

# CODE OF ETHICS



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# FOREWORD BY THE MANAGEMENT BOARD

*At Prvo plinarsko društvo d.o.o., Vukovar, the foundation of our operations lies in clearly defined values and principles. The **Code of Ethics** reflects our shared commitment to acting with integrity, respect, and a focus on excellence.*

As members of the Management Board, we take great pride in being part of an organization that places trust, responsibility, and ethics at the forefront. The principles contained in the Code of Ethics are not merely guidelines for professional conduct — they embody the core values that shape our identity and organizational culture.

We expect all our employees to adhere to the Code of Ethics, and we encourage our business partners and collaborators to respect and apply the principles and values it contains. Ethical business conduct is a shared responsibility and a key to long-term success and the trust we build with all our stakeholders.

By applying the Code of Ethics, we collectively contribute to a culture of inclusion, innovation, and mutual respect, creating an environment that fosters growth, sustainability, and a positive impact on the community in which we operate.

The strength of our company lies in the integrity and dedication of each individual. Through our joint efforts, we build a workplace where everyone feels empowered to achieve their best, with clearly defined personal responsibility, continuous mutual support, and collaboration.

*The Code of Ethics provides guidance for ethical behavior in daily work. It helps us navigate challenges and opportunities, and ensures adherence to the highest standards of behavior.*



*The Management Board of Prvo plinarsko društvo d.o.o.*  
**Zvonimir Šibalić, Ivana Pek Lučić, and Slaven Rajman**

# CORE VALUES

## I RELIABILITY IN BUSINESS RELATIONSHIPS

*We build relationships based on trust and transparency.*

Prvo plinarsko društvo d.o.o. (hereinafter: the Company) operates as a reliable and responsible partner, building all business relationships on trust, transparency, and mutual respect. Long-term and open cooperation with business partners is achieved through consistent adherence to agreed obligations and active contribution to the joint creation of value.

## III HONESTY AND OPEN COMMUNICATION

*We foster open communication within and outside the Company.*

The Company encourages open, honest, and transparent communication among employees, with business partners, and with the wider public. All activities and relationships are conducted with a high level of integrity, with full respect for the dignity of everyone involved.

## II COLLABORATION AND MUTUAL RESPECT

*We value cooperation and respect every individual.*

In its operations, the Company promotes unity, teamwork, and a culture of collaboration. It fosters an environment where diversity is accepted and respected.

Particular emphasis is placed on maintaining a healthy work-life balance, as success is grounded in the satisfaction and well-being of employees.

## IV RESPONSIBILITY AND GOAL ACHIEVEMENT

*We care for the community and environment in which we operate.*

In achieving its goals, the Company acts responsibly, transparently, and with full integrity. Commitment to quality, innovation, and continuous improvement is aimed not only at achieving business results but also at creating a positive social impact. The Company actively engages in supporting its employees, the community, and those in need, promoting a dignified and fulfilling life for all.

# BUSINESS PRINCIPLES

## V PROHIBITION OF DISCRIMINATION AND HARASSMENT

The Company does not tolerate any form of discrimination, intimidation, or harassment — whether in the workplace, in communication between employees, or in interactions with business partners and third parties.

*Any form of unequal treatment is strictly prohibited, especially on the basis of:*

- ethnic origin, nationality, or race
- religion or personal beliefs
- age
- skin color
- sex, gender identity, or sexual orientation
- disability
- marital or family status
- any other personal circumstance not related to job performance or professional competencies



## VI *Unacceptable behavior includes, but is not limited to:*

- use of offensive, degrading, or inappropriate language
- communication or actions that cause discomfort, fear, or a sense of exclusion
- creating a hostile, unpleasant, or discriminatory work environment

The Company promotes a culture of respect, professionalism, and inclusion. All employees and collaborators are expected to contribute through their behavior to a positive, safe, and supportive work environment where all individuals feel accepted and treated equally.



## VII RESPECT FOR HUMAN RIGHTS

The Company respects the fundamental human rights of every individual and is committed to their protection and promotion across all areas of its operations.

In its actions, the Company adheres to the principles set out in the Universal Declaration of Human Rights of the United Nations, which form the foundation of a free, fair, and dignified society. The Company does not cooperate with companies or organizations that knowingly violate human rights, and expects all its business partners to share the same values and operate in accordance with high ethical and human rights standards.

## VIII PROTECTION OF PRIVACY AND CONFIDENTIAL BUSINESS INFORMATION

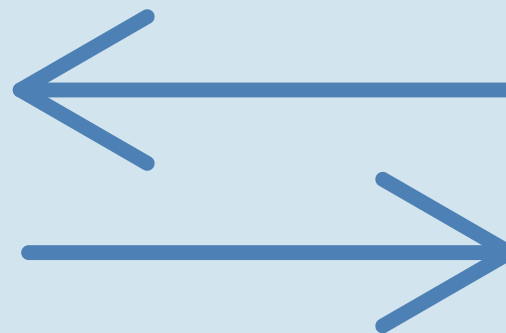
In the course of performing their duties, employees of the Company may come into contact with personal data of business partners or third parties.

The Company collects and processes personal data fairly, lawfully, and transparently, strictly in accordance with applicable data protection legislation, including the General Data Protection Regulation (GDPR) and other relevant regulations.

All personal data is considered strictly confidential, and access is granted only to authorized personnel.

The Company protects all business information related to its own operations, as well as to the operations of its partners and collaborators. All information and data used in the context of business activities are considered confidential.

The Company undertakes all necessary technical and organizational security measures to prevent unauthorized disclosure, use, alteration, or loss of personal and business data.



## IX PREVENTION OF CONFLICTS OF INTEREST

The Company expects its employees and business partners to avoid situations in which their personal interests could conflict with the interests of the Company or compromise objective decision-making. A conflict of interest may arise when an employee:

- benefits personally from a business decision they are making or influencing,
- uses the Company's confidential information for personal purposes,
- is involved in business relations with companies in which they or persons close to them have a financial or other interest,
- engages in external activities that could impair their loyalty to the Company or damage the Company's reputation.
- Employees are obligated to:  
promptly report any situation that may represent an actual or potential conflict of interest,
- refrain from making decisions or participating in processes where a conflict of interest may exist,
- comply with all internal procedures and policies related to conflict of interest management.

The Company promotes a culture of transparency and accountability and ensures that no employee will be placed at a disadvantage for reporting a potential conflict of interest in good faith.

# CONDUCTING BUSINESS WITH INTEGRITY

## X ZERO TOLERANCE FOR FRAUD

The Company enforces a zero-tolerance policy toward all forms of fraud, dishonest behavior, and data manipulation. Strictly prohibited actions include:

- falsification of business documentation or records,
- misrepresentation of facts,
- concealment of information relevant to business decision-making,
- manipulation of data for personal or organizational gain,
- selective interpretation of the same data depending on the situation to gain an unfair business advantage.

*All employees are required to act honestly, responsibly, and in accordance with applicable laws and the Company's internal policies. Any attempt at fraud, as well as knowingly ignoring unethical behavior, is considered a serious violation of ethical principles.*



## XI PROHIBITION OF MARKET MANIPULATION AND INSIDER TRADING

To ensure transparent and fair business practices, the Company complies with all regulations prohibiting market manipulation and the use of insider information in trading.

The Company operates based on principles of integrity, fairness, and equity, and is committed to the functioning of liquid, fair, and transparent markets in which all participants have equal access to information and operate under market conditions.

The Company acts in full compliance with applicable laws, regulations, and its internal policies and procedures.

## **XII PROHIBITION OF CORRUPTION AND BRIBERY**

The Company strictly prohibits any form of corruption, bribery, or unlawful influence in business dealings. Employees are responsible for performing their duties lawfully and ethically and are expected to:

- comply with all legal regulations in the country in which the Company operates,
- understand the risks associated with unlawful business conduct and corrupt practices,
- avoid situations that could be perceived as attempts to offer or receive bribes, whether directly or indirectly.

The Company maintains a strict policy against offering or accepting any inappropriate gifts, incentives, services, or advantages that could be perceived as an attempt to influence business decisions.

## **XIII PREVENTION OF MONEY LAUNDERING AND TERRORIST FINANCING**

The Company strictly prohibits the use of its resources, services, or business relationships for the purposes of money laundering or terrorist financing.

To protect the integrity of its operations and uphold social responsibility, the Company has established clear standards and internal procedures to identify and prevent such activities.

All employees are required to act in accordance with:

- applicable legislation and international regulations,
- internal Company policies and governing documents,
- best practices in the field of anti-money laundering (AML) and counter-terrorism financing (CTF).

The Company does not engage in business with partners, clients, or suppliers who are suspected of involvement in activities that may constitute money laundering, terrorist financing, or any other forms of financial crime.

## **XIV FAIR AND PROFESSIONAL CONDUCT TOWARD CUSTOMERS**

In its dealings with customers, the Company upholds principles of fairness, professionalism, and long-term relationships based on trust and credibility.

Our goal is to understand the challenges our customers face and to work together to find the best possible solutions.

Transparency in contractual relationships includes:

- ensuring that customers are fully informed about all relevant aspects of a contract before signing,
- providing clear and accurate information about price developments and the factors influencing agreed pricing,
- maintaining open communication about legal and regulatory requirements, as well as potential risks for both parties.

Our fair and transparent approach is the foundation of long-term partnerships and maintaining trust in the market.

## **XV RESPONSIBLE PARTNERSHIPS**

The Company expects all business partners to uphold high ethical standards that align with our business principles.

Ethical conduct, professionalism, and transparency are the cornerstones of all our business relationships.

Our success depends significantly on partnerships built on trust, respect, and honesty. Therefore, we fulfill all our obligations to business partners in a timely manner and in full compliance with contractual and legal requirements.





## **XVI FAIR AND HONEST MARKET COMPETITION**

The Company operates based on the principles of free and fair market competition, with full commitment to compliance with competition laws and related regulations in all countries and markets where the Company operates.

## **XVII SUSTAINABLE DEVELOPMENT**

The Company is aware of its responsibility and impact on the society in which it operates, as well as on the environment.

By creating jobs that respect dignity and equality, and by supporting initiatives aimed at reducing social inequalities, we actively contribute to economic development and strengthening of local communities.

## **XVIII ENVIRONMENTAL PROTECTION**

The Company recognizes the importance of environmental preservation as an integral part of its social responsibility. We are committed to implementing practices that minimize the negative impact of our business activities on the environment.

All employees are obliged to:

- comply with applicable laws and internal policies related to environmental protection,
- use resources and energy responsibly,
- properly dispose of waste and promote recycling,
- actively participate in initiatives that contribute to nature conservation and reduction of harmful gas emissions.

The Company strives to continuously improve its environmental standards and, through innovation and responsible practices, contribute to sustainable development and a healthier planet for future generations.



# CONTACT US...

Vukovar, March 1, 2025

PRVO PLINARSKO DRUŠTVO d.o.o.

*If you have any questions  
regarding the Code or  
wish to report violations,  
non-compliance, or any  
other illegal activities,  
please contact us at:*  
**compliance@ppd.hr.**