

## **CODE OF ETHICS OF THE COMPANY KOPUR d.o.o.**

### **PRINCIPLES OF CONDUCT AND BEHAVIOUR OF EMPLOYEES and OTHER RELATED PERSONS IN THE COMPANY KOPUR d.o.o.**

#### **➤ *Employees and other members of the company***

##### **1. Our Ethical Principles apply to everyone in equal measure.**

The Ethical Principles apply to all employees of KOPUR d.o.o., including the administration and management of the company, its executives, employees, representatives, and contract workers.

Employees are expected to adhere to these Ethical Principles and assist their colleagues and partners of KOPUR d.o.o. in understanding these Ethical Principles and complying with them.

Superiors will help their employees in raising awareness of the meaning and the requirements of these Ethical Principles and will also assist them in implementing programmes and procedures to promote "day-to-day integrity".

Superiors are responsible for assisting the members of their groups in complying with the requirements of the Ethical Principles and act in the spirit of said Principles.

##### **2. Occupational health and safety, environmental protection and quality**

KOPUR d.o.o. attaches great importance to the safety and health of its employees and business partners, as well as to the protection of the environment.

Legislation in the field of occupational health and safety, fire protection, environmental protection and energy consumption sets the framework for our measures in this regard. We are constantly improving our activities related to the environment and energy. All employees are aware of their own responsibility in terms of quality, occupational health and safety as well as environmental protection. Using various initiatives, KOPUR d.o.o. continuously promotes improvements in these areas. We consistently implement regulations in the field of safety, health, and environmental protection.

The goal of all our construction and production activities is to achieve the highest possible degree of product safety. It is essential that our employees work in a healthy and safe work environment:

- we always follow safety procedures and instructions,
- we help create physically and emotionally safe workplaces,
- we do not engage in violence, and we also do not tolerate it,
- we never come to work under the influence of drugs or alcohol.

**3. We include everyone, we appreciate diversity, and we support employees in realising their potential.**

KOPUR d.o.o. provides equal opportunities when it comes to employment, salaries, benefits, promotion, discipline, termination of employment and retirement.

We respect equal opportunities.

We do not tolerate any harassment, be it physical or psychological, or any other harmful behaviour.

**4. We protect the privacy of our employees.**

We only use employee data to support the business operations of KOPUR d.o.o. and provide benefits to our employees. Protective measures have been implemented in our company for the protection of personal data; access to data is only provided to employees who need said data for business purposes. Furthermore, we also operate in line with the legislation in the field of data protection and privacy:

- we comply with the guidelines and provisions of the company in the field of data protection and privacy;
- we make sure not to violate privacy (not to disclose personal information when we access or send it). We only obtain the information that we need for our work;
- without proper authorisation, we may not access systems or databases containing private information, such as employee or staff records, customer forms or e-mails and personal messages of our colleagues.

**5. We respect the freedom of association and all legislation in the field of working hours and allowances.**

Every employee has the right to association, to working hours in accordance with the legislation, and to obtain fair remuneration for the work performed.

We respect the right to organisation and collective bargaining.

We respect the right of our employees to adequate remuneration, and we strictly comply with minimum wage regulations.

The hours worked are paid fairly and in accordance with the legislation or the contract.

The compensations and benefits provided by KOPUR d.o.o. allow our employees to cover all their basic needs, while also providing them with the opportunity to improve their skills and abilities.

**6. Refusal of forced and child labour**

KOPUR d.o.o. condemns forced labour, child labour and human trafficking, and also respects the exercise of the rights of its employees.

We strongly reject child labour. Employment of persons under the legal minimum age is prohibited.

We expressly distance ourselves from forced labour. Exploitation of employees and employment which is not based on free will are prohibited.

We encourage the competence and development of our employees and strengthen their

personal responsibility when it comes to their professional tasks. When it comes to managing our employees, we rely on the principles of trust, responsibility, openness, honesty and equal opportunities.

## ➤ **Company**

### **1. Compliance with the applicable legislation and internal acts**

It goes without saying that KOPUR d.o.o. adheres to the rules applicable to business activities around the world.

We comply with the applicable legislation and internal acts of KOPUR d.o.o., both at the national and international level and at the internal level within our company. We expect our executives to actively act pursuant to these principles.

KOPUR d.o.o. must comply with the laws and regulations of every country in which it operates:

- we respect the principles and procedures of KOPUR d.o.o.,
- we respect the laws applicable to our work,
- we report any violations of laws perpetrated by employees of KOPUR d.o.o. or its business partners to our superiors, other superiors, or the HR and Legal department.

### **2. We respect human rights and mutual respect.**

At KOPUR d.o.o., we firmly believe that respect for human rights and the promotion of mutual respect are an expression of social responsibility which therefore importantly contributes to the success of the company. Therefore, KOPUR d.o.o. expects its employees to internalise the business culture characterised by respect, objectivity, fairness, and cooperation.

Respecting and promoting the protection of human rights is of fundamental importance to us. We condemn any form of discrimination or harassment in the work environment, whether based on gender, skin colour, handicap, origin or provenance, religion, age, or sexual orientation. Our company always puts people first, unconditionally and without prejudice.

### **3. We protect confidential information of KOPUR d.o.o. and compete fairly.**

We protect industrial property rights, trade secrets and other confidential information of the company from unauthorised disclosure and unwanted access. In addition to protecting our own trade secrets, we also feel committed to protecting the trade secrets of our business partners.

Employees who have become aware of or who have received confidential information or trade secrets of KOPUR d.o.o. or third parties may only use or transfer them for business purposes of KOPUR d.o.o., but may never do so for private purposes.

We protect confidential information pertaining to products, activities, success and plans of KOPUR d.o.o. (which means that we only reveal confidential information on a "need-to-know" basis, including to other employees of KOPUR d.o.o.).

We never disclose confidential information outside of KOPUR d.o.o. unless your non-disclosure or confidentiality agreement has been approved by the management of the company.

When we are not reviewing confidential information, we securely store it so that it cannot be accessed by others.

We do not request or receive trade secrets or confidential information from our competitors, unless such disclosure is governed by a non-disclosure or confidentiality agreement approved by the management of the company.

We compete in a fair, honest manner. We do not use illegal or unethical means to obtain confidential information from our competitors.

KOPUR d.o.o. expects its employees to respect and protect trade secrets as well as tangible and intangible assets of KOPUR d.o.o. and its business partners.

We treat the material resources and assets of KOPUR d.o.o. as if they were our own. We do not use them for private purposes, with the exception of material resources and assets of the company that we are expressly allowed to use for private purposes.

If you dispose of confidential information that is not public knowledge due to the fact that you were previously employed by one of our competitors, you must continue to protect the confidentiality of said information, including from KOPUR d.o.o.

We protect all confidential information of KOPUR d.o.o., even when we are no longer working for KOPUR d.o.o.

#### **4. Prohibition of insider trading**

The employees of KOPUR d.o.o. must not engage in insider trading and must also not provide any inside information to anyone.

Inside information is treated as strictly confidential. Employees who have access to confidential inside information must not use said information for private purposes and must also not disclose it to other persons for private purposes until said information has been made public.

Until inside information is made public, "insiders" may not operate on the capital market or use said information to buy or sell shares or securities.

#### **5. We act in the best interests of KOPUR d.o.o. and only use company money for business purposes of the company.**

We must not give or accept anything of monetary value to unduly influence anyone's business judgement or use information, property or powers of KOPUR d.o.o. for personal gain.

When adopting business decisions, we must solely focus on the long-term benefits of KOPUR d.o.o.

We do not seek personal gain; in addition to the usual salary provided to us by the company, we do not take advantage of the fact that we are the CEO, a manager, an employee, a representative or a contract worker of KOPUR d.o.o.

In the event of a situation in which our relatives, friends or business partners might benefit from their connection to us, we inform our superiors of said situation.

We report on our financial interests and on the financial interests of our relatives in entities who are conducting business transactions with KOPUR d.o.o.

Whenever our association with KOPUR d.o.o. allows us to uncover a business opportunity, we do not exploit said opportunity for our personal benefit or for the benefit of any other entity

except KOPUR d.o.o.

As long as we are employed by KOPUR d.o.o., we do not work for any of its clients, suppliers or competitors. We do not engage in insider trading.

Whenever we find ourselves in a situation where we could accept gifts or invitations from suppliers, customers, representatives or others who would like to conduct business with KOPUR d.o.o., we must always consider how this would look.

We make careful use of company assets.

We are personally responsible for the use of company assets in any form. We must always make sure that KOPUR d.o.o. receives the full value in exchange for the approved assets spent.

**6. We are determined to provide safe and high-quality products and services. Instead of trying to hide any risks and errors, we confront them.**

These Ethical Principles include our commitment to providing safe, high-quality products, services and solutions.

We must immediately notify the quality management department or one of our superiors if we notice:

- any defects in the design, safety, installation or maintenance of a product that could endanger anyone's health or safety;
- anything that could harm the quality of our products and services;
- anything that could damage the reputation of KOPUR d.o.o.;
- anything that could harm the financial interests of KOPUR d.o.o.

**7. We use assets of KOPUR d.o.o. such as e-mail, internet access, phones and computers, in a responsible and honest manner.**

We only use computing capabilities of KOPUR d.o.o. for business purposes.

We use electronic media correctly (we do not install any risky content, such as private applications, video games, etc., on company phones).

The information available in the computer systems of the company, including e-mail and other online systems, are owned by KOPUR d.o.o. and are used for the business operations of the company.

We do not use company funds to insult, harass or threaten others, or to access or save illegal or generally offensive content.

We do not use company assets to copy, display, distribute or save any content that infringes any trademarks, copyrights, licences or other intellectual property rights.

We use company assets, such as company cars, in a conscientious, legal manner and only for business purposes.

**8. Prohibition of corruption**

KOPUR d.o.o. condemns all forms of corruption and prohibits any behaviour which influences decisions adopted in the business or in the public/government sector using

dishonest or illegal means.

In our business transactions, we do not offer or approve any benefits with the intention or expectation of receiving any unfair preferential treatment. Furthermore, we also do not require any unjustified benefits and do not accept them. These rules apply in particular to cooperation with officials or public institutions.

We acquire business transactions through the integrity of our products and personnel, and due to our personal character. We do not acquire any business transaction by trying to unfairly influence the judgement of our customers.

We do not tolerate bribery of private individuals or public figures. We do not give or accept expensive or luxurious gifts.

Before we give or offer anything as a gift, we make sure that the value of the gift cannot be interpreted as an attempt to influence an official decision.

We comply with all local anti-corruption and anti-bribery laws.

We correctly record all our transactions, including our costs, gifts, and invitations we provide, in the books of KOPUR d.o.o.

We do not associate with business partners who engage in corruption. We perform regular checks of our business partners and cease our cooperation with them if any reasonable suspicions of corruption occur.

We do not offer any gifts, invitations or other favours to union representatives without first consulting the legal department.

**9. We make sure that our books and records are accurate and complete, and we keep our books and records pursuant to all applicable laws and best practices in the industry.**

KOPUR d.o.o. strictly adheres to the legal frameworks of proper bookkeeping and financial reporting. Our financial statements are prepared in due time and pursuant to the applicable accounting regulations. We require our employees to prepare correct documents, records and financial statements pursuant to the applicable provisions and regulations.

The company's books must be complete, accurate and reliable, as well as in accordance with the generally accepted accounting principles.

The business transactions of KOPUR d.o.o. are reviewed and evaluated annually by independent auditors.

Disciplinary measures, termination of employment and personal liability are envisaged in the event of any falsification, concealment or tailoring of evidence.

If we discover any errors or cannot provide a consistent calculation for an invoice, we notify the management in order to correct said invoice.

We respect the laws and the principles of KOPUR d.o.o. in the field of document and record storage.

## ➤ *Our customers, competitors and suppliers*

### **1. We believe in intense competition, and we do not use any illegal or unethical means to gain an advantage over any of our competitors.**

KOPUR d.o.o. is committed to fair and honest competition, without any limitations. We reject any business operations, the purpose or effect of which is to obtain any advantage in an unfair manner inconsistent with competition law, or through any conduct which runs counter to the legislation in the field of cartel activities. This applies, in particular, to the negotiation of prices and other terms and conditions, and to the distribution of customers, markets, products or personnel.

We do not restrict the presence of our business partners, especially vendors, in the market in an illicit manner. We do not abuse our position in the markets in which we have a dominant position.

It is prohibited to use illegal or unethical means to gain a competitive advantage.

We comply with all antitrust and competition laws in all countries where KOPUR d.o.o. is conducting its business operations.

We do not enter into contracts or agreements with competitors or business partners of KOPUR d.o.o. that could be perceived as restricting competition (e.g.: we do not make agreements in terms of pricing, tender speculations, division of products, territories, customers or markets, or restrict the production or sale of certain products).

We do not make any false, unfounded or misleading remarks about KOPUR d.o.o., its competitors or their products.

### **2. Avoidance of conflicts of interests**

Employees of KOPUR d.o.o. must avoid situations in which their personal interests would run counter to the interests of the company.

We do not allow our personal interests to guide us when it comes to adopting business decisions. Conflict of interest is, primarily, a situation in which the personal interests of an employee run counter to the interests of KOPUR d.o.o. This may be due, for example, to dealings with related persons, complementary activities or shares of the company. In no case will we ever harm the interests of KOPUR d.o.o. Potential conflicts of interests must be disclosed.

## ➤ *The public and our communities*

### **1. We comply with international trade laws.**

We comply with the trade laws of all countries in which KOPUR d.o.o. is conducting its business operations, including laws on:

- import or export of certain goods, services, or technology;
- prohibition of transactions with certain countries, entities or people;
- participation in international boycotts;
- government approvals, licences or other requirements necessary for the conclusion of a transaction or sale;
- product labelling.

## **2. We believe that what is good for the environment is also good for KOPUR d.o.o.**

The products, services and production methods of KOPUR d.o.o. are a reflection of our concern for the environment.

We are strongly environmentally oriented and committed to nature conservation and the reduction of environmental impacts. We are constantly trying to find economical solutions for the reuse of all technological residues of materials and residual value in the automotive industry and beyond. This also brings mutual benefits for the manufacturers of industrial residues, from which our slogan "**Connecting Green**" is also derived. Our vision is to become the leading company in the field of research and development of various new products using recycled materials which boast extremely good acoustic, heat-insulating and fire-retardant properties.

Using eco-friendly products, we are following a global trend which shows that more and more manufacturers of end products are increasingly trying to find and use components with the least possible impact on the environment.

We respect environmental laws and regulations, as well as the environmental protection principles of KOPUR d.o.o.

We use environmentally responsible practices such as waste management, source reduction, recycling and energy saving.

We strive to limit the emissions of toxic and greenhouse gases as much as possible. We use environmentally friendly products and listen to environmental concerns from the community.

## **3. We communicate with the public in a credible manner.**

We make sure that all our communications are truthful and accurate. We do not publish any misleading information.

We are cautious when it comes to discussing KOPUR d.o.o. outside of the company, i.e. in public places, with our friends and relatives, with the media and online, in public forums, in blogs and on social media websites.

We never disclose private information of the company without previously obtaining a proper approval.

The only people who are authorised to act on behalf of KOPUR d.o.o. are those expressly authorised to do so by the company management.

## **4. Measures intended to prevent infringements**

KOPUR d.o.o. ensures that all employees have been made aware of this Code of Ethics, and expects said employees to comply with its provisions.

Regular implementation and promotion of these rules of conduct creates the necessary awareness which will help instil the business culture of integrity and trust in our organisation.

Every manager of KOPUR d.o.o. can fulfil their function of a role model by demonstrating the expected integrity to the employees and leading by example.

In addition, KOPUR d.o.o. is also committed to make this Code of Ethics a part of the training and further education implemented within the company.



## 5. Contact and response to violations

We encourage and strive to achieve a business culture in which all topics can be addressed openly. Therefore, we encourage all employees who have any questions regarding this Code of Ethics to address their immediate superiors or the relevant department (e.g. the management of the company, the HR and legal department, or the internal audit department).

In the event of any violations, suspicions or conflict situations related to this Code of Ethics, all employees are also encouraged to contact the aforementioned departments. In the event of a breach of this Code of Ethics or if any reasonable suspicions arise regarding any improper conduct, the employees of KOPUR d.o.o. may also use the notification system.

Any report of a possible violation will be investigated, and all confirmed violations will be punished.

This Code of Ethics supersedes all previous Codes of Ethics and principles of the company. Compliance with these criteria is a condition for the employment at KOPUR d.o.o.; the compliance with this requirement, however, is not the basis for an employment contract or an employment offer.

Ethical guidelines are not overarching. Please address any questions about any circumstances that are not described in this document to your superior, to the HR and legal department, or to the management of the company.

Exclusion of liability: any exclusions of liability regarding these principles for any person who is affected by these principles and who is not an executive or the CEO of KOPUR d.o.o. can only be approved by the management of the company.

Any alleged violations of these Ethical Principles by executives of KOPUR d.o.o. must be communicated to the management of the company.

Date of entry into force and application: 1 April 2023.

Mr Dušan Goršek, CEO

### STATEMENT

I, the undersigned \_\_\_\_\_, hereby confirm that I have been made aware of the Code of Ethics of the company on \_\_\_\_\_.

Signature:

\_\_\_\_\_