

Na osnovu člana 11.23 Odluke o osnivanju društva Balkans Real Estate d.o.o. Beograd, Bulevar Mihajla Pupina broj 85b (dalje: "**Društvo**"), direktor Društva dana 1. maja 2023. godine donosi

PRAVILNIK O ANTIKORUPCIJSKOM PONAŠANJU

Uvodna odredba Član 1.

Ovim Pravilnikom, Društvo na bliži način definiše pravila u vezi sa sprečavanjem korupcije, aktivnosti koje se tiču borbe protiv korupcije i sprečavanja koruptivnog delovanja u svim radnim, poslovnim i drugim odnosima i procesima Društva, kao i obaveze radno angažovanih lica koje moraju izvršavati u svrhu preventivnog i disciplinskog delovanja protiv korupcije.

Ovaj Pravilnik se neposredno primenjuje na sva radno angažovana lica u Društvu. Radno angažovana lica u Društvu su dužna da se upoznaju sa obavezama i ograničenjima iz Pravilnika koja se na njih odnose, kao i da se pridržavaju i postupaju u skladu sa odredbama ovog Pravilnika.

Za kontrolu sprovođenja odredbi ovog Pravilnika zadužen je Sektor Ljudskih resursa Društva (u daljem tekstu: "**Sektor Ljudskih resursa**").

Značenje izraza Član 2.

Shodno odredbama ovog Pravilnika, pojedini izrazi imaju sledeće značenje:

– "korupcija" je odnos koji se zasniva

Pursuant to Article 11.23 of the Memorandum of Association of the company Balkans Real Estate Ltd Belgrade, Bulevar Mihajla Pupina No. 85b (hereinafter: the "**Company**"), the Director of the Company on 1 May 2023 brings the following

RULEBOOK ON ANTICORRUPTION POLICY

Introduction Article 1

By this Rulebook, the Company is specifying rules for the prevention of the corruption, anti-corruption activities and prevention of the corruption acts in all working, business and other relations and processes of the Company, as well as the obligations of the working staff which they must perform for the purpose of prevention and disciplinary action against corruption.

This Rulebook is directly applicable on all working staff in the Company. Working staff in the Company undertakes to familiarize with the obligations and limitations related from this Rulebook and to adhere and act in line with the provisions of this Rulebook.

Company's Human Resources Department is in charge for the control of the implementation of this Rulebook (hereinafter the: "**Human Resources Department**").

Definitions Article 2

In line with the provisions of this Rulebook, the terms shall have the following meaning:

– "corruption" is a relationship based on

zloupotrebom službenog, odnosno društvenog položaja ili uticaja, u javnom ili privatnom sektoru, u cilju sticanja lične koristi ili koristi za drugoga;

- "Zloupotreba službenog položaja"- čini lice ukoliko iskorišćavanjem svojeg položaja ili ovlašćenja, prekoračenjem granica svog ovlašćenja ili nevršenjem svoje dužnosti pribavi sebi ili drugom fizičkom ili pravnom licu imovinsku korist ili Društvu nanese imovinsku štetu;
- "angažovano lice" je svako zaposleno i drugo lice angažovano po osnovu radnog angažovanja u Društvu;
- "radno angažovanje" je radni odnos, rad van radnog odnosa, volontiranje, vršenje funkcije, prodaja robe, pružanje usluga, kao i svaki drugi faktički rad za Društvo;
- "povezano lice" je supružnik ili vanbračni partner angažovanog lica, krvni srodnik angažovanog lica u pravoj liniji, odnosno u pobočnoj liniji zaključno sa drugim stepenom srodstva, usvojitelj ili usvojenik angažovanog lica, pravno lice koje se smatra povezanim u smislu zakona, pravno lice u vlasništvu/suvlasništvu navedenih fizičkih ili pravnih lica, kao i svako drugo pravno ili fizičko lice koje se prema drugim osnovama i okolnostima može opravdano smatrati interesno povezanim sa angažovanim licem;
- "privatni interes" je bilo kakva korist ili pogodnost za angažovano lice ili povezano lice;
- "suprotni interes" je javni interes, ili interes Društva, ili interes povezanih

the abuse of official, i.e. social position or influence, in public or private sector, for the purpose of acquiring personal gain or gain for other;

- "Abuse of official position" is use of its position or authorities, exceed the limitations of its authorization or lack of performance of duties acquires for itself or other individual or legal entity material gain or causes the Company material damage;
- "engaged person" is every employee or other working engaged person in the Company;
- "working engagement" is employment relations, work beyond employment relations, volunteering, performing of the function, sale of goods, service provision as well as every other actual work for the Company;
- "related person" is spouse or extramarital spouse of the engaged person, blood relative of the engaged person in direct line, i.e. relatives in lateral line, second degree of consanguinity, adoptive parent, adoptive child of the engaged person, legal entity which is legally affiliated, legal entity in ownership/co-ownership of above listed persons, as well as any other individual or legal entity which on the other grounds and circumstances may reasonably be regarded as the related with interest with the engaged person;
- "private interest" is any use or benefit for the engaged person or related person;
- "conflicting interest" is public interest or interest of the Company or interest

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društava sa Društvom ili interes trećih lica koji je/su povređeni sukobom interesa;

of the affiliated entities with the Company or interest of third parties which is/are affected by the conflict of interest;

- "sukob interesa" je situacija u kojoj angažovano lice ima privatni interes koji utiče ili može da utiče na postupanje angažovanog lica u vršenju radnog angažovanja, na način koji ugrožava suprotni interes;
- "poklon" je novac, stvar, pravo i usluga izvršena bez odgovarajuće naknade i svaka druga korist koja je data angažovanom licu ili povezanom licu u vezi s vršenjem radnog angažovanja;
- "prigodni poklon" je poklon koji angažovano lice primi od trećeg lica tokom i povodom radnog angažovanja u prilikama kada ljudi tradicionalno razmenjuju poklone;
- "nedozvoljeni uticaj" je svaka radnja ili propuštanje radnje kojima se od strane angažovanog lica ili bilo kog drugog lica utiče na drugo angažovano lice da svoje radno angažovanje obavlja na način kojim se povređuje suprotni interes;
- "mito" se odnosi na svaki poklon (ili ponudu, obećanje ili odobrenje za poklon) bilo kom državnom službeniku ili bilo kojoj drugoj osobi ili pravnom subjektu, uključujući bilo koju osobu ili pravni subjekat u privatnom ili javnom sektoru, ako je poklon namenjen kao podsticaj primaocu da zloupotrebi svoj položaj ili na drugi način ostvari nepoštenu prednost;
- "državni službenik" se odnosi na pojedinca i uključuje, ali nije ograničen
- "conflict of interest" is situation in which the engaged person has private interest which affects or may affect on the actions of the engaged person in its working engagement, jeopardizing the conflicting interest;
- "gift" is money, item, right or service without the adequate compensation or any other benefit provided to the engaged person or related person with regards to working engagement;
- "an appropriate gift" is gift which the engaged person receives from third party during and in connection with the working engagements in events when people traditionally exchange gifts;
- "inappropriate influence" is every action or omission of action by which the engaged person or other person is influencing other engaged person to perform its work engagement in the manner violating conflicting interest;
- "bribe" is every gift (or offer, promise or approval for the gift) to any public official or other person or legal entity, including any person or legal entity in private or public sector, if the gift is intended as an incentive for the recipient to abuse its position or in other manner to acquire unfair advantage;
- "public official" is an individual and includes, without limitations:

na:

- sve državne službenike, uključujući zaposlene u organima za izdavanje dozvola, poreskim ili carinskim organima, agencijama, službama, komisijama ili odeljenjima;
- predstavnike javnih međunarodnih organizacija;
- gradonačelnike ili druge funkcionere organa lokalne samouprave;
- članove organa za sprovođenje zakona, uključujući i vojne organe, lokalnu policiju, tužilaštvo, sudske i druge organe;
- zaposlene u kompanijama koje su u državnom vlasništvu, ili vlasništvu lokalne samouprave.
- All public officials, including employees in bodies for issuance of permits, taxes, customs, agencies, services, commissions and departments;
- Representatives of public international organizations;
- Majors or other officials of local government;
- Members of law enforcement agencies, including military, local police, prosecution offices, judicial and other bodies;
- Employees in the companies which are in state ownership, or ownership of local government.

Sukob interesa Član 3.

Angažovano lice je dužno da radno angažovanje vrši tako da suprotni interes ne podredi privatnom.

Angažovano lice je dužno da se pridržava ugovora ili odluke o radnom angažovanju, odnosno drugog akta Društva ili propisa koji uređuju njegova prava i obaveze, te da savesno i odgovorno obavlja radno angažovanje.

Angažovano lice je dužno da izbegava stvaranje odnosa zavisnosti prema licu koje

Conflict of Interest Article 3

The engaged person undertakes to perform working engagement so that the conflicting interest is not subordinated to the personal.

The engaged person undertakes to adhere to the agreement or decision on working engagement, i.e. other acts of the Company or regulations which regulate rights and obligations, and to conscientiously and responsibly performs its work engagement.

The engaged person must avoid creating the dependency relationship towards the

bi moglo da utiče na njegovu nepristrasnost u obavljanju radnog angažovanja, a u slučaju da ne može da izbegne takav odnos ili takav odnos već postoji, da učini sve što je potrebno radi zaštite suprotnog interesa.

Angažovano lice ne sme da koristi radno angažovanje za sticanje bilo kakve koristi ili pogodnosti za sebe ili povezano lice koje je moguće finansijski vrednovati.

Obavljanje drugog posla ili delatnosti Član 4.

Angažovano lice koje je u radnom odnosu u Društvu ne može bez prethodne pisane saglasnosti Društva da obavlja drugi posao (radni odnos, rad van odnosa i dr.) ili delatnost za vreme radnog angažovanja u Društvu, koji predstavlja delatnost Društva ili društava povezanih s Društvom.

Angažovano lice koje je u radnom odnosu u Društvu bez prethodne pisane saglasnosti Društva ne može koristiti ovlašćenja, položaj, poslovne kontakte ili informacije do kojih je došlo tokom radnog angažovanja u Društvu u svrhu ostvarivanja koristi ili pogodnosti za sebe ili povezano lice koje je moguće finansijski vrednovati za sebe ili drugo fizičko ili pravno lice.

Obaveza prijavljivanja postojanja sukoba interesa Član 5.

Angažovano lice je dužno da, prilikom stupanja na radno angažovanje i tokom radnog angažovanja, u roku od 3 (tri) radna dana, pismeno obavesti neposredno nadređenog i Sektor Ljudskih resursa i o sumnji u postojanje sukoba interesa ili o sukobu interesa koji on ili sa njim povezano lice ima. Obrazac prijave nalazi se u prilogu 1 ovog Pravilnika.

person which may affect its independence in work engagement, and in cases when such relationship cannot be avoided or when it already exists, to do all necessary in order to protect conflicting interest.

The engaged person may not use working engagement for acquiring any gain or advantage for itself or related person with the financial value.

Performing Other Business or Activity Article 4

The engaged person in employment relationship in the Company may not without previous written consent of the Company perform other activity (employment relations, work beyond employment etc. or activity during work engagement in the Company which represents the activity of the Company or of its the affiliated companies.

The engaged person in employment relationship in the Company may not without previous written consent of the Company use its authority, position, business contact or information acquired during work engagements in the Company to acquire benefits for itself, or other individual or legal entity with financial value.

Duty of Reporting of Conflict of Interest Article 5

The engaged person undertakes, when initiating and during its work engagement, within 3 (three) working days to notify in written its line manager and Human Resources Department if in doubt whether conflict of interest exists or on the conflict of interest which it or its related person has. The form of the report is in the Appendix 1 of this Rulebook.

Društvo može da pozove angažovano lice i traži da dostavi potrebne podatke, u cilju pribavljanja informacija o postojanju sukoba interesa iz stava 1. ovog člana.

Ako Sektor Ljudskih resursa utvrdi da postoji sukob interesa iz stava 1. ovog člana, o tome obaveštava direktora Društva i neposredno nadređenog angažovanom licu i predlaže mere za otklanjanje sukoba interesa.

Član 6.

Obaveza prijavljivanja postojanja sukoba interesa ili sumnje u postojanje sukoba interesa koji ima angažovano lice ili sa njim povezano lice postoji i za sva druga angažovana lica. Svako angažovano lice je u obavezi da prijavi postojanje sukoba interesa ili sumnju u postojanje sukoba interesa drugog angažovanog lica ili sa njim povezanog lica.

Prijava iz prethodnog stava ovog člana može biti podneta i anonimno.

Obaveza obaveštavanja Društva u postupku nabavke Član 7.

Ako privredni subjekat u kojem je angažovano lice ili povezano lice vlasnik/osnivač/zastupnik učestvuje u postupku nabavki ili drugom postupku čiji je ishod zaključivanje ugovora sa Društvom, odnosno licem povezanim sa Društvom, angažovano lice je obavezno da o tome obavesti Sektor Ljudskih resursa u roku od 2 dana od dana preduzimanja prve radnje u postupku, a obavezno pre zaključenja ugovora sa Društvom, odnosno licem povezanim sa Društvom.

The Company may require the engaged person to deliver the needed information in order to acquire information of conflict of interest from paragraph 1 herein.

If the Human Resources Department determines the existence of conflict of interest from article 1 of this article, it shall notify the director of the Company and line manager of the engaged person and purpose the measures for resolving conflict of interest.

Article 6

The obligation of reporting the conflict of interest or doubt in existence of conflict of interest of engaged person or its related person exists for all other engaged persons as well. Every engaged person has the duty to report existence of conflict of interest or doubt in existence of conflict of interest of other engaged person or its related person.

The application from previous paragraph may be filed anonymously.

Duty of Notification the Company in Procurement Process Article 7

If the entity, in which the engaged person or related person is shareholder/owner/representative, participates in procurement or other process which results in concluding the agreement with the Company, i.e. persons related to the Company, the engaged person has a duty to notify the Human Resources Department within 2 days as of the performance of the first action in the process, and mandatory before the conclusion of the agreement with the Company, i.e. person related to the Company.

Nedozvoljeni uticaj na angažovano lice

Član 8.

Angažovano lice je dužno da o nedozvoljenom uticaju kome je izložen u obavljanju radnog angažovanja, odmah obavesti Sektor Ljudskih resursa.

Sektor Ljudskih resursa obaveštava nadležni organ Društva o navodima angažovanog lica iz stava 1. ovog člana, radi pokretanja postupka za utvrđivanje povrede radne obaveze ili nepoštovanja radne discipline, prekršajnog i krivičnog postupka, u skladu sa primenljivim propisima.

Inappropriate Influence on the Engaged Person Article 8

The engaged person undertakes to notify immediately Human Resources Department, on the inappropriate influence to which it is exposed in work engagement.

The Human Resources Department shall notify the relevant body of the Company on the allegations of the engaged person from paragraph 1 of this article for the purpose of initiating the process for determining violations of work obligations or disrespect of work discipline, misdemeanor or criminal process, in line with the applicable rules.

Pokloni Član 9.

Poklon je novac, stvar, pravo i usluga izvršena bez odgovarajuće naknade i svaka druga korist koja je data angažovanom licu ili povezanom licu u vezi sa vršenjem radnog angažovanja, koji je moguće finansijski vrednovati. Obuhvata, ali se ne ograničava na gotovinu, gotovinski ekvivalent (kao što su poklon kartice ili vaučeri), hartije od vrednosti, udele, akcije ili druge oblike vlasništva u privrednim subjektima, gostoprimstvo, obroke, imovinu, usluge ili robu, ulaznice, bonove za kupovinu, provod, putne povlastice, korišćenje nekretnina, besplatne avionske karte (ili karte za drugo transportno sredstvo) ili smeštaj, posebne usluge ili povlastice (kao što su mogućnosti obrazovanja i zapošljavanja za prijatelje i rođake), donacije za dobrotvorne organizacije, popuste, besplatne lične usluge, finansijske ili imovinske kredite,

Gifts Article 9

The gift is money, item, right or service without adequate compensation and any other benefit which is provided to the engaged person or related person with regard to work engagements, with the financial value. This includes, without limitations cash, cash equivalent (gift cards or vouchers), securities, stocks, shares or other types of ownerships in legal entities, hospitality, meals, property, services or goods, tickets, shopping vouchers, entertainment, travel privileges, use of real estate, free airplane tickets (of for other transportation mean) or accommodation, special services or privileges (such as possibility for education and employment for friends or relatives), charity donations, discounts, free personal services, financial or property loans, securing the loans or mortgages or promise of future

obezbeđivanje kredita ili hipoteka ili obećanje budućeg zaposlenja.

Poklonom i prigodnim poklonom u smislu ovog Pravilnika ne smatraju se poklon kartice, vaučeri ili popusti za kupovinu ukoliko se isti odnose na benefite koje poslovni partneri Društva dodeljuju svim zaposlenima Društva za kupovinu proizvoda ili usluga istog poslovnog partnera, pri čemu je direktor Društva dužan da Sektoru Ljudskih resursa dostavi obaveštenje o ovakvom davanju poslovnog partnera, sa podacima koje shodno članu 14. stav 3. ovog Pravilnika mora sadržati obaveštenje o primljenom poklonu.

Kancelarijski materijal i drugi reklamni materijal (sveske, rokovnici, poster, kalendari, hemijske olovke i sl.) ne predstavljaju poklone po ovom Pravilniku.

Angažovano lice ne sme da primi poklon u vezi s radnim angažovanjem, izuzev prigodnog poklona, ali ni tada ako je u novcu i hartijama od vrednosti.

Član 10.

Angažovano lice je dužno da primljeni prigodni poklon preda Sektoru Ljudskih resursa, izuzev ako vrednost poklona ne prelazi 10.000,00 dinara.

Angažovano lice ne sme da zadrži prigodni poklon čija vrednost prelazi 10.000,00 dinara, odnosno prigodne poklone primljene u toku kalendarske godine čija ukupna vrednost prelazi iznos od 30.000,00 dinara.

Prigodni pokloni iz stava 1. i stava 2. ovog člana postaju svojina Društva.

employment.

The gift and appropriate gift in the sense of this Rulebook does not include gift cards, vouchers and shopping discounts if the latter relate to the benefit which the business partners of the Company give to all employees of the Company for purchase of the products or services of the same business partner, whereas the director of the Company undertakes to deliver the notification on such gift to the Human Resources Department with the data per article 14 paragraph 3 of this Rulebook which need to be within the notification on the accepted gift.

Office material and other advertising material (notebooks, diaries, posters, calendars, pens etc.) do not represent gifts under this Rulebook.

The engaged persons may not receive gift related to its work engagement, except appropriate gift, and not even such if in money or securities.

Article 10

The engaged person undertakes to handover the appropriate gift to the Human Resources Department except if the value of the gift does not exceed 10,000.00 RSD.

The engaged person may not maintain the appropriate gift with the value above 10,000.00 RSD, or appropriate gifts received during calendar year which total value exceeds 30,000.00 RSD.

The appropriate gifts from paragraph 1 and 2 of this article shall become the property

of the Company.

Član 11.

U prigodne poklone bez obzira na njihovu vrednost ne računaju se pokloni:

- čije bi uručivanje, odnosno prijem predstavljalo krivično delo,
- čije je uručenje ili prijem zabranjeno propisima,
- ako su uručeni u obliku novca, hartija od vrednosti.

Pokloni iz prethodnog stava ne mogu postati vlasništvo angažovanog lica, ni svojina Društva i potrebno ih je odbiti ili vratiti poklonodavcu.

Zabrana i ograničenja iz ovog člana odnose se i na slučajeve kada se poklon u vezi sa obavljanjem radnog angažovanja angažovanog lica uručuje povezanim licima.

Article 11

The appropriate gifts, regardless of their value does not include gifts:

- which offer, or receipt would represent criminal offence,
- which offer, or receipt would be prohibited per law,
- if given in money or securities.

The gifts from the previous paragraph may not become the property of the engaged person, nor of the Company, and must be rejected and returned to the giver.

Prohibitions and limitations from this article include cases when the gifts in relation to the work engagements of the engaged persons is given to the related person.

Utvrđivanje vrednosti poklona Član 12.

Vrednost poklona je tržišna cena poklona, na dan kada je poklon ponuđen, odnosno primljen.

Tržišna cena poklona je prosečna cena tog proizvoda ili usluge na lokalnom tržištu, odnosno prosečna cena proizvoda ili usluge slične vrste i vrednosti u slobodnoj prodaji na tržištu.

U slučaju potrebe Društvo utvrđuje vrednost poklona.

Determination of the Value of the Gifts Article 12

The value of the gift is its market value on the day the gift has been offered, i.e. received.

The market value of the gift is average price of such item or service on the local market, i.e. average price of the item or service of similar type and value in the free sale on the market.

If needed, the Company determines the value of the gift.

Odbijanje prijema poklona Član 13.

Angažovano lice kom je ponuđen poklon koji ne sme da primi, dužan je da ponudu odbije i da saopšti poklonodavcu da poklon, ako ga primi, postaje svojina Društva.

Angažovano lice je dužno da u najkraćem roku ne dužem od 2 (dva) radna dana podnese pisani izveštaj o slučaju iz stava 1. ovog člana Sektoru Ljudskih resursa.

Obaveza obaveštavanja i vođenje evidencije o poklonu Član 14.

Angažovano lice je dužno da o svakom poklonu u vezi sa radnim angažovanjem obavesti Sektor Ljudskih resursa.

Angažovano lice koji primi poklon treba odmah da ispuni obaveštenje o primljenom poklonu i da ga preda Sektoru Ljudskih resursa.

U obaveštenje angažovano lice treba da upiše sledeće podatke: svoje lično ime/poslovno ime i funkciju koju vrši, ime i prezime poklonodavca, odnosno ime i sedište pravnog lica ili organa, ukoliko je poklon dat u ime pravnog lica ili organa, datum prijema poklona, podatak da li se radi o prigodnom poklonu čiji prijem se prijavljuje shodno odredbama ovog Pravilnika, povod za uručenje poklona, opis poklona, vrednost poklona, podatak na koji je način određena vrednost poklona, podatak da li je poklon postao vlasništvo angažovanog lica ili svojina Društva, datum ispunjavanja obaveštenja i potpis angažovanog lica.

Ako poklon primi povezano lice, angažovano lice je dužno da popunjeno obaveštenje

Rejection of the Receipt of the Gift Article 13

The engaged person to whom the disallowed gift has been offered must reject the offer and inform to the giver that the gift shall become the property of the Company if received.

The engaged person undertakers to file a written report on the event from article 1 herein to the Human Resources Department in shortest period of time, not later than within 2 (two) work days.

Duty of Notification and Registering the Gifts Article 14

The engaged person must inform the Human Resources Department on every gift related to the work engagement.

The engaged person which receives the gift must immediately fill in the notification on received gift and to deliver it to the Human Resources Department.

The engaged person must record in the notification the following data: its name/business name and function, name, surname of the giver, i.e. name and address of the business entity or body if giver is the legal entity, the date of receipt of the gift, information whether it is an appropriate gift which needs to be reported per this Rulebook, reason for giving, description of the gift, its value, information on the manner of determination of the value of the gift, information whether the gift has become the property of the engaged person or the Company, date of the notification and signature.

If the gift is received by the related person, the engaged person must submit the

dostavi Sektoru Ljudskih resursa.

O predaji obaveštenja o primljenom poklonu angažovanom licu se na njegov zahtev izdaje pismena potvrda.

Sektor Ljudskih resursa je dužan da zbirku obaveštenja čuva i vodi evidenciju o primljenim poklonima.

Sektor Ljudskih resursa u popunjeno obaveštenje unosi redni broj i ulaže ga u evidenciju o primljenim poklonima koju vodi.

Evidencija poklona Član 15.

Evidencija poklona predstavlja jedinstvenu listu primljenih poklona, sačinjenu na osnovu podnetih obaveštenja o primljenim poklonima angažovanih lica, označenu rednim brojem, prema hronološkom redosledu primanja.

Evidencija sadrži: naziv Društva, ime i prezime/poslovno ime angažovanog lica, funkciju koju vrši, ime, prezime poklonodavca, odnosno ime i sedište pravnog lica ili organa, ukoliko je poklon dat u ime pravnog lica ili organa, datum prijema poklona, podatak da li se radi o prigodnom poklonu čiji prijem se prijavljuje shodno odredbama ovog Pravilnika, opis poklona, vrednost poklona ili podatak da je procena u toku, podatak da li je poklon postao vlasništvo angažovanog lica ili Društva, mesto i datum popunjavanja evidencije, i potpis odgovornog lica za vođenje evidencije.

Evidencija poklona vodi se za vremenski period kalendarske godine.

Zabrana prijema poklona za povezano lice

notification to the Human Resources Department.

The engaged person shall on its request receive the written confirmation on the receipt of the notification.

The Human Resources Department undertakes to keep the record on the received notifications and gifts.

The Human Resources Department shall insert the registry number on the notification and file it within the registry of received gifts.

Gifts Registry Article 15

The gifts registry is a list of received gifts, made on the basis of received notifications of engaged persons, marked with numbers chronologically by receipt.

The registry contains: the name of the Company, name and surname/business name of the engaged persons and its title, name/business name of the giver, date of receipt of the gift, information whether it is an appropriate gift which needs to be reported per this Rulebook, description of the gift, its value or information that its evaluation is in process, information whether the gift has become the property of the engaged person or the Company, place and date of the registry and signature of the person in charge for the registry.

The gift registry is made for each calendar year.

Prohibition of Receipt for the Related Person

Član 16.

Povezano lice ne može da primi poklon u vezi sa radnim angažovanjem angažovanog lica s kojim je povezano.

Angažovano lice neće biti odgovorno za kršenje odredbi ovog Pravilnika koje se odnose na zabranu prijema poklona ukoliko dokaže da nije moglo da utiče na ponašanje povezanog lica ako je ono poklon primilo, odnosno ako dokaže da poklon nije bio u vezi sa vršenjem njegovog radnog angažovanja.

Na poklon iz stava 1. ovog člana primenjuju se odredbe članova 9, 10 i 11. ovog Pravilnika.

Zabrana mita Član 17.

Svakom angažovanom licu zabranjeno je davanje ili ponuda (ili uplitanje u radnje koje izgledaju kao davanje ili ponuda) mita.

Svakom angažovanom licu zabranjeno je da:

- ovlasti treću stranu da daje ili nudi mito ili olakšavajuća plaćanja u ime Društva ili društva povezanog sa Društvom,
- angažuje usluge trećeg lica da daje ili nudi mito u ime Društva ili društva povezanog sa Društvom,
- angažuje usluge trećeg lica u okolnostima u kojima aktivnosti trećeg lica mogu da dovedu do datog ili ponudnog mita,
- daje sredstva trećoj strani u svrhe plaćanja ili nadoknade plaćanja treće

Article 16

The related person may not receive the gift in relation to the work engagement of the engaged person with whom it is related.

The engaged person shall not be responsible for the violation of the provisions of this Rulebook related to the prohibition of receipt of gifts if proven that it could not influence the conduct of the related person who received the gift, i.e. if it proves that the gift is not in relation to its work engagement.

Articles 9,10 and 11 of the Rulebook shall apply on the gifts from paragraph 1 of this article.

Prohibition of Bribe Article 17

It is prohibited to every engaged person to give or offer (or engaging in activities which resemble giving or offering) the bribe.

It is prohibited to every engaged person to:

- authorize third party to give or offer the bribe or mitigating payments in the name of the Company or company related to it,
- engage the services of third person to offer or give the bribe in the name of the Company or companies related to it,
- engage the services of third person in circumstances in which the activities of third person may result in giving or offering of bribe,
- provide means to the third party for the purpose of payment or

strane za mito.

remuneration of third party for the
bribe.

Član 18.

Article 18

Svaki zahtev za mitom i svaku sumnju u vezi sa time da li je mito zatraženo ili plaćeno, angažovano lice je dužno da prijavi Sektoru Ljudskih resursa.

Every request for bribe and every doubt related to whether the bribe has been asked or paid, the engaged person must report the Human Resources Department.

U slučaju da angažovano lice primi zahtev od državnog službenika za mitom potrebno je da odbije davanje osim ako razumno smatra da će odbijanje davanja mita dovesti do ugrožavanja zdravlja i bezbednost angažovanog lica ili drugog lica. Ako je angažovano lice prisiljeno da da mito da bi izbeglo izlaganje sebe ili drugih takvim posledicama, potrebno je da svom neposredno nadređenom i Sektoru Ljudskih resursa prijavi davanje i s tim u vezi sve okolnosti odmah, a najkasnije u roku od 2 (dva) radna dana.

In case the engaged person receives the request for bribe from the public official, it must deny its giving, unless it reasonably believes that rejection shall result in endangerment of the health and safety of the engaged person or other person. If the engaged person is forced to give the bribe to prevent such consequences, it must report such giving and all circumstances to its line manager the Human Resources Department immediately, and within 2 (two) work days at latest.

Član 19.

Article 19

Bilo kakvi pokloni od strane angažovanog lica moraju imati legitimnu poslovnu svrhu, moraju biti razumni, umereni i namenjeni stvaranju dobrih poslovnih odnosa.

Any gifts of the engaged person must have the legitimate business purpose, reasonable, moderate and intended for good business relations.

Član 20.

Article 20

Svako angažovano lice je u obavezi da prijavi kršenje odredbe člana 17. ovog Pravilnika od strane drugog angažovanog lica.

Every engaged person undertakes to report violation of article 17 of this Rulebook by other engaged persons.

Prijava iz prethodnog stava ovog člana može biti podneta i anonimno.

The report from previous paragraph may be submitted anonymously.

Pokretanje i sprovođenje postupaka

Initiating and Conducting the Process

Član 21.

Article 21

Pokretanje i sprovođenje postupka

The initiation and conduct of the process of

utvrđivanja odgovornosti angažovanih lica za povredu odredaba ovog Pravilnika vrši se u skladu sa odredbama Zakona o radu, Pravilnika o radu i drugih primenjivih akata Društva, ugovora o radu sa angažovanim licem ili drugog ugovora na osnovu kog je angažovano lice u odnosu sa Društvom.

Član 22.

Kršenje odredaba ovog Pravilnika od strane angažovanog lica predstavlja povredu radne obaveze od strane angažovanog lica koje je u radnom odnosu u Društvu, odnosno povredu drugog ugovora na osnovu kog je angažovano lice u odnosu sa Društvom, što predstavlja osnov za otkaz ugovora o radu od strane Društva, odnosno otkaz od strane Društva drugog ugovora na osnovu kog je angažovano lice u odnosu sa Društvom.

Osim otkaza ugovora od strane Društva, Društvo zbog kršenja odredaba ovog Pravilnika od strane angažovanog lica može zahtevati naknadu štete proistekle po Društvo zbog kršenja odredaba Pravilnika, i ostvarivati druga prava koja su predviđena odredbama propisima koji regulišu oblast koja je predmet ovog Pravilnika, kao i odredbama ugovora između Društva i angažovanog lica.

Pored navedenog u stavu 1. i stavu 2. ovog člana, nepoštovanje relevantnih odredaba ovog Pravilnika predstavlja i krivično delo koje je kao takvo predviđeno Krivičnim zakonikom Republike Srbije.

Završne odredbe

Član 23.

Za slučajeve utvrđenih povreda odredbi ovog Pravilnika, koje predstavljaju povredu radnih obaveza angažovanih lica koja su u radnom odnosu u Društvu, ovlašćena lica Društva izriču mere shodno odredbama Zakona o

determination of the responsibility of the engaged persons for the violation of this Rulebook is made in line with the provisions of the Labor Law, Employment Rulebook and other applicable acts of the Company, employment contracts or other agreement with the engaged person.

Article 22

The violation of the provisions of this Rulebook by the engaged person represent the violation of the work duties by the engaged person in employment relationship, i.e. violation of other agreement on the basis of which the person is engaged in the Company, which represents the ground for termination of the employment or other agreement by the Company.

Apart from the termination, the Company may request compensation of damages the Company has suffered due to the violation of the provisions of this Rulebook by the engaged person and claim other rights regulated in other legal provisions with the subject as in this Rulebook, as well as in agreement concluded with the engaged person.

Apart from the latter from paragraph 1 and 2, breach of the relevant provisions of this Rulebook represent criminal offence as set in the Criminal Code of the Republic of Serbia.

Concluding Remarks

Article 23

The authorized persons in the Companies shall impose measure set in the Labor Law in cases of determined violations of work duties of engaged persons in employment relationship in the Company.

radu.

Član 24.

Ovaj Pravilnik objaviti na oglasnoj tabli Društva danom donošenja.

Pravilnik stupa na snagu osmog dana od njegovog donošenja. Ovim Pravilnikom se zamenjuje i stavlja van snage Pravilnik od 17. aprila 2018. godine.

Za Balkans Real Estate d.o.o. Beograd

Pinar Yalcinkaya, direktor

Article 24

This Rulebook shall be published on the bulletin board of the Company on the day of its adoption.

The Rulebook enters into effect on the eighth day following the day of its adoption. By way of this Rulebook the Rulebook dated 17 April 2018 have been fully replaced and put out of force.

For Balkans Real Estate Ltd Belgrade

Pinar Yalcinkaya, Director

Obrazac prijave mogućeg sukoba interesa

Koristeći niz politika i promovišući njihovu implementaciju od strane svih zaposlenih, naša kompanija obezbeđuje da svaka procedura, donošenje odluka ili izvršavanje obaveza uvek budu urađeni na pravi način i zasnovani na vrednostima naše kompanije.

Svi znamo za Pravilnik o antikorupcijskom ponašanju (dalje: **Pravilnik**) koji reguliše sukob interesa, neophodno je da budemo oprezni prema svemu što može i nenamerno izgledati kao da nije u skladu sa interesima kompanije. Sukob interesa, čak i privid sukoba između ličnog i interesa kompanije treba da bude izbegnut.

Prema tome, sukob interesa može nastati kada Vi, član porodice, prijatelj ili drugo povezano lice u smislu Pravilnika:

- Učestvujete u aktivnostima koje konkurišu ili mogu da konkurišu interesima Društva;
- Dopuštate da vaše poslovne odluke budu pod uticajem uticajem ličnih, porodičnih ili prijateljskih interesa;
- Koristite imovinu kompanije, informacije ili resurse za ličnu korist ili korist drugih;
- Zapošljavate, na drugi način ugovorno angažujete, nadzirete ili imate direktan ili indirektan način odgovaranja ili nadređenosti nad članom porodice ili nekome sa kim ste u intimnoj vezi;
- Imate posao izvan kompanije koji negativno utiče na vaš rad ili dovodi do sukoba sa vašim odgovornostima u kompaniji u kojoj ste u radnom odnosu;

Form of possible conflict of interest report

Using numerous policies and promoting their implementation by all employees, our Company ensures that every procedure, decision making, and performance of duties is always regulated in appropriate manner and based on the value of our company.

We are all familiar with Anticorruption Rulebook (hereinafter: **Rulebook**) which regulates conflict of interest, thus it is necessary to be careful in all that may accidentally appear as not in line with Company's interest. The conflict of interest, even oversight of conflict between personal and Company's interest should be avoided.

Accordingly, the conflict of interest may occur when you, your family member, friend or other related person in the sense of the Rulebook:

- participates in activities which compete or may compete interest of Company;
- allow your business decision to be under influence by personal, family or friendship interests;
- use property of the Company, information or resources for personal benefit or benefit of others;
- hire or in other manner contractually engage, supervise or have direct or indirect manner of reporting or superiority over family member or your intimate partner;
- have business outside the Company which negatively influence your work or results in conflict with your responsibilities in the Company

- Imate lični odnos, finansijski interes, pružate usluge ili radite za dobavljača, kupca ili konkurenta ili kompaniju koja želi da posluje sa nama.

Ko se smatra "članom porodice" u Pravilniku?

Član porodice može biti bilo ko od navedenih: bračni drug, partner, roditelj, brat i sestra, dete, deda i baba, unuci, usvojitelj ili usvojenik. Takođe to može biti bilo ko živi u Vašem domaćinstvu ili bilo ko od koga ste zavisni ili neko ko zavisi od Vas ili neko od Vaših članova porodice. Zapamtite, potencijalni konflikti nisu ograničeni samo na odnose sa rodbinom ili članovima porodice. Sukob interesa može nastati s bilo kim ko Vam je prijatelj, kum i sl. ili lice s kim imate lične odnose.

Molimo vas da prijavite bilo koji potencijalni sukob interesa popunjavanjem ovog formulara i dostavljanjem istog Sektoru Ljudskih resursa u roku od 7 dana.

U slučaju da se tokom trajanja mog angažovanja u kompaniji pojavi slučaj koji se smatra ili se može smatrati sukobom interesa, prihvatam da isti prijavim popunjavanjem ovog formulara (koji se može pronaći na Fileshare-u Vaše kompanije) i dostavljanjem istog Sektoru Ljudskih resursa.

Ime i prezime angažovanog lica:

.....

.

Društvo:

.....

Sektor; Lokacija:

where you are employed:

- have personal, financial relationship, provide services or work for the suppliers, buyer or competitor or company which desires to work with us.

Who is regarded as "family member" in the Rulebook?

The family member may be any of the following: spouse, partner, parent, brother and sister, grandparents, grandchildren, adoptive parent, adoptive child. It may also be anyone who lives in your household or someone you are dependent or who depends on you or your family member. Remember, potential conflict are not limited only to relatives or family members relations. The conflict of interest may occur with anyone who is your friend, godfather/godmother etc. or person you are in personal relations.

Please report any potential conflict of interest by signing this form and delivering to the Human Resources Department within 7 days.

In case that a case occurs during my engagement in the company which is regarded or may be regarded as conflict of interest, I accept to report it by filling this form (stored on the file share of the Company) and to deliver it to the Human Resources Department.

Name and surname of the engaged person:

.....

Company:

.....

Department, Location:



.....

Title-jobs:

.....

Report:

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Nothing to report:

Remember! The existence of potential conflict of interest is not necessarily violation of this Rulebook, but the failure to report it, is.

Thank you on your trust and openness.

Human Resources Department
Signature of the engaged person:

Date _____