



CODE OF BUSINESS CONDUCT

INTRODUCTION

Our company is guided by the values and standards outlined in our code of business conduct, which we follow in all of our interactions with clients, partners, employees, and other stakeholders.

A group of ship technology enthusiasts and admirers founded Motorpoint d.o.o. as a business proposal. The company began operations in 2018 with eight employees who were primarily responsible for high-speed diesel and gas engine service, repairs, and maintenance, as well as related management and control systems. We perform over 500 service activities and interventions each year. Our company's basis is built on the organisational knowledge and competencies of our employees. Our employees have professional certifications for the work they do.

We created our market position on strong professional and ethical grounds, and we conducted all business decisions in accordance with legal and moral standards. As a result, we expect all workers and partners to follow ethical business practises and to act in accordance with our core principles.

The Code of Conduct represents our values, reflects the concepts and rules that define our organisation, and establishes clear guidelines for employee and partner behaviour.

Our ethical business, code, regulations, and policies, as well as all applicable laws, represent our consistent handling of our essential beliefs.

Our Code applies to MOTORPOINT d.o.o., all of our employees, and all of our business partners, which include users, suppliers, consultants, external colleagues, and other appropriately linked business partners in compliance with local legal requirements and regulations.

The Code of Conduct provides an overview of guidelines, rules, procedures, and policies concerning us and the work we do. It also lays out the concepts and guidelines for ethical behaviour and sound business operations.

The Code also lists people who can answer questions related to legality and compliance, if they are not covered by the guidelines referred to in the Code.

Although the Code offers guidelines for a number of issues related to acceptable standards of integrity and appropriate business conduct, it is impossible to predict any situation that may arise in everyday business operations, which is why we emphasise the importance of ever

y employee or partner respecting the Code's rules, as well as its contents, being guided by sound reasoning.

We expect our suppliers, consultants, external associates, and all other business partners who do business with us to follow the Code of Business Conduct and make decisions in everyday commercial that will retain the confidence earned through our previous business activities, and we expect nothing less from our suppliers, consultants, external associates, and all other business partners who do business with us.

All workers must abide by all applicable laws, rules, and standards in all countries where MOTORPOINT d.o.o. operates, as well as the Code of Conduct, even if it sets higher requirements than those required by state laws or regulations.

VALUES WE HOLD

Our mission

Thanks to our expertise and experience, we create solutions and services that we continuously improve.

Our society's core values:

Knowledge

We are constantly developing and applying new trends, new knowledge, and new skills. Learn from the best, experience state-of-the art technology and advance with a team of experts with international connections.

Excellence

We are constantly developing and applying new trends, new knowledge, and new skills. Learn from the best, experience state-of-the art technology and advance with a team of experts with international connections.

Trust

Trust is the most valuable currency in the world and we have learned how to build and retain it. As a result, we are always available to assist you. We kept the same values we had when we were a small company.

OUR RESPONSIBILITIES

WHAT IS EXPECTED OF EACH AND EVERY ONE OF US

We expect all MOTORPOINT d.o.o. employees, regardless of their job responsibilities, to:

- act lawfully and in accordance with our basic beliefs;
- abide by our code, rules, and processes, as well as the laws and regulations of the nation in which they work;
- always use common sense and avoid situations that could lead to illegal or unethical behaviour.
- consider in terms of our basic values in every business partnership they enter;
- they must promptly alert their superior or any of the personnel named as reporting channels in this code if they witness or suspect any illegal or unethical action.
- to recognise that any breach of our code, rules, or processes may result in disciplinary action, including termination of employment, as required by law.

WHAT WE EXPECT FROM THE BOARD MEMBERS

- at all levels of business, respect the principles of the Code, comply with the Code, and promote our core values, and their practises demonstrate the importance of adherence to the Code;
- foster a climate that supports legal and ethical behaviour while also allowing employees to ask inquiries and voice concerns about potential violations;
- urge workers to obtain the appropriate training relating to the content and application of the Code and other applicable processes and rules as soon as possible, and to adequately monitor their employees' procedures;
- do not conceal behaviour that is in violation of the Code;
- immediately notify the person in charge of compliance monitoring or another responsible person of any reports of unlawful or unethical behaviour, or any acts or actions that contravene our rules, procedures, Code, or law;
- treat each application with seriousness, and make sure that those in positions of leadership are aware that they will be protected from retaliation if they seek guidance or report potentially harmful behaviour in good faith.

REPORTING OF INAPPROPRIATE CONDUCT

Any employee who suspects illegal or unethical conduct, or acts or procedures that contravene our rules, procedures, code, or law, shall report the alleged infringement as soon as possible. In principle, as a first step, we encourage you to address your superior. If, for any reason, it is not possible to act in accordance with the procedure for notification of non-compliance prescribed by the company.

CONFIDENTIALITY AND ANONYMITY

Any inquiry or report of an infringement may be submitted anonymously.

However, we should remind you that in some situations, thoroughly investigating anonymous applications may be difficult, if not impossible.

We take reasonable steps to protect the applicant's identity and information concerning the specific investigation. All queries will be handled discreetly, and every effort will be made to maintain the confidentiality of information concerning anybody seeking assistance or reporting possible infractions, to the extent permitted by applicable regulations. In accordance with confidentiality requirements for all workers and business partners, all participants in the inquiry into the legality and compliance in any position (e.g., witnesses) are expected to keep the specifics of the investigation discreet.

PROTECTION AGAINST RETALIATION

It is forbidden to take retaliation against any employee who discloses a suspect or injury in good faith. This code prohibits any form of retaliation.

Seeking counsel, expressing concern, raising doubts or infringements cannot and will not be used as a basis for any adverse actions, such as threats, harassment or discrimination, rejection of compensation, termination, relocation to a lower position, or similar.

If an employee believes he or she has been subjected to any of these actions for any of the reasons stated above or for a good faith application, he or she may file a complaint through any of the channels listed above, and we will take necessary action against any retaliation procedure.

False reports of suspicion or infringement are considered a violation of the Code and can lead to disciplinary or other legal action, depending on the circumstances.

CODE IN PRACTICE

We expect employees to use reasonable judgement when deciding how to proceed in a given situation by asking themselves the following questions:

- Is what I'm doing or what other people are doing legal and ethical?
- Is it in harmony with our core values?
- Is it in compliance with this code, our policies, and procedures?

PERSON RESPONSIBLE FOR COMPLIANCE MONITORING

We established a compliance monitoring responsible person, who serves as an impartial and objective body that oversees the compliance programme, assesses company compliance risks on a regular basis, and organises business operations.

The role of the responsible person for compliance monitoring ensures that the management, and employees of the company comply with the rules and procedures of the compliance programme, comply with the rules and regulations of regulatory bodies, and that behaviour in the organisation meets the standards of conduct of society.

The compliance officer in charge is responsible for the following tasks:

- establish a compliance programme and related activities to avoid illegal, unethical, or anti-social behaviour;
- assists the Directorate in the development of organisational culture;
- test and monitor the organization's conformity with its established values, standards of behaviour, mission, and objectives on a regular basis;
- develops and implements an effective internal control system, as well as raising awareness, providing training, and providing guidance on how to increase business integrity;
- design and implement an effective method for reporting violations and safeguarding whistleblowers;
- identify potential areas of vulnerability and compliance concerns, create and implement corrective action plans, and provide broad guidance for dealing with problems;

- handle anonymous and/or confidential reporting channels for infringements (improper conduct and violations of applicable regulations, internal rules, and ethical standards, etc.) with appropriate reporting from authorised resolution authorities;
- colLABOURates with other departments to build a successful compliance programme, which includes adequate initial and ongoing training for all employees, management, and management;
- is responsible for reporting to the management of the company on business compliance;
- make recommendations for corrective actions in the event that inconsistencies, flaws in procedures, rules, processes, or the overall culture of the organisation are discovered and investigated.

The individual in charge of compliance oversight will report directly to the company's management.

THE ESSENTIAL ETHICAL PRINCIPLES OF OUR ORGANIZATION

HUMAN RIGHTS

We uphold fundamental human rights as established in the United Nations' General Declaration on Human Rights, as well as globally recognised concepts and guidelines, such as the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, which addresses freedom of association and collective bargaining, forced LABOUR, child LABOUR, and discrimination.

All legal requirements and standards in the sphere of human rights are respected in all of the countries where we operate.

DISCRIMINATION AND HARASSMENT

We support a work environment free of discrimination against employees, as well as harassment and abuse in the workplace.

Regardless of ethnicity, race or ethnicity, national or socioeconomic origin, gender, skin colour, health, disability, religion or belief, age, sexual orientation, family status, trade union participation, property position, or other personal circumstances, we treat all employees equally.

Employees must communicate in a way that is free of violence, harassment, or violations of recognised human rights, such as the right to an alternative viewpoint, the right to privacy, and the right to expression.

Employees who engage in harassment or discrimination face disciplinary action, which may include termination (depending on the legislation). Immediate superiors or managers are responsible for ensuring that harassment and discrimination are not tolerated in their business units or divisions.

FORCED LABOUR OR CHILD LABOUR

We do not employ children at MOTORPOINT d.o.o., and we do not tolerate any sort of child LABOUR, forced LABOUR, or debt slavery.

All types of forced LABOUR are outlawed, including hard LABOUR, compelled LABOUR, and any other form of forced LABOUR. Imprisonment in any form is prohibited.

It is prohibited to support human trafficking or voluntary LABOUR through threats, coercion, false claims, extortion, or any involvement in such practices.

Employees have the option and flexibility to terminate their employment contract in compliance with all applicable equal employment opportunity regulations, procedural procedures, and the employment contract.

A SAFE AND HEALTHY WORKING ENVIROMENT

In the company of MOTORPOINT d.o.o., we provide our employees with a healthy and safe working environment in accordance with the relevant regulations on work and occupational safety. We adhere to all legal requirements for the establishment and maintenance of a safe and healthy working environment, and we take steps to prevent and remove potential risks to health and accidents on a regular basis.

We encourage and enable our employees to educate and train themselves on a regular basis in the areas of workplace safety and health, fire safety, and property protection, and we encourage them to tell responsible persons about any hazards or disadvantages in the workplace, as well as all uncertainties in the workplace.

All employees must follow the regulations for workplace safety and security, which are outlined in relevant legislation and corporate policies on workplace safety, occupational safety, and fire safety.

With an ISO certified for ISO 9001: 2015 and ISO 14001: 2015, MOTORPOINT d.o.o. aspires to embrace the world's best practises and standards in quality management and environmental care systems.

ALCOHOL AND DRUG ABUSE

Consumption and/or use of alcohol, illegal substances, narcotics, and/or other hallucinogenic substances is absolutely prohibited at MOTORPOINT d.o.o.

A workplace is any site where an employee works for a MOTORPOINT d.o.o., independent of time or location.

According to internal regulations, employees can be subjected to alcohol, drug, and other drug testing, including unannounced random testing.

OUR BUSINESS PROFESSIONALISM

CORRUPTION AND BRIBERY PREVENTION MEASURES

We at MOTORPOINT d.o.o. follow anti-corruption regulations in all of the countries where we do business.

No employee or other person acting on behalf of the company may provide, promise, or make payments or any other item of particular value, or request or accept such an object, in order to sway public or civil servants, employees, or other persons or gain an unfair economic advantage.

It is also illegal to offer, authorise, pay, or deliver any benefit with the intent of improperly influencing public or civil servants or workers in order to gain an unfair business advantage.

Our employees and third parties acting on our behalf are not permitted to offer, seek, or accept bribes or other illegal payments in order to complete or maintain jobs; they are not permitted to participate in money laundering; and they are required to follow the general principles of combating money laundering, corruption, and bribery as defined in the relevant conventions.

GIFTS

Employees or anyone acting on behalf of MOTOR d.o.o. are not permitted to present or receive any gifts, symbols of gratitude, or entertainment offers that could influence business transactions or decisions of employees, business partners, or clients.

Giving presents and entertainment may vary by culture or country, but all gifts and entertainment, whether received or given, must be legal, must not break the donors' or receivers' policies or guidelines, and must adhere to local norms, customs, and laws.

PAYMENT ACCELERATION PROCEDURES

Payments acceleration techniques include offering unofficial advantages in order to facilitate and expedite operations or procedures that the person making the payment is legally authorised to perform.

We don't promise anything, we don't pay, and we don't give presents in order to get governmental bodies, officials, commercial partners, or any third parties to make decisions faster.

CONFLICT OF INTEREST

There is a conflict of interest when, when performing their work, employees or other people who participate in companies put their personal, social, financial, entrepreneurial, or political interests or those of family members or other affiliated persons before the interests of the company MOTORPOINT d.o.o.

When an individual's personal interests affect or may affect an employee's capacity to make objective decisions and do their work for the MOTORPOINT d.o.o., this is referred to as a conflict of interest.

Our workers must avoid circumstances of actual and potential conflict of interest, including situations that appear to be a conflict of interest in connection to their position, job, and oneself, in accordance with the rules of the current regulations.

We expect our staff to act in the best interests of society and to make choices in an objective and impartial manner.

Any potential conflicts of interest should be reported to your immediate boss. If this is not possible due to a variety of factors, you should contact the person in charge of ensuring that everyone follows the rules via the reporting channel.

MANAGEMENT OF PRIVILEGE INFORMATION

The company MOTORPOINT d.o.o. is required to make all information required by applicable laws and regulations available to the public.

Privilege information is any significant information that is not publicly available, is precise, and has a direct or indirect societal connection, and that, if made publicly available, would almost certainly have a significant impact on the prices of financial instruments or related derivative financial instruments.

MOTORPOINT d.o.o. restricts who has access to privileged information in order to prevent market exploitation.

Privilege information is only available to those people who need it for the performance of activities in accordance with the function and responsibilities of the workplace.

We take all necessary precautions to prevent access to those who do not require the information for the regular and uninterrupted performance of their duties, and to ensure that anybody with access to inside information complies with all prescribed responsibilities and is aware of the sanctions that may be imposed in the case of misuse or unauthorised publication of such information.

Trading or attempting to trade based on inside knowledge, advocating or encouraging another person to trade based on inside information, and unlawfully revealing inside information are all absolutely forbidden for anyone who possesses inside information.

OUR RESPONSIBLE BUSINESS

COMPANY ASSETS

We have a variety of assets at MOTORPOINT d.o.o., including physical assets, machineries, tools, business secrets, and intellectual property.

Employees, business partners, and third parties are required to use assets prudently, logically, and in compliance with internal regulations and instructions.

The assets of MOTORPOINT d.o.o. are utilised for the company's needs and, in exceptional situations, for private purposes within the agreed-upon scope.

USAGE OF INFORMATION TECHNOLOGIES

The use of society's information technology and resources, as well as their contents, is permitted for the purpose of carrying out work for society or for other permissible objectives emerging from them.

We expect our employees to use good judgement in all situations, to act morally, professionally, and legally, and to strictly follow permission requirements when using social information technologies and their contents.

Processing, sending, receiving, accessing, displaying, storing, printing, and any other distribution of fraudulent, abusive, threatening, unlawful, racist, sexist, obscene, frightening, defamatory, and other professionally unsuitable messages, materials, and data are all examples of prohibited resource use.

INTELLECTUAL PROPERTY

Intellectual property encompasses a wide range of assets, including computer programmes, technical documentation, scientific and technological information, knowledge and skills, and so on.

Intellectual property is subject to protection or may become subject to special protection under copyright, patent law, trade mark law, etc.

We expect employees to treat intellectual property with care and to use these rights responsibly in order to preserve a competitive advantage.

Employee-created intellectual property, or the right to exploit it, must be transferred to society to the extent required by law and/or in compliance with the rules of procedure, employment contract, or other contract.

We also require employees to respect other people's intellectual property. It is strictly forbidden to use, steal, or dispose of a third party's confidential information or intellectual property without permission.

DATA PROTECTION

MOTORPOINT d.o.o. personnel are given various pieces of information about ownership, including third-party ownership. Financial data, business strategies, marketing plans, sales data, technical data, employee and customer data, and other forms of data may be included.

We take great effort to safeguard all confidential information and to prevent unauthorised or inappropriate access to or disclosure of such information, which could harm society, our business partners, or third parties.

Unauthorized access, use, or disclosure of sensitive data may also be a violation of the confidentiality agreement as well as any laws, including data protection legislation.

Employees must observe all data security and protection regulations and procedures, and access, usage, and dissemination of data must be confined to employees who are properly permitted to do so.

Employees are expected to implement following concepts in regular business:

- they should act with caution and consult the data owner if they are unsure whether the data is sensitive or confidential.
- delivering sensitive or private material via e-mail to ensure that the message is appropriately tagged with a level of confidentiality and that the attachment is suitably protected from unauthorised access;
- expose confidential or protected information to third parties without the requisite authority and/or confidentiality agreement, such as business partners, customers, and suppliers;
- when working in an open atmosphere, avoid discussing confidential material in public places and provide all confidential information;
- sensitive or confidential information is handled and disposed of in accordance with corporate policies and procedures;
- do not access non-public data directly or indirectly, nor do they reproduce, copy, or utilise it outside of their duties and tasks;
- all authorizations for non-public data access or use expire when a person leaves society, and all data must be returned or destroyed.

Employees of the company MOTORPOINT d.o.o., business partners, and third parties operating on our behalf are responsible for the protection of personal data, and such data can only be processed within the limits set by applicable laws and internal company standards.

SOCIAL RESPONSIBILITY

Our business is synchronised with social responsibility, and apart from employees, we actively invest in the community. The majority of investments are made in health and education-related projects.

OUR SUPPLIERS AND BUSINESS PARTNERS

MOTORPOINT d.o.o. successfully manages risks associated with customers, suppliers, and other business partners.

The Code establishes the minimal standards we expect from our suppliers, subcontractors, and other business partners, which they must respect and follow while doing business with us.

We require suppliers, subcontractors, and other business partners to comply with the Code or equivalent standards, which may represent higher standards than those stipulated by the applicable law.

We expect suppliers and business partners to:

- uphold human rights and build a workplace that respects people's dignity and privacy;
- follow the law and uphold our basic values, rejecting any types of illegal action;
- have internal controls, risk management systems, and conflict of interest rules in place, and they immediately alert us if there is a conflict of interest that could directly or indirectly influence business operations;
- make sure that all of its employees and subcontractors are aware of and follow the Code;
- comply with anti-corruption and anti-competition regulations, as well as handle all fraud and abuse risks.

Acceptance of the Code is a requirement for all procurement contracts.

Our business partners agree that all of their actions will be governed by the rules of this Code by accepting the order/contract and referring to it.

Company reserves the right to observe these principles.

The supplier and business partners are required to report any suspected infringement of regulations, laws, and codes through any of our available channels.

Suppliers and business partners who are determined to have influenced corporate choices inappropriately or illegally will be excluded from participating in any future transactions.

Suppliers and business partners may, in good faith, report any suspicion of illegal or unethical acts or any acts or actions that violate our rules, procedures, codes, or laws.

FINAL PROVISIONS

The Code of business conduct of MOTORPOINT d.o.o. was adopted at the beginning of 2022 and takes effect on the day of its publication.

During the onboarding process, all new employees are given an overview of the company's code of business behaviour.

Within 30 days after its publication, all workers must be aware of the code of conduct.

Management

Darko Rakoš, ing.