Code of Ethics

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Scope

Chapter References	Description	
	1. General Principles	
	2. Values	
	3. Code of Ethics Principles	
	4. Relations with Competitors	
	5. Conflict of interest	
	6. Cultural diversity, Discrimination and Harassment	
	7. External Activities of the Company's Employee	
	8. Deception	

Chapter References	Description	
	9. Customer service	
	10. Drugs and alcohol abuse	
	11. Copyrights	
	12. Complaints and disciplinary measures	

1. General Principles

The development of a company relies heavily on the trust of customers and partners. It is a conviction that should exist both in the company's relationship with its staff and between colleagues. To maintain and cultivate this trust, it is very important to implement a set of unique rules of professional ethics.

The Code of Professional Ethics is a guide to be applied by every employee of FIBER Group. This Code summarizes a number of ethical principles, through the implementation of which we aim to maintain and raise labour standards in the company Fiber Group.

It is company policy that employees conduct themselves according to the highest standards of ethics and personal responsibility. All employees are expected to work and behave fairly and impartially, honestly and with integrity in every aspect of their work, as well as in dealings with customers, subcontractors, the community, suppliers and any third party.

2. Values

2.1 Respect

It is very important that every employee feels true respect for what they serve and for whom they serve. Customers, colleagues, contractors and all stakeholders should be treated with the same respect as you would like to be treated. This means that treatment should be fair, impartial and without discrimination.

2.2 Integrity

Employees who join the company must behave with integrity, honesty and fairness towards colleagues, superiors, contractors, subcontractors, suppliers and all third parties, thus enhancing the company's reputation. They must perform their work in accordance with the company's values. It is very important to know that during the implementation of this Code, the personal characteristics of honesty, fairness, impartiality and trust should be the main attributes in managing your work in Fiber Group

2.3 Transparency

All processes and decisions must be made in a transparent manner and with inclusion of all parties in the process. We work with customers, contractors, subcontractors and all partners in a transparent manner and without withholding information that may cause abuse and that may harm partners now, since this would actually be detrimental to the company.

2.4 Prevention of Corruption Practices

Fiber Group attaches great importance on maintaining and implementing an ethical approach to conducting business and does not agree with unethical or corrupt activities by the Company's employees, agents, representatives and/or intermediaries.

Fiber Group has high moral behavior and integrity and considers it unacceptable and prohibits its employees in all subsidiaries from paying, accepting, offering or authorizing the payment of money or transferring anything of value, including but not limited to gifts, loans, compensation, prizes, commissions, contributions and/or anything else of value, to third parties, partners or others with whom Fiber Group has business dealings in order to:

- take or retain business,
- 2. improve profitability or income
- obtaining improper advantages, such as securing business or denying business to others, or
- 4. influence the decision-making process of an official to conduct business in, for or with the payer or any other person.

2.5 Social Responsibility

Being socially accountable means that the decisions you make must not cause social harm. All our partners must be properly and in a transparent manner made aware of all the risks that may be assumed by the agreements related to the FIBER GROUP company.

2.6 Dedication to long-term relationships

By comprehending, carrying and implementing all these values and principles, FIBER GROUP will create long-lasting and reliable relationships, first and foremost in the relationship with its employees and partners. We believe in long-term and trustworthy relationships.

3. Code of Ethics Principles

3.1 Company property

It is your responsibility to preserve and protect the company's assets and use them for proper purposes, as these are what enable and facilitate the performance of our job.

Owned by the company FIBER GROUP we will call, but not limit:

- All property of the company FIBER GROUP rented or under its ownership, including its equipment
- All the information for customers;
- Personnel files, archives, candidate databases and any other files containing information on behalf of FIBER GROUP;
- All studies, promotional materials, customer lists, records or reports of any kind;
- Any software owned by the Company.

3.2 Electronic Communications

In order to facilitate the work of employees, FIBER GROUP has made available a variety of means for communication, such as computers, e-mail, telephone, internet, etc.

Each employee shall ensure that these means of communication are used only for work purposes and shall protect information from being leaked. The company reserves the right to monitor the use of electronic means of communication and to access and report the content of employee messages, including attached documents.

You must not use a personal account for this purpose. Guidelines on the sending of classified information via electronic messaging must be observed at all times. You must never send or receive information (unless authorised to do so) that contains:

Personnel Identifiable Information (PII)

Cardholder Data (CHD)

All messages sent from an organization account remain the property of Fiber Group Shpk and are considered to be part of the corporate record. All organization messages must be considered to be official communications from the organization and treated accordingly.

In detail, please refer to DOC-12-3 Electronic Messaging Policy

3.3 Use of company phones

FIBER GROUP telephones are used for business purposes. Extended personal telephone calls during working hours are not encouraged. Any expenses for personal phone calls will be reimbursed by the employee.

3.4 Confidential information

During your work, you may have access to information about the company as a whole, information about other employees, customers or partners of the company. All this information must remain confidential and must not be disclosed to unrelated parties, but only to be used for the continuation of work and without breaching confidentiality. The disclosure of information is strictly prohibited.

When an employee leaves the workplace at the end of the day, he/she must ensure that no confidential or sensitive material or information is left on his/her desk. All confidential documents must be locked and the computer must be protected by a strong password in accordance with **DOC-08-1 Password Policy**.

In special cases, confidential information shall only be disclosed with the written approval of the administrator of FIBER GROUP. Employees shall provide their colleagues with confidential information only when it is in the interest of the work of FIBER GROUP. The responsibility to maintain confidential information remains valid even after the employee's departure from FIBER GROUP.

4. Relations with Competitors

FIBER GROUP is an advocate of fair competition in the marketplace. As such, it requires each of its employees to maintain the highest professional ethical standards, not only in relation to its colleagues and customers, but also in relation to its competitors. To compete fairly and effectively, the company must be alert to changes in external factors and must not obtain information illegally.

Agreements with third parties that violate competition in an illegal manner are strictly prohibited. Formal and informal agreements between competitors regarding prices and services or restrictions on the production of services are illegal and may not be discussed by an employee with a competitor. In addition, an employee of the company may not perform any work paid for by third parties during the validity of the employment contract he or she has concluded with the company Fiber Group, which harms the employer or competes with the employer, impairing the normal development of the company's business.

PRIVACY PROTECTION IN CASE OF DISMISSAL OF AN EMPLOYEE.

(Legal basis - Labour Code, arts. 26, 28, 29, 30, 31)

Taking into account the obligation of loyalty that must accompany the employee during and after termination of employment with regard to facts of which he/she has become aware as a result of his/her work in the company Fiber Group and which are destined to remain secret (such as secrets relating to the employer's business), the employee, in accordance with the regulations in force, may not make them public to third parties.

In any case, the company Fiber Group may ask its employees to sign a confidentiality agreement when it deems it necessary, based on the latter's access to confidential information relating to the company's business. In the content of this agreement, the employee promises that after termination of employment he/she will not compete in any way with the employer and that we will not form a competing company until a deadline clearly defined in the agreement.

If the employee violates this agreement, he/she shall compensate the damage caused to Fiber Group.

The company in the process of finding such violations, may seek other sanctions in accordance with applicable law, taking into account the interests that have been violated by the employee.

4.1 Business meetings with clients and partners

Fiber Group considers the relationship with customers and partners important and respects it.

In the case of meetings organised with customers or partners, Fiber Group is normally obliged to inform the heads of departments and/or managers who will indicate the presence of the employees.

These meetings shall be organised only with the knowledge of the head/manager of the department and the meeting must be attended by no less than two representatives of Fiber Group.

All employees of Fiber Group will implement these provisions in order to prevent any type of complaints that may be raised at face-to-face meetings.

4.2 Fiber Group's involvement with clients and partners

We are committed to the above principles in relation to our suppliers and service providers.

In return, we expect them to adhere to the same principles of our Code of Conduct. We ensure that the interests of all parties are taken into account in a transparent manner and in accordance with the terms of the contract.

We all have to fulfil our commitments to our customers, partners and suppliers, treating them fairly and making the necessary choices based on objective criteria. All corrupt practices are prohibited. If any of us is subject to pressure or demands from third parties, we must inform our superior.

In order to avoid any suspicious situation, if necessary, every Fiber Group employee should be consulted with the direct manager/leader on the attitude they should take.

4.3 More

Any attempt to establish, coordinate, maintain or stabilise prices or conditions of sale or production/production levels or to allocate customers or markets through any type of agreement, pact or understanding of any nature, whether written or oral, express or implied, with a competitor or potential competitor will be considered a violation of competition law and may result in a violation of the provisions of the Company's Code.

Agreeing and agreeing with others on the prices or conditions that Fiber Group and/or the other parties will offer in response to the solicitation of offers or requests for offers, or agreeing and agreeing not to make offers and/or to withdraw offers, is a similar serious offence.

Acts in violation of the competition rules may constitute grounds for dismissal of the employee without prior warning, or the implementation of other administrative measures that constitute the fundamental provisions of this Code.

5. Conflict of interest

A conflict of interest is defined as a state of conflict between the employee's duty and private interests, in which he or she has direct or indirect private interests, which may prejudice the non-performance of his or her duties and responsibilities in FIBER GROUP.

The employee's private interests are interests that correspond to, maintain, are based on or arise from:

- property rights and obligations of all kinds;
- · any other legal-civil relationship;

- free gifts, promises, favours, preferential treatment;
- any negotiations for future employment by the employee while in office or negotiations for any other type of private interest relation with the employee,
- engagements in private for-profit activities or any kind of income-generating activities, as well as engagements in profit and non-profit organisations, trade unions or professional, political, state and any other organisations;
- other relationships such as: family or cohabitation; community; ethnic; religious; acquaintances of friendship or hostility;
- previous commitments, from which the above-mentioned interest arose or was derived.

Any type of private interest of an employee among those defined above, any connection or entanglement between two or more of them is considered a cause for conflict of interest.

5.1 Advice on how to avoid conflicts of interest

- In every relationship, the employee must verify the existence of an actual potential conflict of interest;
- Potential conflicts of interest of a candidate to be hired at FIBER GROUP must be resolved prior to hiring.
- The Person in Charge/Director with the support of the Human Resources
 Department shall, on the basis of the available data, take the necessary
 measures to ensure that employees are not assigned tasks that could give rise
 to a possible conflict of interest.
- The employee must not ask for or accept gifts, favours, entertainment or any other benefits, or avoidance of possible losses, as well as promises for them, themselves, their family members, relatives, persons or entities with which they have relations, that influence or appear to influence the impartiality of the performance of the task, or are or appear to be a reward for the way of performing the task in the Company FIBER GROUP. This does not apply in the case of ordinary invitations, traditional hospitality, gifts with symbolic or traditional value, courtesy, which do not question the employee's impartiality. (Symbolic value is when it does not exceed 2500 Lek).

- You should be careful to avoid a conflict of interest in case of price reductions or other advantages from suppliers, service providers or customers that the public or your colleagues at FIBER GROUP do not receive.
- You should take care to avoid conflicts of interest in cases where business or customers are directed to suppliers that are owned or managed by members of your family or close friends.

5.2 Conduct Rules

Declaration of Interests

Fiber Group clearly requires that where there might be a personal interest, either directly or indirectly, through business, family or friends, or through other connections, an interest that might influence or be considered by others to influence the person's judgement and impartiality, in any matter pertaining to his or her duties, then that interest must be clearly declared to superiors before any action is taken in the current work process.

5.3 Reporting Conflict of Interest

In the event of a conflict of interest, you must:

- Immediately notify the Manager/Director or Human Resources Manager;
- If gifts or favours cannot be refused or returned to the sender, they should be kept, used as little as possible and reported immediately to the Line Manager/Manager or HR Manager.
- Report the effort as soon as possible to your Line Manager/Manager or HR Manager.
- You must obey any final decision not to take part in the decision-making process, to carry out the task or to give up priorities, which causes conflict.

6. Cultural diversity, Discrimination and Harassment

All employees of FIBER GROUP have the right to work in an environment where their cultural identity is recognised and respected.

All customers, employees, suppliers and all partners of FIBER GROUP have the right to be treated equally, regardless of religion, colour, creed, language, politics, origin and culture.

Discrimination and harassment may occur between employees of the company or between employees and third parties. Discriminatory and harassing situations will be called when:

- An inappropriate, hostile and offensive working environment is created;
- It negatively affects an individual's performance at work;
- It results in forced resignation;
- Affects the integrity and reputation of FIBER GROUP.

It is the responsibility of all employees to ensure that there is no discrimination and harassment in the workplace. The recruitment, promotion and evaluation of employees is based exclusively on objective criteria geared to their job performance. Furthermore, discrimination against employees who have complained of prohibited discrimination is prohibited.

6.1 Reporting and measures in cases of discrimination and harassment

Any person who becomes aware of hostile, physical, abusive or criminal conditions as described in this section should report them immediately. The FIBER GROUP company will undertake an investigation ensuring the strictest possible confidentiality.

The Directing Officer or Human Resources Manager to whom the report is made shall:

- We have taken additional measures to ensure that the reported harassment does not recur in the future.
- If we prove the allegations to be true, punitive action will be taken immediately against the offender up to and including termination of employment.

- If the allegations prove to be untrue, immediate punitive action will be taken against the accuser up to and including termination of employment.
- It must ensure that in the event of harassment or retaliation against the complainant or the accused, the person responsible for the harassment or retaliation is subject to punitive action up to and including termination of employment.
- It shall ensure that such matters are treated confidentially in order to best protect the interests of all aggrieved parties.

There will be no tolerance for harassment (including, but not limited to, sexual harassment), discrimination and is committed to taking all necessary measures to prevent it and, in cases where it is reported, to taking responsibility for resolving such incidents.

Procedure based on the Law

FOR PROTECTION AGAINST DISCRIMINATION

(Amended by Law No. 124/2020)

This law regulates the implementation and observance of the principle of equality and non-discrimination in relation to race, ethnicity, color, language, citizenship, political, religious or philosophical beliefs, economic, educational or social status, gender, gender identity, sexual orientation, sex characteristics, living with HIV/AIDS, pregnancy, parentage, parental responsibility, age, family or marital status, marital status, place of residence, health status, genetic predispositions, appearance, disability, belonging to a special group, or with any other cause.

Purpose

The purpose of this law is to ensure of every person the right to:

- 1. equality before the law and equal protection by the law;
- 2. equality of chances and opportunities to exercise rights, enjoy freedoms and participate in public life;
- 3. effective protection from discrimination and from any form of behavior that encourages discrimination.

PROTECTION FROM DISCRIMINATION IN EMPLOYMENT

Article 12

Prohibition of discrimination

- 1. It is prohibited to discriminate against a person in relation to his right to employment. Discrimination includes any difference, limitation or exception that is based on the causes mentioned in Article 1 of this law and that, among other things, is related to:
- 2. announcement of job vacancies;
- recruitment and selection of employees;
- 4. the treatment of employees at the workplace, including their treatment during
- 5. establishing or changing working conditions, remuneration, benefits and working environment,
- treatment related to professional training or during the disciplinary process or related to dismissal or termination of the employment contract;
- 7. membership in trade unions and the opportunity to benefit from the facilities provided by this membership.
- 8. Any kind of harassment, including sexual harassment, by the employer towards an employee or a job seeker or between employees is prohibited.
- 9. The implementation of special and temporary measures, based on the causes mentioned in Article 1 of this law, in order to accelerate equality in the field of employment, is not considered discrimination. The application of such measures may not, in any case, imply the permanent maintenance of unequal or different standards, and the special measures shall cease when the objective of equal treatment and equal opportunities is achieved.

Article 13

Obligations of the employer

1. The employer is obliged:

- to implement, protect and promote the principle of equality and prohibition of any kind
- 2. discrimination;
- take the necessary measures, including disciplinary measures, for the protection of
- employees from discrimination and victimization, within one month of receiving knowledge;
- 5. respond effectively and in accordance with this law to complaints received due to discrimination committed by his employees, within one month of receiving them.
- 2. The employer is obliged to raise awareness of this law also by posting it in public workplace environments, as well as to enable its full understanding with its own means or with the help of specialized entities.

Article 15

The rights of the employee

- 1. Every employee has the right to complain to the employer, to the Commissioner for Protection from Discrimination, or to the court, if he believes that he has suffered discrimination. This provision does not limit the right to appeal to special institutions, set up near different employment sectors.
- 2. During the review period of the complaint, the employee has the right to continue working according to the terms of the contract.
- 3. The employee has the right to receive information at any time regarding the handling of the complaint, as well as to receive explanations for the decisions taken by the employer, in response to his complaint, immediately after consideration.
- 4. In the case when the employer does not take measures to investigate and resolve the discrimination complaint, the employee who filed the complaint has the right to stop work, without losing the right to wages, for as long as is necessary to protected from discrimination. The employee returns the salary received, according to this article, in case the alleged discrimination is not proved by a final decision.

6.2 Complaints procedures

Anyone who is subject to discrimination should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Fiber Group recognizes that discrimination may occur.

If an employee cannot directly approach an alleged discriminator, he/she can approach one of the designated staff members responsible for receiving complaints through the hotline ethicspoint@wearefiber.com

When the designated person or any other person in charge from HR department receives a complaint of discrimination, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the employee discriminated as to what outcome he/she wants
- ensure that the employee discriminated understands the company's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the employee discriminated from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the employee discriminated
- ensure that the employee discriminated knows that they can lodge the complaint outside of the company through the relevant country/legal framework

Throughout the complaint's procedure, an employee discriminated against is entitled to be helped by a counselor within the company. Fiber Group will nominate a number of counselors and provide them with special training to enable them to assist the employee discriminated against.

Informal complaints mechanism

If the employee discriminated wishes to deal with the matter informally, the designated person will:

- give an opportunity to the discriminator to respond to the complaint
- ensure that the discriminator understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped
- ensure that the above is done speedily and within 2 days of the complaint being made

Formal complaints mechanism

If the discriminated employee wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the discriminated employee, the formal complaint mechanism should be used to resolve the matter.

- produce a report detailing the investigations, findings and any recommendations
- if the discrimination took place, decide what the appropriate remedy for the
 employee discriminated is, in consultation with the employee discriminated
 (i.e.- an apology, a change to working arrangements, a promotion if the
 employee discriminated was demoted as a result of the discrimination, training
 for the discriminator, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the employee discriminated is satisfied with the outcome
- if it cannot determine that the discrimination took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within
 2 days of the complaint being made

Outside complaints mechanisms

A person who has been subject to discrimination can also make a complaint outside of the company. They can do so through commissioner.

Sanctions and disciplinary measures

Anyone who has been found to have discriminated another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the discrimination. Suitable deterrent sanctions will be applied to ensure that incidents of discrimination are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the discriminator or harasser.

6.2 Implementation of this policy

Fiber Group will ensure that this policy is widely disseminated to all relevant persons. All new employees must be trained on the content of this policy as part of their induction into the company.

Every year, Fiber Group will require all employees to attend a refresher training course on the content of this policy.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

6.3 Monitoring and evaluation

Fiber Group recognizes the importance of monitoring this discrimination policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with discrimination cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

7. External Activities of the Company's Employee

An employee's outside activity is any type of regular or occasional activity that requires the employee's commitment, whether for profit or not. The employee shall not engage in an outside activity that prevents the performance of his or her duty in the company, or that requires a commitment, mental or physical, that makes the performance of the duty difficult, or is a continuation of that duty, which in any case violates the image of FIBER GROUP.

In case of doubt as to whether an activity is permissible or not, the employee shall consult with the Human Resources Department. The performance of external activities must be communicated in advance to the Director/Director/Function Manager and the Head of Human Resources. Activities as part of trade union or employee representation activities or teaching activities are permissible when they do not hinder the performance of the job and when they do not violate the principles of this code.

8. Deception

Fraud in any form will not be tolerated by FIBER GROUP. We will promptly identify and investigate all complaints or instances of fraudulent activity. This applies to all personnel regardless of position or experience.

Fraudulent acts include, but are not limited to, the following activities:

embezzlement, misuse or other intentional financial irregularities,

- Forgery or alteration of documents (cheques, contracts, purchase orders, financial documents, electronic files, permits, attendance lists, etc.),
- Forgery of signature/signature,
- Intentional misrepresentation of the company's financial situation or accounts,
- · Destruction or deletion of data,
- Acceptance of gifts of a value exceeding 2500 lek from suppliers or competitors without declaring the acceptance and delivery of such gifts;
- Making incorrect payments to suppliers, competitors or other business connections to obtain an advantage,
- Irregularities in the use or reporting of money or financial transactions (including bribes, erroneous payments to obtain an advantage, special favours),
- Theft or misappropriation of company assets including funds, equipment and inventory, supplies or any other property,
- Authorisation or acceptance of payments for unfinished goods or services,
- Falsification of expense reimbursement,
- Unauthorized disclosure of confidential information to third parties,
- Using the resources of FIBER GROUP for personal purposes,
- Collaboration with a customer or third party that led to the fraud of FIBER GROUP.

9. Customer service

FIBER GROUP is committed to a strong service culture that constantly strives to exceed customer expectations and always for the best possible benefit of both parties.

Company employees must be aware of the importance of customers and other external parties.

We ensure that all our recommendations regarding products, procedures or services are honest, correct and that customers are sufficiently informed of

potential risks.

Providing information that is false, inaccurate or not in line with customers' needs or profile is unacceptable to us.

10. Drugs and alcohol abuse

The company is committed to providing a healthy working environment and to supporting healthy habits. The company regards the use of drugs and alcohol at work as unsafe and unproductive. The company respects your right to conduct your personal life as you wish. However, your behaviour at work affects the people you work with, our colleagues, partners and customers.

It is the policy of FIBER GROUP to employ a workforce that is not under the influence of illegal drugs and the misuse of alcohol during and outside working hours.

Drugs issued (on prescription) by the employee's doctor or other legal drugs may be taken during working hours. In the event that the use of such drugs, as intended, impairs the employee's performance, the employee shall notify the Line Manager and/or the Human Resources Manager. However, we will not tolerate the misuse of (prescription) drugs and will treat such abuse in the same way as illegal drugs if it significantly impairs an employee's work and relationships with others with whom they work.

An employee abuses various drugs or alcohol whenever he or she is at work, regardless of whether he or she is in the office or not.

The company strongly discourages the consumption of alcohol in significant and uncontrollable quantities during business lunches or meetings.

Any employee who acts contrary to this policy is subject to disciplinary measures up to and including dismissal.

11. Copyrights

FIBER GROUP operates in accordance with current copyright and industrial property law, including software. (SUBJECT OF COPYRIGHT PROTECTION Article 8 Works)

12. Complaints and disciplinary measures

Public confidence in the honesty and integrity of all FIBER GROUP personnel is essential. Therefore, we expect all employees to uphold and promote the principles of this code.

We also encourage you to report violations of this code to your supervisor and/or human resources manager. If you violate any provision of this code of conduct, you will be subject to disciplinary action which may include:

- Verbal observations
- Withdrawal Written warning
- Notice of dismissal,
- Termination (immediate) of employment.
- Penal proceedings.

Form of acknowledgement and acceptance of the Code of Ethics |______ accept and acknowledge that I have read and understand the

Fiber Group Code of Ethics and will be responsible for understanding and accepting additional elements in the future as well as changes to this code.

I further acknowledge that I have read and understand all of my obligations, duties and responsibilities under each principle and provision of the Code of Ethics and policies of Fiber Group and will read and understand all of my obligations, duties and responsibilities under all future amendments.

I understand that violations of the Code of Ethics or Fiber Group Policies may result in disciplinary action including suspension without pay and/or dismissal.

Employee signature Date:		