

ZMH HORVAT d.o.o.	POLITIKA ETIČKOG POSLOVANJA I SPRJEČAVANJE KORUPCIJE	Dokument: POL-IMS-05
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ZMH Horvat d.o.o. posluje u skladu s najvišim etičkim, profesionalnim i zakonskim standardima te promiče kulturu integriteta, poštenja i odgovornosti. Cilj ove politike je osigurati da se svi poslovni odnosi, odluke i aktivnosti provode **bez bilo kakvog oblika mita, korupcije, sukoba interesa, zlouporabe položaja ili neetičnog ponašanja**.

Ova politika usklađena je sa **Eco Vadis Ethics pillarom**, te relevantnim zakonodavstvom Republike Hrvatske i Europske unije. Dio je integriranog sustava upravljanja (IMS) i nadovezuje se na **Politiku društvene odgovornosti i ljudskih prava (POL-IMS-04)** i **Etički kodeks ZMH Horvat d.o.o.**

Uprava ZMH Horvat d.o.o. obvezuje se da će:

- 1) Održavati nultu toleranciju na podmićivanje, korupciju i prijevare** u svim oblicima, bez obzira na visinu, svrhu ili okolnosti.
- 2) Osigurati pošteno i transparentno poslovanje**, osobito u odnosima s kupcima, dobavljačima, partnerima, državnim institucijama i certifikacijskim tijelima.
- 3) Sprječavati i upravljati sukobom interesa**, osiguravajući da poslovne odluke budu donesene isključivo u interesu tvrtke, bez osobne koristi pojedinaca.
- 4) Zabraniti bilo kakve poklone, usluge, nagrade, pogodnosti ili donacije** koje bi mogle utjecati na objektivnost i nepristranost poslovnih odluka.
- 5) Uspostaviti i održavati kanale za prijavu nepravilnosti (whistleblowing)** koji omogućuju zaposlenicima i vanjskim dionicima povjerljivo prijavljivanje sumnji na korupciju, prijevaru, zloupotrebu položaja ili bilo kakvo kršenje etičkih načela, bez straha od odmazde. Sve prijave se evidentiraju i obrađuju u skladu s dokumentiranim postupkom SOP-IMS-06 Upravljanje komunikacijom i usklađenošću.
- 6) Osigurati redovitu obuku zaposlenika** o etičkom ponašanju, sprječavanju korupcije, sukladnosti i integritetu u poslovanju.
- 7) Procjenjivati i nadzirati rizike od korupcije** u svim poslovnim procesima (nabava, prodaja, odnosi s institucijama, certifikacijska tijela) te provoditi mjere prevencije i kontrole.
- 8) Primjenjivati sustav "četiri oka" i transparentnog odobravanja odluka** koje mogu imati financijske ili ugovorne posljedice.
- 9) Procjenjivati dobavljače i partnere** prema kriterijima etike i usklađenosti (Supplier Code of Conduct, ESG evaluacija) te surađivati samo s onima koji poštuju iste vrijednosti.
- 10) Pratiti i mjeriti učinkovitost ove politike** putem internih audita, ECO VADIS evaluacija i godišnjih Upravnih ocjena.
- 11) Uprava najmanje jednom godišnje** razmatra sve prijave, rizike i preventivne mjere vezane uz korupciju te donosi odluke o poboljšanjima u sustavu etike i sukladnosti.

Za provedbu i praćenje politike odgovorna je **Uprava**, u suradnji s **Voditeljem IMS-a** i **Voditeljem nabave**. Politika se preispituje najmanje **jednom godišnje** i po potrebi ažurira u sklopu **Upravine ocjene IMS-a**. Politika se provodi kroz dokumentirane postupke. Ovu politiku potpisuje i odobrava Uprava ZMH Horvat d.o.o. Politika je javno objavljena na web-stranici ZMH Horvat d.o.o. te dostupna svim zaposlenicima, dobavljačima i partnerima kroz ugovorne dokumente i komunikacijske kanale.

Ova politika:

- obvezuje sve zaposlenike, dobavljače, podizvođače i poslovne partnere ZMH Horvat d.o.o.,
- javno je dostupna na web-stranici i komunicirana svim dionicima,
- redovito se revidira kako bi se osigurala učinkovitost, relevantnost i sukladnost s propisima i standardima.

U Konjščini, 08.01.2024. Direktor, Zoran Horvat

ZMH HORVAT d.o.o.	ETHICAL BUSINESS CONDUCT AND ANTI-CORRUPTION POLICY	Dokument: POL-IMS-05
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ZMH Horvat d.o.o. operates in accordance with the highest ethical, professional and legal standards and promotes a culture of integrity, honesty and responsibility. The aim of this policy is to ensure that all business relationships, decisions and activities are carried out **without any form of bribery, corruption, conflict of interest, abuse of position or unethical behaviour.**

This policy is in line with **the Eco Vadis Ethics pillar**, and relevant legislation of the Republic of Croatia and the European Union. It is part of the Integrated Management System (IMS) and is based on **the Social Responsibility and Human Rights Policy (POL-IMS-04) and the Code of Ethics** of ZMH Horvat d.o.o.

The Management Board of ZMH Horvat d.o.o. undertakes to:

- 1) Maintain zero tolerance for bribery, corruption and fraud** in all forms, regardless of the amount, purpose or circumstances.
- 2) Ensure fair and transparent business operations**, especially in relations with customers, suppliers, partners, government institutions and certification bodies.
- 3) Prevent and manage conflicts of interest**, ensuring that business decisions are made solely in the interest of the company, without personal gain for individuals.
- 4) Prohibit any gifts, services, rewards, benefits or donations** that could affect the objectivity and impartiality of business decisions.
- 5) Establish and maintain channels for reporting irregularities (whistleblowing)** that enable employees and external stakeholders to confidentially report suspicions of corruption, fraud, abuse of position or any violation of ethical principles, without fear of retaliation. All applications are recorded and processed in accordance with the documented procedure SOP-IMS-06 Communication and Compliance Management.
- 6) Ensure regular employee training** on ethical behavior, prevention of corruption, compliance and integrity in business.
- 7) Assess and monitor corruption risks** in all business processes (procurement, sales, relations with institutions, certification bodies) and implement prevention and control measures.
- 8) Apply a “four eyes” system and transparent approval of decisions** that may have financial or contractual consequences.
- 9) Assess suppliers and partners** according to ethics and compliance criteria (Supplier Code of Conduct, ESG evaluation) and cooperate only with those who respect the same values.
- 10) Monitor and measure the effectiveness of this policy** through internal audits, ECO VADIS evaluations and annual Management Board assessments.
- 11) The Management Board reviews all reports**, risks and preventive measures related to corruption at least once a year and makes decisions on improvements in the ethics and compliance system.

The **Management Board**, in cooperation with the **Head of IMS and the Head of Procurement**, is responsible for implementing and monitoring the policy. The policy is reviewed at least **once a year** and updated as necessary as part of the **Management Board’s assessment** of the IMS. The policy is implemented through documented procedures. This policy is signed and approved by the Management Board of ZMH Horvat d.o.o. The policy is publicly published on the website of ZMH Horvat d.o.o. and available to all employees, suppliers and partners through contractual documents and communication channels.

This policy:

- is binding on all employees, suppliers, subcontractors and business partners of ZMH Horvat d.o.o.,
- is publicly available on the website and communicated to all stakeholders,
- is regularly reviewed to ensure effectiveness, relevance and compliance with regulations and standards.

In Konjščina, 08.01.2024. Director, Zoran Horvat