

## Anti-Bribery Policy

**The Management Board of Jadranski naftovod, dioničko društvo (JANAF Plc.) hereby expresses its insistence on honesty, fairness and personal integrity of all employees and in all aspects of our activities. Any offering, promising, giving, accepting or soliciting of an undue advantage of any value (financial or non-financial), directly or indirectly as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties is prohibited.**

As a company with a strategic and special interest for the Republic of Croatia, JANAF Plc. has established, maintains and continuously improves its anti-bribery system, which is compliant with applicable legislation and the requirements stipulated by the ISO 37001:2016 international standard.

The Anti-Bribery Policy provides a framework for the rules set out in the Code of Business Conduct, for the measures available within our anti-bribery system and for the continuous establishment, review and achievement of objectives pertaining to the prevention of bribery.

JANAF Plc. has set up an internal system for reporting irregularities and suspicions of bribery, it fully complies with the Croatian Whistleblower Protection Act, supports any reports of suspicions, in good faith or on the basis of reasonable belief, and guarantees to protect whistleblowers from any punishment or retaliation.

The Management Board of JANAF Plc. has established an independent Anti-Bribery compliance function with the following responsibilities and competences:

- overseeing the design and implementation of the JANAF anti-bribery system;
- providing advice and guidelines to all employees;
- ensuring compliance of the anti-bribery system with the requirements of ISO 37001;
- reporting to the Supervisory Board, the Management Board and other compliance functions on the performances of the anti-bribery system.

Any deviation from the Anti-Bribery Policy shall lead to consequences and be penalised, in accordance with the applicable legislation and the company's Code of Business Conduct.

The Management Board of JANAF Plc. regularly evaluates the adequacy, appropriateness and effectiveness of its anti-bribery system as part of the Management Review and implements continuous improvement measures to ensure compliance with applicable regulatory requirements and ISO 37001: 2016.

Zagreb, 02 June 2021

Jadranski naftovod, dioničko društvo (JANAF Plc.)

Member of the Management Board

Chairman of the Management Board

Vladislav Veselica



Stjepan Adanić, MSc.

