



## **CODE OF ETHICS**

### **FOR HENDAL EMPLOYEES**

#### **I. GENERAL PROVISIONS**

##### **Subject of the Code of Ethics**

###### **Article 1.**

The Code of Ethics for Hendal Employees (hereinafter: the Code of Ethics) sets out the rules of conduct for Hendal employees and the ethical principles on which Hendal employees act.

The main goal is to formulate clear and unambiguous guidelines and requirements for ethical business practice, both for Hendal and for all persons who are appropriately associated with Hendal, in order to protect the values of Hendal. Determining ethical criteria contributes to more transparent and efficient business and better relationships with business entities.

##### **Content of the Code of Ethics**

###### **Article 2.**

The Code of Ethics for Hendal Employees contains the ethical principles that Hendal employees must adhere to when conducting business activities.

##### **Personal conduct of Hendal employees**

###### **Article 3.**

The ethical principles set out in this Code of Ethics are principles that Hendal employees must adopt as their own principles and personal criteria of conduct.

Hendal employees apply ethical principles in their work and in their relationships among themselves, with their clients, respondents, and Hendal as their place of employment.



## The purpose of the Code of Ethics

### Article 4.

The purpose of the Code of Ethics is to promote ethical and moral principles, as well as values in the conduct of Hendal employees during business activities, with the aim of achieving common good and interests and trust of clients, external associates, and respondents in Hendal as a company.

## II. ETHICAL PRINCIPLES

### Application of ethical principles

#### Article 5.

In the performance of their duties a Hendal employee applies Hendal's principles and the ethical principles of conduct of an Hendal employee as prescribed by this Code of Ethics.

### Respect for the integrity and dignity of citizens and Hendal employees

#### Article 6.

An employee of Hendal is obliged to ensure the exercise of rights, respect for the integrity and dignity of both citizens and Hendal employees without discrimination or privilege on the basis of age, nationality, ethnicity or social affiliation, linguistic and racial origin, political or religious beliefs or inclinations, disability, education, social status, sex, marital or family status, sexual orientation or on any other grounds.

An employee of Hendal has the right to protection from harassment, i.e., behavior that aims to violate or violates the dignity of the employee, and which causes fear or a hostile, degrading or offensive environment.

An employee of Hendal has the right to protection from sexual harassment, i.e., behavior that is verbal, non-verbal, or physical and is sexual in nature, which aims to violate or violates the dignity of the employee and causes fear or a hostile, degrading or abusive environment.



## Safeguard of personal reputation and the reputation of Hendal

### Article 7.

In the performance of their work, Hendal employees are obliged to preserve their personal reputation, the reputation of Hendal and the trust of clients and respondents of Hendal.

### Behavior of Hendal employees in public appearances

#### Article 8.

In all forms of public appearances and activities in which they represent Hendal, employees of Hendal are obliged to present the views of Hendal, in accordance with regulations, their acquired powers and expertise, and the Code of Ethics.

When presenting Hendal's views and their personal views, Hendal employees are obliged to pay attention to Hendal's reputation and their personal reputation.

In public appearances not represented by Hendal, which in any way relate to the work within the scope of Hendal's business activities or the work they perform, Hendal employees must not disclose information that could damage Hendal's reputation and damage the trust of clients and respondents in Hendal's work, or if the disclosure of such information would constitute a violation of professional secrecy, or if it would be contrary to other legally protected interests of citizens and legal entities.

In public appearances where the employee does not represent Hendal and that are not thematically related to Hendal, one does not need the approval of the Hendal director for media appearances but is obliged to pay attention to Hendal's and their own personal reputation.

### Social media

#### Article 9.

When appearing on social media, Hendal employees must refrain from any statements that may adversely affect Hendal's reputation. Hendal expects its employees to behave in a manner consistent with Hendal's ethical principles when giving statements on social media as private individuals, especially when their activities or the employees themselves may be linked in any way to Hendal or when they may appear to be acting or expressing opinions on behalf of Hendal.



## Political engagement

### Article 10.

Hendal respects the right of workers to take up positions in politics and public life, but such activities can only be performed outside their workplace. During their political activities outside the workplace, workers must not abuse their positions in Hendal and must refrain from conduct that could adversely affect Hendal's reputation.

Hendal employees must notify the director of Hendal before taking up any office in any political or governmental organization. During their work at Hendal, workers must not abuse their functions and the position they hold in a political or state organization.

## Safe and healthy work environment

### Article 11.

Hendal provides its employees with a healthy and modern work environment in accordance with the relevant labor regulations and provides protection of their physical integrity and health. Hendal provides its workers with training on occupational safety and fire protection.

It is strictly forbidden to consume or to appear under the influence of alcohol, illicit substances, drugs and / or other hallucinogenic substances at Hendal's places of work, other places and / or occasions related to work under Hendal's employ and / or during work-related activities or to perform activities that qualify as abuse of these substances (offering, giving, trading, etc.).

Consumption of alcoholic beverages in modest quantities, after protocol events, is not prohibited.

The prohibition of material gain or other benefits and avoidance of conflicts of interest in business

### Article 12.

Employees of Hendal must not abuse their powers and position in order to obtain material or other benefits for themselves or another legal or natural person.

Employees of Hendal must not use official information on the activities and work of Hendal for illicit purposes or disclose business secrets that they learned during the performance of their duties.



## III. INTERPERSONAL RELATIONSHIPS OF BUSINESS SUBJECTS

### Law enforcement

#### Article 13.

The principles of business ethics require that each business entity (Hendal and client) strictly adheres to the agreed contractual terms and their obligations under the law, and that it does not interfere with other business entities in the performance of their obligations.

### Information on Hendal's activities

#### Article 14.

Hendal is obliged to provide business partners, government authorities and the public with information on its activities when there is an obligation to do so in accordance with the law, contract, good business practice or justified public interest.

Knowingly giving false information with the aim of misleading a business partner or the public is not permitted.

Hendal will not make commitments that it is aware it will not be able to fulfill.

Hendal conducts research in accordance with the ESOMAR Code.

### Trust

#### Article 15.

Business practice must not abuse the trust of the clients, respondents, business partners or other participants in a business relationship or take advantage of their lack of experience, knowledge or their good faith.

### Contracts and offers

#### Article 16

In concluding a contract, Hendal will formulate provisions so that they are clear and precise and cannot be interpreted contrary to the actual will of the parties.



Hendal will not make bids with insufficient information required for the client to come to a decision.

## Competition

### Article 17.

Business ethics requires respect for the principles of free and fair competition and equal treatment of all participants in business life.

Improper forms of competition, such as dumping, obtaining information about competitors by unethical means and dissemination of false information are not allowed.

Improper forms of cooperation with competitors are also not allowed, such as activities related to price negotiations, market sharing, boycott of customers or suppliers, restriction of sales or services, or any form of secret association in order to gain a privileged market position.

## Reclamations

### Article 18.

Hendal is obliged to answer questions, remarks, and complaints of users within a reasonable time.

If the objections regarding the product or service are justified, Hendal is obliged to offer the customer an appropriate replacement service or to return its monetary equivalent.

## Anti-corruption

### Article 19.

It is forbidden to give or grant unauthorized benefits or to grant illegal advantages in exchange for benefit (consideration). No employee of Hendal or any other person acting on behalf of Hendal may offer, promise, or make payment or give any item of a specified value or request or accept such an item to influence public officials or other persons (or to give the impression of such influence existing) or gain an unfair business advantage. The above items of specified value include financial or other types of benefits, such as cash, gifts, credit/ loans, guarantees, discounts, honors, services, benefits, job offers, etc. There is no minimum amount or threshold that the payment for the purposes or gifts listed above must exceed in order for it to qualify as illegal or contrary to the Code



of Ethics. Also, it is necessary to avoid activities / behavior that arouses suspicion or creates the impression that corruption and prohibited manipulation is involved.

Business decisions must always be made in accordance with Hendal's interests and not based on a personal relationship whose development has been encouraged by a gift or invitation. The main goal is to protect and preserve Hendal's reputation and impeccable integrity.

## Gifts

### Article 20.

Business partners may exchange gifts of lower value with each other (up to 500 HRK); however, the acceptance of such gifts must not condition the conclusion of a business deal or be related to placing the donor in a privileged position towards competitors. The type and value of the gift must comply with the laws, internal decisions of Hendal and accepted business practices.

## Invitations

### Article 21.

Invitations or honors come in a variety of forms, including organized events, concerts, accommodation, or travel. Sending and accepting an invitation can be a legitimate part of business and can contribute to Hendal's reputation and establishing good business relationships. It is permitted to send and accept common business type invitations. The above cases may include invitations to lunch or dinner, participation in banquets or other types of entertainment, such as accommodation or reimbursement of travel expenses. However, the cost / value of the said invitations and honors must remain within reasonable limits, with a "reasonable limit" being determined on a case-by-case basis.

## Donations

### Article 23.

As part of its social responsibility, Hendal provides donations to individual organizations and groups in need. Donations can only be made in accordance with the applicable legal regulations and internal regulations of Hendal. Hendal and Hendal employees may not request or accept any direct or indirect compensation in exchange for donations.



## IV. RELATIONSHIP BETWEEN HENDAL EMPLOYEES AND RESPONDENTS

The manner of conduct of Hendal employees towards respondents

### Article 24.

In their relations with respondents, employees of Hendal must act professionally, impartially, and politely. While engaged in business activities, an employee of Hendal is obliged to apply professional knowledge in a way that the respondents understand him/her.

## V. INTERPERSONAL RELATIONSHIPS WITHIN HENDAL

Salary and working hours

### Article 25.

Hendal will, within its means, provide its employees with an adequate salary according to their work performance, qualifications, work experience, working conditions and working hours. Working hours will be in accordance with applicable regulations. Salaries and allowances will be paid on time and in accordance with the law and the employment contracts.

Violation of employee rights

### Article 26.

In the event of a breach of legal or contractual rights, an employee or associate of Hendal has the right and duty to request a resolution of the problem within Hendal.

When the dispute cannot be resolved amicably, the worker has the right to seek protection in court.

Personal data

### Article 27.

Hendal is obliged to protect the personal data of Hendal employees or job candidates in accordance with the applicable regulations.

Hendal employees are informed about the collection procedures and ways of use of their personal information and information on their activities during their work. The sale, exchange, or transfer of



personal data of employees to third parties is not permitted. The transfer of data to the courts is done only on the basis of a court order.

## Special needs persons

### Article 28.

All disabled persons or persons with permanent or temporary special needs must be treated in the same way as other citizens regarding their rights and obligations when seeking employment, performing their work duties and in other activities whilst respecting and acknowledging the special needs of these persons.

## The manner of conduct of Hendal employees towards other Hendal employees

### Article 29.

Hendal employee interpersonal relationships, i.e., all forms of Hendal employee communication, are based on mutual respect, trust, cooperation, decency, responsibility, and patience.

## Application of ethical principles in the relationships among Hendal employees

### Article 30.

In the course of their work, Hendal employees exchange opinions and information on individual professional issues in order to achieve the common good of Hendal as a whole. Hendal employees acting in accordance with the ethical principles of Hendal in their mutual relations do not interfere with each other in the performance of their business obligations.

## Responsibility of superiors within Hendal in the application of ethical principles

### Article 31.

Hendal's superior employees encourage other Hendal employees to perform their work well and in an efficient manner while maintaining mutual acknowledgment, respect, and cooperation, as well as an appropriate attitude towards citizens (clients and respondents).



## VI. RESOLVING CODE VIOLATIONS

### Article 32.

It is the right of every Hendal employee or associate bound by this Code to report all potential or committed violations of the Code or legal regulations to a direct superior.

Complaints can be submitted in writing or orally, and by e-mail.

An employee or associate of Hendal who submits a substantiated report of a violation of the Code or the law must not be subject to sanctions or discrimination in future work. If a report of a violation of the Code or the law is found to be unfounded and it is proved that the unfoundedness was known to the person who filed it, such a person shall be liable to sanctions in accordance with Hendal's internal acts.

Measures for violations of the Code, depending on the severity of the violation, may impose: advice, reprimand, referral to education, request for correction of the violation, fine, dismissal with an offer of an amended contract, termination of employment contract.

## VII. COMING OF THE CODE INTO EFFECT

### Article 34.

Employees and associates of Hendal and Hendal itself apply the Code from the date of signing of the declaration of acceptance of the Code.