

### CODE OF ETHICAL AND BUSINESS CONDUCT INFOSIGNAL DOOEL Skopje

**INFOSIGNAL DOOEL Skopje** is Macedonian company established in 1991 that provides servicing, maintenance, sale and rental of IT equipment. As a company that is fully dedicated to our clients and their cooperation with us, we are aware of the importance of every segment of our work, and that in addition to professionalism and expertise, a key segment is respecting legal regulations and building a trustful relationship with customers, employees and with the social community.

#### OUR MISSION

The impetus of our work are the interests of our clients, the good of our employees and the quality of our cooperation with the business partners. Our success and reputation are based on the trust and satisfaction of our clients and our mission is to fulfill their expectations from the cooperation with us.

We are responsible members of the community, active in taking care of the health, safety and environment for our employees and the community.

For us, employees, clients and associates are part of our business family and we treat them with the same care and respect as our dearest.

Our commitment is to constantly improve the quality of our cooperation with everyone involved in our everyday business.

#### OUR VISION

To be the number one choice for clients looking for service in the field of information technology is our vision and the goal towards which we strive. To be recognized as safe, reliable and high quality company in the field of servicing and sales of IT equipment.

#### APPLICATION OF THE CODE OF CONDUCT

Our business reputation is all we have. The success, the progress and the development of the company depend not only on the expertise of the employees, but also on the trust of our clients and their satisfaction with the cooperation with us. The guidelines given in this Code of conduct help us to continue successfully develop our mutual cooperation and cooperation with our clients and business partners.

The code of ethical and business conduct sets the guidelines for us as a company and for the employees who are daily representatives of our business reputation. Employees should be aware of their responsibility for the reputation of the company and act accordingly.

#### BASIC PRINCIPLES

The code of ethical and business conduct (hereinafter-the code) sets the basic principles and maxims regarding respecting the law, ethical conduct of the employees and standards of business communication.

The basic principle of Infosignal company and employees is compliance with the provisions of the valid laws.

In addition to acting in accordance with written laws, respecting the so-called unwritten rules, covered by ethical principles, is expected, which will be outlined further in the text of the Code.

Business communication, written and oral, is part of the daily obligations of the employees and it should be conducted according to the standards for business communication.

Respecting the rules and guidelines regarding conduct is obligatory for each employee.

We expect our clients and associates to respect our code of conduct during collaboration with our company.

### Respecting legal regulations

Legal regulations are fundamental to our work. Failure to obey legal provisions is unacceptable to us as a company. The management and the employees are expected to work in accordance with the laws in the country, and respecting the laws of the countries of our business associates.

### Basic ethical principles

Consistent behavior according to the highest moral principles and the application of moral values such as honesty, loyalty, sincerity and mutual respect are imperative for every employee. The same standards apply to the management and to the employees, their interrelationships and relationships with people outside of the company - clients, associates, etc.

Respect is foundation of the Infosignal's functioning. The company advocates compliance with laws, respecting and applying moral values and respecting human rights in all segments.

The dignity, privacy and personal integrity of each employee are being respected by the company and it is expected that the same respect will be shared by employees.

From each employee we expect collegial and friendly relationship with colleagues, based on equality.

### Rightful and equal treatment

Any discrimination against employees is prohibited. All employees are equal and treated equally regardless race, sex, nationality, religious or political beliefs, age, family status, financial status, sexual orientation or other unmentioned personal circumstances.

### Protection from harassment at the workplace

We provide an open, creative working environment for employees in which any expressed opinion is being respected, without creating psychological pressure or any type of harassment by superiors, colleagues or third parties.

Any harassment or discrimination of a colleague or employee is unacceptable. In our premises, we expect all employees, visitors, clients and suppliers to behave in an appropriate way.

Sexual harassment is forbidden and will not be tolerated.

Managers and all employees are expected to contribute to the maintenance of a good working atmosphere.

### Personal data protection

Infosignal respects the personal data of its employees, business partners and clients. All data of that type are used in accordance with the applicable legal provisions for personal data protection and are handled responsibly.

The employees are introduced with the type of personal data stored for them and the purpose for which they are used.

The personal data of the business associates, clients and business partners are in scope necessary for the fulfillment of the legal requirements, they are used only for legitimate business purposes and are not shared with third parties.

Employees are obliged to respect the personal data protection standards according to which the company operates and to behave accordingly, taking care not to share personal data about employees or business associates with third parties, intentionally or unintentionally.

### Confidential information

All business information that employees acquire during their work, are property of Infosignal and its business partners, associates, or clients and they don't represent public information. Internal business information as well as business information concerning external partners, associates, clients, etc. are treated as confidential. Such are commercial data, financial data, technical information, employees and company data, company's intellectual property data, business partners, strategies and business plans, contracts, sales data, pricing, and similar, here unmentioned, data.

It is forbidden to transfer such information to third parties and such information may not be used for personal use and may not be subject to trade.

Employees are obliged to take care of this information carefully, take measures for their protection, and not disclose them to anyone without permission from the owner of that information or without an appropriate request / order from the competent governmental body when the disclosure of information to third parties is legally binding.

### Protection of company property

Towards the entire property of the company (working premises, means of transport, inventory, tools, merchandise, intellectual property etc.) employees should behave carefully and use them according to the needs.

It is the duty of each employee to handle the property of the company in a hostile manner, to protect it from damage, loss, theft or unauthorized use.

Everything created within the working obligations and while working for the company is considered intellectual property of the company.

Misuse of company's property is considered a violation of the code.

### STANDARDS OF THE BUSINESS COMMUNICATION

Everyday communication is verbal and non-verbal. Verbal communication is communicating using language, oral and written, while non-verbal communication are face expressions, posture, gesticulation, tone of the voice, wardrobe etc.

Business communication is taking place the same way, and that is why employees must be careful of both verbal and non-verbal communication.

### Language standards

Standard (literature) language is being used in the communication, or suitable standard foreign language, if needed.

### Direct communication with customers

In contact with clients, business partners and associates employees must be constantly aware that they represent Infosignal and impression they leave is an impression for the company as well.

In immediate communication greeting the client, or the business associate, is cordial, but decent, and is the first step in the opening of the communication.

In a conversation with a client, employees need to be decent, patient and focused on the topic of conversation. The readiness to help, to offer an advice, answer or possible solutions must always be presented towards client.

Employees must pay attention to non-verbal communication - without gestures, decent seating/movement, business tone of address.

Even with clients that have nervous or angry approach, one should not demonstrate nervousness, intolerance or unkindness.

Appeals made by the client are treated professionally, offering possible effective solutions. If it is an omission of the company, a brief apology and search for an effective solution to the problem contributes to reducing the tension.

### Communication with customers over the phone

Phone contact is a very important and indispensable part of daily business communication. The wording should be clear, concise and the volume of the voice while speaking should be controlled. Telephone conversation should be as short as possible and serves to provide help or to make arrangements, not for negotiation and business meetings, which should be held in person.

### Communication via e-mail

Communicating via e-mail is already a routine way of communication. A recommendation is whenever it is possible to use e-mail instead of a phone call, because there is written proof of communication. In the spirit of good business communication, it is to respond to any received e-mail as soon as possible, at the latest within 24 hours, even if you do not have an answer that is required. In that case we explain that we are looking for the answer and it will be delivered as soon as we have the needed information.

Official offers for services, sale etc. should always be send via e-mail, even if there was direct agreement previously.

### Standards of professional appearance

The business standards of behavior include the manner of dressing, appearance, wearing jewelry, etc. The manner of dressing represents the attitude towards work, but also towards colleagues, associates and clients.

The outfit doesn't have to be too official, according to the work duties. It should be comfortable, decent and clean. Although, wearing short pants, strap shirts or too short shirts, tracksuits, transparent materials, summer slippers and similar inappropriate clothes is not allowed.

Hair should be neat, with no intrusive colors and hairstyles, jewelry and makeup discreet, men should be properly trimmed and shaved, and the beard should be neat and trimmed.

### COMPANY INTEGRITY

The integrity, both personal and of the company, is necessary for building a stable company which clients can trust and which will make a quality contribution to the community.

#### Management integrity

Management during the performance of its duties and tasks respects personal integrity and with its behavior should represent an example for the employees. Managers are key to creating a working atmosphere and an environment that helps employees to act in accordance with legal and ethical standards. With their governance they contribute to building a working culture of mutual respect, trust, cooperation and teamwork and responsibly and efficiently working.

They treat the employees with dignity and respect, and they expect the same from them.

#### Prohibition of fraud and corruption

Corruption as an unlawful exchange of benefits constitutes a crime. Infosignal as a socially conscientious company condemns any corrupt behavior and strictly prohibits it.

Employees must not be involved in bribery, i.e. offering or receiving bribes, directly or indirectly. This means that no benefit, personal or economic, gifts, money, prizes or similar can be offered to officials, state authorities or business partners in order to influence their performance or decision-making.

Symbolic gifts given on an occasion, promotional gifts or marketing material with a value that do not exceed the legally allowed value for personal gifts for public employees are allowed.

It is also illegal to bribe employees in private companies. Gifts to individuals from the private sector are an expression of respect and gratitude to the associate, or the client, and are globally used to strengthen the business relationship, but you need to be careful that the type and value of the gift are appropriate so it couldn't be perceived as an attempt to influence or bribe.

#### Cooperation with civil and public servants

Daily business duties also include cooperation with the public sector. In that cooperation you need to be particularly careful. The attempt to influence the decisions of public or civil servants by offering or giving special benefits is illegal both in our country and in other countries around the world. In case of bribery both sides are sanctioned, the one who offers as well as the one who accepts a bribe.

A civil servant is a person employed in the civil service. Public servants are employees in public administration that perform public interest duties.

Infosignal condemns all forms of influence on trade and decisions, especially on secret contracts that affect supply, prices and market positioning. We compete for our market place with the quality of our services and the products we offer and we expect employees to behave accordingly. In communication with state or public servants, one should be especially careful not to promise anything that can be understood as an attempt to influence or bribe.

#### Cooperation with suppliers, buyers and business partners

Suppliers and business partners are an important segment in every company's operations. We appreciate the cooperation with our business associates and we select them with special attention. We make the choice according to their professional performance, quality, price, manner of work and cooperation.

With business associates we always work fairly, honestly and with respect, in a way that we expect to be treated. We expect our business partners to respect the law and to comply with the ethical standards that Infosignal implements. It is forbidden to offer or accept benefits from employees.

### Fair competition

Infosignal as a company is aware that competition in the free market stimulates efficiency, progress and innovation. We operate in accordance with all the laws of fair competition and against the monopoly on the market, which aim is free and fair business competition. With our work and business behavior, we do not restraint, limit or disturb the work of competing companies. We are strongly against unfair and unethical competition, such as giving false statements to harm competition, disclosure or abuse of business secrets of competing firms, i.e. any unlawful and unethical behavior aimed to harm competition. Information about competition companies that is publicly available (annual reports, articles, publications, publicly available archives, etc.) is not considered a business secret but is used solely in an ethical and legal manner.

Infosignal on the market performs independently, does not negotiate the prices with companies with related activities, does not act coordinated with other companies, agreeing on the division of the market and does not impose unfair business condition. Employees must not discuss with employees in competing companies purchase prices and how the sales prices are determined, to negotiate market sharing, to disclose contracts, purchase strategies, business plans, profits or details of participation in public procurement, intentionally or unintentionally, in formal or informal meetings with persons employed in other companies that are or may be competition as well as other third parties.

### Conflicts of interest

A conflict of interest exists when the employee's personal interests affect or could influence the objectivity in making decisions and working for the benefit of the company in which he is employed

A conflict of interest could arise in the following situations:

- When an employee of the company performs services i.e. works, part-time or free of charge, for a company that is a competition or can be considered a competition
- When an employee is an owner or co-owner of a company whose activity coincides with the activity of Infosignal and thus is or may be competition on the market
- when an employee is a member of an administrative or supervisory authority in a company with which Infosignal cooperates or which is or may be competition, and other similar unforeseen situations

During their employment in the company, employees may not perform services, to work or conclude contracts for their own or for a third party for activities that coincides with Infosignal and which could be considered as competition.

### Political activity

Infosignal as a company does not support any political party, nor provides contributions to political candidates or political parties. However, it does not deny or prohibit the political affiliation of its employees, as their personal right, which in no case may be assumed as a political commitment of the company.

Employees can express their political beliefs only in their personal name, in their free time and in their own private resources.

Employees must not use the company's name in their personal political engagements, and their political activity must not affect the goodwill and reputation of the company.

Political commitment must not affect employees when making decisions related to work in the company.

### Humanitarian organizations

As a socially responsible company, Infosignal welcomes and encourages the engagement of employees in humanitarian organizations. In these organizations, employees engage in their personal name and leisure time.

If Infosignal as a company is involved in the work of a humanitarian organization through donations, they must be approved by the management, and may be in the form of services, training, sponsorship, technical assistance or financial.

### HEALTH AND SAFETY IN WORKPLACE

Health and safety of employees are a priority for our company. We devote special care to providing a healthy and safe working environment for employees as well as for customers and visitors in our business premises.

Employees have a clean, healthy and safe working environment with all necessary facilities.

We always respect all norms of safety at work and we work actively in protecting the health of our employees, following the prescribed rules and engaging external experts who evaluate the working conditions of the employees. For the working conditions and the health of the employees an expert evaluation was carried out, an elaborate was prepared by a competent company in which, except for the performed control of the working conditions and the guidelines for the necessary health prevention, the emergency evacuation plan was implemented. The assessment of working conditions, health prevention guidelines, elaborate and evacuation plan are made by a company with OSHAS 18001: 2007 certificate.

However, safety at work is not responsibility only for the company, it is also the responsibility of every employee. Employees are expected to obey safety rules at work, taking care and acting reasonably, thus preventing them from hurting themselves or a colleague with whom they work. The company is open to all suggestions from employees that can contribute to improving safety as part of our ongoing commitment to improving safety at work and providing a safer work environment.

### WORKING HOURS

The working hours of the employees do not exceed the legally prescribed standards according to the valid laws in the country and according to the ILO 1 convention.

### PAID VACATION AND PUBLIC HOLIDAYS

All employees are entitled to use paid vacation during the year, according to the legal norms. State and religious holidays are non-working days.

### SOCIAL RESPONSIBILITY

In terms of social responsibility, we are committed to working responsibly and taking care of the local community and the environment and continually progressing in that.

We are constantly working on building and maintaining positive and productive relationships with the community in which we work.

Infosignal is a company committed to adhering all environmental laws and regulations, with all permits and approvals needed for our work. We take care for the proper handling, storage and disposal of the materials and the timely and precise submission of the required reports to the relevant state institutions.

Our ecological responsibility is achieved through activities that directly protect our environment from waste and pollution. We respect environmental regulations and we cooperate with institutions and the local community. In our work we take care of more efficient use of energy and water, and thus contribute to reducing the negative impacts on the environment.

In our work, we are involved in the appropriate selective collection of waste resulting from our operations, in accordance with the regulations and taking into account not to pollute the environment in any segment of our work, we perform selection of everyday waste, which we further handover to recycling and we actively participate in the care of the greenery and the hygiene in our immediate surroundings.

In terms of social responsibility, we are committed to working responsibly and taking care of the local community and the environment and continually progressing in that.

We are constantly working on building and maintaining positive and productive relationships with the community in which we work.

In our offer we have products that are made according to ISO 9001 and ISO 14001 standards and which directly influence the reduction of CO2 emissions, thus contributing to environmental protection.

We expect our employees and business associates to share our concern for the community and for the environment and to act accordingly the company's principles.

### **VIOLATION OF THE CODE OF CONDUCT AND IMPROPER BEHAVIOR**

If any of the business associates or partners of Infosignal does not comply with the rules of ethical conduct and business operations according to the legal regulations, Infosignal reserves the right to terminate the business cooperation.

The breach of the provisions of this Code by an employee of the company is treated seriously and may be subject to an internal procedure.

### **VIOLATION OF THE CODE OF CONDUCT REPORTING PROCEDURE**

If someone from outside the company, a client, an associate, a business partner considers that he or she has not been treated professionally, responsibly and according to the principles of the company, he/she can submit a written application in the company to the responsible persons. Infosignal undertakes that the entry will be treated professionally and reliably, that it will protect the anonymity of the person and will take measures to resolve the case

### **FINAL PROVISIONS**

All the employees are obligatory introduced with The Code of the company immediately after they start to work in the company.



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