



Pursuant to Article 39 of the Statute of ALICORN doo Podgorica, on the 15<sup>th</sup> October 2021, the Founders adopt the following:

**Rulebook**  
**on Prevention of Conflict of Interest**  
**ALICORN doo Podgorica**

**1. Purpose and scope**

The purpose of this Rulebook on Prevention of Conflict of Interest (hereinafter: the Rulebook) ALICORN doo Podgorica (hereinafter: the Company) is to help employees of the Company identify situations that represent a potential conflict of interest, to respond to them properly and in accordance with applicable laws and the requirements of the Company.

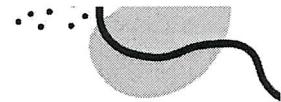
The application of this Rulebook should ensure respect for ethics, responsibility and transparency, as well as business in accordance with the principles of the Company.

The Rulebook prescribes the conditions for controlling the influence of "personal bias" on decision-making and ensures fair treatment of suppliers, users and employees of the Company and third parties.

The Rulebook applies to all employees of the Company, in all business activities and communication.

**2. Relation to other documents and norms**

- Ethical principles required by good business practice



- All other Company rulebooks, policies and guidelines

### 3. Definitions and abbreviations

**Conflict of interest** - a situation in which the interested person has a private interest that affects, may affect or appears to affect his actions in the decision-making process in the Company, in a way that endangers the interests of the Company;

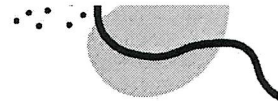
**Private interest** - any tangible or intangible benefit or convenience that may be obtained by an interested or related person;

**Interested person** - an employee of the Company who is in position of control or of significant influence of the business process in the Company, and whose private interest may lead to actions or decisions in a way that endanger the interests of the Company;

**Related person** - spouse or extramarital partner of the interested person, blood relative of the interested person in the direct line, i.e. in the collateral line, concluding with the second degree of kinship, guardian, adoptive parent or adoptee of the interested person, as well as any other legal or natural person and circumstances that may reasonably be considered to be of interest to the person concerned;

**Third party** - an external company or a natural person involved in business cooperation with the Company;

**Business process** - a set of interconnected activities carried out by employees of the Company in order to achieve a predefined business result for an external or internal user;

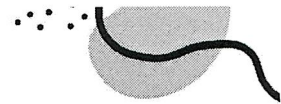


**Principles of the Company** - a set of rules and principles that regulate the way of work and business. It includes ethical principles, policies and regulations, company values, vision and mission.

#### **4. Situations in which conflicts of interest may arise**

4.1 Under the term “conflict of interest” can be considered all situations in which **the interested person can realize material and intangible benefits by influencing the assessment or decision-making in the Company**, or situations such as (but not limited to):

- Receiving material and intangible benefits from a third party that may affect the outcome of the decision-making on behalf of the Company, including the tender process and the award of the contract to a third party;
- When a related party works for a third party that participates in the tender process with the Company;
- Acceptance of seminars, trainings or trips financed by a third party;
- Managing the Company's finances in a way that provides for personal gain;
- Granting any tangible or intangible benefit to a third party that is in any form owned by a related party;
- Possession of shares and options or debts in a company that is in any form of third party ownership;
- Membership of management boards, participation in management boards, part-time employment or other engagement with a third party;
- An interested party in the name and on behalf of the Company concludes any contract in which the other contracting party is an interested person and/or a related party.



- Political engagement of employees, activities in political campaigns and participation in the work of political parties through public and visible engagement.

4.2 Under the term “conflict of interest” can be considered all situations in which **the interested person may be forced to make/change a decision contrary to the interests of the Company**, or in situations such as (but not limited to):

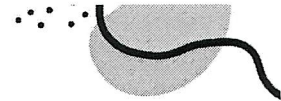
- Threat made by a third party,
- Other Company employees threats.

## **5. Report a conflict of interest**

All employees of the Company have the obligation to submit an application to the e-mail address: [sanja@alicorn.me](mailto:sanja@alicorn.me) or [milutin@alicorn.me](mailto:milutin@alicorn.me) within 3 (three) days from the day of learning about the existence of a possible conflict of interest, while the persons whose behind these email addresses have the obligation to forward the application immediately upon learning to the Commission.

The Commission consists of 3 (three) permanent members appointed by the Chief Executive Officer for a period of 1 (one) year. The Chief Executive Officer is the President of the Commission.

Any application relating to a possible conflict of interest will be considered by the Commission. After receiving the application under the urgent procedure, the Commission will examine the allegations from the submitted application and propose further action in accordance with its competencies. The Commission is obliged to propose further steps within 7 (seven) working days from the day of receipt of the application. In exceptional cases and for justified reasons, this deadline may be extended. The work of the Commission is managed by the Chief Executive Officer.



According to the conducted procedure, depending on the risk/damage assessment for the Company, the Commission will make a recommendation for further action:

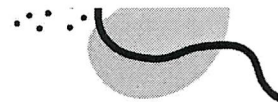
- a) No conflict of interest was observed - continue with the business process;
- b) Potential conflict of interest - continue with the business process with greater control by the Company;
- c) Presence of conflict of interest - exclude from the business process an interested person or a third party and take measures to eliminate conflict of interest.

## **6. Treatment of an employee who reports a conflict of interest**

**1. Employment protection** - no employee of the Company or an interested person who reports a potential conflict of interest before that business process is completed and before the damage is caused to the Company, will be exposed to any procedure that may jeopardize his or her professional integrity or interrupt his or her employment with the Company due to reporting/disclosing the conflict of interest.

**2. Confidentiality** - all information that members of the Commission find out or are made aware of in the procedure prescribed by this Rulebook constitute a business secret and their unauthorized disclosure - disclosure to other employees or third parties constitutes a breach of work duties. The members of the Commission and other persons participating in the procedure will care to protect the confidentiality of information collected from the applications during the examination of the existence of grounds for conflict of interest, as well as about the final decisions regarding the specific application.

**3. Action in case of non-detection of conflict of interest** – against any employee of the Company who find him/herself in a position to find out or has knowledge of a potential conflict of interest and does not report it or decides to control it by themselves, the Company will act in



accordance with internal regulations and determine possible individual responsibility of the employee.

## 7. Roles and responsibilities

Roles	Responsibilities
All the employees of the Company	Revealing situations that may lead to conflict of interest
Chief Executive Officer, Creative Director	Forwarding the application and informing the Commission for monitoring of conflict of interest
Commission for Conflict of Interest	Makes a decision on the appropriate procedure in a situation that may lead to a conflict of interest and fills in the form for reporting on conflict of interest.

## 8. Reports

Title of the report	Time period of reporting	Information entry
Summary of conflict of interest	three months	by hand
Summary of the conflict of interest for the Founders	six months	by hand

## 9. Forms and other attachments

The form for reporting on conflict of interest can be found in the Annex to this Rulebook.

## 10. Entry into force

This Rulebook enters into force on the 8th day from the day of its publication on the Company's website ([www.alicorn.me](http://www.alicorn.me)).

All employees, after getting acquainted with the provisions of this Rulebook, are obliged to sign a statement of understanding.

ALICORN DOO PODGORICA



Sanja Gorkan



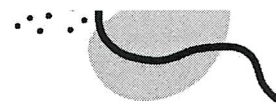
Founders

Person familiar with this Rulebook:

Mina Kocigjerić (name of the employee)

M Kocigjerić (signature of the employee)

15.10.2021. (date)



## Annex to the Rulebook on Prevention of Conflict of Interest

### Form for reporting on conflict of interest

To be filled in by an employee who noticed a potential conflict of interest:	
Name and surname	
Sector/team	
Description of the potential conflict of interest	
Potential risk / damage to ALICORN doo Podgorica if conflict of interest is not managed:	
Send the completed form by e-mail to <a href="mailto:sanja@alicorn.me">sanja@alicorn.me</a> or <a href="mailto:milutin@alicorn.me">milutin@alicorn.me</a> .	

To be filled in by the Commission for monitoring of conflict of interest	
Opinion on potential conflict of interest, including assessment of potential risk/harm to Alicorn doo:	
Recommended procedure	