



**Code of Conduct for Suppliers to member companies of the  
Port of Koper Group (LUKA KOPER)**

## **1. GENERAL**

The corporate vision of the Port of Koper Corporation (Luka Koper, d.d. (hereinafter: Luka Koper) is to become the leading Port System for global logistics solutions of the Central and Eastern European countries. The members of the Luka Koper Group strive for successful operations in the long run that include socially responsible attitude towards society and natural environment.

In doing so, Luka Koper is aware that a sustainable success and reputation of the Port of Koper corporation is also determined by the level of its corporate integrity, therefore, by way of adopting the Code of Ethics of the Luka Koper Group (hereinafter: Code of Ethics), Luka Koper adopted ethical principles, or rules of conduct effective in the Port of Koper corporation in relations with other participants in our business environment, and compiled the Code of Conduct for suppliers to member companies of the Luka Koper Group.

The envisioned principles of corporate ethics /rules of conduct aim to create the conditions under which our suppliers will be cooperating with Luka Koper in the spirit of ethical rules of conduct as applicable to the Port of Koper Corporation. The suppliers confirm and agree to be acting in accordance with the standards of this Code, which is an integral part of the business relationship between a supplier and Luka Koper, and mandatory for the Supplier.

Business information and relations with customers, suppliers and other stakeholders represent, and are treated and protected as confidential (business secret).

Luka Koper reserves the right to potential termination of its business relationship with a supplier in case that the latter does not act in accordance with the principles laid down below.

The relationship with suppliers is based on the following:

- The suppliers of Luka Koper have harmonised their operations with the requirements of international management standards and satisfy the occupational safety requirements, they show environmental awareness and cooperate with Luka Koper in the spirit of principles and values governed by Luka Koper;
- The selection of, and cooperation with suppliers is transparent and compliant with the corporate policy,
- Payment to suppliers is made in the agreed terms;
- Suppliers are being currently assessed under the pre-determined criteria,
- A supplier is declared ineligible, and rejected in case of proposing any offer that is inappropriate or ethically disputable and/or contrary to good business practices while doing business; furthermore, any involvement with a supplier showing signs of corruption shall be avoided;
- The durability and long-term nature of cooperation relies on mutual trust and ethical conduct.

Our suppliers undertake to:

- align their operations with the legislation and regulations in force, as well as with internationally applied standards, guidelines and principles
- comply with anti-trust legislation and competition law.



## **2. GUIDELINES**

Our suppliers undertake to observe and respect the following:

### **1. WORK CONDITIONS**

#### **- Human rights**

The supplier undertakes to safeguard the human rights of its workforce and to treat their employees with dignity and respect. That applies to all employees incl. those hired on a fixed-term or seasonal basis, students, permanent staff, agency workforce, or workers under any other modality of employment.

#### **- Combating child labour:**

The supplier shall avoid engaging any child labour and youngsters aged below 15. Any employed adolescent aged below 18 shall not be assigned any work that might jeopardise their health and/or safety. The supplier shall apply special measures to protect children/adolescents.

#### **- Non-discrimination**

The supplier shall not allow any form of:

- discrimination on grounds of nationality/ethnic or racial origin, gender, sexual orientation, health condition, religion or culture, age, membership in a trade union, political orientation and other personal circumstances;
- sexual or other harassment or mobbing in the workplace;
- intolerant and disrespectful attitude towards co-workers, partners in business, and other persons working in the Company;
- other forms on unethical behaviour with other persons.

The supplier shall allow its employees for reporting any potentially unethical and/or unlawful activities in the workplace. In that, the supplier shall further guarantee the confidentiality of such reports, investigate the reported incidents, and where necessary, put in place adequate measures to eliminate irregularities or deficiencies.

#### **- Free choice of employment**

Any use of forced labour, slave labour, or of any other comparative labour modality is prohibited. All work must be voluntary, and employees shall be allowed to terminate their work or labour relationship any time.

#### **- Worktime and remuneration**

The worktime of Supplier's employees must not be longer than the maximum amount of work hours as prescribed by the law.

Likewise, the salaries of Supplier's employees must be paid out regularly and in accordance with the applicable national laws governing the payroll /remuneration for work. The Supplier is required to keep records of its employees as prescribed by the regulatory framework, and produce the payment slip or a similar document, in due time, as the basis for remuneration of its employees.

Furthermore, the Supplier shall respect human rights and equal opportunities in the workplace, and hire new employees by the respective procedures in compliance with the current laws and regulations.

**- Right to free association**

The Supplier shall respect the right of employees to free association, membership in trade unions and in the Works Council, or in any other forms.

The employees acting as representatives of the labour shall not be placed at a disadvantage in relation to other employees.

## **2. HEALTH AND SAFETY**

**- Occupational health and safety**

The Supplier shall identify and evaluate any safety risks, and take the appropriate measures to cope with such risks. The Supplier shall endeavour to implement the high standards of occupational health and safety in the workplace, to satisfy the current regulations on occupational health and safety, and to create an adequate work environment, safe work processes, preventive maintenance and protective measures that will reduce the safety and health risks in the workplace. All that aims to preserve the good health of employees and to prevent accidents, injuries and occupational diseases at work.

**- Ready to cope with extraordinary situations**

The Supplier must be able to identify and assess any extraordinary situations and events. Having designed the plans to address any extraordinary circumstances and the appropriate reporting procedures, the Supplier shall reduce the impact and consequences to the highest extent possible.

## **3. ENVIRONMENT**

**- Environmental responsibility**

The Supplier shall strive for:

- continual improvement of its own environment management system;
- reducing any negative impact of its own activity on the environment in and concern to reduce emissions;
- environmentally responsible handling of its employees who act in the port area;
- saving natural resources, economical and prudent use of energy, introducing modern and energy-saving technology;

identify the chemicals and other materials whose exhaust poses a danger for the environment, and to handle such chemicals/materials so as to safeguard a safe handling, transport, warehousing, use and recycling.

**- Environmental protection**

The supplier confirms to have established the systems, processes and/or measures and to have acquired all the necessary permits in order to satisfy the legal requirements/regulations in the area of environment protection. Its employees have to be instructed on how to prevent any environmental risks.

#### **4. BUSINESS ETHICS**

##### **- Ethics and integrity**

The suppliers shall act in compliance with all required high ethical standards by which they fulfil their social responsibility commitments, and with a high degree of integrity in all business areas, as well as respect the provisions of the Code of Ethics of the members of the Luka Koper Group, as published on the website [www.luka-kp.si](http://www.luka-kp.si).

##### **- Compliance with laws**

The Supplier undertakes to respect and abide by the law and current regulations in doing its business.

##### **- Unallowed receiving and granting of advantages**

It is prohibited to offer, promise, receive or demand any gifts, benefits, services or similar advantages, directly or indirectly, aimed at exerting influence on independence of an employee at work.

The Supplier shall put in place the procedures to control and fulfil such requirements by which it can ensure the necessary compliance with anti-corruption laws.

Such gifts, hospitality services or entertainment must be legitimate: they shall not violate the respective Rules and Regulations of the giver and/or of the recipient, and must be compliant with the local customs and practices.

The Supplier shall be liable for all damage and bear all the costs inflicted on the Luka Koper Group by any breach of this Code of Conduct and by the resulting withdrawal from the contract.

##### **- Competition**

The Supplier shall respect the principle of fair competition and carry out all its business activities observing the current anti-trust laws and regulations.

##### **- Avoidance of Conflict of Interest**

The Supplier and its employees shall avoid any situation that might be a source or create an appearance of a conflict of interest, or affect the impartiality of an employee in a situation.

The term 'conflict of interest' is explained in detail and substantiated in section 2.6. of the Code of Ethics of the members of the Luka Koper Group, published on the website of the Company.

##### **- Protection of confidential data**

A supplier may use the business confidential data, personal data and other confidential information only in strict observance of the law, in the required and permitted scope, and shall duly protect the confidentiality thereof.

Furthermore, the Supplier shall safeguard the privacy of all employees and partners in business, as well as protect the intellectual property rights.



The **duty** of fair, truthful and reliable recording of all business-related information and reporting is binding on the suppliers. Business-related records shall be created, kept and/or disposed of in strict compliance with the respective legal requirements and regulations.

**- Law governing Imports/exports**

The Supplier undertakes to observe and abide by the applicable laws and regulations in the area of imports/exports and customs control.

**3. COMPLIANCE WITH THE CODE**

The obligation of suppliers is to

- be thoroughly informed on the Code of Conduct for Suppliers to member companies of the Luka Koper Group
- acknowledge in writing their acceptance of said Code of Conduct for Suppliers
- strictly observe the provisions of said Code of Conduct for Suppliers
- take all the reasonable action to inform their employees with the substance of the Code of Conduct for Suppliers to member companies of the Luka Koper Group.

In addition to observance of all other obligations under any contract or agreement made between the Supplier and the Port of Koper Corporation /Luka Koper/, the Supplier shall also act in accordance with the respective Code published in Slovene and English on the website of Luka Koper, and sign the Statement by the Supplier and submit it to Luka Koper.

The provisions of this Code are underlying for the business relationship between the Supplier and Luka Koper.

Management Board of Luka Koper  
d.d.  
The President  
Dimitrij Zadel

Member of the Management Board  
Metod Podkrižnik

Management Board Member for  
Finance and accounting  
Irma Gubanec

Management Board Member –  
Workers director  
Vojko Rotar

## STATEMENT BY SUPPLIER

We hereby confirm to be in possession of the Code of Conduct for Suppliers to member companies of the Luka Koper Group, and declare to share the values of, to respect and act in accordance with said Code of Conduct for Suppliers, and to be implementing the values referred to in said Code, and we confirm to ensure the compliance with these principles on the part of our suppliers and subcontractors as well.

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Company Name and stamp		
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(signature	(co-signature if required)	
.....	.....	
.....		
(name in block letters)	(name in block letters)	
.....	.....	
.....		
(department /function)	(department /function)	