

CLASS: 011-01/22-02/12

REG.NO: 345-100-101/680-22-01

Zagreb, November 5, 2025

ANTI-BRIBERY AND WHISTLEBLOWING POLICY

Hrvatske ceste d.o.o. has established an **Anti-Bribery Management System** and a **Whistleblowing Management System**, based on the international standards **ISO 37001:2016** and **ISO 37002:2021**.

This Policy establishes the principles, obligations, and expectations of all parties involved in the implementation of these systems and provides a framework for their maintenance, application, and continual improvement, in accordance with item 10.3 of ISO 37001:2016.

It replaces the previous version dated November 30, 2022.

The Company operates in compliance with applicable laws and regulations of the Republic of Croatia and promotes a culture of honesty, integrity, transparency, and accountability. Any act of promising, offering, giving, soliciting, or receiving any benefit with the intent to influence business decisions or conduct related to the Company is strictly prohibited.

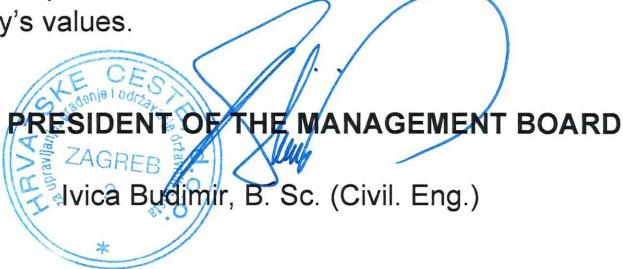
All employees, business partners, and other interested parties are required to comply with this Policy. In cases of non-compliance, actions will be taken in accordance with internal procedures and relevant legal provisions.

The Whistleblowing Management System enables the submission of reports, both identified and anonymous, ensures the protection of whistleblowers, and provides for the processing of reports in line with regulations. Whistleblowers acting in good faith are protected from any form of retaliation.

The Management Board of the Company actively supports the implementation of the systems, ensures the necessary resources, and leads by example in demonstrating responsible conduct. It regularly reviews the functioning of the systems, including evaluations, audit findings, and improvement proposals.

The Policy is available to all employees, business partners, and other interested parties via the Company's website and intranet. It is communicated to business partners through contractual clauses and informational materials. The Policy is regularly reviewed and updated in accordance with the principle of continual improvement.

This Policy applies to all levels of business operations and serves as the foundation for responsible conduct in line with the Company's values.



Hrvatske ceste d.o.o. za upravljanje, građenje i održavanje državnih cesta

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