

## CODE OF CONDUCT FOR BUSINESS PARTNERS OF AVANT CAR d.o.o.

AVANT CAR d.o.o., Savska Opatovina 36, 10000 Zagreb, together with all its affiliated companies (hereinafter: *AVANT CAR*) respects the law and human rights in the course of performing its business activities, acts with integrity and pays special attention to the protection of the environment.

In this Code of Conduct for Business Partners (hereinafter: the *Code*), AVANT CAR sets out the fundamental principles and standards of ethical and business conduct that it advocates and expects its suppliers, service providers and other business partners (hereinafter each of them: the *Business Partner*) to adhere to in the course of their business.

### 1. Compliance with the law

The Business Partner will comply with all applicable national laws and international regulations in the conduct of its business.

### 2. Respect of human and labour rights

Caring for people and providing a healthy and safe working environment for AVANT CAR employees and business partners is an important value for us and we expect our business partners to pay attention to this and to ensure that human and labour rights are respected at all times.

**Employee Welfare:** The Business Partner will respect the rights of employees and treat them with respect and dignity.

**Combating harassment and discrimination:** The Business Partner will co-create a work environment free from psychological and physical violence. The Business Partner is committed to promoting equal opportunities and treatment of employees and to co-creating a work environment based on inclusion and diversity. The Business Partner shall not tolerate any unacceptable behaviour in the business environment, which includes all forms of harassment as well as discrimination on the grounds of nationality, race, ethnic affiliation, religious belief, gender, sexual orientation, age, disability, social background, political affiliation or any other personal circumstance.

**Prohibition of forced labour:** the Business Partner will not support or use any form of forced or involuntary labour, including apprenticeship, dependent or slave labour.

**Prohibition of child labour:** The Business Partner will not support or use child labour.

**Fair pay:** The Business Partner will provide employees with wages and benefits that are at least the minimum amount required by applicable laws/regulations.

**Freedom of Association:** The Business Partner will respect the legal rights of employees to associate and will not discriminate or retaliate against any employee who exercises such rights.

**Employee health and safety:** The Business Partner will ensure healthy and safe working conditions for its employees and is obliged to put in place appropriate organisational processes to ensure compliance with legal requirements in this area. The Business Partner will identify and assess safety risks and take appropriate measures to prevent them. It will inform its employees of such potential risks and provide them with appropriate training on how to act properly and safely and to comply with the relevant safety precautions at work.

**Alcohol and drugs:** The Business Partner will ensure that controls related to the prohibition of alcohol, drugs and other illegal substances are implemented in all cases and wherever its employees carry out their work, whether on the Business Partner's premises, at AVANT CAR's premises or elsewhere.

### **3. Fair business practices**

**Business Licences:** The Business Partner will hold all licences, registrations and certificates required and appropriate for the locations in which it operates.

**Competition Law:** The Business Partner will conduct its business in compliance with national and international competition laws, and will comply with the prohibition on abuse of dominant position and the prohibition on entering into restrictive agreements.

**Conflict of interest:** The Business Partner will conduct its business in an open and transparent manner with the highest degree of integrity. The Business Partner is obliged to inform AVANT CAR of any potential conflict of interest prior to the commencement of the business relationship and/or during the business relationship.

**Prevention of bribery and corruption:** the Business Partner will comply with high standards of integrity. It will comply with applicable anti-corruption laws and will not tolerate any form of bribery or kickbacks and will never give or accept bribes or kickbacks or make facilitation payments.

**Money Laundering and Terrorist Financing:** The Business Partner shall comply with the relevant legislation and take appropriate measures to prevent money laundering and terrorist financing.

**Protection of trade secrets, personal data and intellectual property rights:** The Business Partner shall keep confidential all trade secrets and all other information and content that is marked as confidential and is not, in accordance with the law, exempted from the obligation of confidentiality, and shall ensure that all necessary mechanisms are in place to prevent unauthorised disclosure of such information. The Business Partner will also comply with the legislation on the protection of personal data and will not infringe the intellectual property rights of others.

**Tax Compliance:** the Business Partner will comply with the applicable tax laws.

**Trade and Customs Controls:** The Business Partner must comply with export control and customs clearance regulations.

**Responsible sourcing of raw materials:** The Business Partner will not use raw materials sourced from areas where its operations contribute in any way to human rights abuses, corruption, the financing of armed groups or similar negative impacts.

**Use of AVANT CAR assets:** the Business Partner must treat AVANT CAR assets (systems, networks, facilities, movable assets) with care and appropriately whenever they are used.

#### **4. Sustainability and care for the environment**

**Environmental impact:** The Business Partner will strive to operate in a sustainable manner. The Business Partner shall comply with all relevant environmental laws and shall ensure the efficient (re)use of raw materials, energy and other natural resources and the reduction of waste, emissions and noise.

**Society and community:** The business partner will strive to act responsibly towards society and the environment and to (co)create positive impacts through the delivery of products and services.

#### **5. Final provisions**

The Business Partner undertakes to cooperate with AVANT CAR in order to improve the business environment in which it operates and to comply with the principles set out in this Code, and to ensure that the commitments set out in this Code are also respected by all its business partners, suppliers or subcontractors (to ensure accountability for the entire supply chain).

AVANT CAR reserves the right to verify the compliance of a business partner with the provisions of the Code.

In the event of a breach of the provisions of this Code by the Business Partner, AVANT CAR shall be entitled to withdraw from further business cooperation with the Business Partner without notice, irrespective of any other contractual agreements between AVANT CAR and the Business Partner.

The provisions of the Code are published on the website <https://www.avantcar.hr>.

The Code shall be valid and applicable from 01. 08. 2024.