



Pursuant to Article 23 of the Statute of the Financial Agency (Class: 010-00/09-03/2, File no.: 01-09-3 of 25 November 2009 – consolidated text), Article IX of the Code of Ethics of the Financial Agency (Class: 025-03/24-05/8, File no.: 118-02-1-24-1 of 8 April 2024) and the amendment to the Code of Ethics of the Financial Agency (Class: 025-03/24-05/8, Reg. No.: 118-02-1-25-2 of April 13, 2025), the Management Board of the Financial Agency, after consulting with the Independent Trade Union "Solidarnost, adopts the following

## **CODE OF ETHICS OF THE FINANCIAL AGENCY**

### **I GENERAL PROVISIONS**

The Code of Ethics of the Financial Agency (hereinafter: "Code of Ethics") is a key document that lays down the fundamental values and core principles of conduct of employees of the Financial Agency - FINA. It serves as a basis for establishing high ethical and professional standards in the daily work of FINA employees and their interactions with users, business partners, state and public authorities, media and other relevant stakeholders.

The Code of Ethics is based on values that endorse mutual respect, trust and accountability. Employees must protect the reputation and property of the organisation and act ethically and professionally in their workplace, with a high level of diligence and dedication.

By applying the principles of the Code of Ethics, FINA achieves a high level of professionalism and ethical conduct in all its business segments, thus contributing to the development of a healthy organisational culture based on positive values, behaviours and practices. This also implies an increase in employee and user satisfaction, business efficiency and positive reputation of the organisation.

The Code of Ethics incorporates principles of sustainability in all business segments. With this, FINA strives to ensure sustainable growth and progress, and thus a positive impact on all its stakeholders.

The principles of the Code of Ethics apply to all employees and members of the Management Board, as well as external stakeholders who are in a business relationship with FINA. Employees must adhere to the Code of Ethics' guidelines during and after working hours in all their activities related to FINA. This includes communication and interactions in the public, in social media, during public events and in all situations that may affect FINA's reputation.

Any violation of the provisions of the Code of Ethics is considered as misconduct.

## II CORE VALUES

Core values are the basis of ethical standards that shape the conduct and actions of employees, as well as decision-making processes in FINA. With these values FINA defines its organisational culture and identity and achieves a high level of integrity and professionalism in all aspects of doing business.

- **Integrity:** Respect for high ethical standards and transparency in business
- **Responsibility:** Take responsibility for business decisions and their impact on society and the environment
- **Sustainability:** Commit to long-term preservation of the environment and promotion of sustainable development
- **Cooperation:** Encourage teamwork and partnership and build strong interpersonal relationships
- **Respect:** Respect diversity and promote an inclusive work culture
- **Quality:** Commit to providing high quality products and services
- **Excellence:** Strive to constantly improve and achieve outstanding results
- **User centricity:** Commit to meet and exceed user expectations
- **Flexibility:** Adapt to changes and challenges in the business environment
- **Innovation:** Encourage creativity and new ideas and adopt advanced technologies and approaches

## III CORE PRINCIPLES

Core principles shape the ethical framework that fosters the creation of a fair, transparent and sustainable business environment. They provide clear rules and guidelines for employee conduct and guarantee compliance of all business processes and decisions with legal standards, moral values and expectations of the wider community.

### 1. Legality of work and business

In performing their work assignments, FINA employees must comply with statutory and regulatory provisions and with the internal rules established by the Code of Ethics, the Statutes of the Financial Agency, the Collective Agreement for the Financial Agency workers, FINA general acts and their employment contracts. They must also apply the highest professional, business and ethical standards and norms, in order to ensure legality, professionalism and ethics in all aspects of work and business.



## **2. Transparency**

FINA employees must perform their work assignments in a transparent manner and ensure clear and open communication in all aspects of their interactions.

Transparency also includes timely information on all relevant business activities, projects and decisions. Employees must ensure that all information they share is accurate, complete and up to date. In interacting with customers, employees must provide clear and unambiguous information about products, services, terms and conditions and policies.

During public performances at events, conferences or in the media, FINA employees should present the information in a way that reflects the values and integrity of the organisation, ensuring a true and objective presentation of the organisation.

### **2.1 Transparency in donation and sponsorship management**

FINA is committed to a transparent approach to the management of donations and sponsorships, with the focus on transparency, fairness and compliance with the applicable regulations.

Any potential donation or sponsorship is thoroughly assessed to ensure compliance with the values and objectives of the organisation, as well as a positive contribution to the community, with the transparency of intentions, objectives and expected outcomes.

Decisions are taken through a structured process involving analysis and approval by the relevant bodies within the organisation, ensuring objectivity and avoiding any conflicts of interest. This way, any donation or sponsorship initiative is based on firm criteria, promoting the well-being of the community and respecting ethical standards.

We regularly report on our donation and sponsorship activities through our website and annual reports, providing a transparent insight into our contributions to corporate social responsibility.

## **3. Security, confidentiality and protection of personal data**

Employees must ensure the protection and retention of all data processed during the performance of work assignments. This includes data received from users and other stakeholders, as well as those resulting from business operations, cooperation and service provision.

FINA employees must strictly adhere to internal regulations and procedures related to professional secrecy, ensuring the protection of personal data and sensitive information in accordance with the highest standards of confidentiality and security.



### **3.1 Cybersecurity**

FINA's employees, authorised employees of FINA's business partners and other stakeholders shall comply with all regulations on cybersecurity and FINA's rules on the manner and conditions of using the information assets provided by FINA.

Rights of access to FINA's information assets shall be granted only to authorised employees of business partners and only to the extent necessary.

Use of the internet by employees, authorised employees of business partners and other stakeholders for non-business purposes shall be permitted only if it does not jeopardise the protection of FINA's information assets, efficiency or stability, and does not interfere with the performance of business tasks.

For the purpose of protecting FINA's privacy and data, FINA reserves the right to access and monitor the information assets of business partners used by their authorised employees to access FINA's information assets.

FINA's employees and authorised employees of FINA's business partners shall be required to regularly attend cybersecurity training.

## **4. Anti-corruption**

In its business, FINA promotes a zero-tolerance policy on corruption and applies a number of measures, policies and practices with the aim of preventing, identifying and sanctioning any kind of corrupt behaviour. Accordingly, FINA performs regular and thorough checks of its business processes through risk control, internal audit and compliance monitoring.

### **4.1 Inappropriate receiving and giving of gifts**

When performing their work assignments, employees must avoid inappropriate receiving and giving of gifts or material items, privileges, bonuses and rights and services that are given free of charge.

Employees are not allowed to ask for gifts from users, suppliers or FINA business partners, and accepted gifts should be an expression of good will, without expecting in return any service or undue influence on business decisions. Gifts must not be offered or received in order to gain a preferential position in business arrangements.

It is allowed to occasionally receive gifts that are an expression of good will, without expecting in return any service or gaining of benefits or undue influence on business decisions.



It is not allowed to receive money, securities or precious metals. This does not apply to numismatic coins, commemorative coins in circulation in special packaging or numismatic sets.

In case of accepting a gift in the value exceeding EUR 70, it is necessary to inform one's immediate superior and the Ethics Commissioner.

It is permitted to give a gift to a business partner in the value up to EUR 70, provided that the gift is given on one's own initiative and in accordance with good business practice. Gifts must not be motivated by expected benefit in return and must not influence impartial decision-making. Gifts may not be offered or received in exchange for a preferential business position.

It is permitted to use funds for the entertainment expenses and to accept the usual business hospitality in line with the circumstances, and provided that it is not intended to unlawfully influence the decision-making process.

In the case of any doubt regarding the accepting of gifts, it is necessary to seek counsel from the immediate superior and the Ethics Commissioner.

## **4.2 Reporting of irregularities**

FINA has also put in place an efficient system for reporting irregularities that enables its employees, as well as all persons within the working environment, to report any irregularities, without fear of any negative consequences for their employment status or current position.

Contact information of the Confidential Person and the method of reporting irregularities are published on FINA website.

## **5. Conflict of interest (impartiality)**

FINA employees must avoid situations in which their private interests come into conflict with the interests of FINA or the general public interest. This refers to the acceptance of benefits for business commitments, the abuse of special rights, the acceptance of fees for public duties, the impact on decisions for personal gain and the use of inside information for personal gain.

Conflict of interest may be potential or actual. Potential conflict of interest arises in such circumstances when private interest may affect impartiality in the performance of work assignments. Actual conflict of interest is when private interest has affected or there is good reason to believe it has affected impartiality in the performance of work assignments.

Situations that qualify as a conflict of interest include the following:

- Receive or demand a benefit or a promise of benefit for performing work assignments,
- Exercise or obtain a right by violating the principle of equality before the law,
- Abuse the special rights arising from or necessary for performing work assignments,
- Receive additional remuneration or regular remuneration for performing public duties,
- Seek, accept or receive value or service to vote on any matter,
- Influence a decision of any body or person for the personal gain or gain of a related person,
- Promise employment or any other right in exchange for a benefit or promise of a benefit,
- Influence the acquisition of jobs or public procurement contracts,
- Use privileged information on FINA's business for personal gain.

In the event of circumstances that may be considered a conflict of interest, the employee should refrain from any action that might be in conflict with the interests of FINA. This includes avoiding making or participating in making decisions, as well as entering into contracts that could benefit the personal business interests or interests of their affiliated persons, or their previous employers from up to two years prior to employment in FINA.

Employees may not, on behalf of FINA, engage in business with companies owned or predominantly owned by themselves, their immediate family members or companies in which members of their immediate family are employed.

Also, it is not allowed to act as an agent for third parties in a business relationship with FINA, or take an attitude or position that is in conflict with the interests of FINA. Employees may perform additional jobs outside of FINA only if these jobs are not in conflict with the interests of FINA. Doing work for one's own or for another's account within the premises of FINA are prohibited.

In the event of suspected corruption or potential conflict of interest, employees must consult with their direct superior and Ethics Commissioner.

## **6. Equality and respect for diversity**

FINA strictly prohibits any form of direct or indirect discrimination based on race, ethnicity, colour of skin, gender, language, religion, political or other beliefs, national or social origin, wealth, trade union membership, education, social, marital or family status, age, health condition, disability, genetic heritage, gender identity, expression or sexual orientation. FINA does not tolerate any form of harassment.

FINA ensures that all its employees have equal opportunities for achieving their professional goals, utilising their intellectual capacities and for advancing their careers. Employee's workplace and promotion are based solely on their efficiency and success in performing their work assignments. Any employee is treated with respect and appreciation, in accordance with the guaranteed rights to life, work, integrity and dignity.





In interaction with the users, FINA employees must pay special attention to vulnerable groups, such as the elderly, pregnant women and parents with small children. Adoption and compliance with this principle is also required of all contractual partners involved in providing services to FINA users.

## **7. Professionalism, expertise and conscientiousness**

FINA employees must perform their work assignments in a professional, expert, conscientious, objective, impartial and responsible manner. Cooperation between colleagues, sharing proposals, ideas and knowledge, and mutual support are key to maintaining a positive organisational culture.

Furthermore, employees must regularly attend training with the aim of maintaining a high level of expertise and acquiring new knowledge, especially in the field of digital literacy. All activities that could harm their profession, professionalism and objectivity in work must be avoided.

## **8. Environment and health protection**

FINA operates in accordance with the principles of sustainability and environmental responsibility and is dedicated to preserving the environment and promoting employee health. When performing their work assignments, FINA employees must take care of environmental protection, waste reduction and efficient use of resources.

FINA provides its employees with a healthy and safe working environment and has introduced efficient policies to achieve work-life balance.

## **9. Protection of reputation and property**

Through their appearance, conduct and behaviour, FINA employees must represent the organisation in an honourable manner and in accordance with the regulations, their competence, expertise, abilities and rules of the Code of Ethics. In addition, employees must protect FINA's assets and avoid actions that could diminish the value thereof.

## **IV ETHICS COMMISSIONER**

The FINA Management Board, with the consent of the Trade Union, appoints one Ethics Commissioner and their deputy for each regional centre and specific organisational units within the Management Board. The Ethics Commissioner may not be held accountable or disadvantaged by virtue of his or her duties compared to other employees.

The Ethics Commissioner receives complaints from employees and other interested legal and natural persons about unethical and possibly corrupt practices of employees, he or she examines the merits of complaints, keeps records of complaints received, gives opinions on the content of the Code of Ethics, and monitors the application thereof. He or she also promotes ethical conduct toward users and business partners, advises employees on ethical standards, proposes ways of improving them to the Management Board and monitors international standards in ethical conduct.

FINA must enable the appointed Ethics Commissioner during working hours to perform the tasks from the Code of Ethics, receive the required training and have conditions for unhindered work.

Upon receiving a complaint regarding corrupt practices, conflict of interest or inappropriate receiving and giving of gifts, the Ethics Commissioner must promptly notify the Compliance Officer who can take over the procedure if necessary.

The Ethics Commissioner must submit the annual report on their work to the FINA Management Board and the Compliance Officer. Contact details of the Ethics Commissioner and information on how to submit a complaint are published on the FINA website.

## **V ETHICS COMMITTEE**

With a relevant decision, the Management Board of FINA appoints members of the Ethics Committee (hereinafter: the Committee) for a period of four years.

The Committee has three members, one of whom is appointed from the ranks of FINA workers, with the consent of the Trade Union, one from the ranks of Trade Union members, and one from the ranks of the Ethics Commissioners and their deputies. The members of the Committee elect a chairperson among themselves.

The Committee is independent in its work and decisions, and proposal decisions are adopted by a majority vote.



## **VI VIOLATION OF THE CODE OF ETHICS – THE PROCEDURE FOR FILING A COMPLAINT AND INVESTIGATING THE MERITS OF THE COMPLAINT**

The Ethics Commissioner is required to carry out a procedure to examine the merits of a complaint within an appropriate period of time and no longer than 20 working days from the from the date of receipt of the complaint.

During this procedure, the Ethics Commissioner independently collects evidence, obtains written statements of the employees stated in the complaint and witness statements and, if necessary, complainant's statements, he or she requests written statements from the relevant persons in organisational units, and takes other actions necessary to establish the facts.

The Ethics Commissioner is required to assess the merits of anonymous complaints as well.

After collecting all the required material and non-material evidence, the Ethics Commissioner submits all relevant documentation to the Ethics Committee for further action.

Within 10 working days of receipt of the documents from the Ethics Commissioner, the Ethics Committee must examine and review the established facts in detail. On the basis of the documents submitted, the Committee should establish whether there was a violation of the Code of Ethics, adopt a decision and propose a measure. The decision is made in writing and sent to the FINA Management Board without delay.

The decision to impose a measure is taken by the FINA Management Board.

Should the Committee determine that there is no violation of the Code of Ethics, it will reject the complaint and inform in writing the Ethics Commissioner who investigated the complaint, the employee against whom the complaint was filed, the complainant, the FINA Management Board, and the Compliance Officer.

The Committee must, without delay, submit the decision on the violation of the Code of Ethics to the Ethics Commissioner, the employee against whom the complaint was filed, the complainant and the Compliance Officer.

## **VII IMPLEMENTATION OF THE DECISION ON VIOLATION OF THE CODE OF ETHICS**

The Committee must communicate the implementation of the Decision to the Management Board, the Ethics Commissioner, the Compliance Officer and the complainant no later than 5 working days from the implementation of the Decision.

After one year has passed from the committed violation, the procedure related to the violation of the Code of Ethics may no longer be initiated.

## VIII INFORMING EMPLOYEES ABOUT THE CONTENT OF THE CODE OF ETHICS

When concluding an employment contract, the organisational unit in charge of human resources must inform each new employee about the Code of Ethics and its importance, and emphasize the obligation to adhere to its guidelines and rules.

## IX THE METHOD OF ADOPTING AND PUBLISHING THE CODE OF ETHICS

The Code of Ethics and any subsequent amendments thereto shall be adopted by the FINA Management Board after consulting the Independent Trade Union "Solidarnost".

The Code is available on the FINA web and intranet sites.

## X FINAL PROVISIONS

This Code of Ethics shall enter into force on the eighth day of its publication on FINA's website. With the entry into force of this Code of Ethics, FINA's Code of Ethics, Class: 025-03/24-05/8, Reg.No.: 118-02-1-24-1 of April 8 2024. shall cease to be valid.

Class: 025-03/24-05/8  
Reg.No.: 118-02-1-25-3  
Zagreb, September 14 2025



President of the Management Board  
Dražen Čović, M. Sc.

