

# Code of Conduct Policy

## INTRODUCTION

iVote dooel Skopje is committed to maintaining the highest standards of ethical conduct and professional integrity. This Code of Conduct Policy (the "Policy") sets forth the principles and guidelines all employees, officers, directors, and contractors of iVote are expected to adhere to in their professional activities.

## SCOPE

This Policy applies to all individuals working at any level and grade, including senior managers, officers, directors, employees, consultants, contractors, trainees, homeworkers, part-time and fixed-term workers, and any other person associated with iVote.



## PROFESSIONAL BEHAVIOR

- **Integrity and Honesty:** Conduct all business with integrity, honesty, and respect for the rights and interests of all individuals and entities involved.
- **Compliance with Laws:** Ensure full compliance with all applicable laws, regulations, and standards in all operations and activities.
- **Confidentiality:** Protect confidential and proprietary information and avoid any unauthorized disclosure of such information, signed NDA.
- **Conflict of Interest:** Avoid conflicts of interest and disclose any potential conflicts to management for guidance and resolution.
- **Diversity and Inclusion:** Foster an environment that embraces diversity, inclusion, and respect for all individuals regardless of race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law.



## RESPECT IN THE WORKPLACE

Treat all fellow employees, customers, business partners and other stakeholders with dignity and respect at all times. Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination.

- Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:
  - Yelling at or humiliating someone
  - Physical violence or intimidation
  - Unwanted sexual advances, invitations or comments
  - Visual displays such as derogatory or sexually-oriented pictures or gestures
  - Physical conduct including assault or unwanted touching

- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences
  - The company will not tolerate discrimination based on race, color, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.
  - We are committed to ensuring that our employees, our contractors and our customers work in safe and respectful environment that is free of bullying. Bullying can include:
    - Spreading malicious rumor or gossip
    - Excluding or isolating someone socially
    - Establishing impossible deliverables
    - Withholding necessary information or purposefully giving the wrong information
    - Intimidating someone
    - Impeding someone's work
    - Unfairly denying training, leave or promotion
    - Constantly changing work guidelines
    - Sending offensive jokes or emails
    - Criticizing or belittling someone constantly
    - Tampering with a person's personal belongings or work equipment



### QUALITY AND EXCELLENCE

- Commitment to Quality: Strive for the highest quality in all products, services, and professional activities. Comply with our company's ISO 9001 policies and regulations.
- Continuous Improvement: Pursue continuous improvement in all aspects of work, embracing innovation and efficiency.



### DATA PROTECTION

#### Commitment to Data Privacy

- Data Privacy Compliance: Comply with all relevant data protection laws and regulations, including GDPR for operations within the EU, to protect the personal information of customers, employees, and partners, as well as procedures of our ISO 27001 rules when working for or collaborating with iVote.
- Data Minimization: Collect only the data necessary for the intended purpose and ensure it is processed in a secure, lawful, and transparent manner.

#### Data Security Measures

- Respect implement robust security measures to protect against unauthorized access, alteration, disclosure, or destruction of personal data.
- Regularly review and update security practices and data protection measures to address emerging threats and vulnerabilities.

## Rights of Data Subjects

- Ensure individuals have the right to access, correct, delete, or transfer their personal data, and provide mechanisms for them to exercise these rights.
- Reporting and Accountability
- Report data breaches to relevant authorities and affected individuals promptly, as required by law.
- Maintain detailed records of data processing activities to demonstrate compliance with data protection principles.



## HEALTH, SAFETY, AND ENVIRONMENT

- Safe Workplace: Maintain a safe and healthy work environment for all employees and visitors.
- Environmental Responsibility: Conduct operations in an environmentally responsible manner, striving for sustainability and reducing the environmental impact of activities.



## CONFLICT OF INTEREST

- Report any actual, possible or potential conflict of interest and declare to relevant management or a contact within iVote.
- A conflict of interest can occur when personal activities, investments or associations compromises their judgment or ability to act in the company's (iVote) best interests. All stakeholders should avoid the types of situations that can give rise to conflicts of interest. It's important for you to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to iVote.



## COMPLIANCE AND REPORTING

- The company encourages all employees to ask questions and raise issues without fear of retaliation and is committed to treating reports seriously and investigating them thoroughly.
- Employees must report suspected unethical, illegal or suspicious behavior immediately. The company does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit.



## ETHICAL DECISION MAKING

WHEN MAKING A DECISION, ASK YOURSELF THE FOLLOWING:

- IS IT LEGAL?
- DOES IT COMPLY WITH THE CODE?
- DOES IT REFLECT OUR COMPANY VALUES AND ETHICS?
- DOES IT RESPECT THE RIGHTS OF OTHERS?

- IF YOU ARE UNSURE ABOUT ANY OF THE ANSWERS, ASK.



### ENFORCEMENT AND DISCIPLINE

- Violations of this Policy may result in disciplinary action, up to and including termination of employment or contracts, in accordance with iVote's disciplinary procedures and applicable laws.



### REVIEW AND UPDATE

- This Policy will be reviewed regularly and updated as necessary to ensure it remains relevant and effective in promoting a culture of ethics and integrity.

### ACKNOWLEDGMENT AND AGREEMENT

By certifying to iVote's Code of Conduct, you acknowledge that

- ✓ You have read the entire code of conduct and understand your responsibilities related to it.
- ✓ You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- ✓ You agree to abide by its principles.
- ✓ You agree to report to the company any violations of the code.
- ✓ You agree to cooperate in any investigations of violations of the code.

### AGREEMENT TO COMPLY:

I, undersigned Silvija Gelevski, CEO representing iVote declare that I understand the requirements of the above code of conduct and undertake to comply with them in the course of my activities.

Date & Signature:

01.01.2024

