

The company Norka GT d.o.o. is committed to implementing a business ethics policy that ensures compliance of the company's operations and the conduct of its employees with applicable legislation, applicable standards, adopted guidelines, good business practices, the Code of Ethics and the company's internal regulations.

The business ethics policy applies to all employees of Norka GT d.o.o., business partners and the company's supply chain.

Anti-Corruption and Anti-Money Laundering: A zero-tolerance approach is applied to bribery and corruption, including all forms of bribery, corruption, extortion, embezzlement and money laundering. The company prohibits bribery in any form, including in connection with any contractual payment or part of a contractual payment, or in any manner or through any channels that are used to provide improper benefits to its customers, representatives, contractors, suppliers or employees.

The company prohibits the offering or acceptance of gifts, hospitality or payment of expenses when this could improperly influence the outcome of procurement or other transaction and such expenditure is not reasonable and not incurred in good faith. Employees or other persons may not offer or accept gifts or other benefits, except for occasional gifts of minor value.

Data Protection and Data Security: Employees and other persons must carefully protect the business information of the company and all other company information in their possession. They must handle data in accordance with legislation and the company's internal regulations in order to prevent misuse or intentional distortion of the interpretation of data.

Financial responsibility (Accurate Records): The company ensures full, fair, accurate and understandable disclosure of information in its regular financial reports and in other documents submitted to regulatory authorities and agencies in accordance with applicable legislation.

Disclosure of information: The company publishes business and accounting information, as well as information related to human resources, social and environmental matters in accordance with applicable legislation.

Fair competition and anti-trust: The company undertakes to operate in accordance with applicable antitrust and competition laws and other regulations related to this topic. Business practices such as unlawful restriction of competition, inappropriate exchange of information about competition, price fixing, bid rigging or inappropriate market sharing must be avoided.

Conflict of interest: In the company, it is necessary to avoid any conflict between one's interests or duties and the interests or duties of the company. A conflict of interest occurs when company employees allow their private and economic interests to influence their impartial and objective decision-making in the performance of their duties. In the event of a conflict of interest, notifications are made in accordance with applicable legislation.

Counterfeit parts: The risks of purchasing counterfeit parts and materials are managed by selecting suppliers and purchasing built-in parts and materials only from approved suppliers, and by ensuring high-quality takeover of supplied built-in parts and materials in accordance with the company's internal regulations.

Intellectual property: Intellectual property is an asset of the company that has its own value and affects the value of the entire company because, with the right strategy, it can significantly contribute to the company's growth and reputation. Intellectual property is protected in accordance with applicable legislation and the company's internal regulations.

Export controls and economic sanctions: Restrictive measures (sanctions) are taken in accordance with applicable legislation, taking into account legal acts and decisions adopted as part of the United Nations, the European Union or other international organisation, with the aim of establishing or maintaining international peace and security, ensuring respect for human rights and fundamental freedoms, developing, i.e. consolidating, democracy and the rule of law, and achieving other goals consistent with international law.

Whistleblowing and protection against retaliation: The protection of the whistleblower who reports or publicly discloses violations within the company from retaliation is implemented in accordance with applicable legislation and internal regulations that prescribe the procedure and processing of the report and the protection of the whistleblower from retaliation.

Lenart, 10 September 2024

Director:
Aleksandra Vajnhandl

