

MISSION: Our mission is to deliver our customers products and services of the highest level, completely tailored to their needs and wishes.

VISION: Our vision is with precious employees by continuously improving technologies that we use in our production process as developing and applying innovative solutions to create continual advantage in the market and to consistently deliver top quality products and services to our customers.

To achieve this vision and fulfil our mission, we have strategic goals and we follow the rule that "Joined forces create great works – Roof; Façade; Construction – in Croatian short form: KFK".

Preamble

The employees of the KFK have jointly developed a mission statement. The mission statement expresses what our Company stands for. We are customer-focused.

We develop innovative products and services that create sustainable infrastructures and promote efficient use of resources. We strive to keep with our customers long-term and mutually successful business relationships. In order to achieve continuity of service of the highest level, we introduce into our business the most modern business standards, specific departments and working procedures, control and test mechanisms in the production process.

Our people are capable, technical experts who have won the highest level of ethical code of conduct.

We are entrepreneurs, with high confidence, with passion to create the best products, and have courage to aim to be best in class. This is based on the dedication and performance of every team member. Employee development is especially important. Employee health and workplace safety have top priority.

We share Common Values. We serve the interests of the Company. Our interactions are based on transparency and mutual respect. We are responsible corporate citizens.

Our essence is defined and we achieve the fundamental qualities as they are integrity, credibility, reliability and consistency.

The role of responsible corporate citizen as described in the mission statement also involves making an active commitment to sustainable development, which we support by subscribing to the ten principles of the United Nations Global Compact. We are also committed to the United Nations Universal Declaration of Human Rights and the core labour standards of the International Labour Organization (ILO).

Rules and regulations for special situations and circumstances in the work environment are clearly formulated in the corresponding policies. These policies are unconditionally valid and binding for all employees of KFK. Any employee who fails to comply with the Company policies must expect corresponding consequences under internal rules and legal regulations.

On the basis of the above, this Code of Conduct summarizes the main principles and rules governing our activities as well as the standards we set ourselves in dealings with business partners.

Place and date: Rugvica, May 31, 2017

On behalf KFK d.o.o.:

KFK d.o.o.
RUGVICA, Dugoselska 5 a
DUGO SELO

Emil Krajčarek
Director



Conduct in business

Compliance with the law

Compliance with law, rules and regulations is for us an essential principle of responsible business conduct.

We operate in accordance with legal regulations and requirements at all times, even if this involves short-term business disadvantages or difficulties for the Company or individuals.

Avoiding conflicts of interest

At KFK business decisions are made exclusively in the best interests of the Company. Any conflicts of interest with personal matters or other business or non-business activities, including those of relatives or other related parties, should be avoided. Should such conflicts nevertheless occur, they must be resolved in accordance with the law and Company policies. Conflicts must be dealt openly and transparently.

Fair competition

We are committed to promoting our services honestly and competing fairly. Our conduct on the markets is based on the Compliance Program issued by the Executive Board of KFK d.o.o. KFK stands for technological competency, innovation, customer orientation and motivated, responsible employees. These factors are the basis of our high reputation and the long-term economic success in global competition. Corruption and antitrust violations threaten these success factors and will not be tolerated (zero tolerance). We would rather fail to reach internal goals than act against the law.

With its Compliance Program and Quality Policy, KFK has taken wide-ranging measures to ensure compliance with anti-corruption and antitrust regulations. A violation will not be tolerated and will result in sanctions against the persons concerned. All Executive board members and managing directors, all senior executives and other employees must be aware of the extraordinary risks which corruption and antitrust violations can signify for KFK as well as for them personally.

Preventing money laundering

KFK fulfils its legal obligations to prevent money laundering and does not participate in money laundering activities.

In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

Guarding against bribery and corruption

At KFK, we are committed to conducting business fairly and ethically. We expect our suppliers to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that their employees, subcontractors and agents do not offer, promise or grant any advantages to any of KFK employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Guarding modern slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. At KFK we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

Invitations and gifts

At KFK, we expect that our suppliers refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Any invitations or gifts extended to KFK employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value and reflect ordinary local business custom. We also expect our suppliers to restrain from asking KFK employees or related parties for any inappropriate advantages.

Preventing conflicts of interest

In our suppliers' business dealings with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

Donations

We regard ourselves as active corporate citizens and demonstrate our commitment in a variety of ways. Donations and other forms of corporate citizenship are carried out solely in the interests of the company.

We make no financial contributions, in particular donations or sponsorships, to political parties in our home country or abroad, organizations related or similar to parties, individual office incumbents or candidates for political offices.

Political lobbying

Our political lobbying is centralized, open and transparent. We comply with the legal requirements on lobbying and avoid at all costs unfairly influencing government policy and legislation.

Behaviour in public and communications

We respect the right to free speech and the protection of personal rights and privacy. All employees should be aware that in their private lives they can also be seen as part and representative of KFK and are therefore called upon to safeguard the Company's standing and reputation in the way they act and conduct themselves in public, above all towards the media.

Handling of information - Confidential company information

KFK is built on strong values: reliability and honesty, credibility and integrity. We therefore attach great importance to being open and truthful in our reporting and communications on the Company's business transactions to investors, employees, customers, business partners, the general public and government institutions.

Every employee shall ensure that both internal and external reports, records and other documents of the Group comply with the applicable legal rules and standards and are therefore complete and correct at all times and issued in good time and in accordance with system requirements.

We take the necessary steps to suitably protect confidential information and business documents from access and inspection by unauthorized colleagues and other third parties.

Data protection and information security

The protection of personal data, in particular of employees, customers and suppliers, is of particular importance to KFK Company. We collect and process personal data only when this is absolutely necessary to perform work-related tasks or when required by law. Personal data may be collected or processed only with the consent of the person concerned and where permitted by law.

Protection of company property

KFK is led by policy/expression: "Manners make the man"

We use the Company's property and resources correctly and carefully and protect them from loss, theft and misuse. We use the Company's tangible and intangible assets exclusively for business purposes and not for personal reasons except where expressly permitted. Our employees bear

joint responsibility with their supervisors for ensuring that business trips are always appropriate in nature and scale to the purpose of the trip and are efficiently planned and carried out taking time and cost aspects into account.

Conduct towards colleagues and employees

Equal treatment and non-discrimination

KFK implemented the principle of equal treatment between persons irrespective of religion or belief, disability, age or sexual orientation. A culture of equal opportunities and mutual trust and respect is of great importance to us. We promote equal opportunities and prevent discrimination in the recruitment, promotion, training and development of employees. We treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion or worldview.

Human and labour rights

We respect internationally recognized human rights and support their observance. We reject all forms of forced and child labour. We recognize the right of all employees to form unions and employee representative bodies on a democratic basis within the framework of national legislation. The right to appropriate compensation is recognized for all employees. Pay and other benefits shall at least comply with the respective national or local legal standards or the standards in the national economic sectors/ industries and regions.

Occupational health and safety

The safety and health of our employees are a corporate objective of equal standing with the quality of our products and our commercial success.

Occupational safety and health protection are an integral part of all business processes and are included from the outset – starting in the planning phase – in all technical, economic and social considerations.

All employees shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility.

The same safety standards as for KFK employees shall apply to employees of subcontractors. This is taken into account in selecting and working with subcontractors.

Development of employees

Doing business in competitive markets requires constant improvement and innovation as a continuous process, which is done only by motivated employees. Considering its own employees as the most valuable asset, KFK encourages and supports constant development of knowledge and skills among his employees. We believe that such attitude is not only crucial for a long-term benefit of the company, but also makes the employees more satisfied and personally self-confident.

Implementation and contacts

KFK shall actively promote communication of the Company policies and agreements on which the Code of Conduct is based.

Good and trusting relations between employees and managers are reflected in honest and open communication and mutual support.

For further questions relating to the Code of Conduct all employees as well as third parties (customers, suppliers, etc.) can also contact our management board e-mail address: kfk@kfk.hr and our Legal and General administrative service Mrs. Dunja Kutle, contact phone: +385 1 481981, fax. +385 (0)1 4881980, e mail: info@odvjetnik-kutle.hr
All information will be treated in strict confidence.