

EDINA d.o.o.

Joint Operating Company

DOCUMENT TITLE

CODE OF ETHICS

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1. INTRODUCTION

1.1.MISSION

The mission of Ed-Ina Ltd. (hereinafter, also simply “Ed-Ina”) is to provide its Shareholders (INA d.d. and Edison S.p.A.) with high-quality operations in accordance with Izabela PSA, partnering with its contractors to develop and deploy highly efficient and safe technologies that are compatible with the environment.

The Ed-Ina’s Code of Ethics is based on respect for fundamental human rights and the ethical principles of integrity, honesty, trust, respect, humanity, tolerance and responsibility.

Ed-Ina’s goals in its endeavors are:

- to create value for its shareholders and ensure the Company’s long-term growth;
- to contribute to the wellbeing and professional development of its employees;
- to transfer to the community resources that foster innovation and contribute to economic and social progress, while strictly adhering to the primary values it adopted: ethics and transparency.

Ed-Ina expects stakeholders to live up to and act in compliance with the provisions of the Code, to assist in identification and management of ethical issues and to support the process of reporting breaches of ethical compliance.

In terms of the provisions of this Code, the terms employee and grievance submitter were used exclusively in a generic sense and refer to both male and female individuals.

1.2.CODE OF ETHICS

The Code describes the ethical norms which apply in the course of their business operations to all stakeholders. The Code presents the ethical norms to be followed, it draws attention to potential breaches of the Code, it provides guidance to help identify and manage ethical issues, and it explains how to report unethical conduct.

Some sections of the Code and the topics addressed therein are of greater relevance to certain business segments, functions and organizational units than to others. It should, however, be emphasized that any breach of ethical norms by a single person can damage the hard-earned reputation of Ed-Ina and compromise public trust, hence all stakeholders are expected to be aware of their obligations and to act in compliance with the Code.

The Code was adopted to promote an organizational culture and cooperation which encourage ethical conduct both within and outside Ed-Ina.

In connection with the Code, the following should also be emphasized:

- The Code does not foresee or offer guidance on every possible situation, nor does it cover all topics in detail. Should stakeholders have any doubts on how to assess a given situation, they should seek practical instructions.
- Laws and/or other regulations applicable Ed-Ina (hereinafter: “rules”) also govern and establish requirements in relation to certain topics established by the Code; accordingly it is important and required that stakeholders are aware of and act in compliance with this rules;
- Merely reading this Code will not substitute for acting in compliance with the rules;
- The Codedoes not necessarily contain all norms that apply to any specific type of conduct. Should the law permit that an issue is regulated differently and should the Code regulate an issue differently, the provisions of the Code shall apply. An exception from above Code application, especially if the Code governs the issue in question more restrictively than the law, may only be the application of the most favorable rules for an employee pursuant to peremptory regulations. In the event of any doubts on how to regulate certain acts due to a differing approach in the Code and rules, guidance should be sought prior.

2. VALIDITY AND APPLICABILITY

The Code of Ethics applies to Ed-Ina and is thus binding on the conduct of all employees of these company and of anyone who, for any reason and irrespective of the type of contractual relationship, contribute to the achievement of the corporate purpose (parties with employment contracts or other forms of personal employment contracts).

The Code obligates all employees and other natural persons who are authorized as Management Board members, or in any other capacity according to special laws to conduct business individually and independently or jointly and as a group and who are employed and/or work in Ed-Ina (hereinafter: employees of Ed-Ina) in which the Code was passed, where it is in effect and is applicable as one of the labor relations bylaws.

Ed-Ina is committed to asking that all parties it comes into contact with for the purpose of pursuing its corporate objectives abide by the principles of this Code.

All other stakeholders are also expected to act in accordance with the norms set forth in the Code.

The Code primarily regulates the types of conduct which occur in the course of conducting business operations and in terms of attitude towards work, colleagues and business partners and the public, but all persons obligated by the Code are expected, even after working hours, to act in compliance with and apply Code regulations and to avoid unacceptable conduct in contravention of the Code.

Managers supervise and manage the work of other employees and they have particular responsibility for developing and maintaining the culture of ethical operations by:

- setting a personal example through their own ethical conduct;
- undertaking everything to ensure the Code is known to all stakeholders it obligates and for its requirements to be thoroughly clarified and correctly understood;
- continuously monitoring compliance with ethical principles amongst internal stakeholders;
- ensuring compliance with the rules set forth in the Code and other Ed-Ina bylaws;
- supporting employees who raise issues related to the provisions of the Code or who report Code breaches in good faith. Managers are obligated to ensure that such employees won't be put in an unfavorable position and that their employment relationship rights won't be violated as a result of raising issues related to Code provisions or if they report Code breaches in good faith;
- taking into account and acting in compliance with the norms of ethical conduct when evaluating employees;

- immediately reporting ethical compliance issues which require ethical investigation but which are beyond their scope of competence or authority to the Ethics Council in conformity with the order of ethical procedures, without transferring personal data.

The Code addresses the following stakeholder groups and ethical issues:

- shareholders (transparency of financial statements and accounting; company property; intellectual property and other protected information; insider trading; digital systems);
- employees (prohibition of discrimination; protection of dignity; protection of privacy and confidential information; child and forced labour);
- health, safety and environmental protection and property protection;
- government affairs and involvement in politics;
- local communities and civil society;
- suppliers and business partners;
- conflict of interest;
- competitors of Ed-Ina.

Stakeholder inputs have been taken into account in defining the ethical norms set forth in the Code.

2.1.ED-INA'S COMMITMENTS WITH REGARD TO THE DISSEMINATION, IMPLEMENTATION AND UPDATING OF THE CODE OF ETHICS

Ed-Ina pledges to all those who are involved in the implementation of this Code to:

- ensure the timely dissemination of the Code of Ethics by making it available to everyone and carrying out appropriate training programs;
- review the Code of Ethics and update it on a regular basis in order to make it consistent with shifts in public expectations and changes in environmental and regulatory conditions;
- adopt adequate procedures for reporting, investigating and handling any violations of the Code of Ethics;
- within the confines of statutory requirements, protect the identity and professional reputation of anyone who reports violations of the Code of Ethics.

2.2.COMMITMENTS OF ASSOCIATES AND STAKEHOLDERS WITH REGARD TO THE CODE OF ETHICS

The Code of Ethics is an integral part of the contextual obligations entailed by the employment relationship.

Consequently, all employees must pledge to:

- act and behave in a manner consistent with the provisions of the Code of Ethics;
- report all violations of the Code of Ethics as soon as they are noted;
- cooperate in defining and complying with the internal procedures adopted to implement the Code of Ethics;
- consult the appropriate Compliance Officer, or corporate governance body, with regard to those parts of the Code of Ethics that require interpretation or on which employees need guidance.

2.3.RESPONSIBILITIES

The General Assembly is responsible for the adoption, revision and withdrawal of Code of Ethics.

3. PRINCIPLES OF ETHICS AND VALUES

Ed- Ina's Principles of Ethics are:

- 3.1. Ethics in business conduct and corporate activities;
- 3.2. Ethics in employment and protection and empowerment of Associates;
- 3.3. Commitment to sustainable development and responsible behavior toward the public;
- 3.4. Values.

3.1.ETHICS IN BUSINESS CONDUCT AND CORPORATE ACTIVITIES

Lawfulness – All Associates are required to comply with the laws and regulations in force in the countries where they operate, as well as with this Code of Ethics, and internal company regulations, which they shall apply honestly and fairly.

Integrity – In its relationships with outsiders, Ed-Ina is committed to acting fairly and transparently. It will not disseminate deceptive information, nor condone behavior designed to take advantage of the weaknesses or ignorance of others. Ed-Ina is committed to dealing fairly with business counterparts, establishing lasting relationships with customers and suppliers and giving its Associates adequate recognition for their contribution. Ed-Ina is committed to fighting fraud and corruption in any form.

Loyalty – Relationships with outsiders, between Ed-Ina and its Associates and stakeholders, and among Associates and stakeholders must be characterized by the utmost loyalty, which means keeping one's word, delivering on promises and stipulations and acting responsibly and completely in good faith in all activities and decisions.

Transparency – All actions by Ed-Ina and its relationships with stakeholders and shareholders must be guided by the commitment to act fairly and to provide complete, consistent and timely information, as required by law and best market practices, subject only to the obligation of protecting Ed-Ina's knowhow and other corporate assets.

Respect for the dignity of individuals – Ed-Ina respects the fundamental rights of individuals, protects their moral integrity and guarantees equal opportunities for all.

Discriminatory behavior based on political opinion, labor union activity, religion, race, nationality, age, sex, sexual orientation, health and any other personal human characteristic is not permitted in any relationship inside or outside the Company. Ed-Ina views diversity as an opportunity that should be fully exploited in terms of innovation and development through dialog and the exchange of opinions, ideas and experiences.

Ed-Ina is working to ensure that the rights set forth in the Universal Declaration of Human Rights are guaranteed in the various countries in which it operates.

3.2.ETHICS IN EMPLOYMENT AND PROTECTION AND EMPOWERMENT OF ASSOCIATES

Commitment to improvement – The Associates pledge to the Company that they will work to the best of their professional ability and that they will use the training and professional development tools provided by the Company to continuously improve their skills.

Confidentiality – The Associates and stakeholders pledge to treat as confidential any information they gain in connection with their job and, consequently, agree not to divulge it except to the extent that it may be necessary for the purpose of performing their job and to comply with the transparency principle. Communication to outsiders of confidential or price-sensitive information must be carried out under the supervision of the relevant Department.

Loyalty and absence of conflicts of interest – The Associates and stakeholders pledge that their conduct will always be shaped by the notion of company loyalty and that all business decisions will be made in the interest of the Company. Consequently, they will avoid any situation that, by creating a conflict of interest between personal or family economic activities and the work performed on Ed-Ina's behalf, could impair their ability to make independent judgments or choices.

Safety, occupational health and work conditions – Ed-Ina believes that motivated individuals with outstanding professional skills are the most important strategic asset in its bid to compete successfully and grow its businesses. For this reason, Ed-Ina promotes a working environment that protects the mental and physical integrity of individuals; encourages them to be proactive, creative and actively involved; and is conducive to teamwork and assuming responsibility, while respecting the need to find a balance between professional and private commitments.

Equal opportunity – Professional development and the management of Associates and stakeholders are based on the principles of fairness and equal opportunity. Recognition of personal accomplishments and of managerial and professional competencies of individuals is the basic criterion for career advancement and compensation increases, based on regular and systematic market benchmarking and carried out with transparent evaluation methods and communication modalities. Ed-Ina prevents, discourages and addresses all unjust or discriminatory actions in the workplace, as well as all instances of bullying, violence or harassment.

Professional development – Ed-Ina pledges to make available to all Associates and stakeholders adequate professional development tools and growth opportunities.

Ethical conduct – Ed-ina requires all Associates and stakeholders to act in a manner consistent with the principles and values of this Code of Ethics.

Right to report violations – Ed-Ina guarantees the right/obligations of any Associate or stakeholder who is faced with a situation that violates the principles and values of this Code of Ethics to report it to their superior, in a confidential manner and without fear of retaliation, in accordance with the modalities provided by the implementation rules.

3.3.COMMITMENT TO SUSTAINABLE DEVELOPMENT AND RESPONSIBLE BEHAVIOR TOWARD THE PUBLIC

Promotion of sustainable development – Ed-Ina considers the protection of the environment as a fundamental value and believes that business development and the respect and development of the environment and communities are compatible.

Consequently, Ed-Ina is committed to operating in accordance with current statutes, using the best available technologies, promoting and planning the development of its operations in a manner that maximizes the value of natural resources, preserving the environment for future generations and promoting initiatives for a broad-based protection of the environment in the areas where it operates.

Responsibility toward the public – Ed-Ina takes into account the needs of its host communities and contributes to their economic, social and civil development.

3.4.VALUES

Respect. “We respect our employees, our customers, our stakeholders and the communities and the environment in which we work. We view contributing to improvements in the quality of life and social progress as a duty.”

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Integrity. “We want to earn the confidence of all those who work with us by keeping our promises, behaving transparently and assuming responsibility for all of our actions.”

Service. “We are firmly committed to providing effective and flexible answers and solutions for the needs of our customers, working to establish lasting bonds of trust.”

Team spirit. “We believe that the best results are achieved through team work, in collaboration with our colleagues and with all external partner with whom we interact.”

Excellence. “We devote all of our energies to the effort of steadily improving our results and our services, working to continuously improve our performance and always be among the best.”

Speed. “We want to always be ready to anticipate and lead changes, managing it with agility and flexibility.”

Innovation. “We want to reaffirm our pioneering reputation by challenging conventional wisdom and seeking new ways to produce and distribute energy, thus paving the way for the future.”

4. ORGANIZATIONAL COMMITMENTS, EXPECTATIONS AND RULES OF CONDUCT

The rules outlined below define the behavior that should be followed in order to conduct Ed-Ina’s business in a manner consistent with the Principles of Ethics.

4.1. SHAREHOLDERS

Persons responsible in Ed-Ina are required to protect shareholder investments and to provide long-term returns comparable to those of other leading companies in the industry.

Ed-Ina protects and gives preference to the interests of the Company and its shareholders.

Consequently, Ed-Ina pledges to promptly inform its shareholders of any action or decision that could have a material impact on their investments.

4.2.COMPANY PROPERTY

Employees of Ed-Ina:

- are personally held responsible for ensuring the integrity as well as the expedient and economical use of the property of the Ed-Ina;
- may not use assets or facilities of Ed-Ina for private purposes, except in cases where explicitly authorized to do so by a competent manager exercising employer rights, under applicable rules. Portable or home business equipment entrusted to an employee (e.g. laptops and mobile phones) remain the property of the Ed-Ina, thus employees must use them with due care;
- may not use their work time for personal activities.

4.3.INTELLECTUAL PROPERTY AND OTHER PROTECTED INFORMATION

At Ed-Ina, valuable innovation proposals (technical improvements, business rationalization, useful ideas, industrial designs), confidential ideas, projects, strategies, inventions, software solutions and other copyrights and other types of business information – “intellectual property” – are regularly created or developed which constitute the property of Ed-Ina which must be protected. Given that this information is the product of the efforts of employees of Ed-Ina, regulations permit in specific cases that such information is protected as intellectual property.

Employees of Ed-Ina may not:

- disclose or use at their place of work any confidential information owned by prior employers or any other third parties;
- download any unlicensed software to any Ed-Ina computer;
- accept or use anyone else’s confidential information except after specific approval by the Ed-Ina;

- use materials protected by third-party copyrights, trademarks or seals (e.g. photographs, portions of audio, video or voice recordings downloaded from the internet or other sources) in materials being produced, without special permission by copyright owners;
- use without permission a valid patent or other form of intellectual property known to be owned by a third party;
- use information which is considered a business or professional secret or privileged or potentially privileged information in contravention of the internal regulations. In the event that such information is required by third parties to meet obligations towards Ed-Ina, such parties will be obligated to sign a confidentiality statement or agreement as prescribed by aforementioned regulations;
- use without authorization the intellectual property owned by Ed-Ina.

Ed-Ina is the owner of intellectual property employees created:

- at work;
- in relation to work;
- in relation to the company's activities;
- during work performed at the request or by order of the company;
- on the basis of a contract concluded between the company and the employee.

Ed-Ina has the exclusive right to use within the framework of its regular activities copyrights created in an employment relationship.

Purchased intellectual property becomes the property of Ed-Ina and may not be considered private/personal property.

Documents and materials (including computer software) may be copied and distributed if they are not subject to copyright protection or if a special permission was granted to do so.

Information on the activities of Ed-Ina shall be provided to suppliers and business partners, public authorities and the public when an obligation is given pursuant to regulations, internal bylaws of Ed-Ina, capital market regulations, agreements, good business practices or justified public interest.

In agreement with Shareholder's relevant departments, only authorized persons may reply to queries by the press, media, investors or public and all interested parties (from customers to local communities and civil society).

4.4.UNLAWFUL HANDLING OF INSIDE INFORMATION AND INSIDER TRADING

The term “insider trading” refers to the unlawful use of inside information for material gain. The term “unlawful handling of inside information” refers to the use of inside information or handling inside information in contravention of regulations pertaining to the capital market and internal bylaws of Ed-Ina in regard to inside information. Inside information is information of a precise nature which is not publicly available and which pertains directly or indirectly to Ed-Ina as the issuer of financial instruments or one or more financial instruments of Ed-Ina which would, if publicly available, likely have a significant impact on the price of these financial instruments or the price of relative derivative financial instruments. The probability of a significant impact is given if a reasonable investor would likely take into account such information as part of the basis for making investment decisions.

Insider trading and the unlawful handling of inside information is prohibited to all employees and officials of Ed-Ina. For this purpose, full compliance with applicable laws and internal bylaws of Ed-Ina governing inside information is required, and all employees and officials of Ed-Ina in particular:

- may not buy or sell stocks or shares of Ed-Ina while in possession of inside information;
- may not disclose inside information to anyone outside Ed-Ina in contravention of the provisions of internal bylaws of Ed-Ina governing inside information;
- must be cautious, even with other employees of Ed-Ina; only to disclose inside information to colleagues based on permission to do so and when necessary to perform business tasks and activities;
- must protect inside information from accidental disclosure.

4.5.PROPER USE OF CORPORATE ASSETS

Each Associate is responsible for protecting Company resources placed in his or her care and is required to promptly inform the appropriate Departments of any threats or damaging events that may affect Ed-Ina.

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More specifically, employees are required to:

- act diligently to protect corporate assets by adopting a behavior that is responsible and consistent with the operating procedures that govern the use of Ed-Ina’s assets;
- avoid improper use of Company assets, which could damage the assets or reduce their efficiency or otherwise be contrary to the Company’s interest;
- obtain permission to use an asset off of Company premises.

4.6.DIGITAL SYSTEMS

The growing dependence on information technology makes it necessary to ensure the availability, safety, integrity and maximum efficiency of IT assets.

Computer hardware and software and all information on digital systems in Ed-Ina, as well as any information about Ed-Ina on a private or other digital system not part of an Ed-Ina are considered the property of the Ed-Ina.

Employees of Ed-Ina:

- must be aware of the IT policy of the Ed-Ina in relation to internet usage;
- may not use the electronic communication systems of Ed-Ina to transmit data without authorization;
- may not deliberately access, store, send or publish pornographic images, text or movies or video recordings; any materials which promote violence, hatred, terrorism or intolerance of others; any material which is harassing, obscene or abusive. Should such inappropriate material be received, e.g. via e-mail, it must be deleted immediately.

Within the bounds of privacy and data protection laws, Ed-Ina reserve the right to access and monitor company computers and data stored therein for the purpose of maintenance or to meet business or legal requirements.

The mismanagement or unsatisfactory management of any kind of Ed-Ina property is regarded as an extremely serious breach of ethical norms and to be against shareholder interests.

4.7.INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM

Ed-Ina's believes that an adequate Internal Control and Risk Management System, one that enhances the effectiveness and efficiency of the Company's operations and is fully embraced by its Associates and external partners, is of key importance to the development of its corporate culture.

An Internal Control and Risk Management System is a complex of rules, procedures and organizational structures designed to allow, through an adequate risk identification, assessment and management process, the implementation of sound and fair business practices that are consistent with a company's predetermined objectives.

An effective Internal Control and Risk Management System contributes to ensure the following:

- protection of corporate assets;
- efficiency and effectiveness of corporate transactions;
- reliability and accuracy of financial disclosures;
- compliance with laws and regulations.

4.8.TRANSPARENCY OF FINANCIAL INFORMATION AND ACCOUNTING

Ed-Ina is aware of the importance of providing transparent, accurate and complete accounting information and financial disclosures (annual financial statements, interim reports, prospectuses, etc.) and is committed to using a reliable administrative and accounting system that presents the results from operations fairly and provides the tools needed to identify, prevent and manage financial and operating risk as much as possible and prevent fraud against the Company.

Each transaction must be backed by adequate documentation and must reasonably verifiable. All accounting records that are used as a source for the preparation of financial statements must be kept clearly, truthfully and correctly and must be carefully filed by the departments responsible for keeping them.

Ed-Ina provides full and transparent information to all stakeholders and are attentive to their concerns. They strictly comply with applicable rules and accurately report on activities in their financial statements.

To this end, employees of Ed-Ina:

- must ensure that all carried-out transactions were validly authorized beforehand, that they are accurately and fully recorded and that no undisclosed or unrecorded transactions or assets are entered into or maintained in the financial accounting system;
- must fully co-operate with internal and external auditors of Ed-Ina and must provide them with accurate information and, upon request, grant them access to documents relevant to their work;
- may not deliberately make false or misleading entries into a report, record or claim;
- may not falsify any records, be it financial or non-financial;
- may not attempt to influence others to do anything which could compromise the truthfulness of the financial records or statements of Shareholders' companies.

4.9. RULES AGAINST MONEY LAUNDERING

Ed-Ina makes sure that its commercial and financial activities cannot become, even potentially, a tool used for unlawful activities or by criminal or terrorist organizations.

Ed-Ina always applies laws against money laundering in any jurisdiction it may operate.

Accordingly, before establishing a business relationship, Ed-Ina verifies with the utmost diligence the available information about its commercial counterparties, suppliers, partners and consultants, with the goal of ensuring that they are honorable and conduct their activities lawfully. Ed-Ina also makes sure that the transactions to which it is a party do not entail, even potentially, the risk of facilitating the receiving, substitution or use of money or assets that originate from criminal activities.

4.10. RELATIONSHIPS WITH RELATED PARTIES

Within Ed-Ina's corporate governance system, special attention is devoted to transactions with Related Parties, which must be executed in accordance with the principles of objectivity, transparency and truthfulness and consistent with the relevant internal corporate procedures.

4.11. RELATIONSHIPS WITH CUSTOMERS

This chapter is not applicable to Ed-Ina.

4.12. RELATIONS WITH SUPPLIERS AND BUSINESS PARTNERS

Suppliers and Business Partners play a fundamental role in helping Ed-Ina improve its overall competitiveness. Consequently, the Company selects the suppliers and Business Partners that are best qualified in terms of quality, innovation, cost, service, reliability and compliance with correct principles of business ethics.

Ed-Ina is required to select suppliers and Business Partners on the basis of the principles of this Code of Ethics. Ed-Ina is encouraged to establish and maintain fair, transparent and collaborative relationships with suppliers and Business Partners and always act in Company's best interest.

Relations with suppliers and other business partners are based on mutual trust and respect. All information in regard to relations between Ed-Ina and its suppliers is considered confidential. Ed-Ina does not misuse its position on the market and is committed to creating equal conditions for all business partners. Ed-Ina is also committed to executing all its contractual obligations.

When acting on behalf of Ed-Ina, it is the specific responsibility of the employees of Ed-Ina to help suppliers to become familiar with and comprehend the ethical requirements and expectations of Ed-Ina.

Employees of Ed-Ina:

- must select only persons and companies with a good reputation and the requisite qualifications;
- must seek to do business with suppliers which comply with relevant legal requirements and act in a manner consistent with the commitment of Ed-Ina to ethical norms in the manner established by this Code;
- must help suppliers to comprehend the requirements of Ed-Ina in terms of quality and ethics;
- report to a line manager supplier activities which are inconsistent with these requirements;

- may not ask for or accept any benefit from any business partner. They must report without delay such unlawful benefits offered by business partners or suppliers to a line manager and initiate the termination of all business relations with them;
- must select suppliers based on merit, avoiding conflicts of interest, the offer of inappropriate gifts, entertainment or any other form of favouritism which might compromise such a selection; promotional gifts of a small value up to EUR 50.00 (e.g. pens, key chains, calendars, agendas), other business gifts, business meals and conference participation given without the intention to exert influence may be accepted;
- must inform a line manager about any gifts with a value exceeding EUR 50.00, who will then decide whether the gift may be kept, offered for charitable purposes or returned to the person it was received from. Ed-Ina makes it possible for their partners to support corporate charity initiatives instead of giving gifts to employees of Ed-Ina;
- must inform a line manager about invitations received for business purposes and they must ensure that accepting such invitations is approved in advance. The line manager has the right to decide if accepting such invitations serves the business interests of the Ed-Ina;
- may not accept travel, holiday and/or accommodation offers by a business partner, external supplier and person working for an Ed-Ina (e.g. consultants, representatives, franchise partners, etc.). In certain cases (e.g. professional training or invitations to hold presentations) accepting such travel and accommodation offers is permitted if approved in writing by a relevant manager exercising employer's rights;
- must record all gifts, business meals and events with a value exceeding EUR 50.00 in the gifts register of the organizational unit in question, regardless of whether accepted or refused. Gifts, business meals and events with a value exceeding EUR 50.00 not recorded in the gifts register may be regarded as acts of bribery;
- must be careful not to disclose confidential business information in relation to suppliers (e.g. bid rating details, bid price information) to any third party.

4.13. GOVERNMENT AFFAIRS, POLITICAL INVOLVEMENT, LOCAL COMMUNITIES AND CIVIL SOCIETY AND RELATIONS WITH THE MASS MEDIA

GOVERNMENT AFFAIRS

In its business operations, Ed-Ina acts in good faith and in an honest manner, in compliance with all applicable regulations of the countries in which they have business operations and they only use permissible business practices. Ed-Ina is committed to acting as socially responsible corporate citizens in relation to state and government authorities, local authorities and in the region and society as a whole. Ed-Ina pays all taxes and insist on transparency in all financial transactions.

Employees of Ed-Ina may not:

- make or authorise any improper and undue payments to a local or foreign government functionary or official or any other affiliated person or entity;
- attempt to induce a local or foreign government functionary or official to commit an unlawful act;
- offer or receive money (or any other material values such as gifts), commissions in relation to obtaining business or awarding contracts;
- do anything to assist someone else to break these rules;
- mislead any police Officer or other government or public functionary or official or regulatory body;
- attempt to obstruct, in any manner, the collection of information, data, evidence or records by government or regulatory bodies duly authorized to do so;
- conceal, alter or destroy documents, information or records which are the subject of an investigation or inquiry;
- attempt to hinder other employees from providing accurate information.

POLITICAL INVOLVEMENT

Ed-Ina does not prohibit employee involvement in politics, but political activities should not be undertaken by employees on behalf of Ed-Ina, nor should such activities be in conflict with the interests of Ed-Ina.

When involved in politics, employees of Ed-Ina:

- must be very careful when pursuing such activities and not to:
 - use the names of Ed-Ina;
 - lead others to believe that Ed-Ina has committed itself to any political party or movement;
 - join groups whose aims or activities are in conflict with the interests of Ed-Ina;
 - use equipment of Ed-Ina (e.g. faxes, computers, the Internet, telephones, copiers, scanners, headed writing paper, etc.);
- may not carry out political activities in the workplace.

In the context of government affairs and political involvement, corruption is regarded as an extremely serious breach of ethical norms.

LOCAL COMMUNITIES AND CIVIL SOCIETY

Ed-Ina contributes to economic growth and raising living standards in the areas in which it does business. Ed-Ina is committed to responsible communication: They provide the general public with regular, complete, comprehensible and trustworthy information about their business activities and intentions via all relevant media. The aim is to develop positive and highly professional relationships with the media. Ed-Ina seeks to engage in an open and transparent dialogue and consultations with local communities and other representatives of civil society with legitimate interests in the business activities of Ed-Ina. Employee participation in support of local community development and social initiatives is encouraged.

Employees of Ed-Ina must:

- comply with valid rules in each and every community and country in which they do business;
- respect the fundamental human rights, culture and differing business customs of these communities and countries (as long as they are not in conflict with the principles of this Code);
- seek to recruit qualified employees from the local community wherever possible.

Within the context of local communities and society in general, human rights violations, disinformation of local communities and corruption are regarded as extremely serious breaches of ethical norms.

RELATIONS WITH THE MASS MEDIA

All contacts with the news media must be handled by the Shareholders' relevant Departments with jurisdiction over such issues.

Ed-Ina's relationships with the mass media are based on the respect of the right to information. The information could be provided to the mass media, following Shareholders' relevant Department approval, and must be accurate, coordinated and consistent with INA's and Edison's principles and policies; it must respect the laws, rules and practices of personal conduct; and must be furnished in a clear and transparent manner. The dissemination of false information is strictly forbidden.

4.14. EMPLOYEES

Ed-Ina is committed to providing a work environment of mutual trust in which all employees of Ed-Ina are treated with dignity and respect. Ed-Ina respects the religious freedom of employees of Ed-Ina and their right to assembly, their right to rest, free time and regular paid leaves. Particular attention is paid to the personal and professional development of employees. Ed-Ina is committed to implementing fair policies in relation to employment and adequate remuneration for completed work in accordance with valid rules. Redundancies are handled in a humane manner, and assistance is rendered to former employees, wherever possible.

PROTECTION OF PRIVACY AND CONFIDENTIAL INFORMATION

Confidential Information is an integral part of the Company's assets and, therefore, must be adequately protected.

Confidential Information is any classified information about Ed-Ina that, if released without authorization or accidentally could cause damage to Ed-Ina.

Within the Confidential Information category, Insider Information, is particularly significant.

Ed-Ina is committed to respecting the confidentiality of employees' personal information. The business policy of Ed-Ina is to acquire and retain only information requiring employee consent unless prescribed by the law. Access to personal information is strictly limited to duly authorized company personnel and may only be granted for business purposes. Anyone without special authorization, power of attorney or valid business reason may not attempt to access such information. Persons with access to personal employee information may only use such information for the purpose for which it was acquired and must adhere to highest confidentiality standards when doing so.

HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION AND PROPERTY PROTECTION

Health, safety and environmental protection is a continuous responsibility and priority as well as part of all business processes and development programs of Ed-Ina.

In line with the commitment to sustainable development, a systematic approach to health, safety and environmental (HSE) protection issues was adopted to achieve continual improvement in performance in these areas. Ed-Ina is committed to reducing health, safety and environmental risks arising from its business activities by creating safe working conditions and by continuously improving the efficiency of its environmental management performance. Focus on quality is a fundamental requirement in business activity performance. Ed-Ina puts in place environmental protection programs in the areas in which they have business operations. In the performance of their business activities, Ed-Ina observes all technological and ecological guidelines in force and it promotes the acceptance of stricter standards designed to minimize the risk of adverse effects on the environment resulting from their business activities.

Ed-Ina is committed to providing all its employees and other employers carrying out business activities on the premises of Ed-Ina with a safe and healthy work environment in which nobody is exposed to unnecessary risks. Ed-Ina recognizes that safe business activities depend not only on technically sound facilities and equipment, but also on qualified employees and an active HSE culture.

Employees of Ed-Ina:

- must always comply with HSE requirements at their work place;

- must cease any activities which become unsafe and must immediately report this fact to a superior or relevant manager;
- may only perform tasks for which they are trained, competent, medically fit, sufficiently rested and ready to carry them out, pursuant to regulations governing labor and safety at work;
- must know what to do in the event of an emergency at their work place;
- must promptly report to a line manager or manager exercising employer's rights about every accident, injury, illness, unsafe or unhealthy conditions, incidents, spills or releases of substances harmful to the environment, so immediate measures can be taken to remedy, prevent or monitor such events;
- may not perform work when their performance is impaired by alcohol or drugs (medication), legal or illegal, prescribed or acquired otherwise. They must also prevent other employees from doing so;
- may not possess, use or transfer illegal medication or narcotics on the premises of Ed-Ina and must report any such actions by others;
- must comply with regulations concerning smoking restrictions in the workplace.

It is in everyone's interest and everyone's responsibility to maintain the values of Ed-Ina. Knowledge of and compliance with the safety rules of Ed-Ina play a key role, as well as ensuring compliance thereof on the part of business partners and staying on the premises of Ed-Ina.

Employees of Ed-Ina:

- must perform work in accordance with security requirements;
- must bear in mind and inform external partners that it is forbidden to bring firearms into the facilities of Ed-Ina if they suspect that an external partner carries a firearm, except for persons legally authorized to do so (members of the armed forces and armed security guards) during the performance of their duties;
- may not leave unattended any confidential information and valuables of Ed-Ina;
- may not engage in conversations about topics of a confidential nature in public, either inside or outside the business premises of Ed-Ina;

- must report security-related incidents (e.g. criminal acts, threatening telephone calls, loss of confidential information) to a representative of the local security services and their employer.

In the context of health, safety and environmental protection, dangerous behavior posing risks to others is regarded as an extremely serious breach of ethical norms.

PROHIBITION OF DISCRIMINATION

Ed-Ina is committed to prohibiting and preventing discrimination. The employees of Ed-Ina include citizens of various ethnicities and nationalities; Ed-Ina supports cultural and national diversity and the creation of an international team.

To this end, employees of Ed-Ina must:

- not discriminate against anybody on the grounds of race or ethnic origin or skin color, gender, language, religion, political or other beliefs, national or social origin, pecuniary circumstances, trade union membership, education, social standing, marital or family status, age, health condition, disability, genetic inheritance, gender identity, expression or sexual orientation;
- make decisions exclusively based on merit, performance and qualifications as well as on other work-related criteria;
- base workplace relations on cooperation, openness, trust, mutual recognition and support;
- be open to accept cultural and national diversity and help colleagues from other countries to adapt to local circumstances;
- not publish or disseminate materials or jokes which might offend people belonging to any specific group;
- only pursue political and religious activities outside the workplace;
- take firm action against any form of discrimination.

PROTECTION OF DIGNITY

Every employee is required to create an atmosphere of mutual respect and trust, without which cooperation and the achievement of excellent business results is not possible. Ed-Ina will not tolerate any form of abuse or harassment, at any workplace, towards employees, contractors, suppliers, customers or other stakeholders.

Employees of Ed-Ina must not:

- engage in undesired behaviour which could be considered offensive, intimidating, malicious or insulting;
- engage in sexual harassment: Sexual harassment is a form of discrimination on gender grounds which includes every verbal, non-verbal or physical unwanted conduct of a sexual nature which aims to or which constitutes the violation of a person's dignity which causes fear, a hostile, humiliating or offensive environment where the person who is the subject of sexual harassment may assume that rejecting the offer will put him/her in a disadvantageous position regarding employment, promotions or that it will create a hostile working environment;
- engage in any form of harassment with the aim or effect of;
 - creating a hostile or intimidating work environment, in which employees may be compelled to engage in inappropriate conduct in order to fit in;
 - jeopardize the reputation, honor, human dignity and integrity of an individual or group;
 - decidedly interfering with an individual's work performance;
 - manipulating an individual's working conditions;
- humiliate or insult another person;
- make racial, ethnic, religious, age-related or sexual jokes;
- distribute and forward or display offensive material, including inappropriate images;
- misuse personal information;
- spread malicious rumors or use voice mail, e-mail or other electronic devices to transmit derogatory or discriminating information.

HIRING AND EMPLOYEE ORIENTATION

Ed-Ina's hiring practices satisfy the dual needs of obtaining from the marketplace knowhow and professional skills that are not available inside the Company and adding to its staff young people in which it can invest to ensure its continued growth and development.

In the process of recruitment and selection of eligible employees respecting the privacy of the applicants and making hiring decisions must be based solely on objective and transparent criteria, so as to ensure equal opportunity and avoid favoritism.

All employees are hired under regular employment contracts that comply with the laws in force in the place of hire. No irregular or off-the-books employment is allowed.

Upon hiring each employee is provided with accurate information — particularly with regard to the rules that govern his or her employment relationship, the rules and prevention procedures related to occupational safety and health, Ed-Ina's corporate policies, and the provisions of Ed-Ina's Code of Ethics — in order to help the employee quickly become knowledgeable of these matters and accelerate his or her integration into the Company's life and culture.

COMPENSATION

Ed-Ina compensates its employees based on the post held, their professional competencies and the results achieved, with the goal of providing full recognition for the merits of each employee and establishing an overall wage and salary structure that is always absolutely competitive when benchmarked continuously and systematically against the reference markets where the Company operates.

INTERNAL COMMUNICATIONS

Ed-Ina views internal communications as an essential structural tool for the effective functioning of corporate processes and to foster an effective integration of all employees and their involvement in Company activities, because it promotes the sharing of values, strategies and objectives by employees and the exchange of information and expertise and helps establish a strong Company identity and culture.

Internal communications are carried out using different tools for different objectives, target audiences and subject matters. These tools include corporate publications, intranet services, conventions, social events, etc. Internal communications are also a primary and direct responsibility of each manager, as part of the proper and ongoing management of his or her interpersonal relationships with his or her employees. They are carried out by creating opportunities to exchange information, listen to employees and dialog with them within the framework of individual or group relationships.

CONFLICTS OF INTEREST

All employees must ensure that all business decisions are made in Ed-Ina's interest. Consequently, they must avoid any situation that gives rise to a conflict of interest between the economic activities of an employee or his or her family and the function he or she performs at Ed-Ina. Such a conflict of interest could impair the employee's independent judgment or choice.

Employees of Ed-Ina may become exposed to conflict of interest which must be avoided. Such cases must be reported to and require authorization by a line manager exercising employer's rights.

Since the following situations clearly represent conflicts of interest, employees of Ed-Ina may not:

- transact, for their own or someone else's account, business in the field of activity performed by Ed-Ina or work with or provide services to any third party with whom they have established prior contact as part of their work for Ed-Ina;
- be a member of a company or invest into a supplier or customer if they are involved in any manner in the selection or evaluation of the supplier or customer or if they supervise anyone who has such responsibility. Investments in public business associations represent an exception to this rule.

In the following cases, employees of Ed-Ina must previously obtain a written authorization from a line manager exercising employer's rights:

- prior to establishing any relations, in which a conflict of interest can be assumed, with persons in competition with Ed-Ina, customers and suppliers;
- prior to accepting executive positions, membership in a supervisory board or other membership in a business enterprise or non-profit organization, which is in the field of activity of Ed-Ina;

- prior to becoming the owner of a controlling stake in an external business enterprise, which is in the field of activity of Ed-Ina;
- prior to making any substantial investment in companies owned by persons in competition with Ed-Ina, suppliers or customers. A substantial investment means any economic interest which might influence or create the impression of influencing the employee's judgement.

In the following cases, employees of Ed-Ina must request in writing a decision by a line manager exercising employer's rights (or the relevant project manager in case of projects) on whether the following is incompatible with the work performed at Ed-Ina:

- if a person works within the framework of an employment relationship or as an agent or representative of another company outside Ed-Ina;
- if, based on the position held, a person has the possibility to hire, supervise, affect the terms and conditions of employment or influence the supervisor of any of their close relatives, regardless of whether this person is an employee of Ed-Ina or a contracted partner of Ed-Ina;
- if a person learns that one of their close relatives works or provides services to persons in competition with Ed-Ina, a customer or supplier, and that the close relative has been involved in decision-making or contract conclusion procedures in relation to persons in competition with Ed-Ina, customers or suppliers.

All actions by employees of Ed-Ina not in compliance with the above shall be considered unacceptable conduct and shall as such be treated as acts contrary to the interests of Ed-Ina.

With regard to suppliers and business partners, corruption is regarded as an extremely serious breach of ethical norms.

CHILD AND FORCED LABOR

Ed-Ina does not tolerate any form of forced or child labor. All employees and business partners of Ed-Ina are expected to be aware of this obligation and abide by it in their daily work.

Human rights violations and any forms of discrimination of employees are regarded as extremely serious breaches of ethical norms.

4.15. COMPETITORS

While Ed-Ina actively compete in many of its business activities, their actions on the market are conducted in accordance with the norms of fair competition and in conformity with applicable competition law. Ed-Ina collects information on persons in competition with Ed-Ina in a strictly legal manner. They only use publicly available information and sources to evaluate business, consumer, supplier and technological trends, parliamentary bills in draft as well as communication campaigns of suppliers and persons in competition with Ed-Ina. Ed-Ina will gather such information in a fair and legal manner.

Ed-Ina pays particular attention not to conclude any kind of cartel agreement or practices agreed in concert, directly or indirectly, with persons in competition with Ed-Ina for the purpose of fixing prices, sharing markets or fixing production and sales quotas.

At the same time, where business activities of the industry in general significantly impact both the natural environment and the social development of local communities, Ed-Ina will actively cooperate with persons in competition with Ed-Ina in the execution of mutual social and environmental responsibilities. Ed-Ina companies will seek every opportunity to express their ethical commitments among trade organizations, industry associations, multi-stakeholder organizations and on the level of local, regional and global partnerships that advance the values of sustainable development.

With regard to persons in competition with Ed-Ina, cartel agreements are regarded as an extremely serious breach of ethical norms.

4.16. SPONSORSHIPS AND CONTRIBUTIONS

Ed-Ina may contribute to or sponsor initiatives proposed by public or private institutions or by nonprofit organizations established pursuant to law when such initiatives are consistent with Ed-Ina's principles of Ethics.

Sponsorships and contributions can involve social, cultural, sports and artistic events and initiatives. They can also serve the purpose of supporting studies, research, conventions and seminars on issues of interest to Ed-Ina. Whenever possible, Ed-Ina cooperates in the preparation of such events and activities to ensure an adequate level of quality.

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In selecting the initiatives that it intends to support, Ed-Ina is extremely careful to avoid any potential conflicts of interest both at the personal and Company level.

5. POSING QUESTIONS AND EXPRESSING CONCERN

Employees of Ed-Ina must report any breaches or potential breaches of Ed-Ina's Code of Ethics of which they become aware – whether these relate to themselves, their direct reports, line managers or others. They must seek advice if they are ever unsure about the proper course of action.

When reporting unethical conduct, the reporting person must respect the rights of the person reported on, thus it is forbidden to disclose or forward personal data of the person being reported to a third party not concerned with the ethical compliance issue in question.

In the event of any concerns of an ethical nature, employees may first contact a line manager or Ed-Ina General Manager.

Should employees ever feel uncomfortable to use these channels, they may, at any time, contact Ethics Officer.

The main role of Ethics Officer is to ensure the impartial implementation of procedures.

The respective managements of Ed-Ina must ensure that the employees of Ed-Ina are familiarized with the content of the Code.

Ethics Officer:

- periodically review and, without stating personal details, report on ethical procedures initiated against persons who have breached the Code; He/she report to the Company's Management Committee as well as to INA Group's Ethics Council and to Edison Group's Audit & Ethics Committee;
- oversee ethical behavioural training and communication related to the Code;
- carry out ethical investigations;
- continuously assess non-compliance risks and ensures that regulations are proportional to such risks;
- provide support and help to employees comply with the Code;
- draw up and submit Code compliance reports to the Management Committees as well as to INA Group's Ethics Council and to Edison Group's Audit & Ethics Committee.

In case of reservations regarding the use of above possibilities, unethical conduct may be reported to Ethics Officer in Ed-Ina. Ethics Officer can be contacted via e-mail at gaetano.annunziata@ina.hr or in writing to the following address: Šubićeva 29, Zagreb, Republic of Croatia, with the obligatory note “Attn.: Ed-Ina’s Ethics Officer” and “Do not open”. In any case unethical conduct may be reported directly to INA Group’s Ethics Council and to Edison Group’s Audit & Ethics Committee.

Please bear in mind that investigations are more effective if you provide as many details about the reported compliance issue as possible, including the name of the grievance submitter. Anonymous reports will only be investigated if an extremely serious breach of the Code is assumed to have occurred.

Any employee may seek advice, raise concerns or report in good faith acts of misconduct in compliance with this Code. If an employee of Ed-Ina reports a breach of ethical norms knowing that no Code breach was committed or that the Code breach was committed by a person other than the person reported, ethical procedures may be initiated against that employee.

Ed-Ina will not tolerate any retaliation against people reporting compliance issues in good faith. Allegations of retaliation must be reported. Ethics Officer will investigate all such allegations and take the appropriate actions.

Anyone responsible for retaliation against individuals who report suspected unethical conduct or other business risks will be subject to an ethical procedure. If you suspect that you or someone you know have been retaliated against for raising an ethical compliance issue reporting a Code breach, you should contact Ethics Officer immediately.

6. ETHICAL PROCEDURES

6.1.GENERAL PROVISIONS

A breach of ethical norms is committed by a person who deliberately or by negligence breaches the Code through conduct or failure.

OBJECTIVE OF ETHICAL PROCEDURES

The primary objective of ethical procedures is to promote ethical conduct /behaviours as prescribed by the Code, to specify the roles and responsibilities of organizational units and the persons involved therein, to define the applicable rules of procedure and the operations of Ethics Officer.

DEADLINES

Persons involved in ethical procedures must take all reasonably expected efforts to meet the deadlines set forth in this chapter in a way as to ensure that procedures conducted by Ethics Officer effectively support decision-making by managers exercising employer's rights and the management of other contractual legal relations.

CONFIDENTIALITY

In order to protect the privacy of persons involved in ethical procedures, all documents drawn up or made available in the course of ethical procedures shall be confidential, unless established otherwise in this chapter.

All documents pertaining to ethical conduct issues fall under the category "confidential".

All parties involved in ethical procedures must handle all information and documents as confidential. Should a reporting person fail to comply with this rule, the investigation of the ethical issue may be refused.

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PARTIES' BEHAVIOUR

In the course of an ethical procedure, all parties must use a communication style expected in any formal business relationship.

6.2. RESPONSIBILITIES AND POWERS OF ETHICS OFFICER

The essential mission of Ethics Officer is ensuring the ethical conduct of stakeholders and coordinating purposeful ethical development in Ed-Ina. Ethics Officer monitor and prepare Code amendment proposals. He is responsible for monitoring long-term compliance with the Code. He investigate ethics complaints and addresses ethical issues received from stakeholders of Ed-Ina, he oversees Code-related communication and education and operate a Code monitoring system. He draws up semi-annual reports for the Management Committee and for INA Group's Ethics Council and Edison Group's Audit & Ethics Committee on investigation results, findings and raised ethical issues, and he prepares proposals on necessary measures.

In the event of a breach of the ethical norms established by the Code, it is under the competence of Ethics Officer to conduct an ethical procedure in relation to the Code breach and to prepare proposals for line managers exercising employer's rights.

By publishing its decisions, Ethics Officer facilitate the interpretation of Code provisions for the purpose of introducing standard practices.

ETHICS OFFICER AND ETHICS SECRETARY ACTIVITIES

Ethics Officer coincides with the president of the Board of Ed-Ina. ED-INA's General Manger shall pass the decision on appointing of Ethics Secretary, who will support the Ethics Officer.

Ethics Officer is responsible for preparing and regularly convening meetings, providing sufficient information required for effective conduct and decision-making in a timely manner. Ethics Secretary sends out invitations to previously scheduled meetings or meetings convened for a date set by the Ethics Officer so that all participants receive such invitations at least 5 working days in advance.

Ethics Secretary takes minutes during meetings. The minutes are verified by the Ethics Officer and Ethics Secretary. Upon request, minority or dissenting opinions must be attached to the minutes. Verified minutes must be made available to Ethics Officer in electronic form via the repository designated for this purpose, with the necessary access rights granted.

All the documents arising from ethical procedure must be drawn up in Croatian and English language. Upon request of a reporting person and/or reported person may permit the use of the person's mother tongue and makes documents drawn up during the course of procedure available in the same language.

6.3. INITIATING ETHICAL PROCEDURES

Anyone can initiate ethical procedures when detecting conduct which constitutes a Code breach. Managers of Ed-Ina must report conduct that requires no measures by the employer or other actions based on contract, but are considered Code breaches.

After a period of three years, procedures for breach of Code norms may only be initiated when duly justified.

Reports may be submitted and ethical procedures initiated through the channels listed in the Code. The reporting person must supply the following details for the initiation of ethical procedures:

- name, home or work address, phone number and e-mail address (if available) of the person initiating the procedure, the name(s) of reported person(s) and a specification of the presumed breach of Code norms;
- all important information required to assess the ethical compliance issue;
- evidence which may include corroborating statements of other persons or specific information as to persons who may be contacted to provide such corroborating evidence supporting the report.

The reporting person shall state in the report if he/she wishes to remain anonymous, even if the required information has been stated in the report.

Anonymous reports shall be investigated in the event of an extremely serious Code breach.

Upon receiving reports and a report/investigation request, Ethics Officer shall examine whether the reported case comes within its competence. If the reported breach of ethical norms also involves failure to fulfill obligations arising from employment or failure to fulfill obligations from another contractual relationship, Ethics Officer shall hand over all available information to a line manager exercising employer's rights and/or the head of the organizational unit responsible for managing the contract obligations breached for further action, while simultaneously informing the reporting person thereof.

In the event that an issue comes incomplete, the Ethics Officer shall return the report/request – stating which information is missing and setting a short deadline - to the reporting person with a request for additional information.

Upon receipt of a report and missing information, the Ethics Officer shall immediately inform the reported person about the report received.

Within 8 days from the receipt of case documents, the Ethics Officer shall make one of the following decisions:

- information and evidence presented in the report/request do not constitute grounds for the initiation of ethical procedures;
- the report contains non-credible and/or insufficient information in spite of a request for additional information or it is clearly unsubstantiated or inconsistent, thus Ethics Officer will not investigate the case;
- the information and evidence described in the report/request constitute grounds for the initiation of further procedures.

If the reporting person can be clearly identified, Ethics Officer must inform the reporting person in writing about the decision under this paragraph.

In the event that Ethics Officer decides to initiate ethical procedures, Ethics Officer shall inform, in writing, the reporting person and the reported person that has initiated ethical procedures based on a report of ethical misconduct received and shall briefly outline the allegations stated in the report.

The name of the reporting person may only be disclosed to the reported person if so justified by the nature of the unethical conduct and it is necessary to effectively conduct the procedure.

As part of above communication, both the reporting person and the reported person must receive a copy of these rules of procedure.

6.4. RULES APPLICABLE DURING ETHICAL INVESTIGATION PROCEDURES

All persons involved in an investigation must keep confidential all information and act with integrity and impartially throughout the entire process. On all communication related to the case, “confidential” must be indicated.

Should special expertise be required, the Ethics Officer is authorized to involve any person they wish. This fact, and the name of the organizational unit and the company of the person involved in the procedure shall be stated in the written investigation report. Only the following persons can be informed of the investigation:

- Ethics Officer;
- the reporting person;
- the reported person (and his legal representative);
- employees providing information to the ethical investigation.

Involved persons must immediately report any conflicts of interest to the Ethics Officer.

The Ethics Officer shall solely conduct the investigation and only he/she is authorized to process documents and information created during the investigation. During the investigation, Ethics Officer may consult INA Group’s Ethics Council and Edison Group’s Audit & Ethics Committee without transferring or providing any personal data.

During the investigation, the following actions can be taken, in particular:

- conduct face-to-face or phone interviews with the relevant persons;
- request of written or published documents associated with the case;
- visit(s) to locations important from the perspective of the case.

Ethics Officer must compile a written report no later than 30 days following the decision on initiating an investigation. If the assessment or other circumstances relevant to the case require so, Ethics Officer is authorized to extend the term of procedure on one occasion, by 30 days, or if duly justified, by a maximum of 60 days. The report should discuss all the documents used in relation to the investigation, a statement of reasons for proposed solutions, including case-specific correspondence and all other evidence acquired and examined during the investigation.

Ethics Officer can pass one of the following decisions:

- establish Code violations and inform the line manager exercising employer's rights that the reported person has violated one or several Code rules, along with proposed measures;
- to refuse reports/requests based on which ethical procedures were initiated.

Ethics Officer must document its decisions in writing together with a statement of reasons. Apart from the management of the Ed-Ina and managers exercising employer's rights, decisions by Ethics Officer must also be communicated to the reporting person and the reported person.

Ethics Officer concludes an ethical procedure by communicating the decision to a manager exercising employer's rights.

At the recommendation of Ethics Officer, the line manager of the reported person exercising employer's rights is authorized to pass a decision concerning sanctions and must notify Ethics Officer thereof.

Reporting persons are never entitled to any compensation on the grounds of an ethical procedure.

Ethics Officer shall decide whether the decisions should be published within Ed-Ina, without names and other details in regards to persons involved. The report communicated to the reporting person and the published decision may not contain information that could violate the privacy of any employee of Ed-Ina or any other legal or private person involved in the procedure, particularly information in relation to business secrets, privacy or data protection.

Any established Code breaches shall be included in the perpetrator's personal file.

7. RELATED DOCUMENTS

Reference documents of the Code:

- Labour Act
- Prevention of Discrimination Act
- Companies Act
- Capital Market Act
- Data Protection Act

8. AMENDMENTS

No amendment to this Code of Ethics is present.

9. FINAL PROVISIONS

The Code shall come into force and be applicable at the earliest 8 days after its release.