

CODE OF CONDUCT

COMPANY MISSION

We create platforms that provide Knowledge and Services to help businesses succeed in their ventures in the digital era. We do this with a talented pool of people with a growth mindset who can build platforms that empower our clients in conducting better business and consequently achieve better results.

Through this **Code of Conduct** we want to showcase our values and beliefs and ensure that these values get used by everyone joining New Media.

Our company's suppliers shall put into place safe working conditions and ensure their employees are treated with respect. Also their production processes should be responsible and environmentally friendly.

Our suppliers are selected and evaluated beyond the basis of economic criteria. We also look closely at environmental protection, compliance with human rights, labor and social standards as well as anti-discrimination and anti-corruption

PURPOSE OF THE CODE OF CONDUCT

The purpose of this Code of Conduct is to conduct the business of the Company in accordance with the applicable laws, regulations, rules and with the highest standard of ethics and values. The matters covered in this Code are of utmost importance to the Company, shareholders and employees.

Our Supplier Code of Conduct enlists our Supplier Partners in upholding these same principles. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.



Our Set of Values and beliefs include:

We stick to our word and keep our promise

We understand that our job starts when we promise to have something done. When we give our word to someone that one project is going to be implemented to the best quality and on a certain timeframe. So, we hire people with integrity who stick to their word and keep their promises. This determination to stick to our word is what differentiates us in our business and everyday life as people.

This applies to relationships with our clients, team members and suppliers / partners.

Great Communication is the key

We Communicate, we don't give orders. Great communication implies being kind to answer to every request made verbally or in writing. No communication should be left unanswered as we believe that is a sign of respect and part of the process in having more context into situations that improve decision making and gets the work done on time.

We are aware that the services that we offer or the job that we do can also be provided from other companies similar to us, but great communication between us and the client and treating our clients as friends makes an important difference for a long lasting relationship.

Great communication is necessary between colleagues, suppliers and clients.



COMPLIANCE WITH LAWS OR LAWS RELEVANT TO EMPLOYEE OR MEMBER RIGHTS

Our company is regulated by the laws of the Republic of Albania and all the rights of the employees and members of the company are protected by the Albanian law. There are specific laws for each field of treatment, where we can enforce the Labor Code for employees or The company law for members of the company.

Also, in **our company** are applied the international conventions and laws ratified by the Republic of Albania, which in certain fields protect the rights of the employees and the members of the company. We strive to implement all laws and regulations, in order to provide a comfortable environment for our employees and a clear vision for our company.

As a **responsible company**, we expect our global Supplier Partners to share our commitment to following the law. We expect our Supplier Partners to know and follow the laws that apply to them and their business and treat legal requirements as a minimum standard.

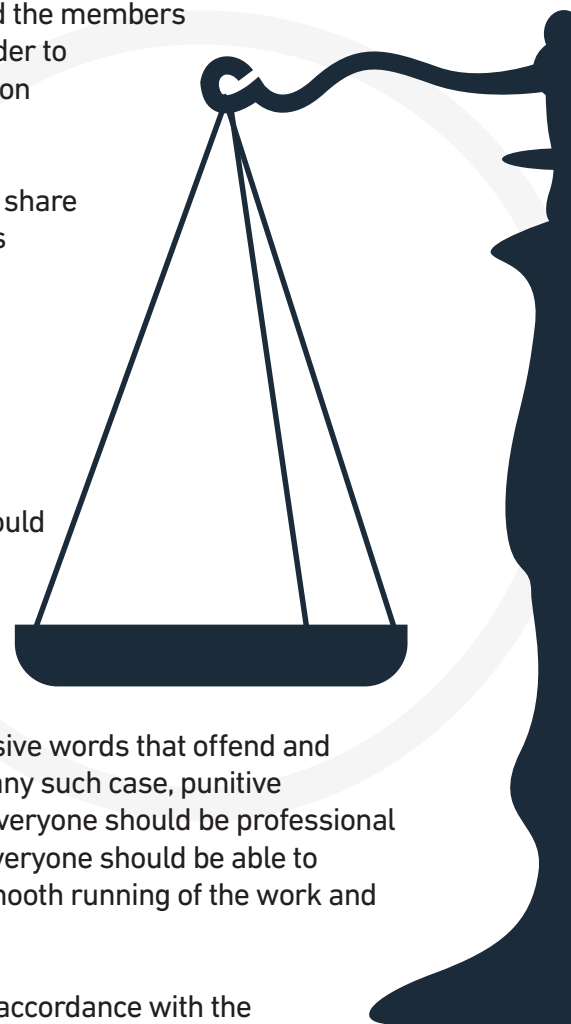
OUTLINE OF UNACCEPTABLE BEHAVIORS IN THE WORKPLACE AND THEIR CONSEQUENCES

Everyone is obliged to respect each other in the company, no one should be discriminated against because of race, religion, ethnicity, political, religious or philosophical beliefs, economic status, social status or parental affiliation. The values of the company and its image must be respected by all employees and members of the company.

Employees must respect work ethic that means that insulting, offensive words that offend and cause concern to colleagues are prohibited on company premises. In any such case, punitive measures and reprimands with warning for dismissal will be taken. Everyone should be professional in their relationship with each other and with the company's clients. Everyone should be able to separate personal issues from those of work without hindering the smooth running of the work and the atmosphere of the company.

We expect all the Members of the Company and Employees to act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct, while working at the Company's premises, at offsite locations, at Company's sponsored business and social events, and/or at any other place where the Members of the Company and Employees represent the Company.

We expect from all Members of the Company and Employees to be punctual, be honest, transparent, be friendly and smile.



PROTECTING CONFIDENTIAL INFORMATION

Members of the Company and Employees are required to maintain the confidentiality of all confidential information that they receive or become privy to in connection with the Company's business, except when disclosure is authorized or legally mandated. Confidential information includes all nonpublic information that might prejudice the ability of the Company to pursue certain objectives, be of use to competitors or harm the Company, its suppliers or its advertisers, if disclosed.

Confidential information also includes any information relating to the Company's business and affairs that results in or would reasonably be expected to result in a significant change in the market value of the Company's securities or any information a reasonable investor would consider important in making an investment decision. Members of the Company and Employees must not use confidential information for their own advantage or profit directly or indirectly.

CONDUCT BUSINESS WITH INTEGRITY

We seek business relationships based on trust, transparency, and mutual accountability.

We expect our Supplier Partners to compete fairly and ethically for Company's business, never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with Company's business, avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate and work with their own suppliers to promote business conduct consistent with the principles in this Code.

We work with Supplier Partners who share our desire to build productive business relationships. This requires honest communications, mutual respect, and delivering on commitments.

We expect our Supplier Partners to Share our commitment to conducting business honestly and transparently, and also to honor business obligations and manage unanticipated events in a proactive, timely, and open way.



TREAT PEOPLE WITH DIGNITY AND RESPECT

We expect our Supplier Partners to stand with us in prioritizing the safety, well-being, and dignity of all individuals, whose talents and hard work help us deliver our products and services.

We expect our Supplier Partners to:

Provide safe and healthy working conditions at all of their operations

Never use or tolerate the use of human trafficking, forced labor, or child labor as defined by the International Labour Organization (ILO)

Foster an inclusive work environment that is free of harassment and discrimination

Respect employees' rights to organize and bargain collectively

Meet or exceed all legal requirements for compensation and working conditions

