



INA GROUP CODE OF ETHICS FOR BUSINESS PARTNERS

Dear Business Partners,

INA Group's Code of Ethics for Business Partners is an abstract of INA Group's Code of Ethics and contains the ethical norms we consider particularly important in our business relations and which we also expect our business partners to comply with. Business partners are suppliers, customers and other contractual partners of INA Group.

- 1. Communication** – We expect our business partners to comply with conduct rules in all verbal and written communication. Business partners shall maintain the confidentiality of all information on business partners.
- 2. Reporting** – Business partners shall protect the integrity of financial statements and reports.
- 3. Assets** – Business partners shall assume responsibility for ensuring integrity and the adequate and economical use of INA Group property.
- 4. Intellectual products** – Business partners shall respect the fact that valuable, confidential ideas, strategies and other types of business information created or developed in INA Group companies constitute INA Group property, and in certain cases assets are subject to intellectual property laws.
- 5. Insider trading** – Business partners shall not unlawfully use insider information for material gain.
- 6. Human rights** – INA Group partners shall respect the freedom of religious belief and assembly of their employees, their right to rest, free time and regular paid leave, and shall commit themselves to implementing fair recruitment and remuneration policies in line with applicable laws.

7. **Avoidance of discrimination** – INA Group business partners shall not discriminate on the grounds of gender, marital status, age, ethnic origin, race, religion and political conviction, disability or sexual orientation.
8. Harassment – INA Group business partners shall not engage in behavior which could be interpreted as offensive, intimidating or malicious.
9. **Forced and child labor** – INA Group business partners shall not tolerate any form of forced, bonded or child labor.
10. **Health, safety and environmental protection (HSE)** – INA Group business partners shall comply with relevant health, safety and environmental protection laws and regulations.

11. Corruption – INA Group business partners undertake to conduct business free of any and all forms of corruption and fraud, including the rejection of propositions or attempts made in favor or on behalf of their employees or organizations aimed at unjust payments.

12. Conflict of interest – INA Group business partners undertake not to employ persons who are employees of any INA Group company and shall prevent them from acquiring assets or shares in their companies.

13. Fair competition – INA Group business partners shall conduct operations in accordance with fair competition standards and in conformity with applicable competition laws.

14. Products and services – INA Group suppliers shall provide quality and safe products and services and supply timely, truthful, reliable and clear information.

INA Group business partners shall ensure that all participants are informed about above stated expectations and the application thereof. Business partners shall inform INA Group without any hesitation about any Code of Ethics breaches and the implementation of corrective measures.

In the event of permanent and serious breaches of INA Group's Code of Ethics for Business Partners, INA Group will terminate the business cooperation with the relevant business partner.

In addition to ensuring compliance with above provisions, INA Group business partners shall also strive towards a better understanding of the entire content of the Code of Ethics available on INA Group's website and to ensure compliance with the Code, regardless of the application of legal consequences stipulated under other applicable agreements. INA Group will encourage business partners to apply and comply with above provisions amongst all suppliers, sub-contractors and business partners.

*Please support our efforts
aimed at ethical business conduct!*

INA Group

Should you have any questions or complaints in relation to ethical issues or should you wish to report unethical conduct, please contact INA Group's Ethics Council:

- by sending an e-mail to INA Group's Ethics Council: eticko.povjerenstvo@ina.hr or
- by sending a letter to:
Av. V. Holjevca 10
p.p. 555
Zagreb
Republic of Croatia
Along with the note:
"For INA Group's Ethics Council" and "Do not open!"
- INA Group's Ethics Council also operates a hotline with an answering machine: +385 (1) 64-52-454 which is available 24 hours a day, 7 days a week.

www.ina.hr/code-of-ethics