

LUKA KOPER D.D. AND LUKA KOPER GROUP
CORRUPTION PREVENTION POLICY

1. Preliminary provisions

- 1.1. This corruption prevention policy (hereinafter: Policy) applies to the company Luka Koper, d.d. and its subsidiaries jointly forming the Luka Koper Group (hereinafter: Luka Koper, d.d. or the Luka Koper Group).
- 1.2. Luka Koper, d.d. operations are based on the transparency and legality of its actions, as well as honesty and personal integrity of our employees. Commitment to the highest standards of ethical business conduct for everything we do and in our relationships with all stakeholders who are in any kind of business relationships with us.

2. Scope

- 2.1. Compliance with the principles and rules set out in this corruption prevention policy and compliance with laws and regulations, is the responsibility of all individuals working for us and/or on our behalf, including all employees at all levels at Luka Koper, d.d. and all companies which jointly with the parent company constitute the Luka Koper Group, agent workers, external consultants, agents and other parties related to us, wherever they are located (hereinafter »employees«).
- 2.2. We also expect behavior in accordance with this Policy from all individuals and organizations with whom our employees come into contact in the course of their work, including actual and potential customers, suppliers, consultants, associations, representatives of the local community, State authorities and political parties.

3. Policy Statement

- 3.1. At Luka Koper, d.d. we follow the principle of zero tolerance towards unethical and/or corruptive actions.
- 3.2. It shall be prohibited to offer, promise, give, receive or demand any financial or non-financial benefits, regardless of value, that may be received directly or indirectly as an incentive or a reward to a person for acting or omitting to act in relation to that person's obligations.
- 3.3. Benefits of any value may take various forms and include but are not limited to: cash and cash equivalents, unreasonable gifts, entertainment and recreation, travel, tickets to sporting and social events, donations, sponsorships, discounts, loans, promises of employment.



Corruption prevention policy

- 3.4. If an employee is offered or solicited a bribe by anyone, or if there is suspicion of bribery, corruption or a violation of this policy, the employee shall notify his or her superior and the compliance officer.

4. Corruption Risk Management

- 4.1. Luka Koper, d.d. has established the management systems for corruption prevention that meet the requirements of ISO 37001:2016 standard. On the basis of the periodic reviews and performance measurements, activities are carried out for the continuous improvement of the management system for the prevention of the corruption.
- 4.2. In this regard, an independent business compliance function has been created with powers and responsibilities to supervise the implementation of management systems designed to prevent the corruption, providing support to the company's employees in relation to questions about the risks of corruption and the activities for the corruption prevention, ensuring compliance with the requirements of the ISO 37001:2016 standard and informing the supervisory board, management board and other functions for ensuring compliance at the Luka Koper, d.d. about the operation of management systems for the corruption prevention.
- 4.3. Through a programme of targeted employee training, we develop competencies for early identification of risks and the application of protective measures to prevent corruptive acts. We also encourage employees to contribute to the effectiveness of the management systems to prevent corruption by proposing improvements.

5. Gifts and hospitality

- 5.1. Gifts and hospitality may give the appearance of an attempt to influence the objective and impartial performance of the of Luka Koper, d.d. employees or the representatives of third parties, and therefore the circumstances of receiving and giving gifts and hospitality must be handled with the utmost care and in accordance with the applicable legislation and Luka Koper, d.d. internal acts.
- 5.2. Gifts or hospitality may be given, offered or accepted only if they are appropriate and when there is no risk of creating the impression of undue influence on the recipient's decision.
- 5.3. Gifts must be symbolic or of minor value, and catering an hospitality must not exceed reasonable costs. Spending on lavish or inappropriate gifts or entertainment (hospitality) may be defined as corruption, and therefore prohibited. Regardless of the value, an employee must not accept or give gifts in the form of cash, securities, gifts and vouchers nad cards and precious metals.
- 5.4. Luka Koper, d.d. keeps records of received gifts.

Corruption prevention policy

- 5.5. In case of uncertainty regarding accepting or offering of gifts and hospitality, the employee must consult the corporate integrity and compliance officer.
- 5.6. The limit values of gifts and hospitality are defined in more detail in the Rules on gifts and hospitality.


6. Reporting irregularities

- 6.1. Luka Koper, d.d. has procedures in place for internal reporting of irregularities and supports any expression of suspicion, in good faith or on the basis of well-founded belief, and ensures the protection of the reporter against any punishment or retaliatory measures.
- 6.2. The reporting of the Luka Koper corporate integrity violation may be submitted:
- via online form or through a secure and anonymous channel at <https://irregularities.luka-kp.si/>
 - via usual printed form by submitting the reporting by regular mail to the address of the registered office of the company headquarters (Luka Koper, d.d., Vojkovo nabrežje 38, 6000 Koper with the annotation "za pooblaščenca za korporativno integriteto" – for the corporate integrity officer),
 - to the email address integriteta@luka-kp.si

7. Status of the Policy

- 7.1. The corruption prevention policy complements the Code of Ethics of the Luka Koper Group companies and is an integral part of Luka Koper, d.d. system for the corruption prevention. The principles and rules defined in this Policy provide a framework for defining and achieving the goals of Luka Koper, d.d. in the field of corruption risk management.
- 7.2. Any deviation from the Corruption prevention policy will be dealt with in accordance with the applicable legal regulations, the Code of Ethics of the Luka Koper Group and other applicable acts.
- 7.3. By implementing the Policy, we are pursuing long-term stable and successful operations of the company and the Luka Koper Group.
- 7.4. This policy shall come into force on the date of the adoption by the company's management board and the approval of the company' Supervisory Board.

Koper, August 24, 2023

Luka Koper, d.d.
Nevenka Kržan 
President of the Management Board

Vojko Rotar 
Member of the Management Board -
Labour Director

