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## **GOLDEN RULES OF CONDUCT**

**Employee Code of Ethics  
within the MSIN Group**

December 2017

# SENIOR MANAGEMENT STATEMENT

Message from the General Manager of MSIN d.o.o.  
and from both owners Marko Mohar and Matjaž Satler

Dear employees and co-workers!

Our work does not only focus on satisfying the customers' and business partners' needs, ensuring the best possible products and services, on effective communication and proper flow of information, providing assistance to our colleagues or on creating a friendly work environment. The main impetus in terms of your employment should be on doing 'the right things' on a daily basis, meaning that you **respect yourself**, are familiar with who you are, where your place is, and that you are loyal, **comply with the law, behave honourably and are polite and respectful towards your colleagues and partners**.

With the adoption of the MSIN Group's Employee Code of Ethics (hereinafter: Code) we wish to remind all our colleagues how important it is to act in a professional and business-oriented manner, and to measure our own actions and the actions of others **according to high ethical standards**. Often we spend more time in the workplace than at home and so it is important that the workplace represents an environment that we enter and exit satisfied. Mutual relations and the success that we experience strongly influence our satisfaction. Being relaxed during work generally results in better performance. It is impossible to achieve excellent results on a daily basis. But in order to achieve as many successful days as possible it is crucial to create a positive atmosphere, a pleasant and conducive work environment, good relations among work colleagues, with clients and the external environment. A solid foundation of mutual trust and respect is not something that is built by itself or overnight. It has to be earned step-by-step each and every day. It requires hard work, commitment and the belief that we are doing things right and we are heading in the right direction.

This Code is also entitled '**The Golden Rules of our Conduct**', as it brings together a summary of the desired actions/conduct of all employees within the MSIN Group (hereinafter also: the group) and **our common values** that we were able to outline at the group level with your help. The mission of this Code is to translate these desired actions into the work environment, into practice, which can only be accomplished as a group, united – through decisions and actions. I wish that we are constantly committed to abiding by high standards of conduct in our work and in relation therewith. The reason why we wish to aim so high is completely practical by nature: only our commitment to high standards can contribute to our goal of having the opportunity to employ top-level individuals, manufacture superior products and attract first-class customers and business partners.

**Our objective is that the Code is adhered to by all co-workers and its use is encouraged in**

**practice.** It is therefore only natural for all employees to be apprised of its content – we need to be well familiar with everything the Code covers.

We are all responsible for the atmosphere we create at individual companies and within the Group as a whole. **We are also co-responsible for creating our own organisational culture which reflects our values, convictions and past actions.** That is why we suggest you read through and adopt this Code!

If you should have any questions regarding the Code, specific principles or any of its provisions, or if you determine that a colleague or the entire team does not abide by it, please do not remain silent. Inform us about this or of any other feedback you may have in connection with the Code. **In the event of questions, doubts or issues in using the Code we request you contact the HR representative at your company or the MSIN Group's Legal Department directly.**

Any questions or notifications regarding any violations of this Code or even legal violations that you observe can always be sent to the e-mail [info@msin.si](mailto:info@msin.si). Your complete anonymity is assured. **Any deviations from the commitments set out in this Code will be interpreted as undesired actions/conduct.**

The senior management of MSIN will protect the anonymity of the whistleblower, as well as preventing the whistleblower from being the target of any consequences or subject to disagreeable situations as a result of their notification. If you are subject to any disagreeable actions as a result of reporting violations of the Code or of any law, please contact MSIN's Legal Department. Anonymous letters can always be sent to the following address: MSIN d.o.o., Leskoškova cesta 6, Ljubljana.

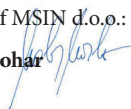
Do not forget: **It is extremely difficult to become a top expert without hard work and discipline!**

We appreciate your trust and wish you continued success in your work!

Marko Mohar, General Manager

Owners of MSIN d.o.o.:

Marko Mohar



Matjaž Satler



COMMITMENT

TO THE ACHIEVEMENT OF GOALS

RESPECT

INTEGRITY AND TRANSPARENCY OF OPERATIONS

COOPERATION AND TEAMWORK

PROFESSIONALISM

AND EXPERTISE

BUSINESS EXCELLENCE

ACTIVE ENGAGEMENT AND CREATIVITY

# VALUES OF THE MSIN GROUP

## **1. COMMITMENT TO THE ACHIEVEMENT OF GOALS**

We deliver what we promise.

## **2. RESPECT**

Respect yourself, your colleagues and the environment!

## **3. INTEGRITY AND TRANSPARENCY OF OPERATIONS**

Our decisions and actions are transparent and consistent.

## **4. COOPERATION AND TEAMWORK**

We are stronger when united.

## **5. PROFESSIONALISM AND EXPERTISE**

We are reliable and know what we are doing.

## **6. BUSINESS EXCELLENCE**

Best with a smile.

## **7. ACTIVE ENGAGEMENT AND CREATIVITY**

We develop solutions that improve the quality of life.

# WHAT IS THE CODE?

**This code is a selection of rules, standards of conduct and desired behaviour. It is an indication for employees as to how to act and operate within the MSIN Group.**

The actions of anyone within the MSIN Group affects the reputation and good name of the Group or of its individual companies. **The culture of the MSIN Group and its individual companies is created** from our actions. Our culture is the reflection of our principles, values, conduct and our success.

This Code should provide assistance to employees during daily activity/conduct. By using this Code we can avoid situations in which **we do not know how to act** or react to certain behaviour. The Code can be helpful **to avoid the violation of laws and damage being caused to the company (or the Group) or to the company's (or Group's) reputation**. Ultimately, it is also a tool for creating a friendlier work environment and contributes to **motivation and the greater satisfaction of employees**.

The Code does not set stricter rules of conduct but establishes a **standard of conduct that is based on ethical and moral principles**. This means that in addition to the Code employees must also be aware of and comply with the employer's other internal rules (general bylaws) that set out the organisation of the work process and the obligations that we as employees must be apprised of during our work.

**The violation of or disregard of Code rules may constitute a breach of an employer's internal rules or even legal breaches**, which may result in disciplinary procedures, liability for damages, or even in an individual's criminal liability.

# WHO DOES THE CODE FOCUS ON

**The Code applies to all employees within the MSIN Group.**

The Code will also apply to all employees working at companies who could become part of the MSIN Group in the future.

**We expect all our managers to comply with the Code and encourage co-workers to also comply with the Code, as the former lead by example.**

Alongside our employees, work at our companies is also often performed by students and scholars, workers who are hired via a temporary employment agency or contracted partners working under work, service, and copyright contracts. Therefore this Code also applies to them and serves as a guideline for their conduct during the period in which they are part of our work process.

With the publication of the Code on our website we wish to apprise business partners of our values and standards of conduct and thus ensure that they become familiar with its content and our commitment to compliance.

# PURPOSE OF THE CODE

People comprise an organisation and every one of us co-creates a segment of our and their story.

**An individual's objectives at the company are legitimate if they coincide with the company's objectives.** We as employees at the company create the company's story together, here and now, based on the decisions that are made daily and the actions that follow these decisions. What are the grounds on which we make decisions and what drives us to act in a certain way? Are the decisions that we make the right ones? In order to be able to answer both questions we must first ask ourselves where do we want these actions and behaviour to take us? Do we know in what direction we wish to go? In order for our common story to make sense we have to have an outlined objective. Each organisation has to have it in order to justify its existence or achieve its purpose, despite each employee being an individual within the organisation with their own goals. **Without purpose (goals) there is nothing to aspire to.** Without purpose there is no happiness or satisfaction; just remember the satisfaction you felt when you reaped the benefits of your work after achieving a specific objective!

**Every company has its own vision** and the most important part of a company's aspirations is to **realise its vision**. A company's business strategy and the values that a company adopts in the process of implementing that vision contribute to this in the long-term. **The strategy is the basis for defining interim goals and the manner of achieving the final result. It provides answers as to what needs to be done to achieve these objectives, while the values give answers as to how we need to act to achieve these objectives and how we need to work to achieve them, meaning how we need to behave in that respect. Do the ends justify the means? Certainly NOT!**

**The MSIN Group implements high moral and ethical norms.** We are especially attentive during our daily activities to always abide by and comply with these norms. Values that are classed under the 'personality' of our Group comprise our **system of values**. Values have the same role in the 'life' of our Group as they do in the lives of individuals: **they direct our actions and conduct, affect the Group's attitude towards itself, towards employees, business partners, the external environment, the company in general and towards social, environmental and other phenomena.**

The organisational climate measurements that we have been carrying out among employees within the MSIN Group since 2009 is an important indication of the mood: the atmosphere, attitude and conduct of employees at all companies. We wish to emphasise in the long-term how important it is to be aware of that mood and how vital it is to collectively build our **own organisational culture that is a reflection of our values, past events and our tradition.** We are focused on continuously stimulating senior management and executives to **create a positive climate among employees, towards employees and co-workers, work in general, external business partners, the social environment, our assets and nature, etc.** All these tools form part of our practice which has already had success in the past and will have even more success in the future in achieving our objectives.

This Code is an upgrade of all our aspiration, and even more clearly and declaratorily notifies and **binds senior management and all employees to co-create a positive, creative and dynamic environment.** This type of environment provides us support and an incentive for all our efforts to **achieve joint success**, at the same time also providing us a safe haven and understanding at times when everything does not go our way.

Let us be part of these efforts, since no one is perfect and no one constantly reaps rewards. **Values and therefore behaviour that encourages us to give and receive are inspiring for those who give and also for those who receive ... But you never know when these roles are reversed.**

**INTEGRITY  
IS DOING  
THE RIGHT THING,  
EVEN WHEN  
NO ONE IS  
WATCHING.**

**(C.S. LEWIS)**

# I COMMITMENT TO ETHICAL CONDUCT

**We strive to maintain high moral principles and ethical standards.**

We adhere to the constitution, international treaties, laws and other regulations, commercial usances (usages), best business customs and business practices.

**Our mutual relations are fair and based on mutual respect, dignity and personal integrity\*.**

We behave responsibly and during our work are active, honest and fair, fulfilling promises and assumed commitments.

We recognise that the satisfaction of employees, business partners and all of the other stakeholders brings good results, and so **we strive for the highest possible solidarity, mutual assistance and intergenerational exchange of experience**, for encouraging the younger members of the team and paying tribute to older members and other individuals.

We recognise that the preservation of integrity brings long-term partnerships and success.

**We protect our integrity and the integrity of others.**

\*

INTEGRITY: integrity, compliance, authenticity, fairness, credibility

A person with integrity is a person who means what they say and does what they say, in accordance with moral norms and applicable laws.

An organisation with integrity is an organisation with employees with integrity, while at the same time operating in accordance with the ethical norms specified in the code of ethics, general bylaws and applicable laws.

WE DELIVER  
WHAT WE  
PROMISE.



## II COMMITMENT TO RESPECTING THE FOLLOWING VALUES:

### 1. COMMITMENT TO THE ACHIEVEMENT OF GOALS

**We implement the outlined objectives.**

Our objectives are outlined objectively, taking into account the ethical standards and all the factors and stakeholders that exist in our environment when devising these objectives.

**The business results we wish to achieve are a reflection of our objective expectations and the expectations of our senior management.**

We implement our vision, mission and values regularly on a daily basis, thereby showing our responsible attitude to work and to our colleagues.

**We are determined and proactive.**

Consistent in the fulfilment of issued promises provided the objectives are outlined objectively.

We fulfil our tasks daily with the aim of achieving the outlined business results that raise productivity and result in the company's successful business performance.

When making decisions and implementing activities we **comply with the cost effectiveness and quality achievement principles.**

We strive that every employee has a clearly defined suitable and useful role at the company that is tailored to their knowledge and skills. Each employee is independent when implementing these outlined objectives.

**We act responsibly.**

**COMMITMENT means the pursuit of what you committed to, long after the will to do this has disappeared.**

RESPECT  
YOURSELF,  
YOUR COLLEAGUES  
AND THE  
ENVIRONMENT.

## 2. RESPECT

**Respect yourself.** Every individual is important.

If we lead by example we encourage respectful relations in the workplace.

**We do not tolerate behaviour that creates a non-working, unstimulating or offensive work environment.**

We treat others as we would wish to be treated.

**We encourage equality** regardless of gender, race, age, state of health, disability, religious, political or other conviction, trade union membership, national or social background/origin, marital status, financial situation, sexual orientation or other personal circumstances.

Relations with co-workers and partners are built on mutual respect and the acceptance of their opinions, needs, feelings and contributions.

**We do not interrupt or cut into our counterpart's conversation.**

We pay close attention to the speakers and respond in good time through clearly expressed and professional communication.

**At meetings and workshops we avoid the use of smart phones, tablets and other media that divert our attention from the topic at hand at the meeting.**

We recognise that situations that are full of challenges contribute to an individual's personal growth and to our common growth, to development and doing good business. That is why we try to assist the co-worker in such cases.

Mutual assistance, incentives, learning and instruments for learning are regularly tailored to the individual in order for them to be able to effectively complete their work, in doing so achieving personal development and contributing to the implementation of the organisation's objectives.

**We support measures that make it easier to balance between work and family life.**

We especially respect co-workers that make an effort.

We are open to new ideas from co-workers.

**Success and achievements are recognised and rewarded.**

We are grateful for the positive energy workers bring to the workplace.

**We praise work that is performed well and issue criticism that is substantiated and constructive\*.**

We recognise that constructive criticism enables changes for the better.

The ability to accept criticism that is appropriate and maintains an individual's integrity is our virtue and strength.

We are responsible for ensuring a safe and healthy work environment.

**Respect is a two-way street:  
in order to earn it, you have to show respect.**

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CONSTRUCTIVE CRITICISM: see indent 8 of Section III Commitment to a culture of communication.

OUR DECISIONS  
AND ACTIONS  
ARE TRANSPARENT  
AND CONSISTENT.

### 3. INTEGRITY AND TRANSPARENCY OF OPERATIONS

**We respect the legal frameworks within which we operate.** We operate in accordance with the adopted work processes and procedures.

**We operate fairly, objectively (free from bias) and to the benefit of the company.**

The procedures employed for adopting decisions are transparent.

We pursue best business practices.

**The decision on the use of the company assets is adopted on the basis of at least three tenders that we obtain.**

In relation to all stakeholders\* our conduct is consistent and responsive.

We complete tasks and assignments on an on-going basis and in accordance with the issued authorisations.

**Our thoughts, wishes, ideas and criticism is expressed clearly and unambiguously.**

The protection of personal data and business secrets represents the core of our operations.

**We do not disclose the data regarding the company's performance to anyone, unless we are expressly authorised to do so.**

We inform our direct superior in good time of facts that are material to the company's operations.

**We do not conceal information and we also do not manipulate it.**

We provide correct and accurate information in good time.

We are trustworthy and are responsible for our actions and work.

We plan projects and their implementation consciously and objectively.

**Every employee is entitled to an open dialogue with their co-workers, supervisors and subordinates.**

We respect the association of workers under various forms of workers' representation.

We encourage an open and transparent dialogue between employee representatives and the company's senior management.

**'A lack of transparency results in distrust and a deep sense of insecurity.'**

Dalajlama

\*

STAKEHOLDERS: a group of people or other entities that influence one another. The company's stakeholders comprise owners, consumers, employees, suppliers, the local community, the state (government) etc., and influence the operations of the company and vice-versa.

WE ARE  
STRONGER  
WHEN UNITED.



## 4. COOPERATION AND TEAMWORK

**All of us collectively create the environment for successful cooperation and teamwork.**

Each and every co-worker must contribute to the consolidated results.

A colleague's success is also the success of the entire company.

We are all a part of the company and together form a successful work collective.

We work together with all our colleagues in good spirits and with honourable intentions.

**We introduce colleagues to their post and into their work environment.**

Providing assistance to colleagues is the key to joint success.

We respect knowledge – recognising that a variety of skills/knowledge complement each other and thus result in even greater success.

**We share/transfer knowledge and experience to co-workers.**

Motivation is vital. We need to work and operate as a group, encourage each other and at the same time recognise our mutual differences, strengths and weaknesses.

**We encourage the free flow of information and open communication that serves as the basis for successful cooperation.**

We identify and draw attention to issues in good time, as this can significantly affect cooperation and contribute to joint success.

**We resolve conflicts on an on-going basis with understanding and with the constructive confrontation of different views and opinions.**

Teamwork raises our potential in terms of flexibility, productivity and creativity.

**Individual goals are adapted to the objectives of the group** with the responsibility for the satisfaction of the individual conferred upon the group.

The key factor for successful and effective teamwork is a high level of mutual trust and respect.

**Cooperation is that difficult revelation that our common goal cannot be achieved unless we all work together.**

WE ARE  
RELIABLE  
AND KNOW  
WHAT WE ARE  
DOING.

## 5. PROFESSIONALISM AND EXPERTISE

**We are polite, respectful, operate in a professional manner and have a positive attitude.**

We are aware of our role within the organisation.

We respect our time and the time of others – **fulfilling our tasks on time without delay.**

We contribute to our joint achievements and success at our own initiative.

**We constantly seek solutions and do not make excuses why something cannot be done.**

We complete daily assignments consistently and responsibly to the best of our abilities.

If we do not know something or fail to understand it, we must not be embarrassed to ask for assistance.

**We tackle problems with a positive attitude and with optimism – as they provide us with challenges.**

When making decisions our rulings are objective and clear; our operations are thus effective and trustworthy.

**We are continuously responsible for personal and professional growth and for development which strengthens our professionalism.**

During operations we utilise the knowledge and technology at our disposal, thereby creating added value for partners, owners, the company and the environment.

**We create high-quality solutions that are the result of our work, competences, actions in accordance with the prescribed procedures, and of the fact that we love doing what we do.**

**‘Professional is not a label you give yourself – it’s a description you hope others will apply to you.’** David Maister

BEST WITH  
A SMILE.



## 6. BUSINESS EXCELLENCE

**Our actions and conduct comply with the principles of this Code and of other general bylaws adopted by the company.**

Through top-level services and product excellence we satisfy the needs and follow the interests of our clients.

**We know how to listen to clients and recognise their distinctive features.**

Long-term partnerships are built on compliance with client needs and on mutual trust.

**We provide the correct and accurate information regarding products and services.**

We recognise that the success of our business partners is also our success.

We are an equal partner and act honourably in relationships.

**We continuously upgrade processes and work procedures by being critical, innovative and by operating at the highest professional standards.**

We believe in the existence of fair competition and support it.

We recognise that we are a live element of the environment in which we operate and know how to adapt to changes and developments therein.

**‘Excellence is not a skill, it’s an attitude.’**

Ralph Marston

WE DEVELOP  
SOLUTIONS THAT  
IMPROVE THE  
QUALITY OF LIFE.



## 7. ACTIVE ENGAGEMENT AND CREATIVITY

**Active engagement and creativity are those who make the difference.**

We develop tailor-made advanced solutions.

**We ensure that we keep abreast with the most recent market developments and with the development of the sector and the relevant technologies.**

Improvements and practical suggestions help us improve the work process.

Our innovative way-of-thinking and ideas are shared with the team in which we operate.

**We respond to initiatives and proposals with agility\*.**

We recognise that our common path to the desired objective can only be accelerated by the employees, as we know our work best.

Innovativeness strengthens the power of thinking as a team and together we are able to create new solutions.

**We devise creative and effective solutions through an active and innovative approach.**

We respect intellectual property, whether are own or of a third party, and adopt the relevant measures for its protection.

We recognise that creativity requires protection and timely action needs to be taken to protect industrial property rights.

**We must ensure that we don't share our innovative activity with the public or third parties.**

**'An essential aspect of creativity is not being afraid to fail.'**

dr. Edwin Land

\*

AGILITY: agility, quick reactions that can appear as a change in direction; someone's ability to change direction rapidly.

### III WE ARE COMMITTED TO A CULTURE OF COMMUNICATION

THAT IS WHY:

- we recognise that communication is a reflection of our actions and affects a company's reputation;
- we communicate in a way to spend our time as efficiently as possible. In doing so we utilise all the electronic communication means available to us, never forgetting to foster mutual relations, as meetings are also very important;
- we are responsible for issuing feedback in good time;
- we communicate clearly, unambiguously and in good time;
- we avoid the use of smart phones, tablets and other media that divert our attention from the topic at hand at meetings and social events;
- we do not tolerate offensive behaviour, shouting, belittling, defamation, mobbing in communications between colleagues and do not behave that way ourselves;
- we are conscious of the fact that our behaviour does not cause our colleagues to feel discomfort;
- we present and allow criticism that is constructive – i.e. criticism that is expressed at the right time, in the right way, is substantiated and action-oriented, and is never directed against someone's personality or an individual;
- we realise that constructive criticism helps our co-workers by presenting to them the areas that they could improve on;
- we recognise that if the proper and constructive criticism is unsuccessful in achieving its goal, the criticism can be intensified; in that event we must not forget the significance of respecting and maintaining the integrity of the individual whose actions are subject to criticism;
- we must not be late to meetings and must actively participate at them in accordance with a meeting's objective;
- we prepare for the topic being discussed before meetings take place;
- we behave in a civilized manner, respectfully at meetings towards everyone, even those whose opinion we do not share, without insulting them and listening carefully to their opinion;
- we are kind, courteous, patient and attentive to the opinions of all persons taking part in the discussion;
- we abide by spelling rules when communicating in writing;
- we always respond to written messages if that is derived from the purpose of the subject being discussed, or if that is expected by the other party;
- we do not abuse business e-mail addresses for private means;
- we do not communicate outside the company on matters over which we have no authority;
- we do not communicate on social networks on behalf of the company;
- we do not share data about the company on social networks with the exception of data that is available to the public.

## IV COMMITMENT TO THE PROTECTION OF PRIVACY AND PERSONAL DATA\*

THAT IS WHY:

- **we recognize that the right to privacy is one of the most important human rights and therefore we respect the privacy of each individual, even in the workplace;**
- access to personal data is only authorised to employees who require such data for the performance of their work and assignments that are connected with a specific post that they hold, and to authorities that are authorised for such access pursuant to applicable laws;
- **personal data that we manage during work or in connection therewith must not be disclosed to or shared with any third party if there are no legal grounds or authorisation expressly issued by an individual therefor;**
- we protect personal data with the highest possible standard of protection and in accordance with the company's general bylaws and applicable laws;
- we address any questions about personal data management to MSIN's Legal Department, to the person authorised for the protection of data at the relevant company or to the information commissioner.

\*

PERSONAL DATA: any data that refers to an individual, irrespective of the form in which it is expressed. An individual must be a specific or determinable individual to whom the personal data refers; an individual is determinable if he/she can be directly or indirectly identified, in particular with reference to an identification number or a single or multiple factors that are characteristic for his/her physical, physiological, mental, economic, cultural or social identity, ensuring that the identification method does not cause high costs, disproportionately high effort or does not require a great deal of time; e.g. personal identification number, tax number, telephone number, wages in the private sector.

## V COMMITMENT TO THE PROTECTION OF BUSINESS SECRETS

THAT IS WHY:

- we recognize that **the company's business secrets comprise data that is confidential and owned by the company;**
- we acknowledge that data representing a company's business secret comprises **data that represent a competitive advantage of the company or Group** – these data can be related to finances, sales, be technical by nature, and other business data, personal data, internal (in-house) documentation relating to public tenders and an awarded public contract in the segment that is not available to the public, pricing policy and pricelists, data regarding clients, business relationships with clients, reports, research, expert reports, studies, analyses, projects, concepts, know-how, inventions, processes and standards, work and process procedures, safe work instructions, hardware and software, etc.;
- **we respect the general bylaw adopted by the company regarding the definition of and protection of business secrets** (hereinafter: employer's general bylaw);
- we know how to determine if specific data is a business secret even though it is not marked as such in the employer's general bylaw, i.e. **data which by its very nature is such that damage could be caused to the company if any unauthorised person would gain access to it;**
- we as employees are obliged to maintain the confidentiality of data that is a business secret, and prevent unauthorised disclosure thereof to third parties;
- we recognise that the abuse or deliberate distorted interpretation of a business secret can be detrimental to the reputation of a company and to its business interests;
- we recognize that **the unauthorized disclosure of business secrets jeopardises the business objectives of the company and causes the company irreparable damage;**
- we undertake to also protect the confidentiality of a business secret even after the termination of employment within the MSIN Group, and to refrain from any actions that could impair the reputation of the company or of the Group as a whole.

## VI COMMITMENT TO ABIDING BY OCCUPATIONAL SAFETY AND HEALTH STANDARDS

THAT IS WHY:

- **we are responsible for our own health at home and in the workplace;**
- we recognise that the work environment where we work should be safe, properly protected and health-friendly, to which we ourselves can also contribute to the best of our abilities;
- we know that we have to be informed of the risk assessment for our post and be familiar with its content;
- **we know that we ourselves are responsible for being apprised of the instructions for safe work;**
- we behave responsibly in the workplace with respect to our own health and the health of our co-workers – **always using the prescribed personal protective equipment and abiding by the prescribed procedures;**
- we recognise that the responsibility for safe work and work under the regulations governing safe work fall under the responsibility for the safety of all employees and contributes to the prevention of damage;
- **co-workers are encouraged to comply with occupational safety measures;**
- when a work hazard or disregard of occupational safety procedures is identified, we must inform our direct superiors thereof;
- in the event of a workplace accident we immediately inform our direct superior and the relevant technical department;
- we do not come to work or work under the influence of alcohol, drugs or other illicit substances;
- we know that working under the influence of medication that can affect an individual's physical and mental fitness is prohibited at posts where due to increased risk of workplace accidents this is specified in the safety statement (including risk assessment). The consumption of such medication during work should be discussed with the responsible technical department (occupational medicine or visit the head of the HR Department to be properly directed to the former);
- we recognise that **an employee under the influence of alcohol, drugs or other illicit substances cannot perform work and must be removed from the work process.**

## VII COMMITMENT TO ECONOMIC MANAGEMENT OF COMPANY ASSETS\*

THAT IS WHY:

- **we respect foreign property;**
- we are tasked with **responsibly managing all the funds and assets of the company;**
- **we only use the company's assets for business purposes**, if not determined otherwise, and always in accordance with the conferred authorisations;
- we strive for optimal solutions in all areas and treat the company's property as if it was our own;
- we use the company's assets and funds sensibly and economically;
- we prevent damage, destruction, disposal, loss or abuse of company assets;
- all the orders are carried out following a preliminary procedure in which at least three competing bids are obtained;
- we diligently strive to extend the useful life of assets and their yield;
- we do not misappropriate (usurp) the company's assets;
- we recognise that we are personally responsible for the company's assets that we manage;
- **we are responsible for the efficient use of working time**, within the scope of which we serve the employer and do not abuse it for our private activities or means;
- we duly and appropriately register our working time and never misrepresent it.

\*

ASSETS: assets, property

## VIII COMMITMENT TO THE PROTECTION OF INTELLECTUAL PROPERTY\*

THAT IS WHY:

- we realise that through our own creativity we can produce creations that we are obliged to properly protect in order to protect our rights against third parties who could otherwise exploit our creations without limitations.
- before presenting them to the public our own creations or inventions are protected in good time on the basis of procedures provided for this purpose by the relevant laws;
- we are careful not to disclose details, ideas or contents of our own creations or inventions until the procedures required for the protection of intellectual property rights have not been finalised;
- **we must always be duly convinced whether a creation can be protected as intellectual property, as we recognise that the selection of intellectual creations is diverse. In addition, we always seek professional assistance;**
- we never violate the intellectual rights of third parties: we do not use them without the proper authorisation and we do not imitate known copyrights, inventions that are the subject of industrial property or other rights;
- **we ensure in a timely fashion that the relevant written legal transactions are concluded regarding the use or exploitation of intellectual property rights, i. e. therefor we regulate rights through contractual means.**

\*

INTELLECTUAL PROPERTY: is a type of property that originates from human intellect and intelligence. Intellectual creations are intangible as such. If they are tangible the holder of the right thereto can exploit them commercially. Intellectual property is classed into two groups: into copyrights and related rights, and industrial property. There are also other so-called sui generis rights that are classed under other rights. The protection of copyrights is governed by the Copyright and Related Rights Act, while the fundamental characteristics and principles of industrial property rights are governed by the Industrial Property Act.

Industrial property rights comprise patents, models, trademarks and geographical indications. Patents protect inventions originating from all technical fields that are new, apply to inventive levels and are susceptible to industrial application. Models protect the outside appearance of products. A trademark is a legally protected mark or any combination of marks that enables distinctions to be made between the same or similar merchandise or services, and can be graphically illustrated. It is used for increased market recognition. Geographical indications are used to protect produce or foodstuffs that originated from a specific geographical region and are attributed a particular quality, reputation or other feature that originates from a specific geographical region.

## IX COMMITMENT TO PREVENTING BRIBERY

THAT IS WHY:

- **we do not promise, give or accept prohibited rewards, gifts or benefits to/from business partners or any other person during work or in connection with work. We also reject any promise or offer of prohibited rewards, gifts or benefits;**
- we recognise that a prohibited reward (gift or benefit) is a reward (gift or benefit) that has a disproportionate value and may influence an individual by persuading them to conclude a transaction that they would otherwise never conclude;
- we recognise that a permitted reward is specified as such in the employer's general bylaws, senior management resolution or applicable laws, and is granted to us by the employer as a result of successful performance;
- we are aware that occasional gifts or gifts out of hospitality are permitted. These are gifts below EUR 40 in value or up to 80 EUR at most, given to the same person or received from the same giver during the same year;
- **we accept occasional gifts and gifts out of hospitality but they do not in any way influence our business decisions;**
- we inform our direct superior of any accepted gift;
- occasional gifts and gifts out of hospitality are only offered to partners if authorisation for this is gained from our direct superior;
- **we do not accept or give gifts in the form of money, loans, securities, personal favours or valuable items or precious metals;**
- we do not enter into sponsorship agreements or provide donations that would damage the reputation of the company;
- we do not provide financial aid or support to political parties.

## **X COMMITMENT TO PREVENTING CONFLICTS OF INTEREST**

THAT IS WHY:

- **we operate fairly, objectively (free from bias) and to the benefit of the company;**
- business decisions are formulated in accordance with the company's objectives and according to its business plans and strategy and the employer's instructions;
- **our personal interests or connections do not affect our business decision;**
- in every situation we pay special attention to avoiding conflicts of interest – **our decisions must not be influenced by a prohibited interest, our personal interest or an interest that is not an interest that complies with the company's objectives;**
- **we exclude ourselves from procedures in which decisions are taken on our rights and obligations, on the rights and obligations of our immediate family members, relatives, friends or acquaintances;**
- we must inform our direct superior if we believe that our interests do not comply with the interests or mission of the company;
- we must inform our direct superior if we believe that our personal, business, political or other connections with a third party could affect our business decisions;
- **we must not abuse business connections acquired at the company or in connection with our work; this also applies even after our employment within the MSIN Group is terminated;**
- we diligently protect data about the personal, business, political or other connections of co-workers to which we gained access during our work or in connection therewith.

## **XI COMMITMENT TO THE SECURE MANAGEMENT OF INFORMATION TECHNOLOGY**

THAT IS WHY:

- we provide secure IT management, as this ensures secure and uninterrupted operations;
- **we act responsibly with the passwords allocated to us personally and with the identification access to the company's information sources and do not reveal them to or share them with third parties;**
- we never **abuse personal passwords or identification access** and do not enable unauthorised access;
- **security incidents are reported immediately to the relevant technical department or IT department;**
- if unauthorised hacking occurs, we immediately switch-off our computer and contact the relevant technical department or IT department;
- **special care needs to be taken when handling information sources that contain confidential data;**
- upon departure from work we log-off from our workstation and lock our screen;
- we must comply with the rules that ensure secure information technology.

## XII COMMITMENT TO SOCIAL RESPONSIBILITY AND ENVIRONMENTAL PROTECTION

THAT IS WHY:

- our actions must comply with environmental protection laws;
- **we must ensure the economic use of energy products and other resources;**
- we comply with the rules governing safe work, as this helps us prevent accidents, fires, explosions or other environmental incidents;
- **we are responsible for the separation of waste and disposal of hazardous waste on a regular basis;**
- we support projects that contribute to sustainable development and preservation of biological species;
- we recognise that child labour and work under unsuitable and inhumane circumstances is prohibited;
- we are responsible for the environment and work closely with the local community in environmental protection projects;
- **we are inclined to seeking solutions and procedures in which we mitigate the hazards or risks to the health of people and the hazards that jeopardise our healthy environment;**
- we prevent emissions of hazardous or harmful substances or reduce them to the lowest possible level;
- we participate and start a dialogue with our social partners, thus contributing to the prosperity of society and the local community.

# QUESTIONS REGARDING THE CODE AND VIOLATIONS THEREOF

## QUESTIONS

Questions posed and doubts or dilemmas raised in using the Code will be answered by the representatives of the HR department of a specific company or MSIN Group's Legal Department (e-mail to [info@msin.si](mailto:info@msin.si)).

## VIOLATIONS

Violations of the Code or the commitments set out herein entail undesired conduct and can be deemed a violation of the employment contract that is sanctioned in accordance with the provisions of the Employment Relationships Act.

## NOTIFICATION OF VIOLATIONS

Violations of commitments from the Code or the identified violations of the law are reported via e-mail [info@msin.si](mailto:info@msin.si), ensuring that the anonymity of the person reporting the violation is maintained.

The senior management of MSIN will protect the anonymity of the whistleblower. No one will suffer any adverse effects or be subject to procedures due to such notification of violations.

The notification can also be sent anonymously in writing to the following address: MSIN d.o.o., Leskoškova cesta 6, Ljubljana.

## VALIDITY AND PUBLICATION OF THE CODE

The Code enters into force on 1 January 2018 and is posted on the website [www.msin.si](http://www.msin.si) and on the websites of the companies within the MSIN Group.

**AS HUMAN BEINGS,  
OUR GREATNESS  
LIES NOT SO MUCH  
IN BEING ABLE  
TO REMAKE THE WORLD  
AS IN BEING ABLE TO REMAKE  
OURSELVES.**

**(MAHATMA GANDI)**

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The following people participated in the drafting of this text: Legal Department of the MSIN Group, HR department heads within the MSIN Group, senior management of KIG d.d. and MSIN d.o.o. Special thanks during the drafting process goes to Ms Marjana Novak, managing director of KIG d.d., Ms Vesna Reich, head of CETIS d.d.'s HR department, Ms Mojca Golob, head of EGP d.d.'s HR department, Mr Anton Černič, head of accounting within the MSIN Group, Ms Tina Aleksić, Office Manager at MSIN d.o.o. and Ms Tina Bačić, Head of the Legal Department within the MSIN Group.

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