



INTELLIGENT NETWORK SOLUTIONS LLC SKOPJE

CODE OF BUSINESS CONDUCT

Of the company for trade and computer services
INTELLIGENT NETWORK SOLUTIONS LLC SKOPJE
-consolidated text

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TABLE OF CONTENTS

- 1. CULTURE OF INTEGRITY3
 - Abiding by the code and the law3
 - Promotion of ethical culture and conduct in accordance with the code.....4

- 2. MANNER OF CONDUCT IN ACCORDANCE WITH THE CODE4
 - Anonymity and confidentiality4
 - Investigation and disciplinary action5
 - False accusations.....6

- 3. INTEGRITY OF THE COMPANY 6
 - Health and safety in the workplace....7
 - Business and financial information and company property..... 7
 - Intellectual property..... 7
 - Technology 8
 - Confidential Data..... 8
 - Personal data protection..... 9

- 4. PROCEUDRE FOR THIRD-PARTY RELATIONSHIPS.....9

- 5. FINAL PROVISIONS10
 - Responsibility to revise the Code..... 10
 - Trainings 10

I CULTURE OF INTEGRITY

The Code of Business Conduct has been created with the purpose to assist all of us to act in accordance with the values that make the company INTELLIGENT NETWORK SOLUTIONS one of the most successful and reputable organizations in Republic of Macedonia and worldwide.

These values include:

- Authenticity;
- Team culture (functioning as a single individual);
- Remarkability;
- Caring for our people;
- Teaching and upgrading the knowledge of the employees.

The Code sets forth the company's commitment on business conduct in accordance to our values, all valid laws, rules and standards. The Code represents a guide on what is expected by each of us and provides referrals to other policies and guidelines of the company.

Violation of the Code or any other policy of the company is considered as a serious misconduct and may result in disciplinary actions including dismissal.

I.1 Abiding by the Code and the law

The Code has been made available to all company employees and has been published on the official website and all company employees must read it, confirm they understood its contents, abide by it and the laws in any given situation during the company's business actions and must avoid inappropriate behavior. Lack of knowledge of the Code does not justify employee's inappropriate behavior.

If the employees are uncertain on what actions to take in a given situation, they should ask themselves the following questions:

- Are their actions in accordance with our values?
- Are their actions in accordance with the Code?
- Are their actions legal?
- Will their actions reflect positively on the employee and the company?

The Code is valid for each employee of the company anywhere, no matter location, role or function. This includes all employees, directors and the managing body of the company.

The employees with limited-time contracts, contractors, freelancers, consultants, installers and any third party acting on behalf of the company are expected to abide by the Code principles. Each branch and joint venture controlled by the company must adopt and abide by the Code.

I.2 Promotion of ethical culture and conduct in accordance with the Code

With the behavior and actions, the manager should be a role model for everyone else.

The manager should:

- Ensure that the employees understand their responsibilities under the Code and the other company policies.;
- Use an opportunity to discuss the Code and accent the importance of ethics and how important it is that the employees abide by the Code.
- Design an environment where employees feel comfortable about asking questions;
- Take into consideration whether employees abide by the code and other company policies in the process of employee assessment;
- Discourage or disapprove of employees achieving results to the detriment of ethical conduct or violation of the Code or the law;
- Constantly undertake measures with the purpose of cease violation of the Code or the law by employees.

II MANNER OF CONDUCT IN ACCORDANCE WITH THE LAW

Should employees have any questions regarding the Code or a given situation, before taking actions, they are obliged to ask the competent persons for implementation of the Code.

Person in charge of all the employees is the company's manager and according to the Code, certain actions require a written approval beforehand.

All employees are under the obligation to support the company's ethical standards and undertake responsible measures in order to prevent violation of the Code.

Should the employee notice concerning behavior or behavior that may represent violation of the Code, he/she is under the obligation to take actions for resolution of the situation immediately. By doing so, employees will enable the company to deal with the problem and come to a resolution before a violation of the law occurs or it poses threat to health, safety or reputation of the company.

II.1 Anonymity and confidentiality

An employee raising questions regarding a possible violation of the Code is entitled to the right of remaining anonymous although identification is encouraged in order to facilitate communication.

Should the employee identify him/herself, the employer shall undertake all possible measures of precaution in order to keep his/her identity confidential, by conducting a thorough and fair

investigation in accordance with the valid law, validating the submission and responding to the submitter when possible.

As the company thrives towards strict confidentiality in all investigations, it may be impossible that the submitter is informed on the investigation outcome. In order to assist in maintaining confidentiality, employees are obliged to avoid discussion of these issues or any other ongoing investigation on Code violation with other employees.

The Company values the assistance of employees identifying potential problems that should be solved by the Company. Any sanction against an employee who properly raised concerns about violation of the Code is violation of the code.

The fact that an employee properly raised concerns or took part in an investigation may not be deemed as grounds for sanctioning of the employee such as: dismissal, degradation, suspension, loss of benefits, threats, harassment or discrimination.

The remainder of the employees are obliged to continue treating the person who raised concerns or provided information in an investigation with the same politeness and respect as previously.

Should the reporting employee (the submitter) can feel any consequences, he/she may discuss this with the competent persons responsible for Code implementation or to the Company's Chief Legal Counselor.

II.2 Investigation and disciplinary actions

The Company takes all submissions/notifications for a possible violation of the Code or the law seriously.

The Company is under the obligation to investigate the matter in a confidential manner and determine whether the Code or the law have been violated and thus undertake proper corrective actions.

Should the employee be involved in an investigation regarding the Code, he/she is obliged to fully cooperate and answer all questions completely and honestly.

Any violation of the Code is subject to a measure based on the nature of the violation, the circumstances, whether they are mitigating or aggravating, as well as previous measures (or measure extent).

Sanctions for Code violation, including but not limited to one or any combination of the following:

- Written warning,
- Warning before dismissal,
- Unpaid suspension (in accordance with the law),
- degradation,
- deprivation or reduction of bonus or other rewards and dismissal.

- The company has a zero tolerance policy for theft on company property, including but not limited to movable property, computers, phones, work tools, products.
 - In addition, the company may pursue compensation of expenses or compensatory damages through civil proceedings or initiate criminal procedure if necessary.
- Each disciplinary procedure shall be initiated in accordance with the valid laws and collective agreements. The violation of this Code is not the only basis for disciplinary procedure. The Company has additional policies and procedures regulating the behavior and may indicate disciplinary measures and consequences.

II.3 False accusations

The Company shall protect each employee who properly expresses concern or reports irregularities, however, intentional false accusations and reporting, false claims, providing false information during investigation or intervening and refusing to cooperate during the investigation are also considering violation of the Code.

Proper reporting does not mean that you should be right when raising concern, it means you should only believe that the information you are providing is true.

III INTEGRITY OF THE COMPANY

The company INTELLIGENT NETWORK SOLUTIONS LLC SKOPJE promotes equal opportunities.

Progress and awards are based on merit, regardless of race or ethnicity, color, sex, age, health circumstances in terms of disability, religious, political or other beliefs, membership in unions, national or social background, family status, property circumstances, gender preference or other personal circumstances.

To support this, the company has adopted a Code of Equality which has been published on the official website of the Company.

The Company adheres to all valid laws referring to work and employment and expects that employees treat each other with dignity and respect.

III.1 Health and safety in the workplace

Health and safety are the Company's key values.

The Company always adheres to the valid rules and regulations on health and safety and thus constantly promotes safe operational practices and avoidance of unnecessary risks for the employees.

The Company requires that all the employees abide by the safety in work practices in the interest of their own safety and the safety of their colleagues.

Safety is a responsibility of each employee.

Employees can prevent injuries that they can cause to themselves or to their colleagues through constant implementation of the safety practices and through reporting of every unsafe condition they take notice of. Many employees go further than their basic responsibilities by taking part in safety committees and providing information on safety policies and procedures to the management and thus assist the implementation of the safety verifications or accident investigations.

III.2 Business and financial information and company property

Providing accurate and complete business and financial information falls under every employee's responsibilities rather than responsibilities of employees in accounting and finance only.

Proper records and report keeping reflects on the Company's reputation and credibility and guarantees that the Company complies with all legal obligations. Furthermore, it guarantees that success is valued, and compensation is properly distributed among employees.

Employees are obliged to protect the Company's property and use it in a way it was intended to.

The property of the Company may be used for legitimate purposes in relation to the Company's activities only and may not be used for personal purposes. Employees may not use Company's property for personal benefits or benefits of any person/subject other than the Company. An important fact to accent is that theft or intentional misuse of Company's property is considered as violation of the Code.

The Company's Policies may permit additional personal use of certain property items such as a Company's car or wireless communication devices. Employees are under the responsibility to always verify they are using the Company's property in a proper way and in allignment with the relevant policies.

III.3 Intellectual property

The Company's intellectual property, licenced or personal, is considered as property of biggest value and thus it must be properly protected.

Intellectual property refers to everything that is created during the business actions on behalf of the Company, for the benefit of the Company and during day to day work activities. The Company owns the rights to evetything that is created during conducting business permitted by law, no matter if the results of the work may be protected or not and regardless of whether they represent a business secret or not.

Intellectual property rights include the following: copyrights, patents, trademarks, trade secrets, industrial design rights, logo, software programs, business processes and delivery or production methods.

III.4 Technology

Computer systems and equipment in property of the Company are to be used in accordance with the Data Protection Policy. For example, they are never to be used for outside businesses, illegal activities, gambling or pornography. Employees are not permitted to download or save illegal or inappropriate content from the internet to the company's computers.

Employees are not permitted to sell, transfer or make available in any other way to any unauthorized person the software products or associated documentation licenced or owned by the Company.

Furthermore, lack of attention of a single individual may result in breach of information security, affecting the entire Company. Everyone using the digital systems of the Company – employees, contractors, consultants and other temporary access individuals – must ensure that these sources are used properly and in accordance with the Data protection Policy of the Company.

The employees are expected to:

- Never reveal their username and password;
- Not access, download or forward emails, documents or image that may be offensive or harmful to other persons;
- Not install or use hardware or operating systems on any system of the Company without prior approval;
- Never send information to someone who contacted them claiming they are Company's employee and requesting information to be sent via email, in such cases the authorized person in the company should be notified.;
- Keep important data on the internal network for safety reasons and protection from data loss.

III.5 Confidential data

Information that was not published or made available for the public is considered confidential. It is the duty of the employees to protect the Company's information that is considered confidential.

The employees may not share this information with other individuals outside the company, including family members and friends unless sharing it is necessary for performing their work duties.

This type of information is deemed Company property and employees may not reveal it to other parties, even after they are no longer part of the company.

In addition, sharing such information must be limited within the Company itself and only be shared with employees who require it for performing work duties.

Confidential information is considered any information that the Company has not published or made available to the public and refers to its business and current activities, including information related to: employees, discoveries/innovations, contracts, offers, strategies and business plans,

financial transactions, larger management changes, new products, marketing campaigns, status changes, technical specifications, financial information etc.

III.6 Personal data protection

The Company shall respect the privacy of all its' employees, business partners and clients.

The Company shall handle personal data responsibly and in accordance with the Law on personal data protection, legal acts and the Rulebook on technical and organizational measures for ensuring privacy and protection of personal data.

The Company shall process personal data in accordance with the regulations on personal data protection and is listed in the Registry of the Directorate for Personal Data Protection.

IV PROCEDURE FOR THIRD PARTY RELATIONSHIPS

In cases when the Company engages an external service provider or other third party, the manager responsible for the engagement must ensure the third-party entities are familiar with the Code.

Contracts with representatives, installers, marketing consultants and companies engaged for promotion are considered as risks to the alignment with the Code. Utilization of the funds and the property of the Company for any illegal purposes is forbidden and a violation of the Company's policy. Contracts with consultants and third parties should be presented in a written form with a clear and exact definition of the rendered services, as well as the basis of the contractual profits or compensation and the manner of calculation of the compensation. Compensation for consultants and third parties must be within reasonable amounts proportional to the rendered services.

Each inappropriate act or compensation the Company is aware of or there is a reason to be aware that the compensation or the act will be performed and may be performed by an employee in the Company is also deemed inappropriate as well as if it is done by an agent, consultant or a third party on behalf of the Company.

It is necessary that the Company always cooperates only with qualified and renowned individuals or reputable companies. To achieve this, setting criteria is necessary, i.e. identifying the candidate's qualifications and the legitimate reasons for the selection of the candidate, conversation, meeting and familiarization with such candidates as well as reference checks of the candidate.

Consultants, mediators and other entities engaged by the Company should receive a copy of this Code and be informed of the obligation to abide by it. Also, they should be informed about their rights and responsibilities and seek advice as well as report any violations of the Code.

FINAL PROVISIONS

The Code of Business Conduct has been provisioned in a manner that ensures employee behaviour consistency inside and outside the Company. There is no set of rules that covers all potential situations. All employees must understand that these guidelines do not modify their working relationship, neither through a single-party wish, settlement nor agreement. The Company reserves the right to amend or revise this Code at any given time and due to any reason.

V.1 Responsibility to revise the Code

The responsibility to update and modify the Code is assigned to the Company's manager who is responsible to obtain legal assistance in the process of updating with the purpose to align the contents of the Code with the valid laws and positive regulations.

V.2 Trainings

The manager who is in charge of the Code implementation, with the assistance of the Human Resources department and the legal consultant of the company shall organize trainings for the employees, partners and collaborators with the purpose to inform them on the Code, assist them in understanding of how this Code may be implemented in situations and conditions relevant to them, how to handle situations that may occur and in which situations a certain behavior is considered forbidden according to the Code.

With the purpose of ensuring alignment with the Code, the Company requests that each employee attends trainings right after the work relationship is initiated and re-visit (update) them at a certain timeframe. All employees must sign the attached form confirming that they have read the Code of Business Conduct and will act in accordance to its provisions.

All employees are required to study in detail the content of the Code and declare that they have received and understood it and shall abide by it. Failure to read the Code or sign the form is not considered an excusable justification for violation of the Code.

Abiding by the Code is a responsibility of each individual. Colleagues are available to assist in determining the right course of action. An employee properly asks for advice when in doubt is the right course of action in accordance with the Code.

INTELLIGENT NETWORK SOLUTIONS LLC SKOPJE

Manager:
