



CODE OF CONDUCT FOR BUSINESS PARTNERS OF THE LUKA KOPER GROUP

Koper, 11. 7. 2022

1. PREFACE

The mission and vision of the Luka Koper Group (hereinafter: Luka Koper) is to support global logistics solutions to the heart of Europe with reliable and developed offers of port services, in accordance with the needs of the company and to become and remain a leading port system for global logistics solutions of Central and Eastern Europe. The goal of Luka Koper is a long-term successful performance, involving a socially responsible attitude towards the community and the environment.

Luka Koper is well aware that long-term success and reputation are determined by actions which are compliant with accepted rules and ethical principles, and that they also comprise external stakeholders in the business environment.

With set principles and rules and business ethics, which are defined more in detail in the Code of Ethics of Luka Koper, Luka Koper strives to create conditions jointly with business partners, that mutual cooperation and the conduct will take place in the spirit of these rules.

This Code of Conduct for Luka Koper business partners (hereinafter: Code) defines the expectations and standards of cooperation that Luka Koper expects from business partners when doing business with them. At the same time, Luka Koper encourages them to exceed these expectations and to strive for improvements.

For the purposes of this Code, the business partner is any natural or legal person or other form of independent entity, which is involved in a business relationship with Luka Koper for the purchase or sale of goods or services or other forms of cooperation.

By acceding this Code, the business partner shall confirm and agree to act in conformity with the requirements of standards set out in the Code, which is an integral part of the business relationship between the business partner and Luka Koper.

In a spirit of respect of stated principles and values, Luka Koper may require the submission of an adequate statement or documents to demonstrate such compliance both prior to or during the actual implementation of the business relationship.

Luka Koper shall reserve the right to decline or terminate the business relationship in case the business partner does not act in accordance with accepted commitments and defined principles.

2. GUIDELINES

2.1. General

The business relationship between the business partner and Luka Koper is based on the fact that the business partner has its operations harmonized with the requirements of international business standards, which include, but not exclusively:

- cooperation, based on a long-term mutual trust and ethical conduct, in a spirit of established business practices, principles and values,

- operations in accordance with applicable laws, other rules, valid recommendations, and internal regulations,
- respect and protection of human rights,
- compliance and respect of standards, occupational health and safety requirements and environmental awareness,
- transparent cooperation, with the appropriate handling of acquired business information and protection of confidential information,
- fair payment within agreed terms,
- respect, recognition and appropriate action in the event of conflict of interests,
- the possibility to not establish a business relationship due to inappropriate offers, ethically questionable offers or conducts, which oppose or could oppose business practices, unethical, corrupt or other controversial conduct, etc.

In a business relationship with Luka Koper, business partners undertake to act in accordance with the guidelines set forth hereinafter.

2.2. Protection and respect of human rights and workers' rights

- Human rights:

The business partner undertakes to safeguard and respect human rights of its workforce (that applies to employees employed on a fixed-term or seasonal basis, students, permanent staff, agency workforce, or workers under any other modality of employment) and their personality, and to treat them with dignity and respect.

- Preventing forced labour and child labour:

The business partner shall not use forced labour and shall avoid engaging in or supporting any child and youth labour, which does not comply with the national legislation.

- Respect for the principle of professionalism, loyalty, personal responsibility and integrity:

The business partner shall respect and encourage professionalism, truthfulness, loyalty, personal responsibility and integrity and condemn intolerant and disrespectful attitude towards its employees or its business partners.

- Non-discrimination:

The business partner shall not allow any form of discrimination on grounds of origin, nationality, race, gender, sexual orientation, health condition, religion, age, membership in religious organizations or in trade unions, political orientation or other personal circumstances, nor he will tolerate sexual and other forms of harassment or mobbing at the workplace, and shall enable its employees to report unethical and illegal activities, ensuring them the confidentiality of reporting and the protection of the reporting person.

- **Free choice of employment:**

The business partner does not use and shall not use forced labour, slave labour or any other comparable labour modality, which does not comply with the applicable law.

- **Worktime and remuneration:**

The business partner shall ensure the compliance of the employees' working time, as provided for in the national legislation and shall ensure regularity and fairness of payment for work. It shall also ensure that the principle of equal opportunities in employment and on the workplace will be observed.

- **Right to freedom of association:**

The business partner shall respect the right of employees to freedom of association, membership in trade unions and in the Works Council, or in any other forms of workers' cooperation and shall not put them at a disadvantage because of this.

- **Occupational health and safety:**

The business partner shall recognize risks and take appropriate measures to prevent risks in relation to occupational health and safety. The business partner shall strive for high standards of health at the workplace and shall provide a safe workplace within the framework of applicable standards for activities it performs.

2.3. Environment

- **Environmental responsibility:**

The business partner shall strive for the implementation of and compliance with standards of environmental awareness and shall strive to reduce negative environmental impact.

2.4. Business ethics

- **Ethics and integrity:**

The business partner shall act in compliance with high ethical standards, by which it fulfils its obligations, and with a high degree of integrity in all business areas.

- **Compliance with laws:**

The business partner shall comply with applicable national and international regulations, including with regulations relating to competition, embargo, sanctions, corruption, bribery and money laundering in doing its business.

- **unallowed receiving and granting of advantages:**

the business partner is aware that it is prohibited directly or indirectly give, promise, accept or solicit gifts, benefits, favours or something similar intended to influence the independence, transparency or other benefits to obtain the business. The business partner shall establish procedures to control and fulfil these requirements with which it can ensure proper compliance with anti-corruption laws.

- **Competition**

The business partner shall respect fair competition principles and carry out its business activity in accordance with the competition law.

- **Avoidance of conflicts of interests**

The business partner shall avoid any situation that might be a source or create an appearance of conflict of interest or affect the impartiality in acquiring or conducting its business.

- **Protection of confidential data**

The business partner 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 dully protect the confidentiality thereof.

Furthermore, the business partner shall safeguard the privacy of all employees and partners in business, as well as protect the intellectual property rights. It is subject to the duty of fair and accurate recording of all business information and reporting. Business records are created, kept and disposed entirely in accordance with all relevant legal requirements and regulations.

3. COMPLIANCE WITH THE CODE

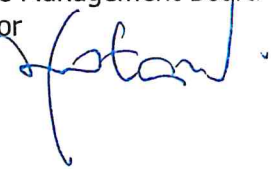
The business partner shall acknowledge and confirm the acceptance of this Code. In addition of observance of other obligations under any contract concluded between the business partner and Luka Koper, d. d., the business partner shall act in accordance with the respective Code published in Slovene and English on the Luka Koper, d. d. website.

Management Board of Luka Koper, d. d.

President of the Management Board
Boštjan Napast 

Member of the Management Board
Nevenka Kržan 

Member of the Management Board
Robert Rožac 

Member of the Management Board
Labour Director
Vojko Rotar 

STATEMENT BY THE BUSINESS PARTNER

We hereby confirm to be aware of the provisions of the Code of Conduct for business partners of the Luka Koper Group companies, and declare to share the values of, to respect and act in accordance with said Code of Conduct, and to be implementing the values referred to in said Code, and we confirm to ensure the compliance with these values on the part of our business partners as well.

Company's name and stamp _____ Place _____ Date _____

Signature – name in block letters

(department/function)