

ANTI-CORRUPTION POLICY

1. Introduction

Operation of Aluminum Kety EMMI d.o.o. in the global market should always comply with the laws. We categorically oppose any act that would show signs of corruption or lead to corruption. All employees and business partners should be familiarised with the anti-corruption policy.

2. Objective

The objective of the anti-corruption policy is to reduce corruption risks in both internal and external relations of the company.

3. Scope and use

The anti-corruption policy applies to all employees and business partners and complements legal regulations in this area.

4. Definitions

Corruption – To promise, demand, receive, or offer, directly or indirectly, any financial or personal benefit in exchange for carrying out or preventing a business action.

Financial benefit – All forms of financial gifts (increase in assets, reduction of liabilities, more favourable loans, debt write-off, etc.)

Personal benefits – Non-financial benefits that improve the recipient's position (e.g. promised promotion, employment, unjustifiably reduced workload, etc.)

Nepotism – Abuse of position in employment, giving preference to family ties over the abilities of job candidates.

5. Rules to prevent corruption

Gifts and other benefits

It is prohibited to give gifts in order for a person to act in favour of our company or to prevent measures that are unfavourable to the company. Courtesy gifts of small value, which do not affect the impartiality of relations with business partners, are allowed.

It is prohibited to invite business partners to parties that are not part of a business event and are not related to the celebration of anniversaries and other important milestones of the company. It is also prohibited to attend sports, cultural or entertainment events of business partners that are not related to the celebration of anniversaries or other jubilee of the business partner.

It is prohibited to accept benefits such as payment of accommodation costs by the organizer of a business meeting, conference, training, workshop and similar events.

Cooperation with public institutions and civil servants

Cooperation with public institutions and civil servants should comply with all legal provisions and other rules applicable to such cooperation.

Nepotism and other prohibited employment practices

Nepotism is prohibited, as well as any offering or receiving of personal and financial benefits in exchange for employment, promotion, unduly reduced workload or discharge in the event of a breach of duties.

Business partners

It is prohibited to receive any financial or personal benefits from existing and potential business partners. Relationships with business partners should be based on professionalism and mutual trust, and decisions on mutual cooperation should always be made on the basis of facts alone. The basis for cooperation with business partners should be written agreements or orders, all payments for goods and services should be documented.

Accounting system

The company should maintain a reliable, transparent, legally compliant accounting system that does not allow unrecorded transactions, recording of non-existent costs, use of false documents and deliberate destruction of documents before the legally permitted deadline.

6. FOLLOW UP IN THE CASE OF INFRINGEMENTS

The company should document every actual and potential act of corruption and act in accordance with applicable legal and internal regulations. Any action that is contrary to the anti-corruption policy may lead to the termination of business cooperation.

Slovenska Bistrica, 22 February 2019

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