HRVATSKE CESTE

KLASA: 003-01/26-01/358

URBROJ: 345-100-101/680-26-10

Zagreb, October 2026

ANTI-BRIBERY POLICY

Hrvatske ceste d.o.o. has established an Anti-Bribery Management System (ABMS) and a Whistleblowing Management System (WMF), based on the international standards ISO 37001:2025 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 the requirements of the international standard ISO 37001:2025.

The Company conducts its business in accordance with applicable laws and regulations, other relevant regulatory requirements and internal policies and procedures. The Company develops, maintains and promotes an anti-bribery culture based on integrity, ethical conduct, accountability, transparency and zero tolerance for bribery.

Any promise, offer, giving, requesting or acceptance of any undue advantage, whether directly or indirectly, for the purpose of influencing business decisions or actions related to the Company is strictly prohibited. The Company does not tolerate bribery in any form.

All employees, business associates and other stakeholders are required to comply with this Policy, applicable laws and regulations, internal procedures and other requirements of the Anti-Bribery Management System.

The Whistleblowing Management System enables reports to be submitted either on an identified or anonymous basis and ensures confidentiality, the protection of whistleblowers and the handling of reports in accordance with applicable regulations. The Company encourages the reporting of suspected bribery and other irregularities in good faith or based on a reasonable belief, without fear of retaliation, discrimination or other detrimental treatment.

The Company's Management Board demonstrates leadership and commitment to the implementation of the Anti-Bribery Management System, provides the necessary resources for its operation and promotes an anti-bribery culture at all levels of the Company.

The Company has established an Anti-Bribery Function (ABF), which is provided with appropriate authority, status, independence and direct access to the Company's Management Board and Supervisory Board, as well as the necessary resources to ensure the effective implementation, oversight and reporting of the Anti-Bribery Management System.

The Company is committed to the continual improvement of the effectiveness of the Anti-Bribery Management System, as well as to the regular review and updating of this Policy and related procedures.

This Policy is made available to all employees, business partners and other stakeholders through the Company's website and intranet. It is communicated to relevant parties through contractual clauses, training and information materials.

This Policy serves as the foundation for responsible, lawful, transparent and ethical business conduct and for fostering an anti-bribery culture at Hrvatske ceste d.o.o.

PRESIDENT OF THE MANAGEMENT BOARD

Ivica Budimir, B. Sc. (Civil. Eng.)

