



## Direct advertising doo Subotica Ethical Policy

This policy outlines acceptable and non-acceptable behaviors to ensure compliance of Direct advertising doo with ethic connected nondiscriminatory and anti-corruption laws. This includes compliance with all laws, prohibiting improper payments, gifts or inducements of any kind to and received from any person, including officials in the private or public sector, customers and suppliers, data and assets protection and connected provisions and rules.

Inside this Policy, you will find practical advice about laws and regulations, expectations and guidance about main business ethical principles in our company.

This Policy applies to: staff directly employed by Direct advertising doo on temporary or permanent contracts, as well as staff employed or provided by contractors to work on Direct advertising doo premises or to undertake work for or on Direct advertising doo

### **I NONDISCRIMINATION/PROFESSIONAL DEVELOPMENT**

Direct advertising will ensure that its employment-related decisions are based on relevant qualifications, performance and other job-related factors. Direct advertising will not tolerate discrimination relating to employment.

Every employee should base hiring, evaluation, promotion, training, development, discipline, compensation and termination decisions on qualifications performance and business considerations only.

Any discrimination according to race, color, religion, age, gender, sexual orientation, marital status, disability, ethnic origin or nationality is forbidden.

Direct advertising will not tolerate harassment, nor any action, conduct or behavior which is humiliating, intimidating or hostile. Every employee should be particularly sensitive to actions or behaviors that may be acceptable in one culture but not in another. Main principles:

Do not physically or verbally intimidates or humiliate others.

Never make inappropriate comments. If you are unsure whether something is inappropriate assume that it is.

Never distribute or display offensive or derogatory material, including pictures.

Don't be afraid to speak up and tell a person if you are upset by his or her actions or behavior.

### **II FIGHTING CORRUPT PRACTICES NO CORUPTION OR BRIBERY**

Direct advertising does not tolerate bribery, market abuse, fraud or money laundering. You must also avoid any real or potential conflict of interest (or the appearance of a conflict) and never offer or accept inappropriate gifts or hospitality. Even unsubstantiated claims of corruption can damage reputations and business.

Bribery occurs when you offer, pay, seek or accept a payment, gift or favor to influence a business outcome improperly. Bribery and corruption – whether involving government officials, or commercial entities, can be direct or indirect through third parties like agents. Even ignoring your suspicions of bribery and corruption can result in liability for Direct advertising and for you personally.



Bribery is a criminal offense. As an employee you will be accountable whether you pay a bribe yourself or whether you authorize, assist, or conspire with someone else to violate an anti-corruption or anti-bribery law.

Never offer, pay, make, seek or accept a personal payment, gift or favor in return for favorable treatment, to influence a business outcome or to gain any business advantage. Facility payments are strictly forbidden.

Always, in a proper legal way, report to your manager if you suspect or know of corruption in company or in any party (company or individual), we do business with.

You must not offer, pay, seek or accept a personal payment, gift or favor in return for favorable treatment or to gain any business advantage. You must follow all anti-bribery and corruption laws that we are subject to. You are liable to disciplinary action and legal proceedings if you are involved in bribery and corruption.

The offering of gifts and hospitality for business partners or third parties (including government officials) creates special concerns and we need to follow the laws regarding this issue. Gifts that sometimes are acceptable between private business partners may be unacceptable between a business and an official.

You may give a modest gift to parties only when it is appropriate and in limitation allowed by law. Direct advertising does discourage its employees from accepting any gifts from business partners, especially if it value exceeds 3000rsd. Decline any gift if you would feel uncomfortable telling your line manager or supervisor, colleagues or family that you had accepted them.

### **III CONFLICT OF INTEREST**

You face a conflict of interest when your personal relationships, participation in external activities or interest in another venture influence or could be perceived to influence your decisions.

Declare to your supervisor any matter that could influence or be perceived to influence your decisions or actions at Direct advertising doo.

Give your supervisor all the relevant facts in writing if you believe there is an actual or potential COI.

Withdraw from decision-making that creates, or could be perceived to create, a COI.

Be impartial, professional and competitive in your dealings with contractors and suppliers.

### **IV MONEY LAUNDERING**

Money laundering occurs when the criminal origin or nature of money or assets is hidden in legitimate business dealings or when legitimate funds are used to support criminal activities, including the financing of terrorism. Offences covered by anti-money laundering legislation include: prejudicing or obstructing an investigation and failing to report suspicious activity.

Criminals who launder money could exploit Direct advertising doo. You should conduct appropriate counterparty due diligence to understand the business and background of our prospective business partners and to determine the origin and destination of money and property. You must report suspicious transactions or incidents of money laundering to your supervisor.

### **V ANTITRUST**

Antitrust law protects free enterprise and prohibits behavior that limits trade or that restricts fair competition. These laws apply to every level of business. They combat illegal practices like price-fixing,



market-sharing or bid-rigging conspiracies, or behaviors that aim to achieve or maintain monopoly. Direct Advertising does not tolerate violation of antitrust laws.

You must not agree with competitors of Direct Advertising to fix price or any elements of price (such as discounts, rebates or surcharges). You must not rig bids or tenders, and you must not agree with others to boycott any customers or suppliers except in connection with internationally imposed sanctions. Agreements with competitors to reduce or stabilize production, capacity or output are forbidden. You must also not agree with independent dealers or resellers to fix a minimum resale price of a product. Anti-competitive practices are unacceptable and illegal.

Do not agree, even informally, with competitors on pricing, production, customers or markets without a lawful reason. Always get legal advice on whether a practice is lawful.

#### **VI ASSETS SAFEGARD**

Corporate assets can be financial, physical or intangible and include offices equipment, funds, software, know how, data, intellectual property (IP).

You must protect Direct Advertising assets against waste, loss, damage, misuse, theft, misappropriation or infringement. You must use company assets appropriately and responsibly. You must respect the physical and intangible assets of others. A failure to follow the requirements of any laws or regulations may result in disciplinary action, including termination of employment.

You should apply high ethical standards, comply with applicable laws and regulations, and ensure you meet legal security requirements when using IT and communication facilities.

#### **VII DATA PROTECTION**

Direct Advertising respects the basic right of individuals and legal entities – including employees, customers and suppliers – to privacy.

You must respect a person's right to privacy and follow applicable laws when gathering or using their data. Personal information about individuals must be protected from misuse. You must follow correct procedures when collecting, using and sharing this data. Protect personnel and business files, which contain personal data.

#### **VIII COMMUNICATIONS**

Your communications are a reflection on Direct Advertising. Ensure your communications are necessary and appropriate. Ensure you adhere to all rules and follow all guidelines. Failure to safeguard information can damage Direct Advertising reputation and its ability to conduct business effectively. Inappropriate, inaccurate or careless communication can create serious reputation, liability and compliance risks for you and Direct Advertising.