

The background features two thin, teal-colored curved lines. One line starts near the top right corner and curves downwards and to the left. The other line starts near the bottom left corner and curves upwards and to the right. They meet towards the center of the page.

abkons
LOCAL Knowledge, GLOBAL Standarts

CODE OF CONDUCT

LIVING BY OUR VALUES

The way how we achieve results is equally important to the results

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A photograph of four business professionals (three women and one man) in an outdoor setting, possibly a garden or courtyard, looking at a document held by the man. The image is overlaid with a large white circle and a smaller white circle. The text "OUR VALUES" is written in a bold, teal, sans-serif font across the center of the image.

OUR VALUES

**Abkons
values are at the
core of this Code
of Conduct**

Excellence

Working together to boost performance

Display commitment, passion and motivation.

Overcome challenges by working together to find the best quality solutions.

Always strive to improve and develop personal skills.

People

Respected and open minded

Treat every person with respect and kindness.

Value cultural, gender, age and individual diversity.

Build long-term trustworthy relations with key stakeholders.

Achieve maximal results by working together.

Integrity

Do what you say and say what you do

Act in compliance with company's instructions.
Code of Conduct, and values.
Be honest and true to yourself.
Be proud of the company and your role in it.
Articulate your ideas and stand by your decisions.

Responsibility

Act in a safe manner and think about your future actions

Act with responsibility towards colleagues, society,
nature and resources.
Fully commit to the achievement of standards and
safety measures.
Care for each other and show zero tolerance
against any form of damage.
Be responsible towards the company and act with
caution.

CONDUCTING BUSINESS ACCORDING TO ABKONS

2.1 Our Commitment

We conduct business according to Abkons' way every day. We are proud of our achievements and the way how results are achieved. We act in compliance with our Code of Conduct and our goal is to be one of the best companies committed to acting with integrity towards all of our partners.

Integrity towards each other: we support a diverse working group and promote a working environment based on respect and good will.

Integrity towards the community and the environment: We invest in developing the community. The activity of our company is compliant with all applicable laws and regulations. We use resources with responsibility and strive to minimize negative impacts of our projects on the environment.

Integrity towards our partners: We work hard to build a company in compliance with the highest ethical standards which embody the values of our shareholders/partners that the trust investors place on us.

Integrity towards the market: we are proud of conducting our business activity with integrity and by respecting fair competition principles. Unfair practices are not part of the business activity of our company.

2.2 Who Shall the Code Apply To

This Code of Conduct applies to Abkons Company, its employees, third parties and other parties acting on behalf of Abkons.

In this Code of Conduct, Abkons means: "A consulting company registered under the name Abkons sh.p.k".

"Employees" means:

Persons employed directly by Abkons. Persons subcontracted by Abkons.

Abkons relies on the expertise of its employees and third parties in conducting its business activity. Third parties are expected to comply with the principles stipulated by the Abkons' Code of Conduct and any other contractual provision when they act on behalf of Abkons.

Third parties include: contractors, suppliers, agents, mediators, lobby groups, consultants and advisers.

Abkons will apply sanctions against employees, third parties and those who act on behalf of Abkons that fail to adhere to Abkons' principles.

Throughout this Code of Conduct, the term "We" refers to all individual employees, company partners, third parties and to all those acting on behalf of Abkons.

2.3 How To Use the Code

Understanding of the Code of Conduct by all employees will assist in conducting business according to Abkons' way. This Code of Conduct does not provide answers to all challenges and issues that could be faced in the future, but it is an important tool in assisting employees undertake sound and ethical decisions. This Code of Conduct serves as a manual that refers to Abkons' policies, laws and applicable regulations that should be recognized by all employees in order to conduct the activity in line with the expectations of Abkons. Abkons relies on sound judgment and decisions of its employees and their need to ask for instructions from the company. Abkons adheres to the legal norms of the Republic of Albania. This Code of Conduct has received the approval of all Abkons' partners. Prior approval by Abkons' partners is needed for any change to the Code of Conduct in the future. All employees are expected to recognize and apply the principles of the Code of Conduct. All employees are expected to attend the necessary trainings and should be updated with the standards and expectations of the company. Abkons demands an annual attestation on the compliance of the Code of Conduct.

2.4 Expectations from Employees

From employees it is expected:

To always act with a high level of professionalism, honesty and ethics when working for Abkons;

To attend all necessary trainings and be updated with the standards and expectations of the company;

To report any kind of concern about possible breach of laws, regulations, or the Code of Conduct (Reports should be addressed to the supervisor of the group or to those specified in the Code);

To fully cooperate and always tell the truth prior to an investigation or auditing;

Employees must never erase or destroy data during investigations or prior to any possible investigation process.

2.5 Higher Expectations From Top Level Management

The Code of Conduct applies to all employees of Abkons; still, expectations are higher from the top level management of the company due to their leading roles. This implies that the top level management not only adhere to the application of the Code of Conduct, but they must also a) be proactive, discuss and address challenging issues

with the others in an ethical manner; b) enable an environment where employees feel comfortable asking questions and reporting potential breaches to the policies or to the Code of Conduct; c) they must not ask from anyone to do things that they themselves are not allowed to do.

If they manage third parties, they must ensure that the latter understand their ethical obligations and compliance with the Code of Conduct. Top level management must report all violations by third parties.

2.6 Compliance With The Laws and Regulations

All employees shall adhere to the legal norms and applicable regulations in the Republic of Albania. All employees have the duty to recognize laws and regulations related to the activity of Abkons.

The Principle of "acquaintance" of Law and equality towards it. No one is exempt from liability (civil, administrative, penal) with the argument of no acquaintance of the law.

Seeking instructions and reporting of integrity breach

3.1 Seeking Instructions

Employees may face situations in which they might not be sure of what to do. If employees have any inquiry about the Code of Conduct or any specific situation, they shall contact one of the following:

- Manager/Department Director (when one is a company employee);
- Contract Representative (in the case of third parties);
- Abkons compliance officer via phone or e-mail compliance@abkons.com;
- Compliance Department or Human Resources Department.

3.2 Reporting Breach of Integrity

If employees are aware of a certain situation regarding the breach of the Code of Conduct, law, or Abkons' policies, they are encouraged to report it by following the procedures specified below:

- Bring your concerns to your directors;
- Contact Abkons' compliance officer via phone or e-mail compliance@abkons.com;
- Depending on the nature and the issue, reporting could be also done at Integrity Line; phone number +355 (0) 69 70 34 779.

3.3 Integrity Line

The integrity line is operated 24/7 by a third independent party. Phone calls are not recorded and not traced. Any information will be treated in full confidentiality.

Disclosing your identity, you will help Abkons during the investigation of the case. If you are not comfortable disclosing your identity you may still report as anonymous. Regardless of the way you choose to report breaches or suspected situations, all cases will be treated with the required attention. The appointed members of the personnel will carefully examine all reports and cases and Abkons will undertake the appropriate measures.

3.4 Say No to Workplace Revenge

Abkons promotes the culture of integrity and protects employees when they report an inappropriate behavior. Abkons prohibits acts of revenge at workplace when one of employees reports an inappropriate behavior. Reporting inappropriate behaviors in an atmosphere of trust, means to provide the entire information which one believes to be true. Employees trying to take revenge against a colleague who reported them would be subject to disciplinary measures and even termination of the contract. If an employee believes that he/she is subject to revenge acts by another colleague, he/she must take the matter to one of the parties listed at point 3.1, that they consider will treat their concern with a high level of seriousness.

3.5 Obligation to Cooperate

Abkons investigates all reports of inappropriate behavior in line with the requirements of company regulations, instructions, Code of Conduct, values and policies. To assist the company in this process, employees must fully cooperate in a fair way by contributing to a full and unbiased investigation to identify and prevent any potential illegal or unethical activity. The investigation will be conducted in confidentiality and by making sure that there will be no revenge taken against anyone working for the company.

Every employee of ABKONS when ascertaining the elements of a criminal offense must inform the entities listed in point 3.1 of this Code, these shall report to their managers and when there are legal conditions, the case is reported to the competent authorities.



A photograph of a man with grey hair, wearing a yellow polo shirt, looking off to the side. The image is partially obscured by a large teal circle that contains white text. The background shows some green foliage.

**Integrity
towards
each
other**

Success at Abkons depends on respecting the rights of all employees and encouraging an open communication culture. We strive to take into consideration information from our collaborators and we welcome their opinions. We all reserve the right to have our opinions but we are also expected to respect the opinions of the others.

4.1 Respecting Human Rights

Abkons adheres to the legislation of Republic of Albania, the international conventions on labor and is committed to apply the principles stipulated by the Universal Declaration of Human Rights and the European Convention on Human Rights. In line with this commitment, Abkons while respecting fundamental human rights and freedoms treats all employees fairly, with respect and dignity.

4.2 Promotion of Equal Opportunities and Diversity

We take decisions that promote equal opportunities and diversity regardless of gender, religious beliefs, ethnicity, physical disabilities, sexual orientation, family status, political beliefs, or other characteristics protected by law.

4.3 Creating a Discrimination and Harassment Free Workplace

Abkons is committed to create a working environment free of any form of discrimination and harassment. We will not tolerate any form of discrimination or harassment because of gender, religious beliefs, ethnicity, physical disabilities, sexual orientation, family status, political beliefs or other characteristics protected by law.

4.4 Ensuring Health and Safety in the Workplace

4.4.1 Health and Safety at Work

Abkons' success depends on creating a safe and healthy working environment for all employees and those affected by our activity. People are the company's most important resource therefore their safety is our top priority in all the levels of the company. Our expectation is that no one suffers an injury or accident and we are striving to have a zero level of injuries or accidents at work and professional diseases. In order to prevent all diseases related to profession, employees must:

Develop a culture that promotes a responsible approach to health and safety;

Ensure that health and safety aspects are fully integrated in the company activities and employees have received the appropriate trainings;

Recognize Abkons procedures on health and safety at work; Abkons has the obligation to instruct employees and third parties regarding health & safety standards and measures. The instruction is materialized by signing the relevant documents.

Act in a responsible way and not place at risk the safety of others;

Undertake all preventive measures when using equipment or heavy load machineries;

Report accidents;

Bring into attention of company directors potential risks due to failure of respecting rules and standards.

4.4.2 A Working Environment Without Illegal Substances and Alcoholic Beverages

When conducting business on behalf of Abkons, employees must not be under the influence of drugs, alcoholic beverages and other substances which present a threat to a safe, quality and efficient work. This rule does not fully apply to a special events organized by Abkons where moderate consumption of alcoholic beverages is permitted.

4.5 Respecting Privacy

Abkons is committed to respect the privacy of personal data.

- We will only collect, record and process personal data that are necessary for Abkons to conduct its business. All personal data will be treated in compliance with the law;
- We will only process data in compliance with the applicable law and data protection policies of Abkons;
- We are aware, open and transparent on the kind of personal data we collect and the purpose of its use;
- We don't disclose personal data to third parties with exception of cases when the procedures are compliant to the applicable law and Abkons' policies.

INTEGRITY TOWARDS COMMUNITY AND ENVIRONMENT

We, at Abkons, aim to have a positive impact on the community in the area where we conduct our activity. We aim to avoid negative impacts on the environment. We, at Abkons, apply the highest legal standards and the best practices.

5.1 Development of Communities Impacted by Abkons Activity

Abkons strives to be a responsible company with a focus on the society. Abkons seeks to promote economic and cultural development of the community where it conducts its activity. The company aims to achieve this goal by implementing a social investment plan. In this framework, Abkons makes efforts to avoid, minimize, cushion and/or compensate all undesirable effects and consequences from its business. In order to materialize that aim, Abkons has always been committed, together with its stakeholders and partners, based on the best international practices.

5.2 Environment Protection

Protection of the environment is one of the key priorities of Abkons. We are aware of the obligation to contribute to sustainable development. The protection of the environment must be an integral part and embedded in the company processes of business planning, designing and development. Abkons will achieve this through commitment, inclusion and training of its employees and through open communication with its partners. We put forward maximum efforts to minimize negative effects on environment. We will try to use natural resources with efficacy and in a responsible way. We will monitor the environmental impact of our activities in the areas where we work.

5.3 Measures Against Bribes and Corruption

Corruption hampers economic development of the countries and destroys free competition in business. Corruption also damages the reputation and exposes individuals and companies to risks.

Abkons is against any form of indirect or direct corruption through third parties. Abkons will undertake active measures to ensure that no corruption practices will take place in any of its business activities.
Abkons condemns all forms of bribes and corruption.

Corruption is defined as abuse of power for personal benefits.

Bribes are defined as giving (active corruption) or receiving (passive corruption) something of value from someone in return of an action or refusal to act. Examples of bribing could be the following:

- Awarding a contract to a company that has connections with a public official without any proper tendering procedure
The public official provides political support in return of the bribe;
- Giving a gift to a public official to receive a facilitative treatment in relation to the payment of taxes;
- Offering a job to a relative of a public official in order to receive a favor, a permit or an approval by that public official;
- Giving favours to tender officials for granting the tender to a certain company.

5.3.1 “Facilitating Payments”

Measures to prohibit bribing include cases when small amounts of money are offered to low level public officials in order to fasten or accelerate routine actions for which we are legally responsible.

Such payments are also called “facilitating payments”. The pressure from the “time” factor cannot be considered as a justification for such payments.

There could be certain situations when such a payment can be asked when failure to make the payment would result into an immediate risk to the safety, health and physical wellbeing of the person. If a payment has been made under such circumstances, it must be immediately reported to the Compliance Office of Abkons.

5.3.2 Gifts, Entertainment, and Hospitality

Offering gifts and inviting business partners to special events could help in strengthening work relations. However, they must not be used for the purpose to receive a service in return as it might be considered as a form of bribery.

ABKONS allows “Symbolic gifts” which do not have the value of a product intended for the market but convey cultural, gratitude, spiritual values, etc.


5.3.3 Third Parties

Abkons can not be held responsible for the corruption practices of third parties working on behalf of Abkons. Before contracting third parties, managers must ensure that the reputation, capabilities and past experiences of third parties are appropriate and satisfactory.

Abkons insists that third parties act in compliance with its Code of Conduct and such prerequisite must be inserted in all the contracts that Abkons signs with third parties.

5.3.4 Donations and Sponsorships

Sponsorships are a crucial element of the public relations of Abkons and serve to bolster the reputation of the company. Sponsorships differ from donations as the former are intended for a specific purpose. Sponsorships may be misunderstood as they can be interpreted as a way to receive underserved advantages.



We will offer sponsorships only if the purpose for which they are intended do not lead to undeserved advantages.

Donations are part of the commitment of Abkons to the society and away to contribute the right causes.

They reflect the identity of the company with a high level of responsibility and a humanitarian element. Donations comprise all valuable contributions donated by Abkons to support charity causes.

No business profits or any other form of profit is allowed for Abkons when donating.

Still the company maintains a high level of caution as donations might be interpreted as a way to receive underserved advantages.

We will provide donations only if the purpose for which they are intended do not lead to undeserved advantages.

Donations and sponsorships are made with the prior approval of Abkons Managers.

5.4 Rejecting Money Laundering

Under no circumstances does Abkons accept, facilitate or support money laundering activities.

Money laundering is the process of creating the appearance that large amounts of money obtained from criminal activity originated from a legitimate source.

We should always adhere to the laws and the regulation on

- money laundering and report every single suspicious transaction;

We must avoid receiving payment or involvement in

- transactions or activities where funds might be originating from a criminal activity. This can be achieved by strictly implementing financial and procurement procedures of

We must undertake appropriate and reasonable measures to

- identify and value the integrity of third parties working with and for Abkons.

5.5 Lobbying and Political Activities

Employees are free to attend and contribute to a political process. However, they must ensure that their personal political beliefs and political activity do not represent Abkons in any way.

Furthermore, employees must never use Abkons' funds, assets and resources to support a political candidate or a political party.

- We will not be involved in a political activity;
- We will not provide any monetary or other form of contribution in any political context.

Abkons can be engaged in different ways, including lobbying too, in debates over policy-making on issues that Abkons maintains a legitimate interest for its employees and the community where it operates. Lobbying activities are regulated and conducted only by authorized persons by Abkons.

INTEGRITY TOWARDS PARTNERS

We will always maintain the highest ethical standards of honesty and integrity.
In this way, we have earned the trust of our partners.

6.1 Protection from Non Ethical Procurement

Abkons is important to the countries and the regions where it conducts its activity. There is a high interest by other companies and business operators to sign business contracts with Abkons. It is highly crucial that Abkons maintains a neutral position to external pressures. All goods and services are procured by the supplier that offers the best price, quality and the highest level of service.

Suppliers are selected through a transparent, non-discriminating and competitive tendering process for all goods and services. Tendering criteria are made available and public. Abkons conducts a verifying process for all suppliers that are involved in high risk activities to ensure that they incorporate solid ethical values.

- Abkons will not be engaged in contractual obligations beyond its authority;
- We will ensure that there will be a clear separation of duties in the tendering processes;
- We will sign written contracts with our business partners.
The written contract will detail the true relations of Abkons and its business partners;
- We will ensure that the compensation level justifies the provided services;
- We will cooperate only with those business partners that incorporate Abkons' requirements on integrity;
- Abkons requires that suppliers offer technical qualifications and ethical standards in the level of Abkons.

6.2 Avoiding Conflicts of Interest

"Conflict of interest" is the situation of conflict between the public duty and the private interests of an official, in which he has private interests, direct or indirect, that affect, may affect or appear to affect the unjust performance of his public duties and responsibilities. Conflict of interest can be: factual; visible; possible; case by case; constant.

All business transactions must be made by considering the best interest of Abkons. Still, such situations are not always visible and clear. However, employees must report them immediately to their director or the contractual representative so as Abkons may manage, monitor, assess and deal with every single case appropriately.

6.3 Business Information and Financial Data Accuracy

Financial data and business information are crucial to our success. Integrity and accuracy of such data are what is reported back to investors, creditors, state agencies and other business partners. Financial data and business information must be transparent, complete and compliant to applicable financial regulations and other laws in force.

- We will establish and maintain a sound and effective internal control system to assure Abkons' investors and partners that their money is used in the best way possible;
- We will ensure that all business transactions are fully and accurately recorded and clearly written in accounting registers of Abkons in line with the legislation in force and main standards of accounting;
- Storage of documentation must be done in line with company's instructions on safe keeping of documents. No document may be destroyed or shredded before an auditing or investigation process. Employees must contact the Department of Compliance if they have concerns about treatment of any specific data.

6.4 Maintenance of Abkons Assets

Abkons has placed trust in employees for using company assets and they are responsible for using them with caution and maintaining them. Abkons assets include: Abkons time, funds, IT equipment, materials, premises, information, documents, notes, copies and information of different kinds used by employees or related to employees and their tasks during the entire period of employment.

- Employees will ensure that Abkons assets will not be lost, damaged or misused out of any criteria;
- Employees will ensure that Abkons assets will not be used to support an outside business or an unauthorized activity;

- The use of Abkons assets for personal purposes is not encouraged, even though accepted at minimal level and without an impact on the performance and working environment;

- Do not share passwords with others and do not allow other persons, including friends and family members, to use Abkons resources and assets;

- If employees have suspicions or concerns about possible thefts or acts of deception, they must inform their director or the Department of Compliance immediately.

6.5 Avoiding Insider Trading

We will not trade the shares of our shareholders or of our business partners based on non-public “material” information about the company that was gained while working for Abkons. Disclosing confidential information is prohibited.

The information is considered as a “material” if a potential investor would deem as important the acquisition, sale, or keeping the shares. “Non-public” information implies information that is not yet disclosed to the public. This is the case when confidential information is disclosed to a person by providing him/her with “non-public” information—material. That person later trades information on our behalf.

6.6 Communication with Other Parties

Only Abkons’ authorized employees must disclose or provide information to interested parties. It is highly important that only authorized employees speak on behalf of Abkons.

- Communication with interested parties must be in line with the best international practices;
- We shall not make public declarations about business activity of Abkons unless authorized to do so;
- We shall ensure that documents will be reviewed and approved by Abkons' partners (directors) before being disclosed.

6.7 Social Media Appearance

We have to be cautious with our written communications that might be published online. If you attend an online forum such as blogs, chat rooms or news groups make sure that you do not leave the impression that you are talking on behalf of Abkons. Think twice and review your communication before posting it.

We shall not send an email or post confidential information or materials that can threaten the company's reputation and image.



INTEGRITY IN THE MARKET

Abkons is committed to acting with integrity and in a fair way while competing with other companies in the market. Actions and behavior that threaten fair competition are prohibited. Abkons will operate in the market by applying the highest ethical standards in competing with other companies within the legal space on competition and laws that also apply to Abkons.

7.1 Antitrust

Antitrust laws prohibit agreements or actions that destroy or discourage competition leading to the creation of monopolies, abuse with the dominant position in the market, stagnant prices, or illegally prevent, or create burdens for trade.

- We shall not make agreements for the division of markets, areas or consumers;
- We shall not make agreements not to compete;
- We shall not discuss processes regarding participation in tenders;
- We shall not exchange information about prices, market shares or other market conditions with competitors, clients or third parties in violation of the existing laws;
- We shall not assist rival companies so as they can coordinate their actions at the expense of competition laws.

7.2 Gathering Information on Competitors

All information about competitors shall be gathered in a public, ethical and legal manner.

PRACTICAL IMPLEMETATION

When you are unsure whether you are acting appropriately, ask yourself the following questions:

Is my behavior contributing towards maintaining the trust of the company?

Did I use the appropriate consultation?

Do my family members, friends and colleagues think that my behavior is ethical?

Am I thinking about the impact of my behavior on others?
Would I feel comfortable if someone behaved in the same way towards me?

Would I feel comfortable if a decision of mine was going to be published on a newspaper the next day?

Is my behavior in line with Abkons' policies?

abkons

LOCAL Knowledge, GLOBAL Standarts

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