

# BOSQAR INVEST

**POLITIKA**  
preprečevanja in  
sankcioniranja podkupovanja  
in korupcije

**POLICY**  
on the prevention and  
sanctioning bribery and  
corruption

Zagreb, 31. oktobra / October 2024

## UVODNE DOLOČBE

### Članak 1.

Ta Politika (v nadaljevanju "**Politika**") ureja ravnanje družbe BOSQAR d.d. (v nadaljevanju: »**Družba**«) kot tudi njenih odvisnih družb z namenom prepoznavanja in preprečevanja morebitnih primerov dajanja ali prejemanja podkupnin in drugih oblik korupcije z namenom ohranjanja integritete in ugleda Družbe.

Družba v celoti obsoja in ocenjuje kot nesprejemljiva vsa ravnanja, ki imajo značilnosti podkupovanja in korupcije. Družba tudi prepoveduje kakršno koli ravnanje v nasprotju s Konvencijo Združenih narodov proti korupciji z dne 25. septembra 2008.

## PODROČJE UPORABE

### Članak 2.

Člani uprave, nadzornega sveta in njegovih komisij, poslovodstvo, delavci, osebe, ki so na podlagi posebne pogodbe angažirane kot zunanji sodelavci (svetovalci, študenti ipd.) in druge osebe, ki delujejo v imenu družbe, so dolžne delovati v skladu s tem Pravilnikom.

Obnašanje oseb, ki jih ta Politika zavezuje, mora odražati načela in standarde, predpisane s to politiko.

Ta Politika zavezuje tudi vse odvisne družbe v obsegu, ki velja zanje, pod pogojem, da uprave teh družb to politiko sprejmejo s svojo odločitvijo.

## INTRODUCTORY PROVISIONS

### Article 1

This Policy (hereinafter: "the **Policy**") regulates the conduct of the company BOSQAR d.d. (hereinafter: "the **Company**") and its subsidiaries in order to identify and prevent possible cases of giving or receiving bribes and other forms of corruption in order to preserve the integrity and reputation of the Company.

The Company fully condemns and considers unacceptable all behaviours that bear the characteristics of bribery and corruption. The Company also fully condemns and considers unacceptable all behaviours that are contrary to the United Nations Convention Against Corruption.

## SCOPE OF APPLICATION

### Article 2

Members of the Management Board, the Supervisory Board and its boards, executives, employees, persons engaged on special contracts as external associates (consultants, students, etc.) and other persons acting on behalf of the Company are obliged to act in accordance with this Policy.

The conduct of persons subject to this Policy must reflect the principles and standards prescribed by this Policy.

This Policy also binds all subsidiaries of the Company to the extent that it is applicable to them on the condition that the Management Boards of those Companies adopt this Policy by their decisions.

## POJMI

### Članak 3.

»Podkupovanje« pomeni neposredno in posredno dajanje in ponujanje kakršne koli vrednosti in/ali koristi, da bi prejemnika ali katero koli drugo osebo spodbudili k neprimernemu dejanju ali dejavnosti ali k neizpolnitvi svoje obveznosti. Podkupovanje pomeni tudi neposredno ali posredno zahtevanje in prejemanje kakršne koli vrednosti ali koristi od kogar koli v zameno za neko neprimerno dejanje ali dejavnost.

»Korupcija« v smislu kaznivih dejanj korupcije ne zajema le dajanja/prejemanja podkupnin in drugih koruptivnih dejanj, temveč tudi poskuse, napeljevanje k pomoči in napeljevanje k takim dejanjem.

"Vrednost" ali "ugodnost" se nanaša na katero koli obliko ugodnosti, vključno, vendar ne omejeno na:

- denar ali denarni ustreznik, posojilo, darila, nagrade;
- ponudbe za zaposlitev ali obljube prihodnje zaposlitve (posameznikom ali njim bližnjim);
- ugodni pogoji za izdelek in/ali storitve in/ali popusti na izdelke ali storitve;
- plačilo potnih stroškov, nastanitve, prehrane, bivanja ali stroškov izletov ali bivanja v letoviščih;
- uporaba vozil ali nepremičnin;
- brezplačne ali znižane vstopnice za različne dogodke in zasebne storitve; ter

## DEFINITIONS

### Article 3

"Bribe" or "bribery" means the direct and indirect giving and offering of any value and/or benefit to induce the recipient or any other person to perform an inappropriate act or activity or to refrain from fulfilling his/her duties. A bribe also means the direct and indirect claiming and receiving of any value and benefit from anyone to perform an inappropriate act or activity in return.

"Corruption" in the sense of criminal offenses of corruption includes not only giving/receiving bribes and other corrupt acts, but also attempting, persuading, aiding and abetting the commission of such acts.

"Value" or "benefit" refers to any form of benefit, including, but not limited to:

- money or cash equivalent, loan, gifts, rewards;
- offers for employment or promise of future employment (to an individual or persons close to them);
- favorable conditions for the product and/or service and/or discounts on products or services;
- payment for travel, accommodation, food, living expenses or expenses for excursions or stays at resorts;
- use of vehicles or real estate;
- free or discounted tickets for various events and private services; and

- politične ali dobrodne donacije.

- political or charitable donations.

## NIČELNA STOPNJA TOLERANCE DO PODKUPOVANJA IN KORUPCIJE

## ZERO-TOLERANCE FOR BRIBERY AND CORRUPTION

### Članak 4.

### Article 4

Družba ima vzpostavljen, vzdržuje in stalno izboljšuje sistem vodenja preprečevanja podkupovanja in korupcije, ki zahteva skladnost z veljavno zakonodajo, ki opisuje koruptivno ravnanje in ureja njegovo sankcioniranje ter zahtevami mednarodnih norm.

The Company has established, maintains and permanently improves the management system to combat bribery and corruption, requiring compliance with applicable laws describing corrupt behaviour and regulate its sanctioning as well as with the requirements of international norms.

Družba ima ničelno stopnjo tolerance do podkupovanja in korupcije ter ju prepoveduje v kakršni koli možni neposredni ali posredni obliki.

The Company has a zero-tolerance policy for bribes and corruption and prohibits them in any possible, direct or indirect, form.

Prepoved podkupovanja in korupcije velja tako za državne uradnike kot za druge osebe v zasebnem sektorju.

The ban on bribery and corruption applies to both state officials and other persons in the private sector.

Družba se zavezuje, da bo preverjala vsa ravnanja, ki so v nasprotju z načeli, določenimi v tej Politiki, in sume morebitnega primera dajanja/prejemanja podkupnine ali druge oblike korupcije ter po potrebi izvedla preiskavo in sprejela disciplinske ukrepe s sankcijami, ki jih predvidevajo veljavni predpisi.

The Company undertakes to check any conduct contrary to the principles set out in this Policy and any suspicion of a possible case of giving/receiving bribes or other forms of corruption and, where appropriate, to investigate and take disciplinary action with sanctions provided by applicable regulations.

## PLAČILO ZA POSPEŠITEV POSTOPKA

## PAYMENTS WITH THE PURPOSE OF ACCELERATING PROCEDURES

### Članak 5.

### Article 5

Plačila za pospešitev postopkov so neuradna in Acceleration payments are unofficial and

naprimerne plačila majhnih denarnih zneskov nižjim uradnikom za zagotovitev ali pospešitev izvedbe rutinskih ali nujnih dejanj, za katere ima izvršitelj teh plačil zakonsko podlago za pospešitev.

Plačilo za pospešitev postopkov je prepovedano.

## TRGOVANJE Z VPLIVOM

### Članak 6.

Družba prepoveduje kakršno koli trgovanje z vplivom.

Za trgovanje z vplivom se šteje vsako stanje, ko nekdo z izkoriščanjem svojega službenega ali družbenega položaja ali vpliva posreduje pri izvedbi uradnega ali drugega dejanja, ki se ne bi smelo opraviti ali da uradno ali drugo dejanje, ki bi se moralo opraviti, ni izvedeno. Prav tako je strogo prepovedano spodbujanje druge osebe k enakim dejanjem kot sta obljuba in dajanje podkupnine.

## PRANJE DENARJA

### Članak 7.

Družba prepoveduje kakršno koli obliko pranja denarja.

Za pranje denarja se šteje vsako stanje, ko nekdo vloži, prevzame, pretvori, prenese ali nadomesti premoženjsko korist, pridobljeno s kaznivim dejanjem, z namenom prikriti ali lažno prikazati njen protipravni izvor ali pomagati storilcu ali udeležencu pri kaznivem dejanju, s katerim se je pridobila premoženjska korist, da bi se izognil pregonu ali odvzemu premoženjske koristi, pridobljene s kaznivim dejanjem.

inappropriate payments of small sums of money to lower officials to ensure or expedite the execution of routine or necessary actions which the executor of those payments has a legal basis to expedite.

Payment to expedite procedures is prohibited.

## TRADING IN INFLUENCE

### Article 6

The Company prohibits trading in influence in any possible, direct or indirect, form.

Trading in influence is any situation when someone, by taking advantage of their official or social position or influence, procures an official or other act that should not be performed or procures that an official or other act that should be performed is not performed. Inciting another person for the same purposes including making a promise and giving a bribe for this purpose is also strictly prohibited.

## MONEY LAUNDERING

### Article 7

The Company prohibits any form of money laundering.

Money laundering is any situation when someone invests, takes over, converts, transfers or exchanges the proceeds of crime in order to conceal or falsely present its illegal origin or when someone assists the perpetrator or participant of the criminal offence by which the proceeds were obtained to avoid criminal prosecution or confiscation of the proceeds of crime.

## PONEVERBA IN IZOGIBANJE PLAČILU

### Članak 8.

Družba prepoveduje kakršno koli obliko poneverbe in/ali izogibanja plačilu.

Za poneverbo se šteje vsaka situacija, ko si kdo protipravno prilasti tujo premočnino ali premoženjsko pravico, ki mu je zaupana ali jo je našel ali do katere je prišel po naključju.

Za izogibanje plačilu se šteje vsaka situacija, ko nekdo pri delu brez dovoljenja uporablja tujo premočnino ali lastninsko pravico, ki mu je zaupana.

## PRIKRIVANJE

### Članak 9.

Družba prepoveduje kakršno koli obliko prikrivanja.

Za prikrivanje se šteje vsaka situacija, ko kdo ve ali bi moral vedeti, da si je kdo neko stvar pridobil s kaznivim dejanjem zoper premoženje, prvi pa ne glede na to kupi, zastavi ali kako drugače pridobi, preproda ali skrije ali pomaga pri preprodaji ali skrivanju take stvari.

## EMBEZZLEMENT, EVASION

### Article 8

The Company prohibits any form of fraudulent evasion and/or embezzlement.

Evasion is considered to be any situation when someone uses without approval someone else's movable property or property right that has been entrusted to them or that they have found or accidentally come across.

Embezzlement is considered to be any situation when someone uses without approval someone else's movable property or property right entrusted to him/her at work.

## CONCEALMENT

### Article 9

The Company forbids any form of concealment.

Concealment is any situation when someone knows, or should have known, that another person has obtained an item through a criminal offense against property, and this first person still buys, pledges or otherwise acquires, resells or hides, or helps to resell or hide this item.

**DARILA IN GOSTOLJUBLJE****GIFTS AND HOSPITALITY****Članak 10.****Article 10**

Prejemanje in dajanje simboličnih daril ter gostoljubje poslovnih partnerjev v znak hvaležnosti in spoštovanja v določenih okoliščinah velja za zakonit del poslovanja.

Receiving and giving symbolic gifts, as well as the hospitality of business partners as a sign of gratitude and respect is considered a legitimate part of business in certain circumstances.

Pri prejemanju ali dajanju daril je treba upoštevati naslednje smernice:

When receiving or giving a gift/hospitality, the following guidelines must be followed:

- darilo mora biti dovoljeno z zakonom in s pravili organizacije prejemnika;
  - vrednost darila mora biti razumna in primerna položaju, okoliščinam in priložnostim obdarovanca, tako da ne ustvarja vtisa nepoštenosti ali neprimernosti in da ga obdarjenec ali druge osebe ne morejo napačno razumeti kot podkupnino;
  - darilo mora biti dano javno in transparentno (tajno obdarovanje ni dovoljeno);
  - darilo mora biti dano v imenu družbe, ne v imenu člana uprave ali zaposlenega osebno;
  - istemu prejemniku se ne sme podariti več kot trikrat v obdobju dvanajstih mesecev, da se ne ustvari vtis neprimernosti;
  - darila v obliki denarja ali denarnih ustreznikov niso dovoljena; ter
  - darilo ne sme vplivati na odločitve ali dejavnosti ali ustvarjati obveznosti na strani obdarovanca.
- the gift must be permitted by law and the rules of the recipient's organization;
  - the value of the gift must be reasonable and appropriate to the recipient's position, circumstances and occasion, so as not to create the appearance of dishonesty or inappropriateness and so that it cannot be misunderstood by the recipient or other persons as a bribe;
  - the gift must be given publicly and transparently (giving gifts in secret is not allowed);
  - the gift must be made on behalf of the Company, not on behalf of a member of the Board of Directors or on behalf of an employee personally;
  - gifts should not be too frequent i.e. more than three times in any 12 months' period so as not to create the impression of inappropriateness;
  - gifts in the form of cash or cash equivalents are not allowed, and
  - the gift must have no effect on decisions or activities of the recipient and must not create any liability for the recipient.

Če je vrednost darila večja od nominalne vrednosti 65,00 EUR, je pred prejemom oziroma izročitvijo darila potrebna predhodna pisna odobritev uprave Družbe in/ali oddelka za skladnost poslovanja.

If the value of the gift is higher than the nominal value of EUR 65.00 EUR prior written approval of the Company's Management Board is required before receiving or giving the gift and/or Compliance department.

Vsa darila v vrednosti nad 65 EUR morajo biti vpisana v Evidenco daril, ki jo vodi oddelk za skladnost poslovanja, sicer se lahko darilo šteje za podkupnino.

All gifts with a value of more than 65 EUR must be recorded in the Gift Register maintained by the management team for combating bribery and corruption, otherwise the gift may be considered a bribe.

Izogibati se je treba večkratnim darilom posameznim javnim uslužbencem in/ali družinskim članom javnih uslužbencev.

Multiple gifts to an individual public official and/or family member of public officials must be avoided.

Najvišja dovoljena vrednost darila se določi za vsako odvisno družbo posebej na podlagi Sklepa posloводства hčerinske družbe v skladu z zakonskimi predpisi države, v kateri odvisna družba posluje. Če ta znesek ni določen z zakonskimi predpisi, se uporabi tukaj določen znesek.

The maximum permissible value of a gift is determined separately for each subsidiary based on the decision of the subsidiary company's management in accordance with the legal regulations of the country in which the subsidiary operates. If this amount is not defined by law, the amount set out here applies.

## DONACIJE POLITIČNIM STRANKAM, DOBRODELNOST IN SPONZORSTVA

## DONATIONS TO POLITICAL PARTIES, GIVING TO CHARITY, AND SPONSORSHIPS

### Članak 11.

### Article 11

Donacije političnim strankam, voditeljem političnih strank in kandidatom lahko Družba daje samo v skladu z veljavno zakonodajo in zahtevami javne objave. Znesek in čas političnih donacij je treba spremljati, da se zagotovi, da se ne uporabljajo za korupcijske namene.

Donations to political parties, political party officials and candidates may be made by the Company only in accordance with applicable law and public disclosure requirements. The amount and timing of political donations should be monitored to ensure that they are not used for corruptive purposes.

V skladu s poslovnimi interesi in družbeno odgovornostjo Družba podpira sponzorstva in donatorstva. Sponzorske in donatorske storitve urejamo in izvajamo preko oddelka za trženje in odnose z javnostmi, predvsem za marketinške namene družbe.

Vsako sponzorstvo ali donacija mora biti pregledno dokumentirana s sklepom vodstva družbe ali pogodbo o dajanju donacije ali sponzorstva.

Dobrodelni prispevki in sponzorstva se ne smejo uporabljati v koruptivne namene ter morajo biti transparentni in v skladu z veljavno zakonodajo.

## NASPROTJE INTERESOV

### Članak 12.

Prepovedano je zaposlovanje in kakršna koli druga oblika koriščenja storitev posameznikov, ki so neposredno pred pričvrtkom sodelovanja, pa tudi v preteklem obdobju 6 mesecev, opravljali določeno javno funkcijo v sektorju, v katerem Družba deluje ali katerih angažma bi bil neposredno povezan z njihovo prejšnjo funkcijo.

## FINANCE IN RAČUNOVODSTVO

### Članak 13.

Vse finančne transakcije Družbe morajo biti pravilno in objektivno evidentirane v ustreznih poslovnih knjigah in računovodskih evidencah.

In accordance with its business interests and social responsibility, the Company supports sponsorships and donations. Sponsorship and donation services are arranged and provided through the marketing and public relations department, especially for the Company's marketing purposes.

Every sponsorship or donation must be transparently documented through a decision of the Company's management board, a donation agreement or a sponsorship agreement.

Charitable contributions and sponsorships must not be used for corruptive purposes and must be transparent and in accordance with applicable law.

## CONFLICT OF INTERESTS

### Article 12

It is prohibited to employ as well as otherwise use the services of individuals who, immediately prior to the engagement in question, as well as in the previous period of 6 months, held a certain public office in the sector in which the Company operates or whose engagement would be directly related to their previous function.

## FINANCE AND BOOKKEEPING

### Article 13

All financial transactions of the Company must be properly and objectively recorded in the appropriate business books and accounting records.

Letne računovodske izkaze bo revidiral nepristranski revizor tretje osebe.

The annual financial statements will be audited by a third independent auditor.

**Članak 14.**

**Article 14**

Ne sme biti "neuradnih", tj. tajnih računov, prav tako ne smejo biti izdani dokumenti, ki ne bi objektivno in natančno evidentirali transakcij, na katere se nanašajo.

There must be no "unofficial" or secret accounts, and documents may not be issued in which the transactions to which they relate are not objectively and accurately recorded.

**Članak 15.**

**Article 15**

Neobstoječi odhodki ali obveznosti, ki temeljijo na napačni določitvi njihovega predmeta ali transakcije brez pravega in zakonitega namena, se ne smejo knjižiti. Družba pa mora zagotoviti spremljanje denarnih plačil ali plačil v naravi, da se izogne njihovi uporabi v zameno za podkupnine in le majhna gotovinska plačila bi morala biti dovoljena z zneski iz državne blagajne ali v državah ali krajih, kjer bančni sistem ne deluje.

Non-existent expenses or liabilities based on incorrect identification of their subject or transaction without actual and lawful purpose should not be recorded, and the Company should ensure the monitoring of cash or in-kind payments to avoid their use in exchange for bribes and should only allow small cash payments from the treasury or in countries or places where the banking system is not functioning.

**Članak 16.**

**Article 16**

Družba mora zagotoviti, da se nobena knjigovodska ali druga pomembna listina namerno ne uniči pred zakonsko določenim rokom.

The Company needs to ensure that no accounting or other relevant documents are intentionally destroyed before the statutory deadline.

**Članak 17.**

**Article 17**

Družba je dolžna vzpostaviti neodvisne revizijske kontrole z namenom odkrivanja poslov, ki so v nasprotju s tem Pravilnikom ali ustreznimi računovodskimi pravili in ki po potrebi predvidevajo ustrezne korektivne ukrepe.

The Company is required to establish independent audit controls for the purpose of disclosing transactions that are contrary to these Rules or the relevant accounting rules and which, if necessary, provide for appropriate corrective action.

**Članak 18.**

**Article 18**

Družba je dolžna spoštovati vse določbe nacionalnih davčnih predpisov, vključno s tistimi, ki prepovedujejo odbitek kakršne koli oblike podkupnine od obdavčljivega dohodka.

The Company is required to comply with all provisions of national tax regulations, including those prohibiting the deduction of any form of bribe from taxable income.

## TRANSPARENTNOST

## TRANSPARENCY

### Članak 19.

### Article 19

Družba bo vselej transparentno predstavljala tako svoje pooblaščenke kot delničarje do nivoja dejanskih lastnikov in vse tako, kot to določa zakon o preprečevanju pranja denarja in financiranju terorizma.

The Company will always present its authorized persons as well as shareholders in a transparent manner, up to the level of ultimate beneficial owners, all as provided for by the laws on the prevention of money laundering and terrorist financing.

## PREVZEMI

## ACQUISITIONS

### Članak 20.

### Article 20

V procesu prevzema lahko obstaja tveganje, da je ciljna družba bila ali je še vpletena v dejanja podkupovanja in korupcije. Da bi zmanjšali takšna tveganja, je treba sprejeti naslednje ukrepe:

In the process of acquisition, there may be a risk that the target has been or continues to be involved in acts of bribery and corruption. To reduce such risks, the following measures must be taken:

- skrbni pregled pred sklenitvijo posla za prepoznavanje vseh potencialnih tveganj podkupovanja in korupcije
- implementacijo te Politike in usposabljanje zaposlenih po prevzemu, da bi zmanjšali možnost pojava tovrstnih tveganj v prihodnosti.
- pre-transaction due diligence to identify any potential risks of bribery and corruption
- implementing this Policy and training employees after the transaction to minimize the possibility of such risks occurring in the future.

Odločitev o prevzemu je sprejeta po preučitvi rezultatov poglobljene analize.

The decision to close the transaction is made after considering the results of the due diligence.

**PRIJAVA KRŠITVE ALI  
DOMNEVNEGA RAVNANJA  
ZOPER POLITIKO****Članak 21.**

V primeru, da katera koli oseba, ki je zavezana k uporabi te Politike, sumi zaskrbljujoče vedenje ali vedenje, ki bi lahko predstavljalo kršitev Politike, je dolžna svoje sume prijaviti v skladu s postopkom prijave nepravilnosti, ki ga določa interni akt družbe (glej Pravilnik o postopku interne prijave nepravilnosti in imenovanju zaupne osebe ali drug interni akt, ki ga sprejme odvisna družba, s katerim interni akt določa postopek prijave nepravilnosti).

V primeru, da katerakoli oseba, ki je zavezana k uporabi te Politike, sumi hujše kršitve Politike, to je, da pri kršitvi sodeluje član uprave ali nadzornega sveta, ali da taka kršitev vključuje znatna finančna sredstva ali domnevno kaznivo dejanje, mora svoje sume sporočiti nemudoma v skladu s postopkom prijave nepravilnosti, ki je določen z internim aktom družbe (glej Pravilnik o postopku interne prijave nepravilnosti in imenovanju zaupne osebe ali druge notranje akt hčerinske družbe, ki v internem aktu določa postopek prijave nepravilnosti).

**KONČNE DOLOČBE****Članak 22.**

Vsi člani uprave, nadzornega sveta in njegovih komisij, vodje, delavci družbe in osebe, ki so na podlagi

**REPORTING A VIOLATION OR  
SUSPICION OF ACTION  
AGAINST THIS POLICY****Article 21**

In the event that any person who is obliged to apply this Policy notices worrying behaviour or behaviour that could constitute a violation of the Policy, they are obliged to report in accordance with the procedure for reporting irregularities, which is defined by the internal act of the Company (see the Ordinance on the procedure for internal reporting of irregularities and the appointment of a confidential person or another internal act adopted by the subsidiary which defines the procedure for reporting irregularities).

In the event that any person who is obliged to apply this Policy suspects a serious violation of the Policy, i.e. that a member of the Management Board or the Supervisory Board participates in the violation or that such a violation involves significant financial resources or alleged criminal offenses, they must immediately report in accordance with the procedure for reporting irregularities which is defined by the Company's internal act (see the [Ordinance on the procedure for internal reporting of irregularities and the appointment of a confidential person](#) or another internal act adopted by the subsidiary company which defines the procedure for reporting irregularities).

**FINAL PROVISIONS****Article 22**

Every member of the Management Board, Supervisory Board and its committees, employees of the Company

posebne pogodbe angažirane kot zunanji sodelavci (svetovalci, študenti ipd.) ter druge osebe, ki delujejo v imenu Družbe, kot tudi vse odvisne družbe v obsegu, v katerem se zanje uporabljajo določbe te Politike, so se dolžne seznaniti z določbami te Politike in so pri opravljanju svojih nalog dolžne upoštevati navedene določbe.

Družba meni, da sta podkupovanje in korupcija resni vprašanji in bo v primeru neupoštevanja te Politike uporabila sankcije. Za zaposlene v Družbi lahko neupoštevanje privede do disciplinskih ukrepov, vključno z odpovedjo delovnega razmerja.

Za osebe, ki so zaposlene po posebni pogodbi, lahko neupoštevanje tega Pravilnika povzroči kazni, vključno s prekinitvijo pogodbe. Nadaljnji pravni ukrepi se lahko sprožijo v primeru, da so interesi Družbe oškodovani zaradi neupoštevanja in neupoštevanja te Politike s strani posameznikov in/ali organizacij ali drugih deležnikov.

Ta Politika bo objavljena na spletni strani Družbe, pri čemer Družba zagotavlja, da so vsi relevantni deležniki seznanjeni s to Politiko.

Noben zaposleni ne bo degradiran, kaznovan ali utrpel druge škodljive posledice zaradi zavrnitve sodelovanja pri korupciji ali prijave suma ali dejanskega primera ali poskusa prejemanja/dajanja podkupnine.

\* \* \* \* \*

and persons engaged on the basis of a special contract as external associates (consultants, students, etc.) and other persons acting on behalf of the Company, as well as all subsidiaries of the Company to the extent applicable to them to whom the provisions of this Policy apply are obliged to familiarize themselves with the provisions of this Policy and are obliged to comply with these provisions in performing their duties.

The Company considers bribery and corruption to be serious issues and will apply sanctions in case of non-compliance with this Policy. For employees of the Company, non-compliance may lead to disciplinary measures, up to and including termination of employment.

For persons engaged under a special contract, failure to comply with this Policy may result in penalties, including termination of contract. Further legal actions may be taken in the event that the Company's interests are impaired due to non-compliance with this Policy by individuals and/or organizations or other shareholders.

This Policy will be published on the Company's website whereby the Company ensures that all relevant shareholders are familiar with this Policy.

No worker shall be demoted, punished or suffer any other adverse consequences for refusing to participate in corruption or for reporting a suspected or actual case, or an attempt to give or receive bribes.

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