

## **CODE OF ETHICS**

Verba d.o.o. Podgorica (hereinafter: Verba or the company) has adopted the Code of Ethics to establish clear and unambiguous guidelines and requirements regarding ethical business practices to protect the company's values.

The company's Code of Ethics is regularly updated and improved in accordance with external and internal changes and requirements. It is based on international standards, best practices, and the company's own business experience, taking into account the demands placed on the company and practical feasibility.

### **FUNDAMENTAL PRINCIPLES**

Verba respects and promotes universal human rights enshrined in international conventions and does not tolerate any form of discrimination that undermines human dignity. Therefore, Verba strives to create a working environment where individual differences are accepted and valued. All forms of negative discrimination based on actual or presumed personal traits—such as race, gender, nationality, ethnic origin, disability, religious or ideological beliefs, sexual orientation, political or other opinions, marital status, and others—are prohibited.

Any verbal or non-verbal behavior aimed at or resulting in the violation of a person's dignity or the creation of an intimidating, hostile, degrading, aggressive, humiliating, or offensive environment, especially sexual or other forms of harassment, is prohibited.

The consumption and use of alcohol, illicit substances, or other substances affecting consciousness at the workplace, in other locations or situations related to work for the company, and/or during work-related activities, as well as arriving at work under the influence of such substances, is strictly prohibited.

All employees and company bodies must not, through their behavior or work, harm the reputation of the company or the sector in which it operates. Their conduct must adhere to the principles of this Code of Ethics, both within and outside the work environment.

Employees are expected to be proactive, responsible, team-oriented, and self-initiative in problem-solving. During working hours, they must inform their supervisors about identified issues and actively contribute to resolving them.

### **DATA PROTECTION**

Employees at Verba are required to communicate with clients, business partners, external service providers, and other involved parties respectfully and professionally. Information shared with clients must be accurate, complete, and timely.

Employees must maintain the confidentiality and protection of all business and personal data obtained during work, except when required by law to act otherwise. The obligation of confidentiality remains in effect even after their employment or position ends.



Employees must ensure at the end of the workday that documents containing trade secrets or confidential information are not left in locations where they can be accessed by unauthorized persons.

## **COMPANY RESOURCES**

Each employee is responsible for safeguarding all material, financial, and other resources of the company, clients, and external partners entrusted to them. For the purposes of this act, resources include cash, physical assets (tools, inventory, equipment, etc.), services, business plans, information on clients, employees and external partners, intellectual property, and other private, legally protected, and confidential information.

Improper management of resources or unauthorized sharing of company resources with third parties is considered a breach of obligations to the company and may qualify as an economic offense. Negligence regarding the unauthorized use of company resources is also considered a breach of obligations.

The names, logos, trademarks (including letterheads, websites, social media accounts), stamps, seals, and contacts of Verba must not be used for private purposes or in any way imply Verba's involvement in the business or private activities of employees or third parties without proper written authorization.

## **CONFLICT OF INTEREST**

Employees must avoid situations where their personal interests may conflict with the interests of the company or its clients. In performing their duties, employees must act ethically, refrain from activities contrary to the interests of the company and clients, make decisions impartially and objectively, and prioritize the interests of clients over their own.

Employees are required to promptly notify their immediate supervisor or the responsible person in the company of any actual or potential conflict of interest as soon as it arises and cooperate with the company for its swift and effective resolution. This includes, but is not limited to, financial interests, relationships with clients, suppliers, or competitors, and any personal arrangements that could influence decision-making.

Employees must not use their position in the company, access to confidential information, or company resources for personal gain or the benefit of friends, family members, or other related individuals or entities, nor use the company's infrastructure to promote their personal business or activities.

Employees must obtain prior written approval from the company before accepting additional employment, consulting engagements, or other external activities that may impact their work in the company or create a conflict with the company's business interests.

Employees are prohibited from soliciting, encouraging, or accepting gifts, services, benefits, or other privileges that could compromise their objectivity in performing professional duties or undermine public trust in the company. Exceptions include symbolic gifts representing conventional hospitality and negligible material value.

## **SUSTAINABLE DEVELOPMENT**

Verba is committed to environmental sustainability and protection, as well as the values of socially responsible corporate governance. Adhering to sustainability principles, the company seeks to consider the long-term social and environmental consequences of its activities.

Verba recognizes that mitigating climate change effects and transitioning to a low-carbon economy is one of today's main challenges and that, as a responsible company, it has a significant role in reducing the environmental and social impacts of its operations.

Verba and its employees, in accordance with the rules of environmental ethics, refrain from activities that increase climate and environmental risks or negatively affect their outcomes. Verba strives to provide its employees with training and education on sustainability to ensure they align their daily work with ESG principles.

## **CONSUMER PROTECTION**

As a responsible provider of translation services, Verba pays special attention to the protection of consumer rights and interests and the quality of services provided to consumers. The company ensures that its employees, whether in direct or indirect contact with consumers, undergo appropriate training on consumer protection, understand and apply consumer protection rules adequately, and act with due care and dedication.

Verba continuously monitors compliance with consumer protection and other legal aspects, from planning and offering services to product development and managing marketing and client relationships. During business and consumer communications, the company acts in good faith and adheres to fair business practices, refraining from unfair practices.

Customer satisfaction is a company priority, and Verba seeks to resolve consumer complaints quickly and efficiently in full cooperation with consumers and in compliance with legal requirements.