



# **CODE OF ETHICS**

## **Sharr Berry LLC**



[www.sharrberry.com](http://www.sharrberry.com)

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### **Introductory note**

*The company Sharr Berry DOO is committed to respecting positive legal regulations, international agreements, ethical and moral rules and fair market behavior.*

*The purpose of this Code of Ethics is to identify the basic rules by which Sharr Berry DOO adheres to during its daily activities and establishes appropriate obligations for the company and its employees in terms of the given rules.*

*Sharr Berry DOO and all its employees, without exception, are obliged to respect the Code of Ethics. The code of ethics contains the basic principles and values by which Sharr Berry DOO is guided and which it intends to respect in the future.*

*The Code of Ethics does not and cannot cover all rules and situations that may arise. In matters, situations and relationships that are not expressly covered by the Code of Ethics Sharr Berry DOO and its employees are obliged to behave and act in accordance with the principles and goals of the Code of Ethics, positive legal regulations, international agreements, ethical and moral rules and fair commercial behavior as would respect the reputation and reputation of Sharr Berry DOO.*



## **1. BASIC BUSINESS PRINCIPLES**

### **1.1. Safety at work**

Sharr Berry DOO Sharr Berry is dedicated to ensuring the safety, health, and well-being of all employees taking into account the specific needs and vulnerabilities of different genders. We are committed to maintaining a workplace environment free from harassment and sexual harassment, and to providing a transparent process for addressing such incidents. We also ensure that pregnant and breastfeeding employees are not exposed to hazardous substances, chemicals, or materials that may endanger their health or that of their babies. Suitable personal protective equipment is provided to accommodate the physical changes experienced by pregnant employees."Managers and employees thoroughly eliminate potential risks associated with employment activities. Sharr Berry DOO adopts and regularly checks appropriate, preventive and safety measures in order to protect the health of employees, and these measures are updated as necessary. For this purpose, Sharr Berry DOO also organizes appropriate courses, training and exams for employees regarding occupational safety. Sharr Berry DOO always accepts suggestions from employees to increase the level of safety at work and health protection at work, processes them, evaluates them and adopts appropriate measures in this area if they are justified.

Every employee has the right to submit the proposal mentioned in the previous sentence. If employees suspect that positive legal regulations related to occupational safety have been violated or that such a violation is imminent, employees are obliged to inform the competent manager.

Sharr Berry DOO will ensure workplace safety and health measures consider the specific needs and vulnerabilities of different genders. Harassment and sexual harassment are strongly prohibited. Sharr Berry DOO ensure to provide a working environment in which none of the workers is subject to employer's, superior's or co-worker's undesired treatment of sexual nature, including undesired physical, verbal or nonverbal treatment or other sexually based behavior which creates intimidating, hostile or humiliating relationships and environment at work and offends the dignity of men and women at work. Sharr Berry DOO will ensure a fair and transparent process for addressing such incidents.

We will make sure to avoid exposing pregnant and breastfeeding employees to hazardous substances, chemicals, or materials that could pose risks to their health or the health of their babies. We will provide suitable and comfortable personal protective equipment that accommodates the physical changes experienced by pregnant employees.



## **1.2. Protection of sensitive and confidential information**

Sharr Berry DOO takes care not only to protect sensitive and confidential information about Sharr Berry DOO, but also to protect all other information about employees, customers and business partners. Employees take care that within their activities and during business discussions transactions, they communicate only data that is strictly necessary to third parties. Employees are obliged to ensure that the obligation of the third party related to the confidentiality of sensitive and confidential information becomes part of the communication with the third party or part of the contractual relationship.

Employees take care not to interfere in their activities in communications that are not addressed to them. If employees suspect that sensitive or confidential information has been disclosed or misused, or that disclosure or misuse is imminent, they are obliged to inform the competent manager of these facts.

## **1.3. Protection of personal data**

Personal data is considered to be all personal data that Sharr Berry DOO receives about employees, customers, business partners and all other persons to whom the data refers.

Sharr Berry DOO and employees fully comply with all regulations related to the protection of personal data. Each employee is obliged to thoroughly protect all personal data obtained while performing his/her work and deliver them only to authorized persons on the basis of the corresponding legal regulation or the written consent of the corresponding person. If employees suspects that personal data has been disclosed or misused, or that disclosure or misuse is imminent, is obliged to inform the competent manager of these facts without undue delay.

Sharr Berry DOO is also committed to collect and retain gender-related data that is necessary for the intended purpose, avoiding unnecessary data collection that could lead to potential discrimination.

## **1.4. Protection of intellectual property**

Sharr Berry DOO and employees thoroughly protect intellectual property rights in accordance with all positive legal regulations and international agreements related to this area.

All employees are obliged to protect intellectual property rights owned by Sharr Berry DOO.

All employees are obliged to respect the copyright of other subjects and make sure that they have the right to use a certain work. If an employee suspects that intellectual property rights have been misused or could be misused, he is obliged to inform the competent manager of the said facts without undue delay.



## **1.5. Conditions of employment, conflict of interest**

Sharr Berry DOO strictly insists on hiring quality and reliable staff. Personnel who are thoroughly involved in the recruitment process, in accordance with applicable laws and regulations, check whether job candidates meet all important requirements (eg education, competences, experience, absence of conflict of interest).

A conflict of interest arises in a situation where an employee has an interest that interferes with his work duties at Sharr Berry DOO. Employees strictly avoid situations that could be considered a conflict of interest. In the event that there is a risk of a conflict of interest or a conflict of interest, the employee is obliged to inform the relevant manager of the said risk or conflict of interest without undue delay.

In addition to our conflict of interest policies, we are committed to supporting work-life balance initiatives that recognize and accommodate the caregiving responsibilities that disproportionately affect many women. We enable flexible work arrangements, such as remote work or adjusted schedules, to accommodate the needs of pregnant and breastfeeding employees.

## **1.6. Prohibition of gender discrimination**

Sharr Berry DOO makes sure that there is no direct or indirect gender discrimination, including less favorable treatment of women for reasons of pregnancy and maternity, marital status, nationality, race, disability, sexual orientation, social status, religion and belief, age or any other basis defined by law or agreement and international instruments into force.

Sharr Berry DOO will implement fair hiring, promotion, and compensation practices that do not discriminate based on gender.

Equal pay for equal value of work is a fundamental principle in setting wages. Sharr Berry DOO ensures that men and women employees have equal opportunity to attend education and professional training courses aimed at improving professional skills, and that equal criteria are applied in evaluating the quality of working performance.



## **2. BASIC PRINCIPLES OF RELATIONSHIPS OF SHARR BERRY DOO WITH THIRD PARTIES**

### **2.1. Relations with state authorities**

Sharr Berry DOO cooperates with state authorities openly and in compliance with all laws and sublaws. Sharr Berry DOO respects the independence and impartiality of state authorities. Sharr Berry DOO and its employees never under any circumstances try to illegally influence the decisions and actions of state authorities. Sharr Berry LLC absolutely rejects potential attempts in this regard and does not tolerate them at all.

Sharr Berry DOO we respect and support initiatives by state authorities that aim to create an equitable and inclusive society for all individuals. Sharr Berry DOO and its employees must not be part of actions or activities that could cast doubt on the nature of their relationships with persons acting on behalf of state authorities, especially in situations where officials award contracts on behalf of state authorities.

Sharr Berry DOO and its employees are obliged to cooperate with state authorities regarding compliance with all applicable laws. Based on cooperation, Sharr Berry DOO and its employees must provide accurate, truthful and up-to-date information and supporting documentation to state authorities as necessary.

### **2.2. Business relations and activities of Sharr Berry DOO**

The free development of the markets where Sharr Berry DOO operates is in its interest, and it complies with all laws and regulations within its business activities. In working with suppliers, business partners, customers and donors, Sharr Berry DOO and its employees must always respect all applicable laws and regulations. In relations with suppliers, business partners, customers and donors, Sharr Berry DOO and its employees provide only true and accurate information within the scope of business or marketing activities. Employees are especially obliged to provide true information about the performance and results achieved by Sharr Berry DOO, as well as information about facts that are important for the decision of a supplier or business partner of Sharr Berry DOO, and must not conceal circumstances that have a decisive influence. Before concluding the transaction, employees are obliged to obtain assurance within their capabilities that the potential business partner is not involved in any illegal activity, that the means and profits of the business partner are legal. Before concluding the transaction, employees are obliged to find out, within their possibilities, what attitude the potential business partner has towards its compliance and control mechanisms (work and effectiveness).

In order for employees to find this out, they must make reasonable efforts and the resources available to them. The staff obtains information about competitors and customers exclusively in



a manner that is in accordance with positive legal regulations and from legal sources. In the course of their activities, Sharr Berry LLC and staff never knowingly state false or distorted information about competitors, their products, services or performance. It is forbidden for employees to enter into agreements with competitors, regardless of whether they are oral, written, implicit, formal or informal agreements, in connection with any aspect of competition, that is, with price, terms of sale, assortment of products, preferential terms of delivery of goods or service, nor an agreement that could prohibit the influence on competition. Employees are obliged to avoid actions that could be assessed as an attempt by Sharr Berry DOO to achieve an unjustified advantage in the awarding of contracts in public procurement procedures, grant schemes or bidding, or to influence their course. When concluding contractual relations with suppliers and business partners, Sharr Berry DOO and its employees always try to include in each contractual provision the obligation to comply with applicable laws and regulations, minimum standards of ethical and moral rules and principles of fair commercial behavior. Employees are required to keep records of negotiations conducted with suppliers and business partners regarding contractual conditions.

### **2.3. Prevention of corruption practices**

Sharr Berry DOO absolutely rejects any act of receiving or providing an unfair benefit, an unauthorized act or an act without a legal basis, regardless of the form or method of providing that benefit or execution (hereinafter: "bribe").

Sharr Berry is committed to preventing corruption practices that may disproportionately affect women or create barriers to their participation in business activities. Employees are expected to uphold anti-corruption measures that ensure equal opportunities and fair treatment for all individuals, regardless of gender or any other characteristics.

A bribe is considered any monetary or non-monetary act (indirect or direct) without any legal basis, the goal of which is to make a profit or maintain business in a way that does not include one's own economic activity or act, influencing a business or other decision and/or contracting with another unfair benefits. Before sending or accepting invitations, gifts or any other act (e.g. payment for services), employees are obliged to familiarize themselves with the appropriate rules of positive legal regulations, internal regulations of Sharr Berry DOO and valid and available internal regulations of the business partner, or, alternatively, with cultural and social conventions. A bribe is not considered a gift that: is received or given in accordance with standard market practice in order to promote or support the reputation of Sharr Berry DOO; given without connection to illegal or unethical actions (i.e., for which no unfair advantage or unauthorized act is expected); given in such a way that the nature, value and frequency of the giving of the gift are not inappropriate given the relevant circumstances. However, giving a gift to a third party worth more than 50 euros must always be approved in advance by the manager of Sharr Berry DOO, and expenses related to giving a gift or any other act must always be recorded, which includes the identity of the recipient, the reason and purpose of giving the gift,





so that the records can be reviewed at any time, looking back.

Similarly, attending a cultural, sporting or any other event, or any other act (e.g. payment for services) is not considered a bribe, provided that all the prerequisites of this paragraph are met.

Employees are obliged to inform the appropriate manager of any attempt by a third party to influence the activities, attitudes and decisions of employees within **Sharr Berry DOO**. Employees are also obliged to inform their manager that they have performed or could perform actions that by their nature represent corrupt actions.

#### **2.4. Measures to prevent money laundering**

Money laundering is any activity or procedure aimed at hiding profits or funds obtained through illegal activities, which make it impossible to find the source of said profits or funds and their real owner, i.e., through which the characteristics of said profits or funds are changed so that it appears that they are in question lawfully acquired profits or funds.

Sharr Berry DOO and its employees strictly avoid any activities that could be considered as hiding, transferring, keeping or using goods that could originate from illegal activities, as well as any activities that could be considered as concealing the origin of the goods or creating obstacles to trace the origin goods. Sharr Berry DOO and its employees strictly comply with all positive legal regulations related to prevention of money laundering, financing of illegal activities, fight against terrorism and support of terrorism. Sharr Berry DOO cooperates exclusively with customers and business partners whose business plans, according to the knowledge of Sharr Berry DOO/ employees, are financed from legal sources. Within their capabilities, employees are obliged to check whether the activities of the selected business partner are legal and whether the funds of that business partner come from legal sources. For this purpose, employees collect and store documentation and information related to business partners and completed transactions.

During each transfer of funds that Sharr Berry DOO performs within its activities or interests, employees are required to properly determine who is the recipient of the funds and the purpose of the given act. Every transfer of funds that Sharr Berry DOO performs as part of its activities is properly recorded in the appropriate documentation.

#### **2.5. Restrictive measures and other international sanctions**

Sharr Berry DOO and its employees comply with restrictive measures and other international sanctions (i) to the extent that they relate to Sharr Berry DOO, its employees or activities in accordance with the local legal order governing said members, employees and activities and (ii) to the extent that contractual agreements bind Sharr Berry DOO (hereinafter: "sanctions").

Sharr Berry DOO acts as a precaution to prevent unjustified exposure, directly or indirectly, to the risk of violating sanctions. If the employee is aware of any risk related to sanctions or doubts its existence, even if it is only a hypothetical risk, he is obliged to inform his manager about it.



## **2.6. Communication of information**

Sharr Berry DOO promptly and timely communicates information prescribed by positive legal regulations. Sharr Berry DOO communicates other information respecting the principle of openness to the extent that it corresponds to the given situation. Sharr Berry DOO respects the fact that the information provided should always be accurate, true and verified.

The management of the company is the only one authorized to communicate with the media on behalf of Sharr Berry DOO. Employees are not individually authorized to provide the media with any information about Sharr Berry DOO, nor to communicate this information through communication channels, including social networks. Employees are obliged to inform the manager about the request sent to the employee in connection with giving a statement to the media, that is, about the request to provide information about Sharr Berry DOO or its activities and cooperation with business partners.

Sharr Berry DOO promotes respectful and inclusive language in all communications, including media interactions. We avoid stereotypes, derogatory terms, and discriminatory language related to gender or any other characteristic.



### **3. PROTECTION OF THE ENVIRONMENT**

Sharr Berry DOO is fully aware of its environmental responsibility and strictly adheres to all applicable positive legal regulations that regulate environmental protection. Sharr Berry DOO regularly analyzes the impact of its activities on the environment and adopts appropriate measures for environmental protection. The company regularly updates these measures. Sharr Berry DOO minimizes the use of toxic and other hazardous substances and materials within its activities, and takes care of the proper management of toxic and other hazardous substances and materials. Sharr Berry LLC strives to use only procedures and technology that are environmentally friendly. If an employee notices an event at the workplace that could have a negative impact on the environment, he is obliged to inform the competent manager about this fact without undue delay.

### **4. FINAL PROVISIONS**

Regular trainings are provided for employees to familiarize them with this field. Training is mandatory when a new employee joins the company. Sharr Berry DOO is committed to ensuring that all employees, regardless of gender, have equal access to training and development opportunities that enhance their professional growth.

Sharr Berry DOO revises and updates the Code of Ethics so that it reflects current societal needs, company needs and employee needs.