

CONFLICTS OF INTEREST MANAGEMENT POLICY

1. Introduction

As stated in the Code of Ethics, every employee must avoid situations that could lead to a conflict of interests of the company. Employees are thus obliged to inform the employer about the existence of all their relationships or connections (financial and other) with customers, competitors, business partners, and other entities cooperating with the company. Every employee should be familiar with this policy and act accordingly.

2. Objective

The objective of the policy is to establish rules for detecting, managing, and preventing conflicts of interest.

3. Scope and use

The conflict of interest policy applies to all employees and complements legal regulations in this area. It describes situations that could lead to a conflict of interest and the rules we need to follow in these cases.

4. Definition

Circumstances that may result in an employee having a conflict of interest with the company are, for example:

- An employee gives preference to one business partner over another for financial or other reasons;
- An employee gains benefits or avoids losses, thereby harming the interests and reputation of the company;
- An employee is engaged in the same activity as the company;
- An employee obtains a financial benefit from a business partner due to the service provided;
- An employee is involved in an activity that may damage the reputation, economic or financial interests of the company and, at the same time, is employed as a director or an employee of the company;
- An employee and his / her relatives are in a subordinate / superior position in the workplace.

5. Rules to prevent conflicts of interest / potential risks

5.1 Employees should refrain from any action that could undermine the credibility and integrity of any employee and the company and could lead to a conflict of interest between an employee and the company.

5.2 Employees should inform the employer in case they or one of their relatives has an ownership share in a competing company or are members of a management board or a supervisory board of a competing company.

5.3 If an employee recognizes a potential conflict of interest between him / her and the company, he / she must immediately inform his / her superior, who decides on further action (e.g. a ban on the work tasks where there is a risk of conflict of interest).

5.4 If an immediate superior is aware of the existence of a potential conflict of interest between his / her subordinate and the company, he / she must not entrust him / her with any work task that could actually lead to a conflict of interest.

5.5 If an employee is unable to avoid the situation referred to in point 5.4 and has to perform the task despite the existence of a conflict of interest, his / her superior shall exercise stricter control in order to protect the interests of the company.

5.6 Employees shall not use the name, logo, and printed materials of the company to perform activities not related to work tasks.

5.7 IT equipment and company cars may only be used for business purposes, unless otherwise specified in the contract.

5.8 An employee or the company in which the employee acts as the owner or a member of a supervisory board cannot perform services or provide other products for our company without the prior approval of the management of our company and at the same time demonstrated benefits for our company. An employee may not participate in the supplier selection process if the company in which he / she acts as the owner or a member of the supervisory board is one of the bidders.

5.9 Employees with access to confidential company information must carefully protect it and must never use it for their own benefit or the benefit of relatives.

5.10 Employees with family ties shall not be in a subordinate / superior position in the workplace. If such a case occurs, the manager must take appropriate action (e.g. reassignment to another SM).

5.11 The company's management should analyse the potential conflict of interest arising from subordinate or superior position of relatives in the workplace, and employees are obliged to inform the employer of the existence of such relationships, e.g. sibling relationships and their partners, and relationships between parents and children who do not live in the same household.

6. Follow up in the case of infringements

In the event of a detected violation of the conflict of interest management policy, the director of the general sector must be notified, who will act in accordance with the company's powers and Code of Ethics.

Slovenska Bistrica, 4 April 2019

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