



REVIZIJE DOKUMENATA RECORD OF DOCUMENT REVISIONS	VERZIJA VERSION	DATUM DATE	OPIS DESCRIPTION	REVIDIRANA STRANICA ILI PODRUČJE PAGE OR CHAPTER REVISED	AUTOR AUTHOR
	VO	11.09.24.	Original document	-	Ružica Žuljević Torjanac

DISTRIBUCIJA DOKUMENTA DISTRIBUTION LIST	Vidi CC-IMS-FO-001-1 / See CC-IMS-FO-001-1
---	--

SVRHA DOKUMENTA PURPOSE OF THE DOCUMENT	The Code of Ethics establishes the moral principles and rules of conduct to be followed by employees at International Zagreb Airport Jsc. when performing work and tasks.
---	---

PODRUČJE PRIMJENE SCOPE OF APPLICATION	International Zagreb Airport Jsc.
---	-----------------------------------

REFERENTNI DOKUMENTI REFERENCE (S)	Rulebooks	Pravilnik o postupku i mjerama za zaštitu dostojanstva čovjeka Pravilnik o postupku unutarnjeg prijavljivanja nepravilnosti i postupku imenovanja povjerljive osobe i njezina zamjenika
--	-----------	--

SADRŽAJ DOKUMENTA CONTENT OF THE DOCUMENT	1. Purpose and goal	2
	2. Scope of application	2
	3. Terms and definitions	2
	4. Implementation	3
	5. Responsibility	8
	6. Transitional and final provisions	8

IZRADIO/ PREPARED BY:	Ružica Žuljević Torjanac	Legal affairs advisor		11.09.2024.
PREGLEDAO/ REVIEWED BY:	Ivan Damjanović	Executive director		11.09.2024.
	Matea Ćorić Bilić	Director of Legal Affairs Department		11.09.2024.
KONTROLA KVALITETE/ QUALITY BY:	Sanja Barešić	Senior expert associate for IMS, sustainable development and risk management		11.09.2024.
ODOBRIO/ APPROVED BY:	Hüseyin Bahadır Bedir	President of the Board		11.09.2024.
	David Gabelica	Member of the Board		11.09.2024.



1. Purpose and goal

Based on the decision of the management board and after consultation with the Workers' Council, this Code of Ethics determines the principles of ethics and compliance and rules to be followed by employees at International Zagreb Airport Jsc. (hereinafter: "Company"), when performing tasks and duties. The Code of Ethics is based on values related to: human rights, labor, environmental protection, sustainable development, the fight against corruption and prevention against harassment.

Employees in the Company must comply with all laws of the Republic of Croatia and the decisions and rules of the Company and to act in accordance with this Code of Ethics.

The purpose of the Code of Ethics is to establish an appropriate level of professional relationship and culture of the organization by adopting and consistently applying it, and to adopt international standards, in order to promote and protect the business and overall reputation of the Company. The Company requires from its suppliers and subcontractors to act in accordance with the provisions of the Code of Ethics.

Basic principles and starting points of the Code of Ethics are:

- legality,
- transparency,
- non-discrimination,
- business ethics,
- competencies,
- social responsibility,
- excellence.

2. Scope of application

The Code of Ethics is applicable in all organizational units and business processes of the Company and obliges all employees of the Company. In addition to the Code of Ethics, there are two other related protection procedures in the Company, namely: the procedure for protecting the dignity of employees and the procedure for reporting irregularities.

To the procedure related to the protection of the dignity of employees, the provisions of the current Rulebook on Procedures and Measures for the Protection of the Dignity of Employees (available at the following link: [CC-LEG-RB-07-0-PRAVILNIK O POSTUPKU I MJERAMA ZA ZAŠTITU DOSTOJANSTVA RADNIKA](#)) are appropriately applied.

To the procedure related to the reporting of irregularities, the provisions of the current Rulebook on the Procedure for Internal Reporting of Irregularities and the Procedure for Appointing a Confidential Person and his deputy (available at the following link: [CC-LEG-RB-04-0 - MZLZ d.d. - Pravilnik o postupku unutarnjeg prijavljivanja nepravilnosti i postupku imenovanja povjerljive osobe i njezina zamjenika](#)) are appropriately applied.

3. Terms and definitions

- **Dignity** - dignity.
- **Ethics** - (Greek - ethos, - custom, habit, temper) - the science of morality; it has the task to acquaint us with the definition of morality, what its basic components are, and how to take critical view of existing moral practice (e.g. existing behavior).
- **Code** - (lat. Codex) - a set of principles that determine behavior in an area of social relations.
- **Corruption** - in the broadest sense represents any abuse of position by a person performing a certain public function, and in terms of this Code of Ethics, any abuse of position by a person performing a certain function and/or works on a certain job position in the Company, which goal is personal and / or material gain.
- **Morality** - (lat. - mos, - customs, will, rule, law) - is a set of rules of a certain society on the content and manner of mutual relations and human communities.



- **Sustainable development** - development that meets the needs of the present without harming the environment, without compromising the ability of future generations to meet their own needs.
- **Business ethics** - means performing work for the Company with dedication and honesty, in accordance with the decisions and requirements of the Company.
- **Internal communication** - communication within the Company (between organizational units, business processes, groups and individuals, between superiors and employees and vice versa). It is carried out through: direct communication, meetings, presentations, telephone, internal written information, electronic, intranet of the Company, through bulletin boards, internal newsletter.
- **Harassment** - harassment is any unwanted behavior that is aimed at and actually represents an injury to the employee, and that causes fear or a hostile, humiliating or offensive environment.
- **External communication** - communication of any employee of the Company (direct, through the media and social networks) towards: customers / users of products and services, partners, representatives of the immediate and wider community, representatives of owners, representatives of concessionaires, guests, the public through the media and social networks.
- **Employees** - all employees in the Company, regardless of status (permanent employees, temporary employees, trainees and students on practical work, assigned employees as well as external associates who perform tasks and duties on behalf and for the account of the Company).
- **Company** - International Zagreb Airport Jsc.
- **Procurement Manual** – internal rulebook that governs the procurement procedure in the Company

4. Implementation

Reputation of the Company is based on the Company's policy, the Company's corporate values and employee's behavior who apply ethical principles.

4.1. Business core values

The Company in its activities promotes respect, dynamism, innovation, customer satisfaction, teamwork, professionalism.

Respect - employees build trust by respecting each other, behaving honestly and responsibly towards all stakeholders, and following the determinants of corporate culture in their daily work.

Dynamism - Company employees act dynamically in their work by approaching the solution of everyday tasks in a proactive and decisive manner.

Innovation - Company employees act in an innovative way by improving business with new ideas and an approach based on proactive solutions and effective initiatives.

Customer satisfaction- Company employees nurture quality relationships with clients and business partners by placing their needs and satisfaction on the list of business priorities.

Teamwork - the Company's employees act as a team by striving together to achieve goals, relying on colleagues and associates in an atmosphere of mutual respect.

Professionalism - Company employees act professionally by setting and achieving high standards in their work, constantly maintaining quality and productivity in meeting set goals.

In addition to the basic principles and values of the Code of Ethics, the Company respects and applies the following principles:

4.1.1. Human rights

The Company respects and protects internationally proclaimed human rights. Preventive actions and measures are taken in order to prevent their violation.

4.1.2. Freedom of association

Employees have the freedom to join unions or similar external representative organizations, to the extent regulated by law.

4.1.3. Terms of employment

Employment of employees is carried out under equal conditions, without discrimination.

4.1.4. Child labor

Persons younger than the legally prescribed minimum age for employment shall not be employed.

4.1.5. Prevention of discrimination

The behaviour towards and among employees is based on mutual respect and dignity. Corporal punishment, physical and verbal abuse or any other unlawful harassment, as well as threats or other forms of intimidation are prohibited. Any form of discrimination on the grounds of race, color, sex, sexual orientation, marital status, pregnancy, parental status, religion, political affiliation, nationality, ethnic or social origin, social status, disability, age, trade union membership and any other means is prohibited.

4.1.6. Work conditions

The Company respects health and safety regulations. Employees are provided with a safe working environment that does not endanger health, in accordance with current regulations. Employees are informed about safety at work and for this purpose they are referred to appropriate trainings.

4.1.7. Environmental protection and sustainable development

By performing their activities, employees take care of the prevention of environmental pollution, the improvement of environmental management, more efficient use of resources and energy, and regularly raise awareness of the importance of preserving the environment.

4.1.8. Fight against corruption

Any form of extortion and bribery is forbidden. The fight against corruption at all levels is standard form of behavior for all employees. Employees in the Company:

- shall not give business partners gifts or receive gifts from business partners which exceeds the amount of 66,36 EUR;
- shall not pay or receive fees to business partners, except for the contracted business activity;
- shall use rationally the funds of the Company, with particular care and to prevent damage, alienation or destruction;
- shall keep confidential information from unauthorized access and shall be objective in judging mutual interests, the interests of the Company and the interests of the community;
- shall find the optimal measure and approach in distinguishing business and private interests;
- shall respect all other measures for the fight against corruption and proper performance of procurement activities which are defined in the Procurement Manual.

4.1.9. Prevention against harassment

In addition to the principles defined in the Code of Ethics, other tools are available to employees that ensure their dignity and prevent any form of harassment in the workplace. According to the current Labor Law, the employer is obliged to appoint two persons of different genders who are, besides the employer, authorized to receive and resolve complaints related to the protection of the dignity of employees.

4.2. Employee behavior and work discipline

Employees are obliged to respect work discipline and corporate culture in their daily work and in a timely manner, in accordance with the law and employment contract and the Company's instructions and requirements, to perform work obligations, take care of their professional performance, orderly appearance, dress, communication and behavior. In performing their tasks and duties, they act in accordance with the rules, conscientiously and responsibly protecting

the interests of the Company, while building relations of mutual trust and respect, cooperation and tolerance, respecting differences.

Loyalty and dedication are required from all employees. Every employee is obliged to respect the applicable laws and standards, written procedures and rules of the Company to ensure that their behavior does not harm the reputation and property of the Company and not to jeopardize the ability of other employees to perform their regular duties.

4.3. Supplement for business partners (suppliers and subcontractors)

Suppliers of the Company must ensure that their employees, as well as subcontractors, are informed of the Code of Ethics and comply with its provisions.

The Company pays special attention to the choice of business partners and therefore will not do business with partners who have already violated rules of business ethics.

Details of cooperation with business partners and the process of their selection are defined and applied in accordance with the Procurement Manual of the Company.

4.4. Conflict of interest

A conflict of interest is situation when an individual's personal, financial, or other interests potentially interfere with their ability to perform their duties and responsibilities impartially and in the best interest of the Company. This includes situations where the individual's decisions or actions could be influenced, or appear to be influenced, by personal gain or relationships. Any conflict of interest or the possibility of its occurrence in the Company should be prevented, and any suspicions of a possible conflict of interest should be reported to the ethics commissioner ("Ethics Commissioner"). The reporting obligations and the consequences of conflicts of interest from the Procurement Manual are conducted in accordance with the Procurement Manual.

Conflict of interest may impair the individual's judgment, objectivity, or independence, and can occur in various forms, including but not limited to:

Financial interests (benefits)

Employees may not, directly or through relatives, in-laws, friends or intermediaries, derive personal benefit from suppliers, business partners, service users or competitors of the Company.

Professional activities outside the Company

Employees may not without the approval of the Company for their own or someone else's account to conclude business from the activities of the Company in accordance with the applicable Labor Law, to be a member of the management or supervisory board in another company that deals with activities from the activities of the Company nor may in the premises of the Company perform activities for its own or someone else's account except in accordance with an individual employment contract or a decision of the Company.

About any professional engagement outside the Company the employee is obliged to inform the employer in writing in advance.

Impartiality in decision making

In making decisions, the principle of impartiality and the interest of the Company is fully respected, while avoiding personal recommendations and external influences.

4.5. Data confidentiality

The Company has implemented the general data protection regulation and consistently applies it. In order to ensure compliance with general data protection regulation, employees are also obliged to contribute to this purpose by acting

in accordance with the Rulebook on Work and the Rulebook on Confidentiality and Business Secrets in force at the Company and other internal acts of the Company.

For all questions in relation to the processing of personal data, it is possible to contact data protection officer on the following email address: DPO@zag.aero.

4.6. Communication with the media and public speaking

Inquiries by which the media or other entities request certain information, and the provision of such information is not within the competence of the employee, the employee should forward to the superior or the Corporate and Internal Communications Department.

On behalf of the Company only those employees who are authorized to communicate with the media and the public may speak and write.

4.7. Business finance

Financial statements and notes of the Company must be accurate and comprehensive in the form of international financial and accounting standards and policies that are transparently described in the reports themselves. Procedures governing financial management and control within the Company must be applied consistently, in line with general ethical principles described in this Code of Ethics.

4.8. Intellectual property protection

The Company reserves the copyright on its material which the employees of the Company within the performance of their work tasks submit to any legal or natural person, in accordance with the applicable Labor Law.

4.9. Complaint procedure for non-compliance with the Code of Ethics

Any citizen, business partner or employee may contact the Management Board or the Ethics Commissioner with a complaint if they believe that any of the employees of the Company does not comply with the provisions of this Code of Ethics.

The Management Board of the Company appoints the Ethics Commissioner. The Ethics Commissioner has the following duties:

- monitors the application of the Code of Ethics;
- promotes ethical behavior in the mutual relations of employees and business partners;
- gives opinions and advice to employees on ethical behavior;
- receives complaints from employees and other persons about the unethical behavior of employees;
- conducts the procedure of examining the merits of possible complaints;
- keeps records of received complaints;
- coordinates the work of the Ethics Committee;
- at least once a year reports to the Management Board on the implementation of the Code of Ethics;
- at least once a year submits a report to the Management Board on the efficiency of the system based on this Code of Ethics.

After receiving the complaint, the Ethics Commissioner is firstly obliged to check whether the received complaint is already processed according to the procedure in accordance with the Rulebook on Procedures and Measures for the Protection of the Dignity of Employees or in accordance with the Rulebook on the Procedure for Internal Reporting of Irregularities and the Procedure for Appointing a Confidential Person and his deputy. If it is determined that the complaint is not processed according to other procedures, the Ethics Commissioner is obliged to call a meeting of the ethics committee ("Ethics Committee"). At the meeting of the Ethics Committee, the Ethics Commissioner is obliged to consult with the other members of the Ethics Committee about the complaint and further steps to be carried out for the purpose of examining the allegations from the complaint. The Ethics Commissioner is obliged to draw up the minutes of the Ethics Committee session.

The Ethics Committee consists of a minimum of three and a maximum of four members, of which:

- one member is the Ethics Commissioner;
- one member is a person who holds the position of commissioner for the protection of employees' dignity or confidential person for reporting irregularities, according to the choice and evaluation of the Ethics Commissioner;
- one member may be a person who, according to the Ethics Commissioners' assessment, can give significant contribution for resolving the complaint;
- one member is a lawyer employed in the Company.

When a complaint is filed against one of the persons who may be members of the Ethics Committee, the Ethics Commissioner shall ensure that such person is not a member of the Ethics Committee in the case in question. When a complaint is submitted to the Company's Management Board against the Ethics Commissioner, the Company's Management Board shall ensure that the Ethics Commissioner is not a member of the Ethics Committee in the case in question.

At the meeting of the Ethics Committee, when consulting with other members of the Ethics Committee, for the purpose of protecting the complainant, the Ethics Commissioner will share only the information that is necessary for the consultation process to be carried out successfully. The Ethics Commissioner and the Ethics Committee are obliged to keep as confidential all information they find out in the process of receiving a complaint, refrain from disclosing confidential information to third parties, and are obliged to have a special awareness of the necessity and importance of protecting all personal data entrusted to them, when dealing with it exclusively in accordance with the Company's applicable procedures and in accordance with applicable regulations.

Within 30 days from the date of receipt of the complaint, the Ethics Commissioner is obliged to examine the allegations in the complaint and draw up a report on the actions taken and the facts established and submit it to the Company's Management Board for further action. Before sending the minutes, the Ethics Commissioner is obliged to take into account the potential conflict of interest of some of the parties involved in the complaint procedure. In the event that the complaint relates to the behavior of a member of the Company's Management Board, the Ethics Commissioner will deliver the minutes only to the remaining members of the Company's Management Board who are not the subject of the complaint.

The record of actions taken and established facts must contain:

- statements from the complaint or report;
- the attached minutes from the meeting of the Ethics Committee;
- the statement of the person in relation to whose behavior the complaint was filed;
- the opinion of the Ethics Commissioner whether the reported behavior represents a violation of the Code of Ethics or a specific irregularity;
- the proposal of the Ethics Commissioner in relation to the appropriate measures.

Each application must have a reasoned and substantiated complaint and must contain the date, first and last name and signature of the applicant. If the application does not contain the specified elements, it will be rejected.

The Ethics Commissioner will not investigate the merits of a complaint based on an anonymous report.

Misuse of filing a complaint results in the responsibility of the employee, in accordance with the laws and normative acts of the Company.

A person who reports an irregularity due to a violation of this Code of Ethics will be provided with an adequate and appropriate level of protection, while a person who reports an irregularity that can be considered as an irregularity in accordance with the Law on the Protection of Whistleblowers will be provided with all the appropriate level of protection prescribed by such law.

5. Responsibility

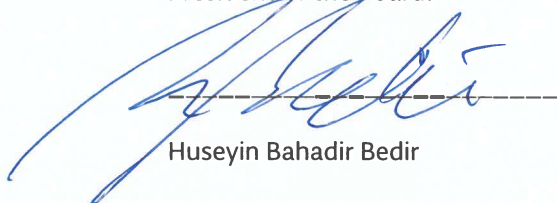
This Code of Ethics is binding for the employees of the Company. Violation of this Code of Ethics results in liability of employees, in accordance with the applicable laws and regulations of the Company.

6. Transitional and final provisions

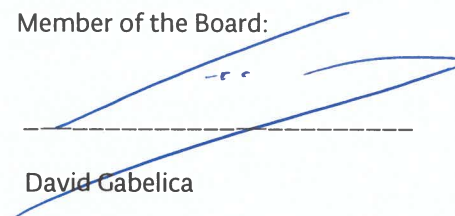
This Code of Ethics enters into force on the eight day of its announcement on the notice board of the Company.

On the date of entry into force of this Code of Ethics, the Company's Code of Ethics dated on 19 October 2021 ceases to be valid.

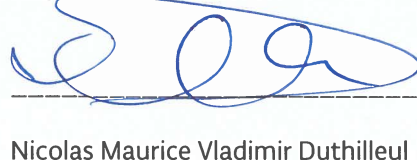
President of the Board:


Huseyin Bahadir Bedir

Member of the Board:


David Gabelica

Member of the Board:


Nicolas Maurice Vladimir Duthilleul

This Code of Ethics is announced on the notice boards of the Company

11.09.2024. year, and enters into force on 19.09.2024. year.