

# *Code of Ethics of the INTEREUROPA Group*

Koper, May 2017

## 1. INTRODUCTION

### 1.1. PURPOSE OF THE CODE

Integrity is one of the most important values within the companies belonging to the INTEREUROPA Group. We operate in compliance with the law, good business practices and ethical principles. Corporate integrity is understood as one of the basic conditions for a successful and long-term business. The staff employed in the companies of the INTEREUROPA Group is required to make decisions that have a bearing on the operations and reputation of the Company. In the course of the work, circumstances may occur giving rise to doubts and resulting in uncertainty regarding the right decision to be adopted.

**The Code of Ethics prescribes the ethical rules for the employees to guide them in certain situations.**

### 1.2. MISSION STATEMENT AND CORPORATE VISION

The long-term development of the INTEREUROPA Group is based on the business vision of "Being a top –ranked provider of integral logistics solutions."

The mission of the Group is to meet the needs for logistics services and provide an optimal functioning of supply chains to the complete satisfaction of our customers, while creating added value for shareholders, employees and other stake-holders in a socially responsible manner.

The corporate strategy focuses on the following values:

- ***Integrity.*** We respect the highest ethical principles, good business practices and customs. We operate in full compliance with the applicable legislation, guidelines, recommendations, and internal regulations of our Company.
- ***Excellence.*** Our services aim to offer the best solutions to the needs of our customers and are based on our advanced logistics know-how.
- ***Adaptability and flexibility.*** Our services are prompt and tailored to our customers' needs. We achieve this by applying innovative approaches and lean organisation.
- ***Responsibility.*** We are distinguished by a high level of responsibility towards the obligations we undertake and the agreements we make, as well as towards the social and natural environments in which we live.
- ***Teamwork and appreciation of employees.*** The quality of our services is the result of the work of individuals and excellent expert teams. We value diverse types of knowledge, experiences and different views of our colleagues.

### 1.3. OUR UNDERLYING ETHICAL VALUES

#### ***Integrity***

For achieving the goals of the Company we find it relevant to integrate and work with the people who are trustworthy and reliable in their interaction. Fair conduct and an open attitude

of all persons involved in the work process are indispensable. We abide by the rules, respect the business ethics and agreements made.

### ***Confidentiality***

We comply with the confidentiality requirement regarding the trade secrets of the Company and those of the business. The information disclosed to our employees is only used for the work assigned.

### ***Objectivity***

We refrain from any discrimination on the basis of race, ethnic origin, nationality, language, religion, political conviction or union belonging, or personal circumstances (age, gender, sexual orientation and health/disability).

### ***Compliance***

The Company is operating in compliance with the applicable legislation, guidelines, internal rules and regulations, standards, the Code of Ethics and values of the INTEREUROPA Group.

### ***Responsibility***

We discharge our obligations and assume responsibility for our conduct and relations towards fellow employees, shareholders, customers, suppliers, as well as the natural and social environment.

### ***Transparency***

The communication and provision of information within the Company and to the external public shall be transparent, understandable, open and fair.

## **2. PRINCIPLES OF CONDUCT**

### **2.1. OUR ATTITUDE TOWARDS OUR STAFF MEMBERS**

The success of our Company depends on us, the employees: each of our companies is staffed with the personnel who are carrying out the work and operations, and the human resources have notably a vital role in particular in service-providing industries. Motivated and professionally qualified employees are the key element for the corporate development, therefore particular attention is paid to further the personal development of our staff, building a success-driven culture and promoting on-going education and training of our employees. We respect labour legislation and oppose any form of forced labour, child labour or discrimination. We support freedom of association and collective bargaining of employees.

#### ***How to take part***

All the staff members are entitled to fair, just, sincere and respectful attitude from our superiors, inferiors and co-workers.

We encourage an open dialogue and fair feedback information among all employees at all levels.

The employees of the Company are acting in compliance with the applicable legislation, regulations, and internal rules and acts (byelaws). Our acts, or omission respectively, shall not inflict any damage to the good name, brand and reputation of the Company.

### ***Work Environment***

The managerial staff has to provide the employees with adequate work environment, compliant with the legislation governing the field of occupational health and safety. Employees have to observe and implement the regulations on occupational health and safety.

No violence, harassment or mobbing is admissible among the employees.

During the working hours the employees must not take any alcohol or narcotic drugs, and must not come to work affected by these substances. Our employees are forbidden to possess, bring and traffic in any illicit narcotics /drugs and instruments for taking drugs.

### ***Work conditions***

The managerial staff members are in charge of assuring the appropriate conditions, surroundings, ambience and organizational atmosphere in which all the knowledge, skills, abilities and competences of the employees can be fully activated.

No person may be discriminated on the basis of gender, race, complexion, age, health condition, religion, political or other conviction, membership in a trade union, or sexual orientation when it comes to employment, wage fixing, promotion, opportunity for education/training, or termination of labour relationship

Our employees are given the opportunity for on-going education and training that furthers their professional and personal development.

They can freely express their viewpoints, submit proposals for improvement, and ask any questions.

### ***Employment and right to privacy***

The Company respects the employees' rights to privacy.

The personal information /data of our employees is collected, processed and used in accordance with the applicable laws. Their personal data is kept safely as prescribed by the applicable legislation and internal rules or regulations. Our employees are permitted to inspect their own personal data.

They are directed to preliminary, periodical and extraordinary medical check-ups as required by the law and internal rules and regulations.

We do not investigate and do not question our employees about their individual personal relations, political conviction, sexual orientation, religion, or family situation.

### ***Conflict of interest***

Our employees are expected to act impartially and prevent any conflicting situations that may arise from a conflict between their personal interests and the interest of the Company.

Their personal interests shall observe and comply with the interests of the INTEREUROPA Group.

An employee is required to inform his/her immediate superior on any existing or potential conflict of interest.

### ***Providing information***

Our employees are provided with current and topical information on a regular and open basis, and thereby we assure their familiarity with the development /events in the Company: a proactive, consistent communication with our staff is of a key importance for successful operation.

### ***Information management***

We do not disclose confidential data or information to unauthorized persons, nor to the public.

The information obtained in our business shall not be used for our own benefit or to the advantage or benefit of any third party outside the Company.

## **2.2. OUR ATTITUDE TO CUSTOMERS, SUPPLIERS AND PARTNERS IN BUSINESS**

Our customers, suppliers and partners in business expect us to provide our services on an appropriate quality level, as well as a professional approach, correctness, integrity and transparency in our cooperation.

We endeavour to build up good relations, based on mutual trust, with our customers, suppliers and partners in business.

### ***Customer satisfaction***

The satisfaction of our customers is the underlying rule for our activity or conduct.

We respect good business practices and customs.

Our efforts are spent on permanent improvement of our services, responding to the desires and needs of our customers.

We aspire towards customer satisfaction and deal with any evtl. complaint in a pro-active way, desiring to improve our service.

### ***Choice of suppliers and service providers***

In our relations with suppliers we are building up and maintaining a high level of commitment and interaction, based on reliability and trust.

Within our Company we endeavour to maintain professional, sound, reciprocal and fair relations with all the suppliers.

As regards the services and plant equipment for our business, we purchase them from reliable suppliers who can best satisfy and meet our needs.

We maintain correct and transparent relations with public institutions.

### ***Fair competition***

We observe the rules of fair competition and advocate for free and open competition at home and abroad.

We further comply with the laws prohibiting the restriction of competition, therefore we do not enter into any agreements with our competitors regarding any pricing policy, partition of the market and division of customers, which could lead to restriction or distortion of competition.

Sensitive business information (on prices, supply channels, terms of sale, margins, discounts, etc.) is not shared with any competitor or its representative(s) at all.

### ***Corruptive acts***

Our employees refrain from taking part in, or being involved in any corruptive acts.

We refuse receiving or giving any money or gifts as a favour in return for concluding a prospective business or obtaining any other benefit or advantage.

## **2.3. OUR ATTITUDE TOWARDS INVESTORS**

The guiding principle in our relations with investors relies on current, sincere and accurate communication, which is underlying for successful business. Particular attention is dedicated to consistent and open communication with shareholders who have a decisive impact on strategic decisions and guidelines for the business of the Parent Company and of the INTEREUROPA Group.

### ***Corporate Governance***

The goal of the Intereuropa Group is successful business in the long run.

For corporate governance, the underlying long-term goal is creating the value for shareholders.

To them, we assure security and provide a return on their investment.

### ***Compliance with rules***

Regarding the information disclosure requirements we observe and comply with the regulations of stock exchanges, who are the issuers of shares of the companies of the INTEREUROPA Group.

We are committed to assuring the investors a fair position (on equal footing) in their purchase or sale of shares of the Company, and we do not abuse internal information.

The rules on trading in securities are strictly complied with.

### ***Providing information***

Our shareholders and other interested public are duly informed, in regular intervals and in the prescribed manner, on the future strategic directions and development, on business goals and operations of the Intereuropa Group, as well as on relevant business transactions or events.

We reach the public via the websites of stock exchanges and communicate with them on the corporate websites of the INTEREUROPA Group and its companies.

## **2.4. OUR ATTITUDE TOWARDS THE SOCIETY**

### ***Social environment***

We cooperate with a number of educational institutions, by organizing presentations of our logistics activities, providing obligatory work practice/traineeship to secondary school and university students, arranging for students to select topics for seminar papers or diploma thesis from various fields of our business, and our experts appear as presenters or lecturers in various conferences.

In sponsoring activities, our primary goal is detecting the most promising opportunities for the recognizability of our Company in the local and international environment.

We also contribute to humanitarian actions. Our focus is on development, education, knowledge and progress, so we favour the projects from the sphere of education and science, primarily in the scope of our operations, but also the projects addressing a broader development for the society.

We do not support events of exclusive or prevailing political importance.

### ***Natural environment***

The design and implementation of business processes are compliant with the principles of sustainable development of the environment.

We observe all the binding legal requirements and adapt to the national and global guidelines of the environmental legislation (EU Directives, international standards).

Our goal is to enhance the environmental protection, i.e. reduce dangerous emissions, contain energy losses and cut the waste volume, promoting separate waste collection and recycling.

## **3. COMPLIANCE WITH THE CODE OF ETHICS**

All employees in all companies of the INTEREUROPA Group respect the rules of the Code of Ethics.

If we detect behaviour that is inconsistent or suspected to be inconsistent with the provisions of this Code, we the employees are obliged to report such instances. The complaint can be presented anonymously and even if we lack the necessary details. The Board of Ethics will deal with each application confidentially. The Board of Ethics will duly inform the senior

management of the complaints addressed. The Board of Ethics will monitor the way the management deals with and investigates an alleged violation. Complaints against the members of the Managing Board, the Supervisory Board and the Supervisory Board Committees as well as against the employees of the Internal Audit Service will be addressed by the Audit Committee.

If you are unsure whether a behaviour is inconsistent with the provisions of the Code, you may simply send a query to the Board of Ethics.

The Board of Ethics is established by the Company Managing Board and consists of a Corporate Integrity Officer and four other members. The Managing Board appoints the Corporate Integrity Officer and two members of the Board of Ethics. Two members of the Ethics Committee are appointed by the representatives of the employees, namely one by the Workers' Council and one by the trade unions. Board of Ethics periodically informs the Managing Board of the complaints and reports regarding non-conformances with the Code of Ethics, except in cases where the complaint concerns a violation made by a member of the Management Board. In this case, the Board of Ethics forwards the complaint to the Audit Committee of the Supervisory Board.

Complaints can also be reported via the web application INTERWB which can be accessed on the web pages of all the companies in the Group, by email to [etika@intereuropa.si](mailto:etika@intereuropa.si), by mail to the address Intereuropa d.d., za etični odbor – ne odpiraj (to the Board of Ethics – do not open), Vojkovo nabrežje 32, 6000 Koper, or in any other way, including directly to the members of the Board of Ethics.

The Code of Ethics is accessible to employees, business partners and other interested public in electronic form on the website [www.intereuropa.si](http://www.intereuropa.si). It is also made available to all the employees on the intranet portals of the individual companies.