


# Code of Business Conduct

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## 1 INTRODUCTION

**The Code of Ethics and Business Conduct of MP PTUJ d.o.o. represents our ethical commitment and guidelines for appropriate business conduct for all our stakeholders.**

This Code of Business Conduct ("KO-MPP-24 Code") is an important document that represents the core values of MP PTUJ d.o.o. and the daily commitment of everyone in the organisation to the principles of socially responsible business.

The Code applies to all employees of MP PTUJ and related entities, regardless of their position, authority or responsibility, and serves as a guide to socially responsible behaviour and conduct in our daily work, when making the right decisions in various situations.

**We are committed to conducting our business lawfully, ethically and transparently. This document applies to all permanent and temporary employees, as well as those who do occasional work in the Company, in accordance with their respective responsibilities and competences. We aim to ensure that the provisions of this Code are also respected by our business partners and other organisations and individuals who do**

**business with us. 2 MISSION AND VISION**

Our mission is the quality (non-)series manufacturing and assembly of parts of steel structures and products for technological plants, the assemblies of which we manufacture and assemble according to the customers' designs and deliver within the contractual deadline, creating value for the owner and employees, as well as for customers through core processes such as production, assembly and sales, by contributing to lower costs of downtime in the investors' production process.

Our vision guides our organisation and helps all employees understand why and how they can support our organisation in consolidating our position as a reputable supplier to major customers in the investment equipment market, both in the region and abroad.

The specific values emphasised are: certified quality, audited financial statements; compliance with the legislation, standards and business practices; integrity and responsibility for commitments undertaken, including to the owner; commitment to generating positive business results; long-standing market presence and risk management; care, education and training for existing and new employees; respect for diversity and a non-discriminatory attitude to employees from other cultures; commitment to improving the management system; good and long-standing relationships with customers and suppliers.

## 3 TRUST AND CREDIBILITY

The success of our Company is based on the trust placed in us by our employees, our customers and our owner.

We gain credibility by honouring our commitment to integrity and achieving our goals solely through ethical conduct. Staff members are expected to observe this Code in their professional and personal conduct and behaviour and to treat everyone with respect, honesty and fairness. All staff members have a responsibility to act in good faith and not to do anything that would break the trust necessary for the employment relationship.

The Company is open to questions at any time and does not allow retaliatory measures against those who report breaches in good faith.

Managers and supervisors are responsible for responding promptly to any ethical issues raised or concerns expressed. Employees must cooperate with investigations into possible or suspected breaches.

## **4 ETHICAL PRINCIPLES AND VALUES**

The Company's fundamental values are:

- Respect for the law
- Responsibility and integrity
- Respect for others
- Honesty and fairness
- Reliability

## **5 ETHICAL DECISION-MAKING**

Ethical conduct means making decisions based on the values. In doing so, we must consider the answers to the following key questions, which help us identify situations that may be unethical, inappropriate or illegal:

Is what we are doing ethical and legal? Does it reflect the values and ethics of our Company? Is it in line with our Code and Company rules/policies? Are the rights of others respected? Are we deviating from the normal course of action?

## **6 COMPLIANCE WITH LAWS AND REGULATIONS**

Our commitment to integrity starts with compliance with laws, rules and regulations. We understand and respect the legal requirements and legitimate business practices. We are committed to complying with all applicable and binding contractual agreements that we enter into and do not abuse our rights. Our staff members must always comply with the applicable laws and regulations, including the Code, and ensure business compliance.

## **7 SUSTAINABILITY OF OPERATIONS**

We are committed to meeting the demands of the present without compromising the needs of future generations. This is why we combine economic, environmental and social factors in our operations and business decisions.

## **8 HUMAN RIGHTS**

We are committed to respecting the human dignity and rights of every individual and community with whom we interact or collaborate in the course of our business. We shall not in any way cause or contribute to human rights violations. Our staff members treat everyone with dignity, respect and due diligence.

## **9 FAIR WORKING PRACTICES AND WORKING CONDITIONS**

We are committed to promoting gender equality and fair employment in our recruitment practices, and to a pay policy that complies with the applicable laws. We condemn all forms of illegal, unfair and unethical labour practices that exploit the workforce, destroy social security or serve as tax evasion, including undeclared work or the shadow economy, and withholding payments. Our staff members shall act with integrity and treat their colleagues and others with respect at work.

### **10 DISCRIMINATION AND HARASSMENT**

Our Company does not tolerate discrimination, harassment or abuse of any kind. We do not allow any direct or indirect discrimination on the basis of any professionally irrelevant characteristic or circumstance, such as gender, marital status, age, national or social or ethnic origin, colour, religion or political opinion, disability, sexual orientation, worker representation or material or other status. All forms of discriminatory behaviour, harassment, victimisation or bullying are prohibited. All staff members are expected to meet the highest standards of conduct based on mutual respect in all forms of oral and written communication, and must avoid all forms of harassment, defamation or any behaviour that could be considered aggressive, intimidating, humiliating, malicious or offensive.

### **11 HEALTH, SAFETY AND THE ENVIRONMENT**

We ensure clean, safe and healthy working conditions and are committed to maintaining a healthy environment. We are committed to reducing the impact of our operations on the natural environment to the greatest extent possible.

We are working to reduce the use of limited resources such as energy or water, and to lower harmful emissions such as those from waste. All staff members must observe and comply with all relevant laws, regulations and rules at all times to protect health, safety and the environment.

### **12 FAIR COMPETITION AND BUSINESS CONDUCT**

Our relationships with our business partners are based on trust and mutual benefit, in line with competition law. We are committed to ethical and fair competition, and we sell our products and services based on their quality, functionality and competitive pricing. In our marketing activities, we make independent pricing and marketing decisions and do not cooperate inappropriately or coordinate our activities with our competitors. We do not tolerate any breach of fairness of any tendering procedure in any way. We shall avoid harming the competition and the reputation of our business partners, as well as any behaviour that undermines the credibility of a competitor. Our staff members are responsible for ensuring honest business in the course of their work and for complying with all competition and consumer protection and fair marketing rules. Customers and business partners must be treated fairly and equally, and products and services must be presented fairly and accurately and in such a way that all relevant information is given.

### **13 ANTI-CORRUPTION**

We strongly condemn corruption and do not tolerate any form of corruption. The Company has adopted a zero-tolerance approach to corruption. It is prohibited to offer, promise, give, solicit, induce or accept, directly or indirectly, any unfair advantage or benefit for the purpose of obtaining, retaining or in any way facilitating business. An unfair advantage or benefit may include cash or cash equivalents, gifts, credit, discount, travel, personal benefit, accommodation or services. Corruption also includes abuse of office or position. Corruption to obtain or retain business, or to obtain or retain an advantage in the conduct of business, is considered a serious violation.

### **14 GIFTS AND HOSPITALITY**

We must avoid any action that gives the impression that we are seeking, receiving or offering favourable treatment in exchange for personal gain. Business gifts or advantages include gifts, rewards, lunches, food and drink, entertainment or other benefits from persons or companies with whom we do or may do business.

We do not give or accept any benefits that constitute (or could reasonably be considered to constitute) unfair business incentives that would violate any law, regulation or policy or that could cause us embarrassment. We may accept and offer occasional gifts and hospitality that are customary and consistent with reasonable ethical practices in the market, provided that they are not inappropriately excessive, are not frequent, do not constitute a pattern of frequent acceptance and do not create the impression of an attempt to influence business decisions. Only everyday gifts of low value may be accepted. All other gifts should be politely declined or, if received by post, returned to the sender. If they cannot be returned, they shall be offered for charitable or community purposes. The person offering, giving, receiving or accepting a gift is responsible for deciding whether it is appropriate.

### **15 SAFETY, PROTECTION AND THE PROPER USE OF COMPANY RESOURCES**

We are responsible for the safety, protection and economic use of the Company's resources. Our resources, including time, materials, equipment and information, are for legitimate business use only.

Occasional personal use is only allowed if it is lawful, does not interfere with work performance and does not disturb morale in the workplace. All staff members are obliged to observe appropriate protection measures and to treat the Company's property, tangible or intangible, with respect and not to misuse or neglect the Company's resources.

### **16 CONFIDENTIALITY, INFORMATION SECURITY, CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY**

We are committed to the confidentiality, integrity and availability of business information, we have appropriate technical security measures in place, and it is the responsibility of our staff members to act accordingly. Confidential information includes, but is not limited to, any non-public information that, if disclosed to unauthorised parties, could be harmful to the Company or its customers and/or business partners. Our staff members must treat such information as confidential. All rules ensuring information security must be respected at all times. We respect the property rights of others. We shall not obtain or attempt to obtain trade secrets or other proprietary or confidential information using improper means. We shall not engage in the unauthorised use, copying, distribution or modification of software or other protected intellectual property.

### **17 BOOKKEEPING, REPORTING FACTUAL DATA AND FINANCIAL INTEGRITY**

We keep our accounting books, records, invoices and financial statements in appropriate detail, and they give a true and fair view of our transactions. We reject all forms of money laundering and are therefore committed to doing business with partners who operate legitimately with funds of lawful origin.

We are committed to fair taxation and avoid all tax avoidance practices.

All staff members must follow accounting procedures, ensure that accounting events are properly recorded and documented, and ensure that all disclosures in the financial statements are complete, fair,

accurate, timely and comprehensible. Staff members must not improperly influence, tamper with or mislead audits.

### **18 ANTI-FRAUD**

Fraud in all forms is prohibited. Any fraudulent conduct detected is treated as a suspected criminal offence, which is prosecuted ex officio and reported to the relevant law enforcement authorities. An employee's commission of fraud constitutes a serious breach of their employment obligations and will result in the immediate termination of their employment with the Company.

### **19 CONFLICTS OF INTEREST**

Our decisions must be based on objective and fair assessments and must not allow the possibility of any undue influence. A conflict of interest exists when a particular employee has a personal interest (which can be linked to e.g. friends, family or even a customer, competitor, Supplier or an entity of a contractor) that is in conflict or potential conflict with the best interests of the Company.

### **20 PRIVACY AND PROTECTION OF PERSONAL DATA**

We respect people's privacy and recognise the need for customers, employees and other natural persons to be able to trust that their personal data will be processed appropriately and for legitimate business purposes. We are committed to complying with all laws on the protection of personal data.

We only obtain and store the personal data that is necessary and we provide data owners with relevant information about these activities. We introduce appropriate security measures to ensure the confidentiality, integrity and availability of personal data. Our staff members must comply with the legal requirements, use compliant practices and follow related procedures to ensure the lawful processing of personal data and the lawfulness of the processing procedures.

### **21 CONCLUSION**

**Failure to comply with this Code shall be considered misconduct, which may lead to disciplinary action in applicable cases, including the termination of employment or other contracts. We are committed to ensuring that our values and norms are upheld**

**throughout the entire business chain of our business partners, subcontractors and service providers.**