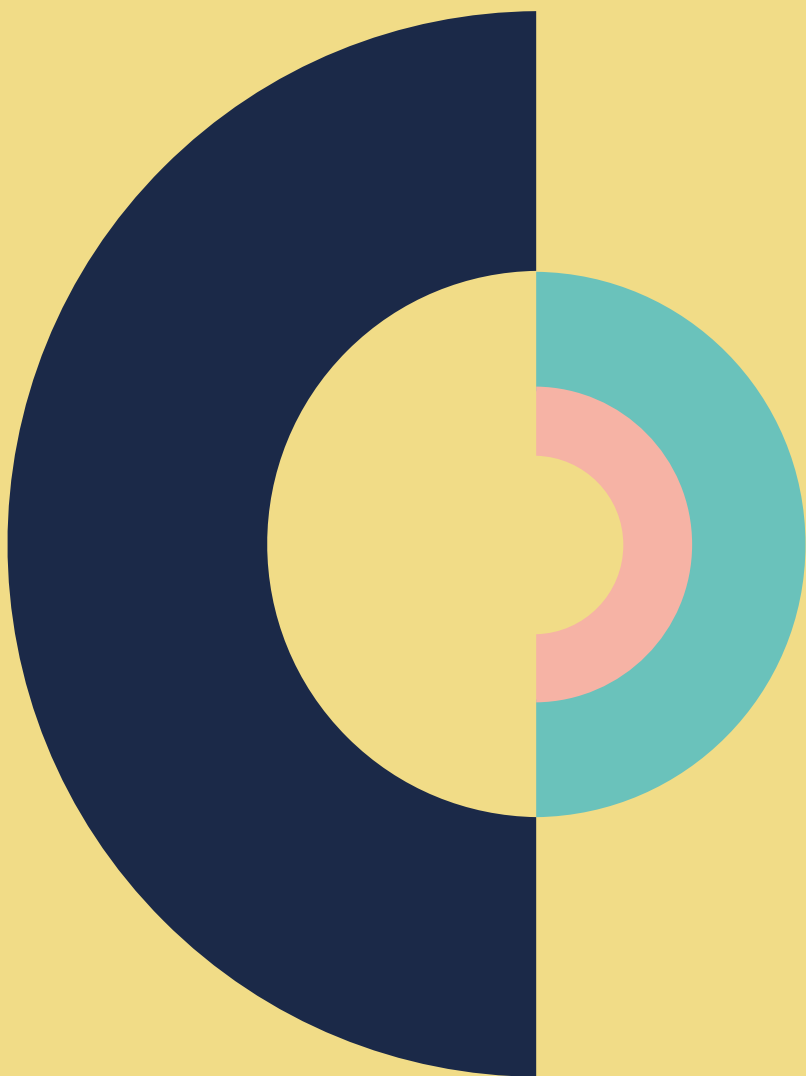


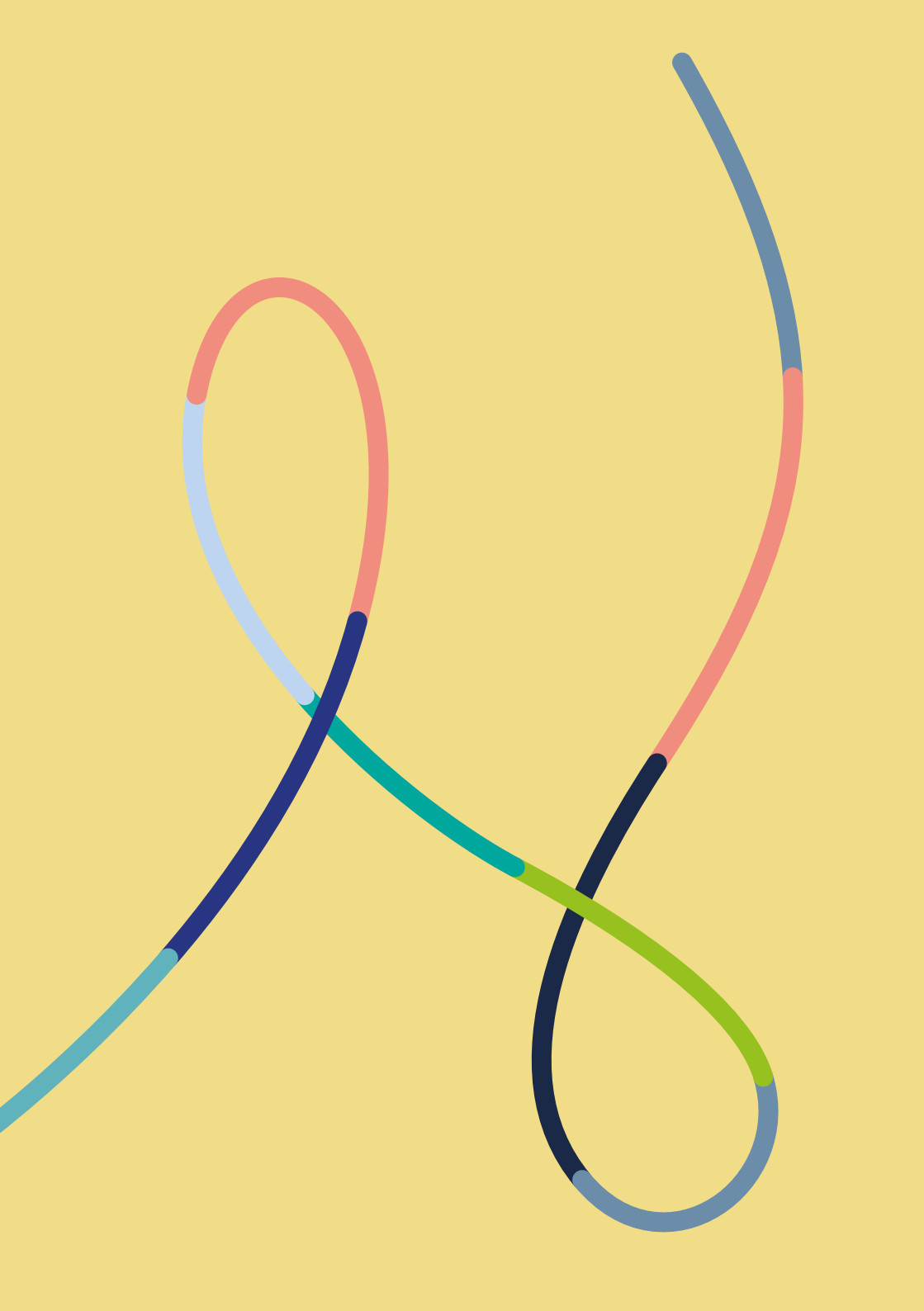


The Rules of Procedure  
and Code of Ethics  
of the Nelt Group  
2023









## Opening speech of the general director

Dear colleagues, associates and business partners, Nelt was established as a family business. We emphasize this with pride because our values have shaped and strengthened such a business environment during three decades of growth, business development and the emergence of Nelt Group as a modern organizational system.



Today, the Nelt Group is a big international family. This family consists of members of different societies, cultures, ages and interests, but we are bound by the same universal values - caring for people, personal responsibility, innovation, a winning mentality and a long-term perspective.

We consider these values the foundation of our organizational culture. With a strong culture and teamwork, we constantly modernize, achieve extraordinary business successes, launch new businesses and enter new markets.

The Rules of Procedure and Code of Ethics of the Nelt Group, which are in front of you, were created on this basis. In it, you will find information and practical guidelines that will facilitate your cooperation and communication. It will help you to act in different business situations ethically and in accordance with Nelt's business culture. We expect external associates and partners to be familiar with its general principles, and employees to read the Code carefully, apply it and actively prevent its violation.

Let us be an example of professional behavior and foster a pleasant business environment for all of us.

With respect,

Miloš Jelic  
*Nelt Group CEO*



PRC  
1-2023

# The Way of Logistics

**nelt.com**

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## Why do we have the Code and why do we have to follow its rules?

### Who is the Code intended for?

The code is intended for everyone who is employed in the Nelt Group companies - both permanent employees, as well as young people, independent contractors and everyone who is temporarily assigned to perform work or services in our companies. The Code, in some of its parts, also applies to everyone who is part of our value chain, that is our suppliers, business partners and those who, directly or indirectly, represent the Nelt Group (hereinafter: the company).

It was created to include the basis principles of business ethics and our organizational culture in one document. By business ethics we mean respect for laws, regulations, contracts between business entities and customs.

Each our employee is obliged to read and understand the Code and adhere to its guidelines. The Code contains recommendations and obligations that we have towards each other and the company, towards our business partners, the environment and the communities in which we operate.

That is why it's important that we act in accordance with those principles, that we constantly consider them and, if necessary, adjust our approach in relation to them.

### HOW CAN WE ENSURE COMPLIANCE WITH THE CODE IN OUR DAY-TO-DAY WORK?

If you have a dilemma about how to act in a certain situation, consider the following questions:

- Is my behavior in accordance with the values and business principles of the Nelt Group?
- Will my behavior allow us to maintain the trust of all those we work with?
- Would my family and friends think I am acting ethically?
- Have I considered the impact on those affected by my behavior?
- Would I feel comfortable if someone else treated me the same way?
- Would I feel comfortable if my actions were published in the media?
- Is my action legal and in line with company procedures?

For help in such situations, write to **[askethics@nelt.com](mailto:askethics@nelt.com)**.



The immediate manager shall be responsible for any additional clarifications in case they are needed.

Formally and legally, we ensure respecting the Code by signing an employment contract or other contract that is the basis of employment, at the same time signing an agreement on familiarity with the binding character of the Code.

Failure to comply with the Code may be considered a breach of duty, which may lead to measures such as disciplinary proceedings or termination of employment.

If we notice behaviors in our environment that are contrary to the principles of this Code, we are obliged to report the case via e-mail address **voice@nelt.com**. In the case of a report to the immediate manager, HR business partner or department responsible for the reported problem, the report should be forwarded to e-mail address **voice@nelt.com**.

By taking an active approach in implementing the Code, we contribute to our company remaining a safe and pleasant place to work.

Team managers are obliged to represent a positive example of professional behavior and nurturing of our organizational culture with their behavior. If the employee has difficulty understanding its individual parts or makes an ethically correct decision, the manager is obliged to provide the member of his team with appropriate support or direct him to the right address in the company.



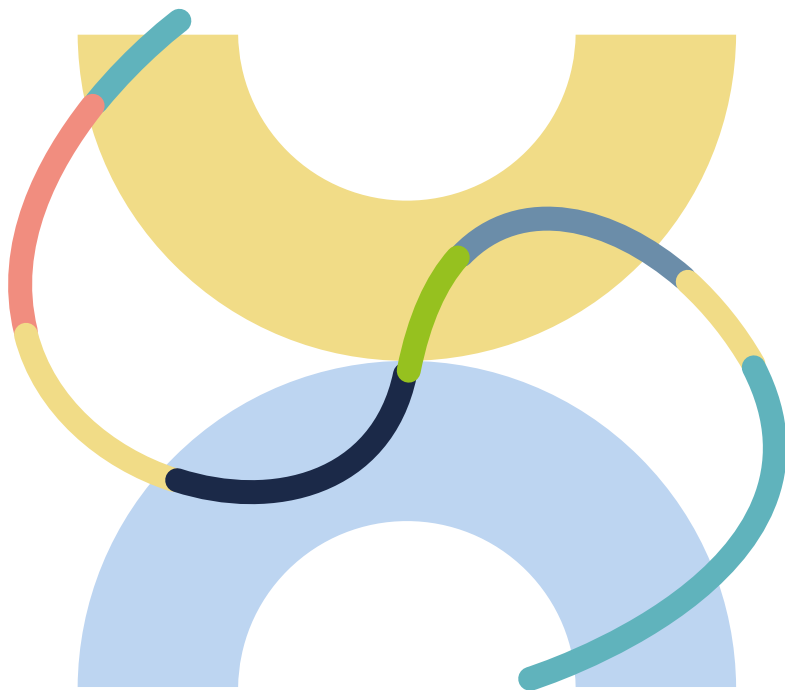
## Postulates of our business

### Vision and values

Our vision is to be the NUMBER ONE company in the application of complete solutions in distribution and logistics services. We improve the quality of life in the communities in which we operate on daily basis, by delivering high-quality products in the safest and most efficient manner.

In our work, we rely on the motivation, energy, winning mentality, expertise, innovation, personal responsibility and teamwork of our employees, state-of-the-art technologies, as well as long-term partnership relations with global leaders in their fields of business.

In implementing this vision in our daily work, our main support is our organizational culture and the five main values that constitute its part.



## Our organizational values are:

### LONG-TERM PERSPECTIVE

We act in accordance with the long-term interest of the company and thus build and develop partnership relationships with internal and external associates. We recognize and understand the needs of users of the company's services and the wider community.

### INNOVATIVENESS

We invest in our own development through constant attainment of new knowledge. We share knowledge and experience with colleagues, propose new ideas and support colleagues who do so. We support innovation and embrace change.

### PERSONAL RESPONSIBILITY

We treat company resources as if they were personal property. We make the necessary decisions within our own jurisdiction and take responsibility for them. We show readiness for discussion and concern for our own safety and that of our colleagues.

### CARE ABOUT PEOPLE

We motivate colleagues with a positive attitude, build relationships based on trust and support teamwork. We treat our colleagues in the way we expect from others, and we communicate clearly, openly, honestly and respect different opinions.

### WINNING MENTALITY

We set and accept ambitious goals, we believe in joint success and highlight it daily. We take reasoned risks, and view failure as a learning experience.

These values define the way we work and are a key factor in achieving our defined vision.

## Sustainability

**A**long with the outstanding financial results we achieve, we strategically base our business on the principles of ethical, responsible and sustainable growth.

We prove that we are guided by the principles of sustainable business with numerous activities that we carry out in areas such as care for employees and the local community, care for the environment, fair treatment of competing companies, various trainings, educations and programs for young people, and transparent and up-to-date communication. The activities we undertake for this purpose are regularly presented in our reports on sustainable business, which you can find on the Nelt Group web portal.

## Quality management system

**A**ll companies that operate within the Nelt Group constantly invest in the improvement of services, implementation of new technologies, education and development of employees with the aim of ensuring business flow.

The foundations of constant improvement and business continuity were established in accordance with the application of international standards. By applying the ISO 9001:2015 standard, the Nelt Group establishes business processes for its organizational segments.

By establishing and defining the process for each organizational part, it is possible to clearly define the roles and responsibilities of each individual who is obliged to follow the work procedures from his scope of activity on a daily basis.

The business flow of the Nelt Group companies is ensured by internal work procedures that hold on to the acquired knowledge and its improvement in various areas.

All internal work procedures are available to the Nelt Group employees on the IntraNelt portal and are used exclusively for the purpose of performing daily work, monitoring processes and control points within the process, improving work processes and presenting to external stakeholders.

The operations of the Nelt Group companies are based on international standards and systems (ISO 9001:2015; Codex Alimentarius - HACCP; ISO 14001:2015; GDP; Organic standard) as well as the application of quality requirements of international companies with which Nelt cooperates.





## Interpersonal relations

### Cultural diversity, inclusion and fair treatment of employees

In the Nelt Group, we strive to foster a working environment in which colleagues respect each other, respect different points of view and acknowledge each other's quality. The atmosphere on every occasion should be characterized by mutual trust and support. Behaviors that demean the values and dignity of our employees are against Nelt's business culture and have no place in our environment.

Every employee must be treated with respect and without discrimination based on gender, place of birth, language, race, skin color, age, pregnancy, state of health, nationality, religion, marital status, family obligations, sexual orientation, political or other belief, social origin, property status, membership in political organizations, trade unions or some other personal characteristic. This kind of behavior is expected from our employees, as well as from our suppliers, business partners and associates.

### Harassment and discrimination at work

We make decisions regarding our employees, such as promotions or awards for business achievements, solely on the basis of work performance, and never on the basis of personal attitude or beliefs.

Any form of harassment or other inappropriate behavior, including physical, emotional or verbal abuse, is strictly prohibited. This applies to everyone who participates in the affairs of our company, regardless of their position in the organization.

Violation of these principles may lead to disciplinary action, including termination of employment contract.

Through the Information Board and the IntraNelt portal, you can find a responsible person for support in potential cases of mobbing.

Reports of all potential forms of fraud, violations of regulations, discrimination or warnings in order to prevent potential damage on a large scale should be sent to **voice@nelt.com**.



## Equal opportunities for employment and advancement

**T**he company is advocating preservation of the diversity of its employees, a culture of mutual respect and respect for the diversity of other people. The right way to achieve this is to provide equal employment opportunities for all and this is an important feature of our success.

At the recruitment process, criteria such as professional qualifications, previous work experience and talent for performing a specific job are taken into account. These criteria are the same for all candidates, regardless of their personal characteristics.

We especially value and promote the personal development of employees through various trainings, awards and internal job competitions.

By creating opportunities for advancement and development, we encourage employees to, if they wish, employ their talents and skills beyond what is their standard and everyday job.

The company expressly forbids any form of harassment, blackmail, direct or indirect discrimination of a person seeking employment, as well as other unwanted behavior aimed at or representing a violation of dignity.

During the recruitment process, we are obliged to respect the company's procedures and not to require job candidates to provide information on family status and family planning, that is the submission of documents and other evidence that are not directly relevant to the performance of the work for which they are being interviewed.

Direct discrimination is any action that places a person seeking employment, as well as an employee, in a disadvantageous position compared to other persons in the same or similar situation.

Indirect discrimination exists when a certain apparently neutral provision, criterion or practice places or could place a person seeking employment, as well as an employee, in a disadvantageous position compared to other persons.



If a pregnant woman who is qualified for the position she applied for, comes to a job interview in our company, her pregnancy must not affect the decision on her employment. The opposite move would be a gross violation of our company's code of ethics, regardless of the sector or position in question.

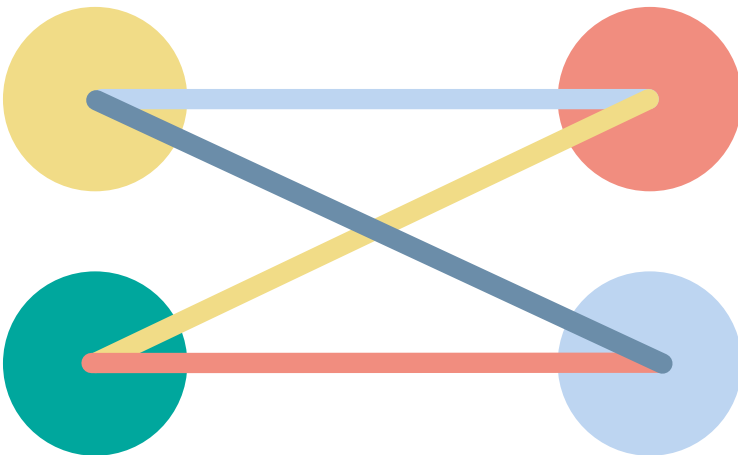
## Remote work

Employees who hold administrative positions, whose work is organized so that they can perform work outside the workplace, in accordance with the agreement with their superiors, can use the benefit of remote work. In using this benefit, we should take care that a certain number of team or sector members are physically present at the workplace every day.

Although telecommuting is allowed to choose the locations from which we work, we are obliged to respect the company's information and security policy in terms of a secure internet connection and protection of data located on a business laptop or telephone.

In order for us to perform our work well and efficiently even when working outside the office, our place of work should be quiet and peaceful so that noise or crowds do not affect our level of attention and productivity.

Adherence to agreed meeting times is mandatory, and managers are obliged to ensure that the quality of communication between the members of their teams does not decrease due to the use of this benefit.



## Dress code and behavior at work

There is no officially prescribed dress code in the dress and appearance of our employees. You can come to work in both formal and informal clothes. Jeans, sneakers or similar clothing is allowed if the employee feels comfortable in it.

Naturally, this does not apply to occasions such as public or media appearances, important meetings with business partners or government officials, visits to state institutions and similar occasions.

In this segment of behavior, we count on personal responsibility and assessment of the situation by our employees. They are expected to look decent and neat at work and to match the level of formality of dress in relation to different work responsibilities and occasions.

Employees in warehouse, delivery, hygiene and other specific positions have special dress codes at work which they are obliged to adhere to for safety, hygienic and other reasons.

Consumption of alcohol and narcotics is strictly prohibited at the workplace or when performing business tasks.

If you're not sure whether a particular item of clothing is appropriate for coming to work, consider these examples:



That is not appropriate. Skirts that are too short do not give the impression of professionalism and moderation in dressing.



This kind of dressing is appropriate, except in cases where due to important business meetings, public appearances or visits to state institutions, the level of formality of dressing should be harmonized with business obligations.



That is not appropriate. Although we can come to work in comfortable clothes and shoes, a tracksuit does not give the impression of professionalism and should be avoided.



Sandals at work are appropriate, except in special cases when the level of formality in dressing needs to be harmonized with business obligations.







# Magazzin

ACCELERATE 2025

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CHECK IN

INTERVIEW

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## Communication

Communication in the Nelt Group implies timely, accurate and transparent transmission of information of importance to different target audiences. Employees are obliged to be informed about all relevant events and changes in the company and follow all communication channels available to them. This especially applies to the company's management, which has the obligation to communicate all relevant information to the members of its teams.

### Written communication

Written communication in the company is based on the rules of clear and concise content and a tone of courtesy and respect. Written communication is done via e-mail, SMS messages, or via platforms such as Microsoft Teams, Skype and others. We try to send messages during working hours, and it is recommended that there is no messages delivery after 6 pm, or on weekends. Our emails should include a company signature and account photos should be up to professional standards.

Messages addressed to larger groups of employees, entire organizations or all employees in the company are sent from personalized sector addresses, with adequate visual marking.

Circular messages are placed so that their content is not burdensome and that they do not overlap each other on the same day.

When creating business documents and letters, we use Nelt memos as a basis, which can be downloaded from the InfoNelt portal.

#### EXAMPLE:

A circular email about the start of the internal prize competition was sent today from the email address of my sector. Later in the day, there was a need to forward service information that is important for all employees in the same way.

#### WHAT SHOULD I DO?

If it is important that the employees have this information before the start of the new working day, you can send the email in a timely manner. If there is no need for urgent forwarding of information, sending the email should be postponed until the next morning.





## Oral communication

Oral communication and communication at business meetings, is based on respect and respect for the colleagues regarding the agreed meeting beginning, the duration of the meeting and the planned topics.

When organizing business meetings in the company's premises, the needs of other colleagues for these premises should also be taken into account. We reserve meeting and conference rooms in the electronic system for as long as we actually need the space. The reserved appointments should be adhered to, and if the meeting is postponed, the room reservation should be canceled.

In addition to regular business meetings, so-called public employee meetings, where management informs employees about key business indicators, results and plans, play an important role in oral communication. In this way, we achieve direct and two-way communication within the company.

Meetings or larger gatherings attended by third parties - principals, partners, customers or clients - are held in accordance with company procedures, with adequate preparations, with announcement and in the spirit of Nelt's hospitality culture.

## Internal communication channels

Employees of the Nelt Group companies can be informed daily through internal communication channels about all important projects, business ventures, new collaborations and benefits for employees, recognitions and awards for the company or individuals, and other relevant events. The internal communication channels that are dominantly used, apart from e-mail, are the intranet portal InfoNelt, internal television for employees in warehouses, the magazine Magazzin and the mobile application for employees the Puls. The content of the communication is adapted to the languages of the employees in all the markets where we operate.

As a company that fosters a culture of open communication, we encourage employees to participate as much as possible in its creation. Employees in all positions, sectors and markets can contact the communications department if they want some information from the domain of their business or an event from their environment to be communicated to the rest of the organization.

## External communication channels

In the external marketing of information, our company uses the official website [nelt.com](http://nelt.com) and pages and profiles on social networks. On the company's website, you can find all relevant information about our company's operations, business reports, press releases and other media materials.

Social networks are one of the key communication channels for the company since they provide the possibility of marketing a wider range of business topics, less formal content and direct interaction with followers. These channels play an important role in creating the image of our company and building the image of a desirable employer in the market.

In accordance with the rules that apply to all users of social networks, polite communication is advised on the private profiles of employees, regardless of whether the content is related to the company or not. Posts on social networks - company accounts or private profiles of employees - must not reveal company information that is not meant for the public.

As a company that operates on two continents and employs thousands of people, we strive to present the team spirit, collegiality and successes of all our employees the best light. News and interesting things from all our companies that can be published on internal or external communication channels, of a more or less formal type, can be sent by employees to the communications department to the following e-mail:  
**[komunikacije@nelt.com](mailto:komunikacije@nelt.com).**

### EXAMPLE:

Our company entered into cooperation agreement with a new principal, which expanded our distribution portfolio to include several globally known and successful brands. This is a great achievement for our company and I am proud to take some of the credit for it. I checked my company's official website and social media and didn't see any news or announcement about it.

### In this case, should I publish the information on my private profile?

Although as a company we support the open communication of our employees, it is recommended that important business news is not published on private profiles before official company communication, so as not to affect its effectiveness. If you have such a dilemma, feel free to write to the communications department at the e-mail **[komunikacije@nelt.com](mailto:komunikacije@nelt.com)**.

## Communication crisis

Crisis communication is regulated by the document „The Nelt Group Crisis Communication Manual“ and the processes and procedures derived from it. Crisis communication is part of the responsibility of the narrower and wider crisis team of Nelt Group, in which representatives of all key sectors of the company are represented. Steps and communication flows are predefined in relation to assumed crisis scenarios. The document is available on the internal InfoNelt portal.

## Cooperation with the media and appearances representing Nelt

The Nelt Group companies continuously cooperate with the media in order to preserve a positive business reputation and ensure business visibility. This cooperation takes place through the placement of announcements, professional texts, interviews, advertising solutions, reports, as well as through the traditional annual meeting with journalists and editors.

Corporate cooperation with the media is the responsibility of the Communication department, which is why it is important that any media inquiry addressed to any individual employee is first forwarded to the e-mail [komunikacije@nelt.com](mailto:komunikacije@nelt.com).

The communications sector also provides support in the preparation of media materials and preparation for media filming.

### EXAMPLE:

Information appeared in the media that there is a product of our company on the shelves of a supermarket that is broken or has a manufacturing error.

### WHAT SHOULD I NOT DO?

To react independently on social networks defending our company and presenting evidence that such an omission is not possible.

### WHAT SHOULD I NOT DO?

I report the issue to the communications department and wait for the company's official reaction.

### EXAMPLE 2:

There was a flood in the warehouse of the company where I work, which damaged a certain amount of goods.

### WHAT SHOULD I NOT DO?

Forward photos and videos of floods to friends or share them on social networks.

### WHAT SHOULD I DO?

Be in solidarity with my colleagues who may be harmed by the leaking of such records to the public and wait for the company's official reaction.

When giving a statement or an interview to the media as a private person, it is important to make it clear that we are not speaking on behalf of the company, if this needs to be emphasized. In such situations, we should make sure that the logo or any other features of the company are not visible on the photo/video.

If you are invited to participate in social or educational gatherings as a representative of Nelt, do consult the Communication department, who will provide you with guidelines and materials for a successful presentation of the company.

#### EXAMPLE:

I am participating in a civil protest where I came as a citizen. The press team asked me to make a short statement for television, but I'm wearing a Nelt branded t-shirt. Does that mean I can't make a statement?

You can give a statement to the media, but it is important to keep in mind the wide possibilities of misuse of such material against your company and ask the cameraman not to show the company's logo in the frame.

## Accuracy of information

Information that is placed in any form and on any communication channel in the Nelt Group must be accurate, precise and verified. In this way, we protect the integrity of ourselves and our colleagues, as well as the reputation of the company. This applies to all sectors, internal and external communication, but also to business reporting and business documentation.



## Environmental protection

The business of the Nelt Group companies holds a long-term focus on environmental protection. In this area, our priorities are the rational use of non-renewable sources and the establishment of a system of renewable energy sources, as well as the use of technology, equipment and materials that reduce harmful effects. We pay special attention to waste management and promoting environmentally responsible business within relevant business associations. We are strategically focused on education and raising awareness on this topic both internally and externally.


Considering the nature of the core business of our companies, the biggest impact on the environment is realized through transport. In order to minimize this impact, we use the latest technological solutions. All vehicles are equipped with GPS devices, and the organization, control and monitoring of all delivery and sales routes is carried out using a modern software solution for the organization and optimization of transport. This ensures greater efficiency, optimization and rationalization of time and other resources.

We continuously and closely monitor the vehicle markets for alternative power trains and evaluate their potential impact on the company's environmental goals. We promote Eco driving and reward drivers with the most economical driving style.

Taking care of waste and consumption of non-renewable resources are an integral part of our company's business strategy and quality policy. In addition to the systematic management of waste flows, all employees of Nelt contribute to the preservation of the environment - from employees in the warehouse, who collect and sort waste during the preparation of goods for distribution, to employees in the offices who sort waste by type using sorters in buildings and recycling islands installed on Nelt's distribution sites and logistics centers.

In the long term, we are working on withdrawing paper documentation from use and switching to digital documentation, and we encourage our colleagues to follow this approach in their daily work.





As it is important for the company to be strategically focused on environmentally responsible business, it is equally important that we behave responsibly towards our environment on an individual level as well.

- Throw away water bottles and other plastic packaging and materials in the bins intended for that, so that this type of waste can be sent for recycling.
- When leaving the meeting room where no one will be staying, turn off the lights and electronic devices. In this way, we save significant amounts of electricity.
- If the air conditioner is on in the office, do not open the window. This saves a significant amount of energy.
- Use Nelt cardboard boxes as little as possible. If you can, for such needs, use the packaging of our principals or clients, which are in warehouses. In this way, we will reduce the amount of used cardboard.
- Whenever possible, communicate and keep the records in electronic form. Reduce the consumption of paper to the minimum possible extent.
- To reduce paper consumption, try to print all materials you can on both sides.

## Safety and Health at Work

In all the Nelt Group companies, business units and work locations, all laws and by-laws, good practices and standards are observed. We are constantly working to improve our policies, requirements, internal regulations and procedures in the field of occupational safety and health and environmental protection, as well as contractual obligations with business partners. Our requirements in the field of occupational safety and health often provide even more than what is prescribed by law and by-laws.

Occupational safety and health is especially important at production and storage locations, container terminals, as well as for drivers and delivery workers who spend a large part of their working time driving transport and delivery vehicles.

The policies of our companies in the field of occupational safety and health oblige us all to be aware of risks in the workplace and to take and improve prescribed measures in this area. In their premises, our companies are responsible for the safety of their employees, as well as visitors, service providers and contractors. Therefore, every company must be familiar with all aspects of their access and movement in complexes, halls and other facilities and spaces.

Employees of other companies who spend time and work in our area must also know and respect the regulations and contractual obligations in the field of occupational safety and health.

That is why all employees, with the professional support of the Safety Sector and the Occupational Safety and Health Team, are dedicated to achieving and maintaining a safe and secure working environment. Our companies have prescribed numerous security requirements that employees in all positions are introduced to during onboarding and that they are obliged to know and respect in the future. Employees can be informed about them on the IntraNelt portal, as well as on the information boards placed at the entrances to our halls.

Of course, physical security is not the only feature of a work environment that we consider safe and secure. It is characterized by the complete absence of violence, both among the company's employees and in their relationship with employees in other companies. Blackmail, threats, intimidation and violence have no place and will not be tolerated in the Nelt Group.

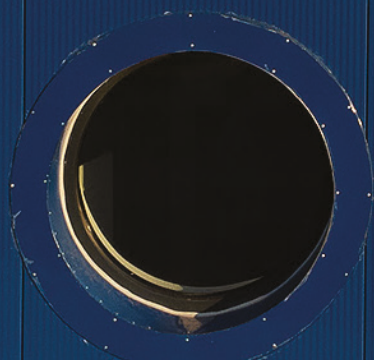
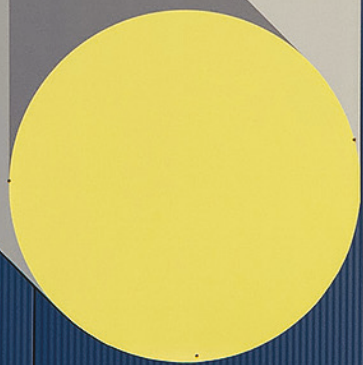
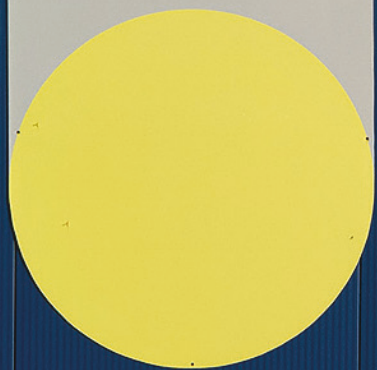
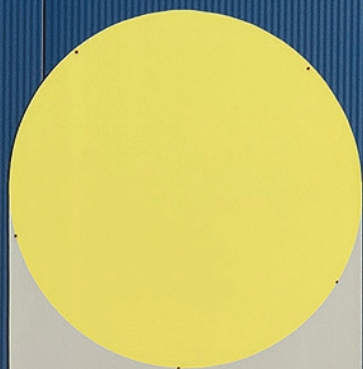
It is very important to be aware of the role of each of us in these situations, whether we are an actor in the event or not. Employees are therefore asked to report any actions that are in conflict with the rules and procedures in the field of occupational health and safety to the email address [voice@nelt.com](mailto:voice@nelt.com).

In the case of reporting to a superior, a person from the Team or employee representatives for occupational safety and health or the HR sector, the report should be forwarded to the address [voice@nelt.com](mailto:voice@nelt.com).

- If you work in a position in a warehouse or have the need to regularly enter warehouses, comply with safety regulations and use mandatory protective equipment.
- Before entering the warehouse, it is necessary to contact the head of the warehouse, who will give us protective equipment.
- Announced group visits to our warehouses, such as delegations from other companies and institutions or student visits, should be announced in advance to warehouse managers so that the visits are approved in relation to business operations in the warehouse and to ensure a sufficient number of sets of protective equipment.

Given the legal obligations, as well as the nature of our business activities, smoking in company yards can be risky. For this reason, there are certain places where smoking is allowed and all employees are obliged to respect this rule.





## Intellectual property

Intellectual property of the Nelt Group is all knowledge and confidential information - technical, commercial and of other nature - that an employee creates in the course of performing the tasks of his/her workplace, information that he/she learns while being engaged in the company, which is not public, as well as all documents, patents, contacts and information about business partners and customers with whom the employee comes or has come into contact.

This includes our brands, logos, visual identity and all other materials. This area is regulated by laws that regulate the area of intellectual property, which the Nelt Group adheres to in all markets where it operates.

### EXAMPLE:

I have subscribed from my company account to a newsletter or business portal that I need in order to be able to follow current affairs from the world of business. Am I allowed to send my credentials to a friend who works at another company?

No, that is not allowed. In this way, we violate the copyright of those who create that content and destroy our reputation and that of the company. The same applies to situations when someone from another company offers us access to content to which we have not subscribed.



All works of intellectual property are the exclusive property of the company, to the maximum extent permitted by mandatory regulations on copyright and other intellectual property rights. Employees are not allowed to copy or use other's intellectual property without specific permission or license.

In this sense, we must be aware that by respecting other people's intellectual property of other companies and individuals, we are also protecting the reputation of the company. Improper use of someone else's intellectual property can expose our company to fines for commercial infringement.

Nelt Group has the exclusive right to use its intellectual property, and employees are obliged to treat this information as confidential information.

#### EXAMPLE:

In cooperation with a consulting firm, Nelt conducted scientific research, the results of which will be used in business development. Am I allowed to share interesting insights from this research with friends from other companies?

No, that is not allowed, unless the data is publicly disclosed by the company. Unauthorized publication or sharing of such information violates our company's intellectual property, which may result in legal action by the company.



## Confidential information

### What is confidential information and how do we treat them?

Confidential information is considered to be all information or data that is not available to the public and/or that the company designates as confidential and/or is treated as confidential in specific circumstances. This is information about each parent company, subsidiary, branch, representative office and all other forms of related companies, which become available in any way, to any employee of the Nelt Group, a person engaged on any basis or to third parties. The obligation to keep business secrets remains permanent even after termination of the employment relationship with the company.

Such information or data can exist in both tangible and intangible form, written or electronic, in the form of a document, drawing, photograph, sample, chart, etc.

Confidential information includes in particular:

- decisions, plans, budget, unpublished results, income, sales forecasts;
- marketing and sales plans, product development plans, competitive analyses, business and financial plans or forecasts, non-public financial information, contracts and lists of clients and employees;
- contracts, purchase orders, approval matrices and forms, consulting offers, offers, price or quota offers and purchase orders;
- all information or material related to the Nelt Group's „know how“ in production, logistics, marketing, procurement, accounting, trade or licensing;
- company procedures, working documents, technical instructions, forms;
- software and other technologies developed or licensed by or for the needs of the Nelt Group or licensed for the Nelt Group by third parties, as well as related documentation;
- all information which the Nelt Group has a legal obligation to treat as confidential or which the Nelt Group treats as its property or designates as confidential or which is for internal use only, whether or not it is owned or developed or not by the the Nelt Group;
- business strategy or other officially adopted strategies of the company that are not publicly communicated by the company.

Take good care when sharing photos from lectures, trainings or meetings. In such photos, non-public information can be seen on the whiteboard or presentation behind you, and thus you may inadvertently reveal it. Before publishing, please note that such information is not visible on the photo.

All important or highly classified papers, documents and information should be made inaccessible when we leave our workplace. This applies both to data in electronic form and to written documents.

Employees are obliged to protect the confidentiality, integrity and availability of company data at all times. Unauthorized access, modification, destruction, use for personal purposes or disclosure of confidential data is not allowed, as well as issuing authorization for access and modification of data to an employee without a real business need. Violation of the employee's obligation in this case may lead to sanctions in accordance with the laws governing this area.

This also applies to confidential information of business partners. Our employees respect the trade secrets and confidential information of other companies and individuals, and we collect information about them exclusively from public sources, such as the media, the Internet or public documents.

This information is also not allowed to be revealed or shared, regardless of whether the conversation is held at a business association meeting or in the family circle. Be careful not to discuss confidential information in public places, such as restaurants, elevators, or public transportation, to avoid the risk of inadvertent disclosure of confidential information.

When signing a contract, you should not accept confidential information from other companies, unless all parties have previously signed an NDA (Non-Disclosure Agreement).



## What is not considered a confidential information?

Confidential information does not include information that is publicly known or becomes generally known during or after termination of employment, information generally accepted in the trade, or general knowledge learned during similar employment elsewhere.

This does not apply to information that has become publicly known as a result of an employee's mistake or breach of duty.

If you are unsure whether you should treat certain publicly disclosed information as confidential, consider the following examples:

- The information about our company's business that is on the website of the official institution is not confidential information.
- The business information on our company's website is not confidential information.
- The information you read in an informal correspondence on a social network, which falls into one of the categories of confidential information, is confidential information.
- Information that was leaked to the media or published on a blog, and which falls into one of the categories of confidential information, is confidential.



## Protection of privacy

Collection and working with personal information of employees and persons engaged according to any basis, clients, business partners and all third parties in the Nelt Group is done in accordance with the applicable laws. Also, all persons, regardless of their capacity in relation to the Nelt Group, have the right to have their personal information protected pursuant to the law.

Under personal information we consider name and surname, residential address, e-mail address, information on health status, personal ID number, salary, grades at school, information on education, marital status, bank accounts, tax returns, information on memberships in organizations and associations, credit indebtedness, browsing history, biometric information (pupil scan or fingerprint), ID number or passport number, DNA, as well as location and movement information.

All persons, regardless of their status in relation to the Nelt Group, have the right to inspect documents containing their personal information stored in the company and the right to request the deletion of information that is not of immediate importance for the work they perform, as well as the correction of incorrect information.

## Surveillance systems

The analysis of online activities of all users on the Nelt Group's information systems is monitored by automatic monitoring systems. In cases where there is an indicator of activity anomalies, the user may be subject to analysis by the security team. In the event that any violation of the information policy is detected and confirmed, the IT engineer for information security (ISO) will inform the relevant departments in the company.

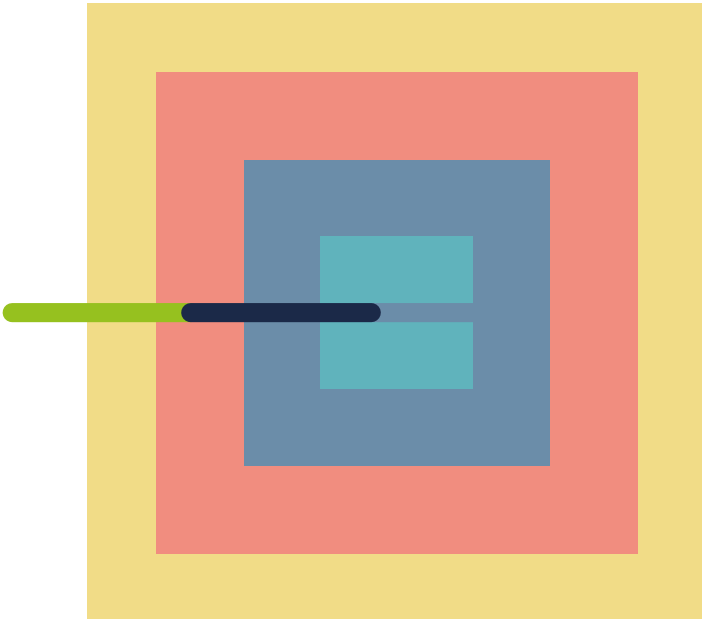
In order to ensure the safety and rational use of all road, delivery and cargo vehicles in our fleet, they are monitored using a GPS vehicle monitoring system.

The buildings of our companies are equipped with security cameras for recording activities outside the building and, if necessary, also inside the building. The subject of the recording is never a specific person, but a business process that is usually performed by several persons.

Employee information can be used in crisis situations, such as when the surveillance system detects online activities that are dangerous to the company's security on the company's computer. In such an event, the information about the online activities of the employee may be subject to analysis and, if it is established that the company's device has been misused, the information is sent to the competent institutions for processing.

In order to protect personal information, the Legal Department of the Nelt Group has drafted the General Act of the Rulebook on the Protection of Personal Information of Employees, Candidates and External Associates and the Privacy Policy. Both documents are available on the Nelt Group website.

If you suspect a potential misuse of your information by the company, you can contact the Legal Compliance & Ethics team via the e-mail address [Legalcompliance&Ethicsteam@nelt.com](mailto:Legalcompliance&Ethicsteam@nelt.com).



## Company property

### Rational use of company resources

We are aware of the responsibility our companies have towards the communities in which they operate. Preservation of what is of vital importance for all of us - clean water, proper food, energy and a healthy environment - we consider our duty, and participation in the development of programs and initiatives to improve the quality of life in the communities where our employees live and work, that we prove.

We are committed to preserving the company's resources and expect such behavior from both our employees and other participants in our value chain. By caring about the health, safety and prosperity of our employees, customers, the communities in which we work and the environment, we demonstrate high standards of social responsibility. We use company resources rationally and foster a culture of togetherness at all levels and sectors of the company.

### Personal use of company funds


Each of us is responsible for safeguarding and protecting company-owned assets, including financial and tangible assets, trade secrets and other confidential information. Resources, such as raw materials, office and field equipment and technology, are solely intended for business purposes. We are obliged to prevent their theft, loss, abuse or misuse.

If a theft occurs, we are obliged to report the case to the sector in which we borrowed the property or to the Security sector. This obligation also applies to situations where we notice damage to company property, regardless of whether we caused it ourselves.

In order to avoid misuse of company funds, we do not use company assets for private, but exclusively for business purposes.

In the case of purchasing equipment that you need to perform business duties, we are obliged to contact the Procurement Department.

The business travel procedure is regulated by a separate document on this topic for the market where the employee works.



I need to go on a business trip to another country. I need a plane ticket and hotel accommodation.

**WHAT SHOULD I NOT DO?**

Find the most favorable ticket and accommodation and make the purchase on my own.

**WHAT SHOULD I DO?**

Inform the Procurement Department about this and leave it to them to organize a business trip for me in accordance with the company's procedure. Carefully collect all the necessary documentation, such as business travel orders and personal documents, and inform myself about the conditions of entry into the country I am traveling to.

All contracts entered into on behalf of the company must go through the delegation of authority system, and all documents must be signed by the responsible person.

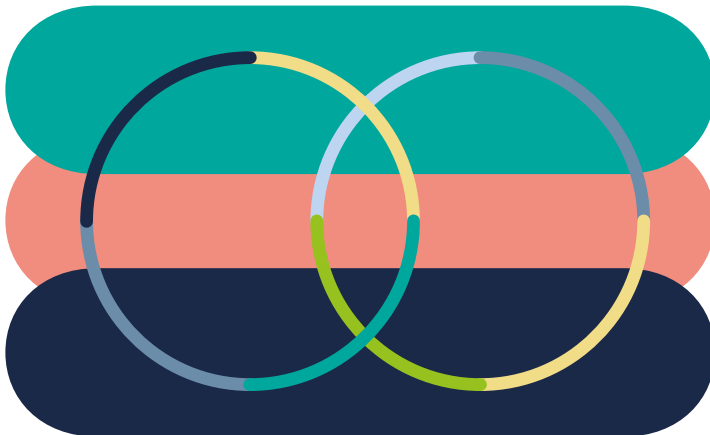
This includes, among other things, business trips and lunches. The business travel procedure is regulated by a document on this area for the market where the employee works. In order to provide us with accommodation in the corresponding hotel according to the prescribed standardization, we are obliged to inform the Procurement Sector, that is the Procurement Officer about the travel. Even in such situations, employees are expected to be responsible and act in accordance with the principles of homely business conduct.

## Electronic devices

**T**he Information and Communication Technologies (ICT) sector takes care of electronic devices, their maintenance and security in all the Nelt Group companies. Employees are obliged to take care of the security of the company's and colleagues' data when using the company's electronic devices.

If we borrowed a phone, laptop or other electronic device from the company, it is important to know that only those hardware and software that have been set up and configured by ICT are allowed to be connected to the network infrastructure. Also, only software approved by the ICT sector for corporate use is allowed to be installed on official equipment. Independent modification of hardware or software is not allowed.

Functionalities set on company devices, such as automatic screen lock due to inactivity, are not allowed to be changed. We are obliged to leave official laptops, telephones and other devices in a safe place, whether they are located in the company's offices or premises or outside. This means that we never leave the company's devices unattended in cars, public places or other places.



Passwords for business accounts must not be shared with other persons, sent via e-mail, be written down on paper or stored in an electronic document in non-encrypted form. Keep the password only for you, do not reveal it to others, no matter how the other person introduces himself/herself.

Email messages are often sent to employees signed as: superior, colleague, Nelt ICT (as part of the organization). in which they are asked to enter a password.

Please note that employees are responsible for their own passwords and may not disclose them. This does not apply to the ICT sector of the company, if there is a need for a specific intervention on your account or device. Passwords created for business accounts may not be used on private accounts and vice versa. If in any way we suspect that someone has come into possession of our password, we must change it immediately.

Use different passwords for different accounts. This prevents a „discovered“ password from one system's various hacking techniques automatically allowing access to all systems, thus multiplying the potential damage.

If we suspect that our device is infected with a computer virus, we are obliged to immediately turn it off and remove it from the company's Internet network, and then report the case to the ICT sector by e-mail

**ICTsecurity@nelt.com.**

In less urgent cases, the address is **helpdesk@nelt.com.**

Read more about the Nelt Group's information security in the „Information Security Policy“ document, which is available on the internal InfoNelt portal.









## Protection of Competition

The Nelt Group operates responsibly in all markets, and accordingly must not distort, prevent or limit competition in any way. Unfair forms of market competition include: abuse of a dominant position, dumping, corruption, unethical obtaining of information about competitors and dissemination of untrue information about them. The Antimonopoly team of the Nelt Group, which has developed special internal procedures, instructions and regulations for this area, contributes to the spread of awareness of the importance of doing business in accordance with competition law.

Competitors of the Nelt Group include companies that perform the same activity, such as distribution, logistics and/or production of brands from the consumer goods category.

Our employees are not permitted to collude with competing companies on sales prices, share customers or markets, illicit rebates, exchange confidential information, or perform other similar actions.

Entering in such agreements, regardless of whether it is a contract, written, electronic or verbal communication, could be considered a violation of competition protection regulations and constitutes a restrictive agreement.

### EXAMPLE:

I am offered to come into possession of data about a competitor without anyone's knowledge, which can help our company position itself in the market.

### WHAT SHOULD I NOT DO?

I bring this information to my supervisor so that we can use this information to create better business results.

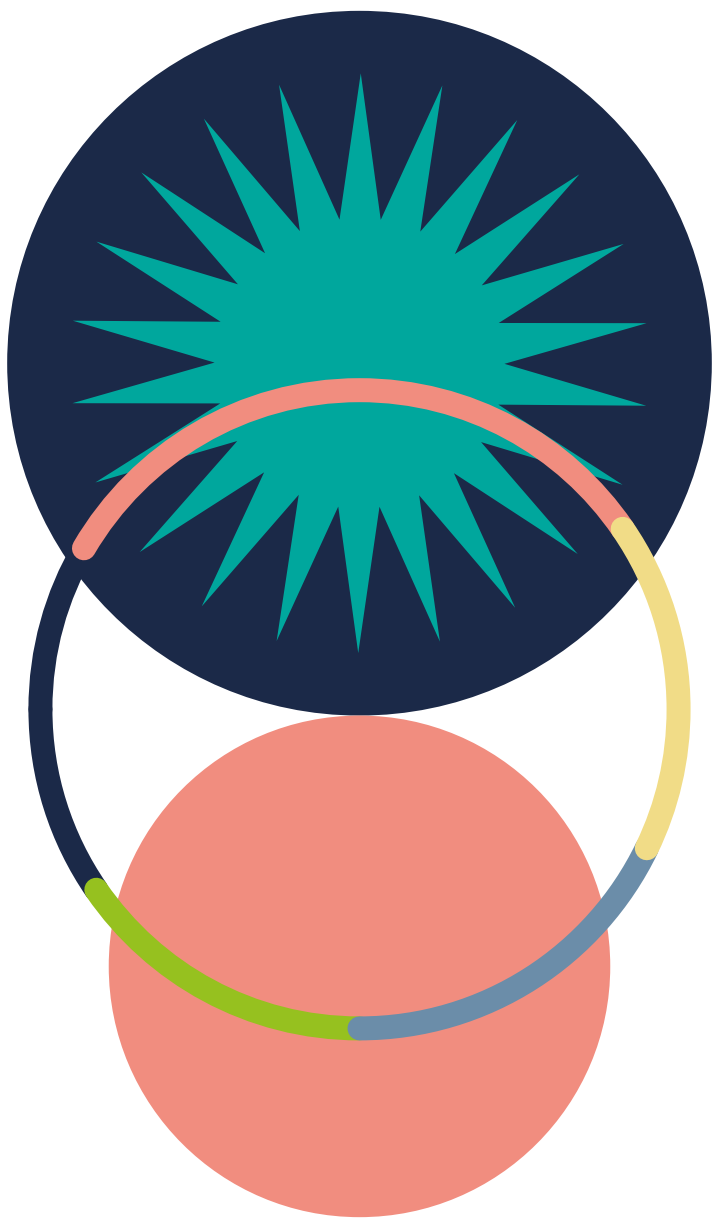
### WHAT SHOULD I DO?

I explicitly refuse to take the data, referring to the responsible business of our company towards the competition and inform the Antimonopoly team about the case.

**[amtingrupa@nelt.com](mailto:amtingrupa@nelt.com)**

In order to completely avoid such situations, conversations with competitors that lead in this direction should be completely and openly avoided.

Acting contrary to antitrust rules is subject to our personal responsibility and we may be sanctioned independently of the sanctions to which the Nelt Group is subject. Also, this kind of behavior affects the amount of the sanction that will be imposed on the Nelt Group as a whole or only on a specific member. If you need help in understanding these regulations, you are free to contact Nelt Group's Legal Department for assistance via e-mail address [amtingrupa@nelt.com](mailto:amtingrupa@nelt.com).



## Conflict of interes

### What is conflict of interest?

A conflict of interest represents a situation in which an employee has a private interest that affects or could affect the interest of the company, that is, his performance of work in Nelt Group companies. A private interest can be any benefit or benefit for an employee or a person related to him, which the employee would not be able to achieve if he were not working for the company.

Employees are expected not to get into such situations and to keep in mind that even the appearance of a conflict of interest can have serious consequences for employees and the company. For this reason, we ask our employees to report any potential conflict of interest via e-mail address [askethics@nelt.com](mailto:askethics@nelt.com). In the case of a report to the immediate manager, HR business partner or Legal Department in the company, the report should be forwarded to e-mail address [askethics@nelt.com](mailto:askethics@nelt.com).

We take good care to ensure that all our employees have equal chances for development and advancement in the business. For this reason, we do not allow personal relationships among company employees, such as marital or family relationships, to potentially put someone in an unequal position compared to colleagues. Spouses in a marriage or family members cannot be superior to each other.

#### EXAMPLE:

The company needs to call a selection of suppliers tender, and my position in the company allows me to influence this decision. I know for sure that one of the companies that provides this type of service, where my wife works, is a quality guarantor. In this situation, is it okay to speed up the process by hiring the company where my wife works without a tender?

No, this type of business is against our company's code of ethics. If you find yourself in a situation in which your personal relationships affect or appear to affect your business decisions, you should report such case via e-mail address **[askethics@nelt.com](mailto:askethics@nelt.com)**.

In addition, if you find yourself in a situation where your personal relationships can affect the decision in the tender process in which you are participating, you are obliged to withdraw from it.

## Gifts and hospitality

Exchanging gifts, organizing parties or providing different types of services to business partners can all represent ways to express gratitude or build a good business relationship. Such actions are, in certain circumstances and in certain places, common and appropriate. Although these customs differ from culture to culture, our employees, regardless of the market in which they operate, must behave in accordance with applicable local laws, company arrangements and good business practices.

The company has prescribed very specific guidelines for situations when its employees offer or accept a valuable item or service.

In order to avoid possible unwanted situations, following these guidelines is crucial:

- If it is a corporate representation or hospitality, it must be reasonable in terms of cost, amount, quantity and frequency.
- Gifts or favors should not be offered in order to influence a business decision.
- Such an act should not violate the regular and accepted business ethics of the country where the representation was used and hospitality was provided.
- They should not violate company rules or existing laws of the country in which they are provided.
- A gift or favor should not be construed as a bribe, payment or commission.
- Such an act should not have hidden value in any segment.
- Disclosure of such gifts or favors in public should not embarrass the partner or damage his reputation.
- Offering or accepting money, cash equivalents or personal loans in the course of company business is strictly prohibited.

It is forbidden to offer or give money, services or objects of any value, either directly or indirectly, to civil servants or employees of the Government, legislative or regulatory body, responsible person in a business company, institution or other legal entity, if such an act could affect their business decisions.

These guidelines do not apply to sectors whose behavior is legally regulated by appropriate legal or by-laws whose force is stronger than this Code.

If you are not certain whether some gifts or services you offer or accept are appropriate, please consider these examples:



Giving a shopping bag with a company logo is completely acceptable..



Flowers, fruit baskets and similar modest gifts are acceptable.



Giving an existing customer a Nelt logo shopping bag with a few expensive bottles of wine is a borderline case. In such cases, seek advice via e-mail address **askethics@nelt.com**.



If you receive a ticket to a sports or entertainment event from a business partner, report that via e-mail address **askethics@nelt.com**.



Giving or accepting a gift trip, with expenses paid, to an expensive tourist destination where no business will be conducted is not acceptable.



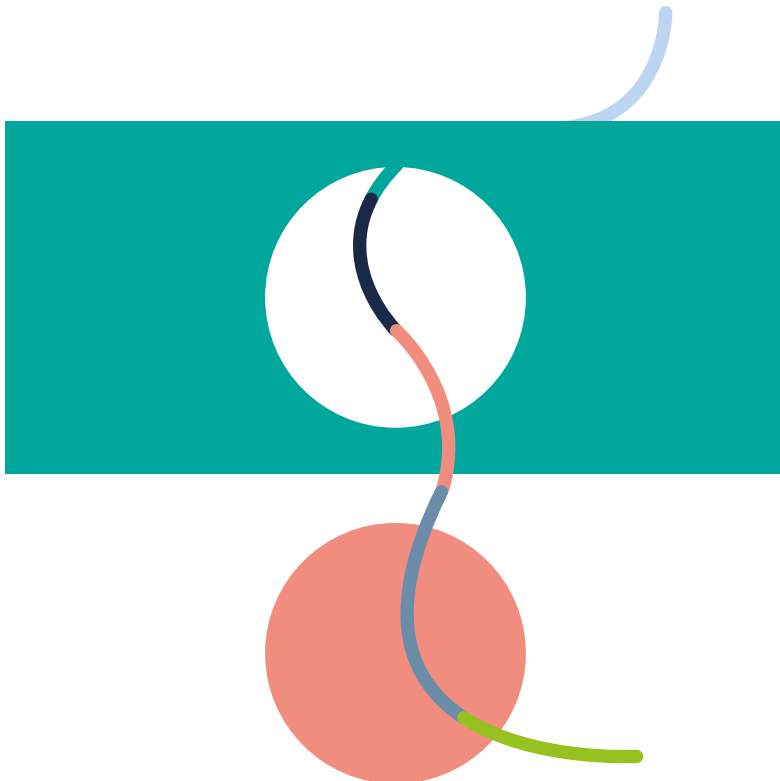
Travels that we receive as a reward from clients and principals for excellent business results are allowed to be accepted. For the sake of business transparency, we must report such situations to the ethics team at **askethics@nelt.com**.

If you still have a dilemma, ask for advice at **askethics@nelt.com**.

## Corruption and bribery

Doing business in accordance with anti-corruption and competition regulations is one of the priorities in the development of our business. Violation of company regulations may result in serious disciplinary action in accordance with internal rules and procedures, as well as other civil and criminal sanctions under applicable local laws. Employee deviations from these regulations will not be tolerated.

Giving and receiving bribes are crimes which represent synonymous for corruption. The value of the gift, service or other benefit is not relevant to the existence of this crime. A gift can be any value of property. It usually consists of money, but it can also be a non-monetary gift such as a work of art and other movable or immovable property.



## Human rights

### Political and social activity and public action

All employees of the Nelt Group, in accordance with the law, are allowed to be politically and publicly engaged. In such activities, however, we must not act in front of the Nelt Group or relate our activities to our work in the company.

For the purposes of such engagements, it is not permitted to use company assets, such as communication channels, premises or equipment, nor is it permitted to perform the engagements during working hours. The employee's political engagement must in no way influence his/her performance of work in the Nelt Group.

#### EXAMPLE:

As a party activist, I participate in the campaign for parliamentary elections. I do not point it out publicly in front of my colleagues, nor do I influence anyone's electoral will. However, I think it is alright that if I don't have time to go to the photocopier to use the printer at work to print promotional materials for the campaign. Is that all right?

No, it is not allowed to use the company's resources for any political purposes.

By political activity we mean any activity that aims to influence political processes at the local, state or international level. This includes membership or engagement in political parties, civil sector organizations, civic associations, citizen groups, participation in protests, public expression of political views in the media, and similar activities.

If we decide to run for any public office, we need to inform the immediate manager beforehand. Manager should then forward the information via e-mail address [askethics@nelt.com](mailto:askethics@nelt.com).

Displaying political messages and banners in the company is not allowed.



## Membership in organizations and committees

All employees of the Nelt Group have the right to freedom of political, trade union and any other association. Such engagements, however, must not bring the employee into a conflict of interest and he/she is obliged to report his/her membership in the board or organization to his/her superior, and he/she must report it via e-mail address [askethics@nelt.com](mailto:askethics@nelt.com).

## Labor law

The Nelt Group respects and implements all the principles and rights prescribed by the laws governing the field of work and prohibition of discrimination in the countries in which it operates.

All employees, regardless of the contract type under which they are hired, have the right to appropriate income, safety and health at work, health care, protection of personal integrity, personal dignity and other rights in the event of illness, reduction or loss of working ability and old age, material security during temporary unemployment, as well as the right to other forms of protection, defined by the employment contract.

A woman employee has the right to special protection during pregnancy and childbirth, and an employee has the right to special protection for the purpose of child care. Employees under the age of 18 and employed persons with disabilities have the right to special protection, in accordance with the law.







[www.nelt.com](http://www.nelt.com)