applied.

If you are uncertain as to which laws apply, or if a conflict between different laws is believed to exist, you should contact Group Legal before proceeding.

How will concerns be investigated?

If, honestly and in good faith, you report apparent misconduct, you will be supported by the Company.

We have developed procedures for investigating and handling potential violations of the Code of Conduct to ensure consistency of process across the business.

All investigations initiated will be conducted thoroughly, fairly and in compliance with the Company's Code of Conduct, local legal requirements and in accordance with the employee's human rights. These are outlined in Section 4, Administration of the Code of Conduct.

Anyone who suspects that the law has been broken or a violation of our Code of Conduct has taken place should first discuss their concern with their manager who will assist to establish a balanced and impartial view related to the significance of the concern.

Compliance with our Code of Conduct

All EZ Engineering employees are required to comply with the standards set out within this Code. Where a violation of the Code of Conduct has taken place, appropriate disciplinary action will be taken, up to and including dismissal.

BUSINESS INTEGRITY

1. Anti-Illicit Trade

We must never engage in or facilitate illicit trade activities. We must ensure that we only conduct business with companies and individuals that are reputable. We must work with Governments, regulators and law enforcement authorities to prevent the illicit trade in every of its meaning.

The illicit trade, especially in performing services, has a damaging effect on our company. It is contrary to our interests and harms our business reputation. It materially diminishes the legitimate markets in which we operate to compete for market share.

Illicit Trade includes:

Contraband Legitimate: products purchased on a duty paid or duty free basis but smuggled into and sold illegally in other markets in contravention of fiscal or customs laws. These products are also known as ‘black market goods’.

Counterfeit Products: Products which illegally copy existing brands which are manufactured and/or sold in violation of trade mark rights, often smuggled into other markets to be sold without any duty being paid.

We must:

- ensure legally binding written contracts are in place to cover all relationships with customers, agents and other third parties;
- seek to ensure our customers share our standards for integrity and are aware of relevant elements of our Code of Conduct;
- review all customer data annually.

We must not:

- expose ourselves to personal risk or danger when gathering or reporting suspected incidences of illicit trade activity;
- continue to trade with customers identified as being involved, deliberately or recklessly, in illicit trade activities;

2. Money Laundering

We must never engage in or facilitate money laundering.

Money laundering is the process of creating the appearance that funds obtained from criminal activities are legitimate or originated from a lawful source. It is a serious criminal activity.

We must:

- only accept payment from customers and other businesses or individuals with whom we commonly conduct business and on whom we have carried out full and proper due diligence and verification (including financial checks);
- immediately raise any concerns with Commercial Integrity, for example, after having heard a rumor which suggests that a customer is or may be involved in illicit trade activities;
- be very careful in all circumstances that suggest improper financial transactions might be taking place. Examples of this include:
 - a customer who is unwilling to provide personal or business background information;
 - a customer who wants to pay using large amounts of cash;
 - a customer who appears unconcerned with price or other terms and conditions of purchase;
 - a customer or supplier who wants to be paid into a bank account in a country different to his country of residence or operation.

We must not:

- accept any cash or cash equivalents that are, or could be, the proceeds of criminal activity;
- ignore, deliberately or recklessly, any of the “red flags” that suggest improper financial transactions might be taking place.

3. Competition and Anti-Trust

EZ Engineering is committed to competing fairly and honestly with our competitors, and in doing so, we must adhere to all anti-trust and competition laws that apply to our business.

The general principles set out in this section are for guidance purposes only. Competition laws that are applicable to a market take precedence. As such, we all must be aware of the competition laws that exist in our local market.

Fair Competition

Most countries have competition laws in place and, depending on our location, the laws which apply to us may vary. Competition laws are designed to encourage a free market and protect consumers and businesses.

Violating competition laws can result in high fines, can lead to litigation from those groups that have been negatively affected and can also damage the company's reputation and share price.

Information Gathering

Gathering, analyzing and using data and market information is a legitimate competitive tool. However, we must be careful when we are gathering information about our competitors. Legitimate sources of information include: the media; the internet and company websites; reputable industry surveys; annual reports; public speeches of company executives; publically available filings with government agencies; collecting data at point of sale through use of Company supplied electronic equipment, for example Siebel, and talking with customers, but not with the specific purpose of obtaining confidential information.

We must:

- understand what competitive information we can gather and how we may use it;
- ensure that our own competitive information is not disclosed either directly or indirectly to competitors.

Subject to applicable laws, we must not:

- attempt to gain access to information regarding a competitor's business by illegal or inappropriate methods, including:
 - engaging in industrial espionage or undercover surveillance to access information which is not publicly available;
 - hiring competitors' employees for the purpose of obtaining confidential or commercially sensitive information;
 - approaching competitors' customers or employees to obtain confidential information;

- adopt any other method of gaining information which may be considered either inappropriate or illegal;
- accept, disclose or use information that we know or have reason to believe was confidentially disclosed to us in violation of a general obligation of confidentiality or a confidentiality agreement between a third party and one of our competitors, for example information about a competitor's proposal when involved in a negotiation process.

4. Anti-Bribery and Corruption

Compliance with bribery and corruption laws is compulsory. We must not offer, give or accept any gift, payment or other benefit that seeks an improper advantage for EZ Engineering.

Most countries have laws which make it illegal to engage in bribery and corruption. An increasing number of countries criminalize and prosecute acts of bribery which take place beyond their borders.

Violating these laws is a serious criminal offence for the individuals and company concerned. Penalties usually include imprisonment, large fines (for both the company and individuals) and significant damage to a company's corporate reputation. Companies may be required to self-report violations by their employees to law enforcement agencies.

The principal corruption offences are:

- paying (or offering) a bribe;
- accepting a bribe.

Bribes can include money, services, gifts, excessive or unjustified entertainment and other similar benefits (including favors). Giving, offering or accepting any of these may amount to bribery, if the intention is to secure or retain business or to gain any form of improper advantage.

Bribes do not have to consist of large amounts of money. Small payments made to government officials or authority representatives are often referred to as facilitation payments, and can be made directly or indirectly, including through a third party. Recipients of bribes may include customers, suppliers, government officials and political representatives and their families and friends. ***We must never engage in corrupt behavior.***

We must:

- bring any request or demand for a potentially corrupt payment by a third party to the attention of your line manager, local lawyer or Group Legal;
- address all “red flags” that indicate there may be a corruption risk;
- actively discourage the use of facilitation payments in markets where we operate;
- seek guidance from your line manager, local lawyer or Group Legal.

We must not:

- pay or offer or accept or authorize a bribe or facilitation payment, or ask anybody else to do so;
- make or authorize an improper payment or bribe to a government official or employee of a state-owned or controlled business;
- attempt to induce a public official to do something illegal;
- ignore or fail to report, a corrupt activity;
- establish an unrecorded fund (such as a secret cash or off-the-books account) for any purpose;
- encourage or facilitate someone else to commit or ignore a corrupt activity.

5. Gifts and Entertainment

When giving or receiving gifts or entertainment, we must ensure that doing so cannot distort our business relationship, create a conflict of interest or be construed as a bribe.

We must:

- always receive prior written authorization from your Head of Function or Business Unit, or Regional Director, before giving or receiving anything, regardless of value, to or from a government official or employee;
- have a justifiable business purpose for every gift and entertainment;
- always consult our line manager for guidance and written authorization prior to giving or receiving any gift or entertainment with a value greater than 200 EUR or relevant Market Limit;
- ensure that all gifts and entertainment with a value of greater than 200 EUR or relevant Market Limit are accurately recorded in our local Gift Register.

We must not:

- offer, give or accept anything illegal or unethical, or which would result in a violation of law or our Code of Conduct;
- offer, give or accept any cash or benefits in return for a commercial favor, e.g. from a supplier in return for the award of a contract.

6. Responsible Procurement and Supplier Partnerships

We must only do business with trustworthy suppliers who have a reputation for conducting their business affairs in a professional and ethical manner.

We are very proud of our reputation for managing professional partnerships with our suppliers in a mutually supportive, open and collaborative way. Developing and maintaining open, honest and fair partnerships with trusted suppliers is integral to our long term business success.

Our supplier relationships must remain on a mutual basis of impartiality, fairness and loyalty. We have a responsibility to select and work with suppliers that demonstrate our commitment to conducting business with integrity.

From time to time we must re-evaluate our suppliers based on impartial decision making through use of objective criteria such as suitability of product or service and price, quality, performance, trustworthiness and reliability.

We must:

- adopt a responsible approach when selecting suppliers, completing due diligence to ensure that their practices will not in any way damage our reputation;
- ensure all our formal supplier contracts incorporate our Code of Conduct (by reference to our website) to make certain that our suppliers are aware of our ethical standards and agree to comply with the overriding principles of the Code of Conduct;
- ensure our day to day suppliers, for example, office maintenance and cleaning contractors are aware of our Code of Conduct as it applies to them;
- encourage and support all of our suppliers to adopt our standards;
- always act in compliance with our Group Procurement Policy;
- raise any concerns related to supplier activities to Group Compliance so that potential risks can be appropriately investigated.

We must not:

- accept or ignore supplier activities which we suspect may be in violation of our Procurement or Human Rights Policies or our Code of Conduct.

7. Political Engagement and Donations

All engagements with Governments, regulators, industry bodies and public interest groups must be completed lawfully and in the best interests of EZ Engineering.

In all of our business engagement activities we must remain politically neutral.

EZ Engineering recognizes the right of its employees to participate in political activity as private individuals. However, we must ensure that our personal views and opinions cannot be interpreted as being those of the Company.

8. Customs and Tax

We must act with integrity in all of our contacts with any Government authority, including customs and tax officials.

We must comply with all regulations which specify import duties, value added tax, excise tax and similar that may be payable in relation to our products in addition to tax, bonding or other regulations that govern tax, duty free or tax suspension shipments.

We must not:

- accept or ignore any suspected violation of our standards on customs and tax and discuss any concerns with our line manager, Group Finance or Group Compliance.

9. International Sanctions and Trade Restrictions

We must understand and comply with all international sanctions and trade restrictions. The United Nations, the European Union and many individual countries impose strict controls on exporting to and trading with specific countries, individuals and businesses.

RESPONSIBLE BUSINESS PRACTICE

1. Accuracy of Accounting, Financial Record Keeping and Disclosures

We must honestly, accurately and objectively report and record all of our financial and non-financial information as this allows the Company to make informed business decisions, safeguard our resources, fulfil our responsibilities and achieve our legal and regulatory requirements.

Financial and non-financial information can take many forms from expenses and timesheets to the recording of transactions, forecasts, individual company accounts and the EZ Engineering Annual Report.

We all have an important role to play in ensuring that accurate and complete financial and business records and reports are maintained.

Falsifying records, accounts or misrepresenting the facts is fraud and managers have an increased responsibility to ensure that all reporting of financial and non-financial information is both relevant and honestly represented at all times, with objective information and opinions presented to senior management.

We must:

- ensure all financial reports, disclosures, forecasts and analysis we are responsible for is submitted honestly and accurately;
- comply with all laws, external accounting requirements and Company Procedures for reporting financial and all other business information;
- demonstrate integrity and care when submitting our own travel and expense claims and in approving those of others;
- co-operate fully with Group Compliance and our external auditors;

We must not:

- prepare or submit any information with the intention of misleading the recipient;
- make a dishonest or deceptive entry in any report or record;
- misrepresent the correct purpose of any transaction;
- create an unrecorded or improperly described fund for any purpose;
- sell, transfer or dispose of any Company asset without prior authorization and appropriately completed documentation;
- modify or damage any Company record unless authorized to do so by established Policies and Procedures;

- engage in activity aimed at falsely exaggerating or moving sales volumes or profit between reporting periods which distorts our financial performance;
- provide any information, either verbally or in writing, about our transactions that would make it possible for a customer or supplier to prepare inaccurate or deceptive financial statements.

2. Use of Company Property, Assets and Resources

Company property, assets and resources are supplied to us for business purposes. We must ensure their proper and appropriate use.

Company equipment includes computers, networks, hardware and software, email, telephones and any mobile devices, photocopiers and vehicles. We must not use any Company supplied equipment in any way that could be harmful, inappropriate or embarrassing to us personally or the Company.

Company time includes the time we use to fulfil our role responsibilities. We all have a responsibility to make the best use of our own time and the time of our colleagues.

Company information and data, documents and intellectual property are examples of Company property, assets and resources. We all have a responsibility to safeguard Company information and data for good document and record management and for safeguarding our intellectual property including trade marks.

We must protect Company property, assets and resources. This includes safeguarding their physical safety, regardless of value, ensuring they cannot be taken or used without authorization. It also means that they should always be used responsibly.

Theft through fraud, deception or the deliberate reporting of inaccurate time or expense claims is another area for which we all have personal responsibility to detect and prevent.

We must:

- protect and use Company funds and property to the standards that you would your own, safeguarding them against theft, loss, fraud or abuse;
- ensure all business expenditure, including expense claims, is supported with honest, accurate and appropriate invoices, vouchers and documentation;
- report the hours we work honestly and accurately;

- ensure we only make reasonable personal use of Company supplied electronic systems including personal computers, laptops and mobile devices.

3. Intellectual Property

We must protect EZ Engineering's intellectual property such as trademarks, design rights, patents and copyrights because they are valuable corporate assets.

4. High Standard of Products and Business Processes

Delivering high quality products and services to our customers is essential to the sustainability of our business.

We must promote high standards through actively seeking to improve our working practices across all aspects of our business and in particular in our services.

5. Privacy of Information (Data Protection)

We must treat personal information with respect and sensitivity and in accordance with our obligations of privacy and data protection laws.

The Company collects, maintains and manages personal information about employees, customers, suppliers and other individuals. This information is often referred to as 'personal data'.

We must:

- only collect or use personal information for Company business purposes;
- ensure that individuals whose information we hold know we have it and understand what it will be used for;
- only share personal information if the people whose information we hold would expect us to do this;
- keep personal information securely, whether it is held electronically or on paper;
- restrict access to personal information to those who need to know;

- ensure that personal information is accurate and up to date;
- delete or destroy personal information as soon as there is no more need for it;
- ensure that employees who handle personal information understand their responsibilities and put them into practice;
- comply with any additional local legal requirements in relation to personal information.

We must not:

- transfer personal information to other countries without adequate protection.

Privacy Policy

(1) The Employer collects processes and uses Personal Data of the Worker for the purpose of exercising the rights and obligations arising from his / her employment relationship, in accordance with the Labor Law, other laws and subordinate legislation.

(2) The Employer specifies certain personal data provided by the Employer to third parties as recipients in order to exercise the rights and obligations on the basis of compulsory insurance and to exercise the rights and obligations of the Worker as a taxpayer. These data are submitted to the Pension Insurance Institute, the Health Insurance Institute, the Tax Administration and other recipients in cases prescribed by law and bylaws.

(3) The collection, processing and delivery of personal data referred to in paragraphs 1 and 2 shall be mandatory, and in the case of refusal to provide such personal data, the Employer shall not be able to provide the Worker with the exercise of his employment rights and shall not be able to report it to the compulsory insurance .

(4) Personal data the employer keeps it permanently or within the deadlines prescribed by the regulations regulating labor relations and accounting.

(5) The Worker shall have the right to request access to the Personal Data from the Employer, correct them, delete them, limit the processing or lodge a complaint against the processing, for all the Personal Data which is based on consent.

(6) The employer processes and collects data such as collecting the birth certificates of employee children used solely for the purpose of payment of cash benefits for the newborn child of the worker / giving of the child.

(7) The employer also collects employee photographs, which are used exclusively within the company with e-mail of employees, in order to improve mutual recognition and communication between employees, given the constant increase in the number of employees.

(8) In addition to the personal data processed in accordance with paragraphs (1) and (7) of this

Chapter, the Employer may determine to collect and process other Personal Data of the Worker, in which case Employer shall ask an explicit consent from the Worker.

If the Processing of Personal Data of a Worker is based on consent, the Worker may withdraw such consent at any time.

(9) For the purpose of exercising their rights to the protection of personal data, the employee can contact the responsible person within the company at e-mail zastita-osobnih-podataka@ez-grupa.com.

If the employer fails to comply with the Worker's request referred to in paragraph (7) of this chapter the Employer may file a complaint with the Personal Data Protection Agency in accordance with Law.

6. Electronic Communications

We are supplied with electronic equipment such as phones, computers and hand held communication devices to help us to do our job.

Electronic equipment and the information it contains is EZ Engineering's property. The Company reserves the right to monitor or filter any content or communication in order to protect the business from security breaches, loss of information or legal action.

It is acceptable to make reasonable personal use of Company supplied electronic equipment, providing that doing so does not impact network security or performance, is consistent with our Code of Conduct and allowed by local management.

All information stored on and communicated using Company supplied services and equipment might be considered to represent the views or opinions of the Company. This includes personal content.

We must:

- protect equipment from unauthorised use or theft when unattended;
- ensure that personal comments or contributions do not damage the reputation of the Company or commit the Company to something over which we have no authority;
- protect sensitive information when travelling or sending information to others;
- report any loss of sensitive Company information.

We must not:

- disable equipment security measures;
- access, store or share anything that could be considered offensive to others or could expose us or the Company to legal action;

- share our personal passwords with others.

7. Information Management

Our corporate records contain valuable information which is used by the business to provide evidence of our activities and decisions. They also enable us to demonstrate that we are fulfilling our regulatory and legal obligations.

Whenever we record information we must do so accurately and ensure we maintain the appropriate level of confidentiality and security.

Records can take many forms including paper and electronic. Electronic records include emails and visual media such as photographs or films. Records can also include voice and text messages, instant messaging and comments made on websites, blogs or social networks.

Our records can be stored on paper or in electronic format and in many locations. They may also be kept or managed for us by outside agencies. We are required by law, regulation and business need to keep records for certain periods of time depending on their content and nature.

We must:

- carefully and accurately record the business activities for which we are responsible;
- ensure that records are kept in a way which allows them to be shared appropriately;
- comply with all legal and business requirements for keeping records;
- review records on a regular basis and safely dispose of those which no longer need to be kept or which must be disposed of in accordance with law including to comply with rules on data protection and in line with our Documents and Company Records Policy;

8. Confidential Information

We create, use and share confidential information on a daily basis.

We must protect this information in order to safeguard our own and the Company's interests and reputation.

Restrictions on sharing confidential information apply until it is available to the public and remains in place after we are personally no longer employed by the Company.

In the same way that we must respect the confidentiality of our own information we must also protect the confidentiality of the information of others.

We must:

- take particular care not to discuss or work with confidential information in public areas, where it could be seen or overheard;
- ensure that security measures are in place to make certain that confidential information cannot be lost or stolen, particularly when travelling or when sending it to others;
- ensure that appropriate formal arrangements are in place relating to the necessary release of confidential information.

We must not:

- disclose information which is not publicly available to others inside Company unless they have a business reason to know;
- disclose information to people or organizations outside our business, except where disclosure is required for business purposes or by law;
- seek to obtain or use confidential information relating to other people including our competitors, even if we indirectly receive the information;
- make use of confidential information from a former employer.

9. Conflicts of Interest

Our business decisions must always be made in the best interests of the company and we must never allow our personal or family Interests to conflict with our obligations to the Company.

A conflict of interest can arise in the following situations:

- if your partner, family member or close relative is employed by a competitor, supplier or customer of the Company;
- if you have a financial interest with an actual or potential competitor, supplier or customer of the Company;
- if you have a partner, family member or close relative who works for the Company or who is seeking to work with the Company.

If you have any reason to believe that you are or may be in a position where a conflict of interest or the appearance of a conflict of interest could arise, you must disclose this to both your line manager and Group Compliance.

It may be that no actual conflict exists or that the conflict, once known, can be managed appropriately.

We must:

- avoid situations where our personal interests or those of our partner, family member or close relative could conflict with the interests of the Company.

We must not:

- use our position in the Company for personal benefit or for the benefit of our partner, family member or close relative.

10. External Communications

Our reputation depends on our professional and ethical behavior. All we do and say and everything our external stakeholders say about us defines EZ Engineering's reputation.

We must protect the integrity of the information we provide by ensuring we give everyone equal access to honest and accurate information.

We must:

- ensure there can be no misunderstandings between our personal views and those of the Company. e.g. we must not use the Company's letterhead, logos or email system to express personal views or for personal business;
- ensure regulatory submissions and public statements are approved by Group Management;
- refer media and press enquiries to an appropriately authorized person

We must not:

- talk about or write anything on behalf of the Company unless we have been authorized to do so;
- talk about or write anything on behalf of the Company on subjects extending beyond our own area of expertise;
- write anything on Weblog sites unless we make it explicitly clear that we are expressing our own personal views and opinions and not those of the Company or the Company's management.

SOCIAL COMPLIANCE

1. Discrimination and Harassment

We must all play our part in maintaining a workplace that is fair, respectful and free of any form of harassment, discrimination or any other demeaning behavior.

Any behavior or action likely to violate this principle, and in particular any form of harassment or bullying, is not acceptable and must not be tolerated.

We must ensure that none of our colleagues are subjected to any undesirable actions or behavior because of their age, race, origin, gender, disability, political view, religion, marital status or physical or mental health. Other unacceptable behaviors include insults of an offensive or potentially offensive nature including those of a racial, ethnic, religious, political or sexual nature, distributing or displaying offensive materials, and using voicemail, email or other electronic devices to communicate insulting or discriminatory information.

We also have a responsibility to deliver the Company's commitment to ensuring we provide an equal opportunities work environment where jobs are filled by the most suitable candidate and everyone is rewarded fairly based on their skills, attitude, ability, experience, qualifications and performance.

Employee Relations

We must make certain that all employees in all locations are employed fairly, safely and in compliance with all local employment laws and regulations.

In countries where works councils, employment unions and worker associations exist we must openly and fairly engage with them.

We must:

- treat all colleagues fairly and equally in accordance with their ability to achieve the requirements and standards of their job;
- demonstrate respect for cultures that may differ from our own;
- recruit, develop, promote, discipline and provide other conditions of employment without regard to a person's age, race, origin, gender, disability, political view, religion, marital status or physical or mental health or any other legally protected status;
- reasonably accommodate employee disabilities, religious beliefs or practices.

We must not:

- allow any discriminatory factor to influence our decisions, either directly or indirectly, related to an individual's recruitment, reward or career progression;
- engage in any form of harassment or abuse, or any behavior that could be perceived as offensive, intimidating, malicious or insulting;
- accept or engage in any form of behavior that excludes an individual or group of individuals from team or group activities, social engagements, team events or any other activity undertaken in their team;
- accept or engage in any form of behavior that creates a hostile working environment.

2. A Healthy and Safe Working Environment

We must behave in a manner that promotes a positive Health and Safety culture and challenge unacceptable or potentially dangerous behavior.

We must:

- conduct our operations in compliance with local Health and Safety laws and our own Occupational Health, Safety and the Environment Policy as this may exceed what local law dictates;
- understand the hazards, risks and control measures of our own activities and environment;
- know what to do in an emergency situation and test our understanding;
- proactively consider our own health and safety and that of colleagues and others;
- integrate health and safety considerations into our daily work activities;

We must not:

- accept or ignore any suspected poor health and safety practices.

3. Environmental Responsibilities

We are committed to introducing more environmentally sustainable ways of working. We all have a role to play in reducing the impact that our activities have on the environment.

We must:

Reduce the impact of our day-to-day activities on the environment by:

- implementing the Group Environmental Standards and guidance;
- modifying our own behavior to reduce our impact on the environment by reducing waste, cutting out unnecessary travel, saving water and energy;
- ensuring unavoidable waste is reused, recycled or disposed of in a responsible way;
- taking all necessary actions to prevent violations of our Occupational Health, Safety and the Environment Policy;
- reporting all spills or unusual emissions to the air or water to our line manager or local Health, Safety and Environment Advisor.

We must not:

Ignore or accept any suspected or known violations of our Occupational Health, Safety and the Environment Policy.

4. Human Rights

We must promote and protect human rights and ensure we do not, directly or indirectly, contribute to any human rights abuses.

We must work towards the elimination of any abuse in human rights which may exist in the labor market, particularly if they are established to be in any way connected to our business or supply chain.

We must:

- look for evidence of actual or potential non compliance, particularly in geographies where it is known or believed that child labor or forced labor issues exist, and to work in partnership with others to challenge these issues;
- support, guide and work with others such as interest groups and Governments to assist them in their efforts to eliminate human rights abuses;
- work with our suppliers, licensees, agents and joint ventures to encourage and support their implementation of minimum age/forced labor standards;
- encourage everyone who either directly or indirectly works with us to comply with our standards;

- protect the right of all employees to allow freedom of thought, conscience and religion as well as the freedom of opinion and expression as described in the Discrimination and Harassment section of the Code of Conduct.

We must not:

- employ any person less than fifteen years old, or the local environment minimum employment age, or mandatory school age, whichever is higher;
- allow or make any distinction against any employee on the basis of their political, religious or jurisdictional status of the country or territory to which they belong, where necessary ensuring that valid working permits are in force for those working outside their country of nationality;
- condone any discrimination arising from an employee's right to freely participate in their community culture.

5. Community Involvement and Charitable Contributions

We are committed to making a positive contribution in those communities in which we operate by supporting and encouraging employee involvement in local community activities.

We must:

- obtain the prior approval of Management before committing to support any charity or community on behalf of the Company;
- take particular care when giving consideration to making charitable donations or community investments at the request of customers, business partners, politicians or government officials (refer to Conflicts of Interest, Bribery and Corruption and Gifts and Entertainment sections of the Code of Conduct);
- consider the sensitivity of any community investment project which may have a connection with minors;
- refer to our International Marketing Standards to ensure that any proposed donation or investment would not in any way violate our own policy.

We must not:

- give any community investment or charitable donation to any unregistered charities or not-for-profit organizations which are informal or unrecognized, or any individual or organization where due diligence has not been conducted.

Support and guidance related to our Community Investment Program, including the key areas of Company focus and the criteria by which funding applications are approved is available on the intranet.

IMPLEMENTATION OF CODE OF CONDUCT

Our Code of Conduct is specifically designed to ensure consistency in how we fulfill the management of our business activities both inside and outside the Company.

EZ Engineering is committed to truth, openness and objectivity in all its activities.

Procedures for investigating and handling potential violations of the Code of Conduct have been developed to ensure consistency of process across the business.

Responsibilities

The General Manager is responsible for administering our Code of Conduct.

Disciplinary Actions

Normal disciplinary procedures will be followed and, where a breach of the Code of Conduct has taken place, appropriate disciplinary action will be taken, up to and including employment dismissal.

In the event of any proven breach of the Code of Conduct also being criminal, the Company will support the appropriate authority in their prosecution of the individuals involved. Following all Code of Conduct investigations, any employee found to have breached the Code of Conduct will have details of the investigation findings and the final decision, including copies of any formal letters issued, placed on their personnel file. Employees should be aware that such information may remain a part of their employment record for a period of time as determined by local agreements and law.

Rights of Appeal

All individuals found to have breached the Code of Conduct will have the right to an independent appeal against the decision and proposed action.

Reporting

Each locality is responsible for honestly and accurately reporting all actual or potential Code of Conduct breaches.

Signatures and Acknowledgement

All existing and new employees must sign an acknowledgement confirming that they have read the Code of Conduct and agree to abide by its provisions.

All employees will be required to make similar acknowledgements on a periodic basis.

Failure to read the Code of Conduct or sign an acknowledgement will not excuse anyone from compliance with the Code of Conduct.

EZ Engineering d.o.o.



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