

# ANTI-BRIBERY AND CORRUPTION POLICY

The Company undertakes to execute the anti-bribery policy that includes procedures, administrative processes, training, guidance, and control. The essence of the undertaking is that the Company ensures the lawfulness of operation, which makes the Company anti-corruption policy an integral part of daily practice.

Any form of bribery shall be strictly prohibited. Bribery is direct or indirect promising, offering, or giving of any undue benefit to

- a public employee,
- a political candidate, political party, or party official, or
- any employee (including a person who manages or works for a private firm, regardless of his or her function within the firm), and to request or accept any such undue benefit from the above-indicated persons in order to obtain, maintain, or manage a transaction, or ensure any other inadmissible business benefit.

The Company prohibits bribery in all transactions performed directly or through third parties, which specifically includes subsidiaries, joint ventures, agents, representatives, advisers, brokers, contractors, suppliers, or any other intermediaries under the effective control of the Company.

The Company prohibits bribery in any form, including bribery related to a contractual payment or a part of a contractual payment, or in any manner or by any means used to provide inadmissible benefits to its customers, agents, contractors, suppliers, or employees.

The system is established according to the international standard ISO 37001 anti-bribery management systems setting out guidelines for the establishment, introduction, maintenance, review, and improvement of the anti-corruption management system.

- **CHARITABLE CONTRIBUTIONS AND SPONSORSHIP:**

The Company, its employees, or agents may not give direct or indirect contributions to political parties, political party officials, candidates for political office, political organisations or individuals engaged in politics, as a pretext for bribery.

All political contributions should be transparent and in accordance with the applicable legislation.

The Company should ensure that charitable contributions and sponsorship are not used as a pretext for bribery. All charitable contributions and sponsorship should be transparent and in accordance with applicable legislation.

- **GIFTS, HOSPITALITY, AND PAYMENT OF EXPENSES:**

The Company prohibits the offering or receipt of gifts, hospitality, or the payment of expenses, when those activities are likely to have an effect on, or could be understood to have an undue influence on, the outcome of a purchase or other transaction, and when such expenses are not reasonable and have not been incurred in good faith.

# ANTI-BRIBERY AND CORRUPTION POLICY



- **ORGANISATION AND RESPONSIBILITIES:**

The Company Management shall be responsible for the control over the development and implementation of an effective anti-bribery policy. The Company Management shall verify whether the anti-bribery policy is effective, and ensure that relevant corrective action is taken when deficiencies are detected.

- **BUSINESS RELATIONS:**

The Company shall apply the anti-bribery policy in transactions with subsidiaries, joint venture partners, representatives, contractors, and other third parties with which it has business relations.

- **SUBSIDIARIES:**

The anti-bribery policy has been designed to take into account the entire Company, and should be implemented at a company-wide level and applied for Company controlled entities in all material respects.

- **REPRESENTATIVES, CONSULTANTS, AND OTHER AGENTS:**

Prior to the appointment of a representative, consultant, or other agent, the Company shall carry out due diligence, where the circumstances so warrant.

Prior consent of the senior management shall be obtained for all agreements with representatives, consultants, or other agents.

Compensation for representatives, consultants, or other agents should be a reasonable and justifiable payment for provided legal services, and must be paid in good faith.

The Company shall monitor the behaviour of its representatives, consultants, or other agents, and shall have a contractual right to terminate the contract when their behaviour fails to comply with the anti-bribery policy.

The Company shall implement its procurement procedures fairly, and in transparent manner. In assessing contractors, subcontractors, and suppliers, the Company should, if necessary, conduct due diligence to ensure that they have established effective anti-bribery policies.

- **INTERNAL CONTROLS AND AUDIT:**

Prior to the appointment of a representative, consultant, or other agent, the Company shall carry out due diligence, where the circumstances so warrant.

The Company shall ensure that internal control systems, in particular accounting and bookkeeping practices, are subject to regular audits.

# ANTI-BRIBERY AND CORRUPTION POLICY

- **CONSEQUENCES:**

The Company's commitment to the programme should reflect in its HR practices. In the case of breach of the anti-bribery policy, the Company shall impose appropriate sanctions in the disciplinary proceedings, with the possibility of termination of the employment relationship.

- **DRAWING ATTENTION TO CASES AT ISSUE AND OBTAINING INSTRUCTIONS:**

Company employees are expected to draw attention to cases at issue as soon as possible, and report suspicious circumstances to the competent employees of the Company.

The Company shall ensure safe and accessible channels through which employees and others can draw attention to cases at issue, and report suspicious circumstances ("whistleblowing") in confidence and without the risk of retaliatory measures. The aforementioned channels should also be available for obtaining advice or making proposals on anti-bribery policies.

- **REPORTING:**

The employees and others may submit notifications on irregularities or non-conformities anonymously to the "WORKS COUNCIL" boxes, or e-mail them to the President of the Works' Council at: [matjaz.obretan@tab.si](mailto:matjaz.obretan@tab.si), or directly to the Legal Department: [ales.horvatic@tab.si](mailto:ales.horvatic@tab.si) (tel.: 02 87 02 464). Please do not hesitate to contact the Legal Department for further clarification or to make suggestions regarding this Policy, or relevant laws and regulations.

- **COMMUNICATION:**

The Company is obliged to publicly disclose its anti-bribery policy. The senior management of the Company should monitor the anti-bribery policy, review its appropriateness and effectiveness on an ongoing basis, and, if necessary, improve it. The Company shall be open for communication related to its Anti-Bribery Policy with relevant stakeholders.

TAB Director:  
mag. **Bogomir Auprih**



MPI-Reciklaža Director:  
**Viktor Fortin**



TAB-IPM Director:  
**Igor Lipovnik**

