



**LINKgroup BOOK OF CORPORATE ETHICAL PRINCIPLES, CODE OF ETHICS AND ETHICAL TEST**

## LINKgroup BOOK OF CORPORATE ETHICAL PRINCIPLES, CODE OF ETHICS AND ETHICAL TEST



### Presidential Cabinet

“Strive to be the best you can at your job, but always play fair and be honest, if you want respect. Respect others and they will respect you. Keep your word if you want others to keep theirs. If you are a supervisor or a manager, try to earn your subordinates’ respect, instead of fear. Do not take respect for granted, or you will lose it more quickly than you think. Earn the respect of others. That is probably the greatest success one can hope to achieve!”

Prof. Dr Valentin Kuleto

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## FOREWORD

Our company was founded out of the belief that the world of education needs to change. We have dreamed big dreams, and we still do.

The values on which the company was founded more than two decades ago are natural and understandable to everyone.

We are a large group of good people who seek to change the world with our honesty, unwavering commitment to truth, and respect for the rights and freedoms of others. We do not wish to endanger anyone.

We believe that everyone in the industry in which our company operates has a role to play in advancing education and changing the world for the better. We value employees, providing them with the best available resources to use, but we also expect a lot from them, because we aim to change the world.

We strive to fully understand the changing and growing needs of our clients. A promise is as sacred and binding to us as a written contract, and we gave a promise to our students that we will help them to realize their full potential. We can promise the same to our employees, suppliers, creditors, and investors, and to all those who seek to achieve societal goals as much as we do, and help us on our journey.

We respect institutions, social communities, and all social institutions which are governed by the rule of law.

It is you, employees, managers, and board members of the LINKgroup, who are there to help us as an institution to keep our word. The Book of Corporate Ethical Principles, Code of Ethics, and Ethical Test exist to help you achieve both your personal and professional goals, as well business and societal goals of our business group. You already carry all these attitudes and values within you. Your moral compass is part of who you are. The documents before you and other policies of the group you have been introduced to are there to help you not to stumble and lose your way if you encounter a dilemma.



Prof. Dr Valentin Kuleto, President of LINKgroup

## SHORT PRINCIPLES OUR BUSINESS IS BASED ON



## I LINKgroup BOOK OF CORPORATE ETHICAL PRINCIPLES

### 1.1. WHY DO WE HAVE A BOOK OF CORPORATE PRINCIPLES

The purpose of our Book of Corporate Ethical Purposes is to provide guidelines for the policies, standards, and plans on which the operation and organization of the LINKgroup is based. All LINK employees and management understand the meaning of the LINKgroup Book of Corporate Ethical Principles and Code of Ethics, and embrace the values found therein as their own.

We believe that every employee is capable of making the best, ethical decisions in compliance with the law, based on their moral compass, set of personal values and attitudes, as well as an established hierarchy of values, and in order to help them through potential dilemmas, and support their innate moral sense, we created the LINKgroup Ethical Test, Book of Corporate Ethical Principles, and Code of Ethics.

The domains and principles, regardless of the group to which they are classified, possess a universal value and apply it to all stakeholders.



## **1.2. DOMAINS AND PRINCIPLES OF ETHICAL BUSINESS OF LINKgroup**

### **DOMAIN 1: ATTITUDE TOWARD TRUTH, LAW, EDUCATION, SCIENCE, PROFESSION AND INDUSTRY**

Every employee and manager in the LINKgroup shall respect the law, corporate ethics, and standards, as well as all participants in the industry in which our company operates in all segments of the company's business activity, and each activity that takes place within the organization. Our business activity is ethical, socially responsible, and transparent. We believe in the role of education, science, and professionalism in providing the optimal conditions for the life and work of all citizens through the promotion of research results, i.e. dissemination of knowledge and transfer of technology, and we respect all those involved in research and development, acknowledge their contribution, and respect their personal, copyright, intellectual and other rights, and property. We believe that information technologies can provide the necessary solutions and support our company in achieving its business and societal goals, which is why we develop new solutions that our employees apply in their daily work. We develop new programs, software automation, and artificial intelligence projects, thus providing our students and the users of our educational services with the education they need to perform existing jobs in the best possible way, and prepare for the jobs of the future, respecting the irreplaceable role of human intelligence, i.e. teachers in educational processes and practices.

#### **Principle 1. Respecting truth and law**

The LINKgroup, all its employees, and board members shall respect and act in compliance with the Constitution, law and bylaws, as well as internal procedures important for the company's business activity within the sector, environment, and industry in which the company operates.

We respect the truth and truthful information and report on one's work and achievements. All data and information, external and internal reports, and notices must be based on objective facts and show the real state of affairs. It is forbidden to misrepresent or embellish the facts for personal benefit, or the benefit of any other employee or member of the group. The group shall never ask its employees to act dishonestly or unfairly, nor authorize any board member, manager, or supervisor to do so.

Any violation or non-compliance with the law and regulations may endanger the reputation and business of the LINKgroup and shall necessitate sanctions against the wrongdoer, defined in the company's external and internal regulations.

## **Principle 2. Respecting professional integrity**

Every profession involved in the business activity of the LINKgroup has its standards and business ethics that we understand and respect. The LINKgroup as an institution and its employees respect all professions and their contribution to the fulfillment of the group's business goals. We respect the standards and business ethics of each profession within the hierarchy of law and norms and value them in terms of its contribution to the fulfillment of our societal goals, and business goals that arise from them, as well as their importance for the specific program, i.e. project we implement.

It is prohibited to publicly disrespect or ignore any profession, or prevent employees from taking part in the business activity of the LINKgroup, provided that they possess the competencies, knowledge, and skills needed for the organization of work processes.

## **Principle 3. Respecting academic integrity**

LINK employees are free and responsible for their work and decisions, and are obligated to improve and develop their competencies and knowledge in line with the highest standards of the educational process integrated into the LINK Standards for Teachers, Students, and Educational Leaders. The LINKgroup promotes academic, intellectual, and spiritual freedom, and employees are obligated to use their acquired knowledge honestly and fairly, disseminate it, transfer it to others, and demonstrate intellectual honesty at all times.

Personal interests of LINK employees must not in any way jeopardize or compromise their creative and research freedom, fairness of expression, and evaluation of other people's success.

LINK employees involved in the educational process must be objective in their monitoring and assessment of student performance, applying appropriate objective, verified, and uniform criteria.

## **Principle 4. Respecting education, science, personal dignity, intellectual, copyright and personal rights and freedoms**

The LINKgroup and all its employees shall conscientiously and consistently respect the human rights and freedoms of all citizens based on the rule of law, international declarations, and the highest legal standards of the countries our students come from, and in which our company operates.

Any direct or indirect violation or infringement on other people's personal, intellectual, copyright, or other rights and freedoms, as well as the appropriation of other people's results and achievements as one's own is strictly prohibited.

We respect the role of education and science in reducing poverty, and improving health, gender equality, peace, and stability. We value the importance of promoting scientific research in solving social problems.

Any academic and scientific research must be based on a clearly defined method, and in no way jeopardized by the researcher's bias or personal interest of those who initiate, fund it or participate in it. The participation of everyone, as well as the sources used, must be acknowledged and compensated, without plagiarism, misattribution, or wrongful appropriation of merit.

Trying to influence the selection and shaping of the subject and goal of the research, research processes, method, and results of scientific research and academic work of employees with falsehood and bias is forbidden.

### **Principle 5. Equal rights and non-discrimination**

All activities and behaviors that jeopardize, belittle, discriminate or aim to isolate individuals or groups based on: racial, national, linguistic, religious affiliation, sexual orientation, physical and mental abilities, and characteristics, disabilities, health status, age, social or cultural background, social status, and political affiliation are prohibited, as well as encouragement and non-prevention of such activity, as well as discrimination on other grounds defined by the Law on the Prohibition of Discrimination.

Discrimination of a person or group of persons involves any direct or indirect, open or covert exclusion, isolation or limitation of their rights and freedoms, unequal treatment or failure to act, making unjustified distinctions, by favoring or giving preference to one at the expense of the other. Introducing special measures aimed at achieving full equality, protection against discrimination, and advancement of each individual, i.e. group of persons who are in unequal/disadvantaged positions is not considered discrimination.

### **Principle 6. Respecting industry**

The industry, i.e. business activity within which the LINKgroup operates, involves different participants on the supply and demand side, as well as representatives of educational policymakers and public figures. The LINKgroup values and respects the role and importance of each participant in the economic and social system, and supports adherence to the principles on which the sector of education is built, as well as the principles of its creators and policymakers.

Exclusion, isolation, or disrespect toward any of the relevant stakeholders without whom building good business relationships, optimal growth, and development, as well as fulfillment of the group's business and societal goals would be impossible is prohibited.





## **DOMAIN 2: TREATMENT OF EMPLOYEES**

The LINKgroup respects and values the contribution of every employee and appreciates the value they generate for the organization. We believe that the growth and development of the group and employee development are processes that must occur side by side. All people are equal in their freedoms and rights, and advancement is not reserved only for the select few. Through our professional development programs, the group gives equal opportunities to all, and their advancement depends on their development potential and acceptance of the opportunities offered. Our group has zero tolerance for injustice, violence, and discrimination, and provides equal opportunities for all employees through our programs and promotion of fair HR management practices, as well as the elimination of errors during the implementation of certain phases and processes. We nurture quality two-way communication, open door policy, meritocracy, open dialog in conflict resolution, and mediation over the arbitration.

### **Principle 7. Managing equal opportunities and diversity**

The LINKgroup values the contribution of each employee in the realization of the group's business goals. We value knowledge and skills, and every employee shall be included in the projects from the domain of their professional and competencies, regardless of their position in the company's hierarchy.

Any form of unequal treatment or discrimination of employees in any stage of their employment within the group, or preparation for employment in the LINKgroup is prohibited, i.e. equal employment opportunities are guaranteed, including the processes of candidate recruitment and selection. It is prohibited to exclude employees from work processes, create an environment in which employees will not be able to exercise their right to decent work or implement such practices that would lead to unequal treatment of employees or unequal consequences.

### **Principle 8. Dignity of work and responsibility for professional development of all employees**

The LINKgroup shall provide optimal working conditions for its employees with challenging work tasks, application of development tools, and the use of the latest information technologies, and establish the practice systems within the human resource department in a way that respects the personality, behavior, results, and competencies of each employee.

Employees are expected to maintain an optimal level of competencies, acquire new knowledge and skills, and familiarize themselves with new practices and paradigms to ensure their professional relevance and competitive advantage.

Making purposeful mistakes in the assessment of employee individual and group performance, appropriation of other people's results as one's own, refusing to learn new procedures or acquire the knowledge necessary for development, and ignoring or refusing training aimed at eliminating performance deficits is prohibited.

### **Principle 9. Meritocracy as employee right**

The LINKgroup is dedicated to finding talents and changing leaders. Thanks to our open door policy and departure from strict hierarchy, we recognize and reward the best employees. We are continuously looking for new ways to recognize the most diligent among our employees and reward them by providing even more stimulating working conditions and opportunities for development. All our employees must point out dedicated employees to the management, respecting their own and other employees' career paths, if they are overlooked or not adequately recognized, promoted, or rewarded due to the size of the group.

### **Principle 10. Respectful and efficient communication with employees**

The LINKgroup insists on open two-way communication with employees. Timely and accurate information is crucial for making the best decisions, and communication is important for sharing information, controlling processes, motivating, building interpersonal relationships, and helping employees and management to be up-to-date at all times. Formal communication and its channels are crucial, both in vertical and horizontal communication.

Employees and management are required to remove obstacles to efficient communication, especially top-down and bottom-up communication, as well as to eliminate the MUM effect. Ways to overcome the barrier to effective interpersonal communication primarily include feedback, simplified language, and active listening.

Intentionally changing the context of information and distorting the real image of an event or a piece of data, as well as denying access to information to those entitled to it, or filtering information for the purpose of manipulating it, is forbidden.

### **Principle 11. Prohibition of harassment and violence**

All forms of harassment are prohibited, especially those based on abuse of power, and institutional or hierarchical advantage. Any form of violence against employees and clients, and any gross violation of their rights and freedoms is prohibited, as well as creating an unfavorable working atmosphere or hostile working environment.

Violence and abuse imply any form of verbal or non-verbal behavior committed once or repeatedly that results in a real or potential threat to an employee's or client's health, development, and dignity.

## **Principle 12. Fair conflict resolution**

Conflicts occur in every organization, but their effect must not be necessarily negative, because they may lead to an exchange of opinions. In the case of negative effects, i.e. disagreements and confrontations that may threaten interpersonal or intersectoral relations within the group, adequate conflict resolution strategies shall be implemented.

Supervisors and managers are expected to know the organization, possess empathy and understanding of the situation, as well as to choose optimal methods and strategies for conflict management and resolution. The LINKgroup does not believe in arbitration as the primary choice, but in open dialog and mediation, but in the case of a conflict escalation or lack of other methods, the arbitration will be chosen to protect our business and our stakeholders. Starting and provoking conflicts that may jeopardize the good atmosphere in the group or suspend the work process, harm employees, clients, organization, or other stakeholders is forbidden.



### **DOMAIN 3: CUSTOMER RELATIONS**

The LINKgroup and all its employees and board members understand that clients are the focus of the group's business activity. Clients in the industry in which our company operates include students, their parents and guardians, users of our training programs, and educational services. We treat the needs of our clients on an individual level, building personalized services tailored to the needs of our clients, and delivering promised learning outcomes and goals. Because of our customers, we develop new and innovative existing services and improve work processes to deliver superior customer service. We communicate with clients and involve them in the life of our educational institutions and the decisions we make, as well as projects that we make for them. We nurture partnerships with our clients, based on mutual trust and benefit. The partnership we offer does not end on the day of graduation, nor does it apply only to students/customers/users, but to their families as well. We believe in cooperation and support.

#### **Principle 13. Let's make education accessible to all**

Quality education is a universal human right, and as such, is a requirement for the successful functioning of the individual and society as a whole. Through different educational and training programs, the LINKgroup offers access to quality education to citizens from all over the world without discrimination, by removing barriers to access. Due to access costs of business aimed at providing the best educational resources to our students, as well as differences in discretionary incomes of citizens, there are bound to be some financial barriers to accessing some of our services.

To ensure that education is accessible to those with financial difficulties as well, we strive to overcome these obstacles as much as we can by providing different forms of financial support, tuition reduction, and scholarship programs, without infringing on the rights of other students. Through free seminars and education programs, as well as the promotion of scientific research results, we seek to disseminate knowledge and share data and information from various fields of education with interested parties and individuals.



## **Principle 14. Responsibility of providing modern education tailored to the needs of clients and labor market**

Quality education is a requirement for the acquisition of knowledge and values, making adequate decisions and choices, and success in one's personal, professional, and social life. The LINKgroup provides modern education tailored to the needs of our clients and the labor market.

Employees and management of our institutions are expected to assess, modify and improve their working practices, providing quality education to all students and clients.

Employees and management of the LINKgroup are obligated to continuously harmonize the services and practices of the group with the needs of clients and the labor market. Any neglect of a client's needs and failure to provide services by the promised, i.e. agreed elements and quality will be considered a gross violation.

## **Principle 15. Responsibility of knowing and using the best educational practices and technologies**

Employees must possess adequate knowledge of the role of information technologies in the teaching process, and use modern tools and technologies to improve student knowledge and competencies.

In addition, employees are expected to improve existing and implement new knowledge, practices, and teaching methods to improve student knowledge and competencies.

Employees are not allowed to ignore the requirements of the group placed before them, and they are obligated to be familiar with and use modern tools and technologies for professional development and educational processes, to provide clients with the education they have been guaranteed.

## **Principle 16. Prohibition of inconsistency and bias in student performance assessment**

The LINKgroup defines the professional duties of all employees involved in the teaching process, including, but not limited to, the area of student performance assessment, through LINK standards for teachers, educational leaders, students, and other employees, as well as through its internal procedures.

Our employees are expected to act with academic honesty, objectivity, and impartiality in the process of conveying knowledge, assessing student performance, and ensuring the transparency of processes and access to information.

## **Principle 17. Prohibition of bribery and gratuities**

Employees must not accept financial or other benefits from third parties, unless it involves small, symbolic gifts, which do not violate the rules and regulations of the LINKgroup, or if such gifts are expressly permitted or otherwise disclosed to the LINKgroup.



## **DOMAIN 4: RELATIONSHIP WITH CREDITORS, INVESTORS, SUPPLIERS AND COMPETITION**

The LINKgroup and all its employees and board members understand the importance of good interpersonal relationships based on mutual respect between the group and all organizations operating in the external environment. In addition to our clients, there are various institutions and social communities in the external environment, as well as investors, suppliers, and competition. We believe that investors and all those who share the same values as our group will help us improve society and the national community within which we operate, as well as improve the quality of education as a whole, curriculum by curriculum, and not just processes and methodology in our educational institutions, programs, and services. Everyone has a role to play in the realization of our mission and vision. Creditors and investors are there to help us drive changes together and to make them comprehensive and timely. Suppliers are there to help the articulation of our vision with their expertise, and competition is there to remind us that we must never be reconciled with the status quo. This is why we nurture relationships with all three groups, valuing their contribution to our business activity and their help in maintaining our focus and commitment to the achievement of societal goals, rule of law, and personal freedoms.

### **Principle 18. Prohibition of evading obligations to and violating the rights of creditors, investors, and suppliers**

The LINKgroup respects its contractual relationships with creditors, investors, and suppliers, and values their contribution to the group's success. Any disregard of mutually agreed rights and obligations that may harm the group, clients, or contracting parties is prohibited.

### **Principle 19. Fair treatment of competition**

The LINKgroup understands that competition is what drives the market forward. We believe that successful companies compete with their market rivals in an intensive, but fair game, seeking to gain a competitive advantage solely by legal and fair means. Doing business in an open and free market implies efficiency, innovation, and superior service as key to the group's success. We treat competition transparently and openly and expect all our employees and board members to behave in the same manner.

Giving false statements that unfairly diminish or minimize the importance of our competitors in public, or with their potential or existing creditors, investors, and suppliers, as well as among potential employees and clients is forbidden.

### **Principle 20. Prohibition of competitive activity**

Given that the LINKgroup invests a lot in our employees and their professional development, to enable them to acquire new and important technological and other knowledge and competencies, and given that such treatment involves meeting our partners, clients, suppliers, investors, and creditors, and access to business information and secrets, employees are not allowed to work for our competitors, which is defined in the mutual rights and obligations of employees and the employer. We believe that in this way, we protect our business information, clients, and other stakeholders, as well as our business and societal goals.



## **DOMAIN 5: RELATIONSHIP WITH INSTITUTIONS, SOCIAL COMMUNITIES, AND SOCIAL INSTITUTIONS**

The LINKgroup, and all its employees and board members understand that achieving societal goals, and solving environmental and social problems requires a broad platform that involves government and non-government institutions, various social communities, and social activists. We believe in the role and importance of all these institutions and in respecting the social contract, which requires the support of all its signatories. Improving education through the use of cutting-edge technology and software, process automation, and the application of new methods is the goal of education policymakers and other external stakeholders with whom the LINKgroup seeks to establish cooperation by providing leadership, knowledge databases, and teamwork. The LINKgroup promotes social engagement of its employees and clients through empowerment, and preparation of concrete programs and projects aimed at empowering citizens and raising their awareness of environmental and societal problems, i.e. by participating in the fight against perceived social inequalities and injustices. Through projects of service learning and other forms of experiential learning, we teach our students how to be sustainable, eco-friendly, compassionate, financially literate and how to think critically.

### **Principle 21. Involvement in humanitarian work and social engagement**

The LINKgroup is a socially responsible company dedicated to achieving societal goals. We help individuals and groups to solve environmental and societal problems. All activities of the group in the field of philanthropy and social engagement must be conducted transparently and systematically to ensure our contribution to solving problems that are significant for the community to which we belong, and to ensure transparency of the process itself.

We expect our employees to take an active part in the group's projects and programs aimed at solving environmental and other societal problems, in line with the group's philanthropic efforts, and propose to clients and suppliers to take part in the same activities, without forcing them.





## **DOMAIN 6. ATTITUDE TOWARD GROWTH AND DEVELOPMENT OF LINK-GROUP**

The LINKgroup was founded to achieve long-term goals. We believe that changing education to meet the needs of society and the economy, and in a way that will change the world for the better for our children, and ourselves, is not a short-term or a time-bound task. We are here to stay. We know that we are just a stopover for some of our employees, and that they plan to remain with us for a few months or years, but this is our life, and we don't have a "spare" job. That is why we must protect our way of life and everyone in it, from employees, clients, and suppliers to creditors, investors, and society in general. We have to protect our way of life and business. This domain and its principles were created as a reminder of what our company needs to survive, manage its internal and external environment, and achieve its business and societal goals. We believe that everyone who reads this document will understand why it is necessary.

### **Principle 22. Security and protection of LINKgroup**

Employees are duty-bound to inform the management of the LINKgroup of all elements that, by their estimate, may jeopardize the survival, reputation, and fulfillment of obligations toward employees, clients, suppliers, and other stakeholders. This applies to all identified or perceived threats and dangers originating from the company's internal or external environment of which they have direct or indirect knowledge. Sources of information include oral and written remarks of clients, and suspected or observed subversive activities based on well-founded indications.

### **Principle 23. Obligation of following changes in internal and external environment**

All employees, especially management, are obligated to implement the principles of strategic management to analyze the business performance of the LINKgroup, and inform the board of the LINKgroup of all perceived strengths, weaknesses, opportunities, and threats, as well as suggest future strategic directions. In addition, employees are obligated to inform the management about all announcements of legal actions aimed at changing the law, economic or legal environment, and other elements that can directly or indirectly affect the group's activity and survival, as well as business climate in which the group's business and development activity take place, but do not directly affect the company by taking part in professional associations and following economic, educational and social trends.

## **Principle 24. Subordination of personal interest to corporate interest of LINKgroup**

Employees, managers, and members of the board should perform their activities in line with the business policies and goals of the shareholders-founders. This means that, given the nature of their position, when making business decisions, their interest must be subordinated to the interests of the group. If employees, managers, and members of the board should act solely in their interest, this can make their business decisions potentially detrimental to the interest of the group as a whole.

All employees are encouraged to achieve business goals in line with the fact that the LINKgroup is primarily oriented toward long-term goals, primarily growth and development.

The group shall make its business, financial, and investment decisions in line with its long-term business plans.

## **Principle 25. Protecting reputation of LINKgroup**

The LINKgroup has built its reputation for over two decades. We carefully analyze and consider every business and investment decision, making sure that the behavior of the group and all its employees is by the legal and ethical norms, and that it will generate value for our stakeholders. The diploma or certificate of the LINKgroup possesses certain value, and by continuously working on the group's growth and development, and building the capital of knowledge and good reputation, we are continuously increasing that value. We care about our good reputation, and we are aware that it is difficult to build and easy to lose. We watch every word, written or spoken, every idea. We particularly care that our employees speak and think well about their company, and share our values.

Presenting the LINKgroup in a bad context, using hate speech, unauthorized presentation of the group in public, or slandering and discrediting the group, its employees, values, and achievements in public is forbidden.

## **Principle 26. Protection of confidentiality**

Employees undertake to protect the confidentiality of all information and documents, i.e. business secrets they are privy to during their employment in the LINKgroup, as well as after they have left the group. We at the LINKgroup have a motto when it comes to confidentiality: Everything about the company is a business secret. Once you understand that, you will never be in a dilemma again. Any violation of this rule will be sanctioned by the law to protect our relationships with the stakeholders, and our data, including personal data.

## **II. CODE OF ETHICS OF LINKgroup**

### **2.1. WHY DO WE HAVE A CODE OF ETHICS**

The LINKgroup is committed to doing the right thing at all times, which is why we have adopted this Code. Before you start reading the document, and understanding the values that motivated each paragraph, you should have a comprehensive understanding of the basic principles on which the Code is based. Any violation of the principles and provisions of this Code shall be adequately sanctioned proportionally to the gravity of the violation. We suggest that whenever you have a dilemma on how to proceed, you test your decision using the LINKgroup Ethical Test, and consult with your supervisor, manager, or a person in charge of Ethical supervision and control.

All LINK employees must be familiar with the laws and bylaws, as well as internal procedures relevant to their position within the company and profession, as well as LINK values and standards. Ignorance or misunderstanding of legal and ethical norms and standards cannot be used as an excuse for unacceptable or unethical behavior.

### **2.2. WHO DOES THE CODE APPLY TO**

The Code applies to all LINKgroup employees and board members, as well as all other persons who have a contractual relationship with the LINKgroup in the field of labor law, i.e. who represent the LINKgroup in relationships with third parties.

### **2.3. WHAT THE CODE ISN'T**

The Code does not and cannot replace other documents, policies, and internal procedures by which the business activity of the LINKgroup is defined and governed, nor does it affect the application of the law and bylaws that define the rights and obligations of employees.

The Code cannot repeal any applicable regulations or established norms in the workplace that must be respected. This Code should be observed as the basis for these rules and standards, and help one understand why they have been established in the first place.

### **2.4. BASIC PRINCIPLES OF LINKGROUP CODE OF ETHICS**

- The LINKgroup and all its employees shall always tell the truth and do so in a consistent manner.
- We respect the laws of the country in which we operate, and standards of ethical corporate behavior.
- The LINKgroup is committed to ensuring the development of education based on adherence to high standards and principles specified in the LINK standards for employees, teachers, and educational leaders.
- The LINKgroup shall do everything in its power to establish and maintain an environment in which everyone feels valued, respected, and free to express themselves.
- The LINKgroup nurtures meritocracy and values the contribution of each employee.
- The LINKgroup has zero tolerance for injustice, violence, and discrimination.
- The LINK shall do everything in its power to strengthen the social engagement of its employees and clients to reduce social inequality and solve societal problems.

- The LINKgroup is a socially responsible company dedicated to the principles of sustainable development, and our primary goal is improving education and solving the problems of both individuals and society as a whole.

## **2.5. DECOMPOSITION OF PRINCIPLES OF LINKGROUP CODE OF ETHICS**

1. Knowledge of laws, bylaws, and internal procedures of the LINKgroup relevant to the business activity of the group and its employees.
2. Following all internal procedures related to ethical behavior, academic integrity, and code of conduct issued by the LINKgroup or its educational institutions and services.
3. Knowledge of LINK standards for employees, teachers, educational leaders, and students, and behaving by the recommendations.
4. Behaving truthfully and consistently, and reporting in all internal and external written and oral business communication.
5. Maintaining academic integrity and objectivity.
6. Respect the rights, dignity, and freedom of others through ethical behavior in all aspects of one's work and communication with others.
7. Prohibition of any direct or indirect violation or infringement on personal, intellectual, copyright, and other rights of others, as well as the appropriation of other people's results and achievements as one's own.
8. Compliance with all policies, processes, regulations, and contracts of the LINKgroup and the workplace in terms of professional behavior and rules of conduct.
9. Accepting the values integrated into the group's mission, vision, goals, policies, and LINK standards for employees, teachers, educational leaders, and students.
10. Accepting business directives of the LINKgroup and work tasks received through channels of formal communication to perform entrusted tasks.
11. Performing obligations and tasks in line with the employee's competencies and professional knowledge, during regular working hours and within a reasonable time, in compliance with the principles of the Code of Ethics.
12. Treat clients, associates, management of the LINKgroup, and the public with respect and politeness.
13. Behaving in the best interests of the LINKgroup.
14. Adhering to all standards and obligations related to health and safety in the workplace.
15. Refraining from making any public statements regarding the business activity of the LINKgroup, unless expressly authorized to do so by the LINKgroup.
16. Refraining from negative comments about the LINKgroup on social media or any other public place and space.
17. Prohibition of acceptance of financial or other benefits from third parties, unless it involves small, symbolic gifts, which do not violate the rules and regulations of the LINKgroup, or if such gifts are expressly permitted or otherwise disclosed to the LINKgroup.
18. Prohibition of work or provision of services to third parties on behalf of the LINKgroup without the group's approval or authorization.
19. Obligation of identifying and reporting potential, perceived, or actual conflicts of interest (direct or indirect) that could jeopardize employees' obligations toward the LINKgroup, or its business, confidential information, or reputation. Employees must follow the LINKgroup practices and policies to eliminate or minimize any such conflict.
20. Prohibition of participation in activities that, in the opinion of the LINKgroup, jeopardize or threaten to jeopardize the company's reputation or property.
21. Prohibition of use of illegal substances (opiates) or alcohol in the workplace, or working under the influence of it.



22. Prohibition of any activity that aims to jeopardize, belittle, discriminate or isolate individuals, or groups based on: racial, national, linguistic, religious affiliation, sexual orientation, physical and mental abilities and characteristics, disabilities, health status, age, social or cultural background, social status, and political affiliation, as well as encouragement and non-prevention of such activity, as well as discrimination on other grounds defined by the Law on the Prohibition of Discrimination.
23. Prohibition of abuse of power and harassment.
24. Obligation to maintain and protect the assets of the LINKgroup, its data, personal data, as well as customer data (all data).
25. Obligation to respect the dress code and maintain a neat, businesslike, and representative appearance (including wearing a uniform if required), and cleanliness of the workplace.
26. Prohibition of using the Internet in the workplace and during working hours for personal needs, as well as viewing and downloading illegal and unethical, or otherwise offensive information and content.
27. Prohibition of using LINKgroup business email for communicating immoral or provocative content, or private communication.
28. Obligation to protect the confidentiality of all information and documents, i.e. business secrets employees are privy to during their employment in the LINKgroup, as well as after they have left the group.
29. Obligation of informing the management of the LINKgroup of all elements that may jeopardize the survival, reputation, and fulfillment of obligations toward employees, clients, suppliers, and other stakeholders.
30. Prohibition of pursuing personal interest by managers, and members of the board that leads to suboptimal business decisions which may jeopardize LINKgroup's success and benefit.
31. Prohibition of any representation of the LINKgroup in a bad context, use of hate speech, unauthorized presentation of the group in public, or slandering and discrediting the group, its employees, values, and achievements in public.
32. Obligation of the management to analyze the business performance of the LINKgroup by implementing the principles of strategic management, and inform the board of the LINKgroup of all perceived strengths, weaknesses, opportunities, and threats, as well as to suggest future strategic directions.
33. Obligation to maintain the basic principles of the LINKgroup, demonstrate honesty, and principled personal reputation at all times.
34. Obligation to report any activity of employees that violates or may violate any procedure or rule, to protect the group's business.



### **III. ETHICAL TEST OF LINKgroup**

1. Are the activities and decisions I make legal?
2. Do my activities and decisions I make reflect the values and standards of the LINKgroup?
3. How would I feel if I were treated the way I treat others with regard to my activities and decisions I make?
4. Are the activities and decisions I make in line with the LINK Code of Ethics and company policies?
5. Do I treat others with respect or do I violate their dignity? (Who will be affected by what I am doing now and in what way? Who will be affected in the long run and in what way?)
6. How would I feel if the news of my activities, and decisions appeared on the front page of some newspapers?
7. How would my family, friends and neighbors see my actions?
8. What does my inner moral compass say?
9. Will the LINKgroup suffer direct or indirect negative consequences due to the actions and decisions I make?
10. Will the decision I made stand the test of time?

## FINAL PROVISIONS

### WHO SHOULD I CONTACT FOR HELP OR TO REPORT SUSPICION OR MIS-DEMEANOR

Who should you contact about the ethical dilemma you have, or report a violation of the Code of Ethics of the LINKgroup, or Corporate Ethical Principles of the LINKgroup?

1. If you are an employee of the LINKgroup, you can contact your supervisor, manager, division manager, or the Human Resources department by email: [cabinet@link.co.rs](mailto:cabinet@link.co.rs).
2. Regardless of whether you are an employee, a manager in the LINKgroup, a client, or an interested citizen, you can contact the person in charge of the application of the Code of Ethics and Corporate Ethical Principles of the LINKgroup by email: [cabinet@link.co.rs](mailto:cabinet@link.co.rs).

We will respect confidentiality at all levels of the process, and there will be no retaliation for expressing concern or reporting violations of the Corporate Ethical Principles and Code of Ethics, because retaliation is against the values and beliefs of the LINKgroup, and is illegal.

The LINKgroup Book of Corporate Ethical Principles and Code of Ethics are strategic documents. Further implementation of the provisions, while respecting the unique characteristics and nature of each educational institution, service, and program within the LINKgroup, i.e. LINK Edu Alliance, is carried out through other policies implemented at the level of each institution, or group as a whole.



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