

**FRAGMAT** 

# CODE OF BUSINESS CONDUCT

**Made by:**  
Gaberšek Leonida, Quality  
Manager



**Approved by:**  
Žgajnar Rok, Manager  
Žužek Dušan, Manager  
Krajnik Gregor, Manager



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FRAGMAT TIM in its politics and everyday business practices follows the principles and standards of the legislation and operates according to the law and the core values, such as health and safety, integrity, social responsibility and respect for others. These values are the foundation of the management policy of the FRAGMAT Group.

FRAGMAT TIM's Code of Business Conduct (CBC) is a set of standards of proper conduct, which applies to all employees and executives of the company FRAGMAT TIM. It was designed so that it guides employees and managers in carrying out their daily business duties.

The same high standard of professional conduct is also expected from all suppliers that do business with the company FRAGMAT TIM and from their employees.

The following principles have to be respected from FRAGMAT TIM's employees and the suppliers:

### **Compliance with laws and regulations**

Compliance with the legislation is the fundamental principle underlying the policy of the Group. From FRAGMAT TIM's employees, executives and suppliers is expected to strictly comply with all laws and regulations that apply to them. Any actual or alleged infringement (and any attempted breach) of applicable laws and regulations must be notified immediately to the management of FRAGMAT TIM.

### **Honesty, equality and fairness in the relationship with suppliers**


Fair competition is the key to economic efficiency, business success and value creation, also when it comes to our relationship with suppliers. Fair competition means in particular:

- all suppliers are treated equally;
- all products and services are regularly compared with the competition on the basis of clear and objective specifications;
- strictly protecting the confidentiality of all conversations, information and data;
- a selection of suppliers based on objective criteria such as quality, delivery conditions, health and safety and commitment to sustainable objectives.

We expect from our suppliers to be committed to recognize and respect this Code of Conduct and to comply with its guidelines. To this end, FRAGMAT TIM demands from its suppliers a written declaration of acceptance of the Code of Business Conduct and its guidelines.

### **Prevention of conflicts of interest**

From FRAGMAT TIM's employees, executives and suppliers is expected to always act in the best interests of the group. Therefore, they should avoid any situations, which might

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lead to an (actual or perceived) conflict of interest with FRAGMAT TIM. This applies in particular to:

- All information and data provided by FRAGMAT TIM has to be treated as strictly confidential (unless they are publicly available) and may not be used for personal gain, or disclosed to persons not entitled to receive such information and data;

### **Prevention of bribery**

Any form of corruption and bribery is prohibited, as is the case for both active and passive bribery.

### **Forced labour**

Any form of forced labour is prohibited. This includes forced labour, debt bondage and other.

### **Child labour**

Any form of child labour is prohibited. If local laws do not set a higher age limits, the employee may not be any school-age child or a person under the age of 15 years. Workers under the age of 18 years may not perform hazardous work and night work.

### **Harassment**


Personal dignity, privacy and personal rights of each individual have to be respected. Employees may not be subjected to corporal punishment or physical, sexual, psychological and verbal abuse.

### **Compensation**

Wages, including overtime and allowances correspond to the level required by applicable laws and regulations of the countries in which we operate or in which suppliers operate.

### **Working time**

From employees it may not be regularly required, except in the case of exceptional circumstances, to perform in the standard working time more than 48 hours work per week, or more than 60 hours throughout the working week (including overtime), unless national regulations require less maximum number of hours. Employees have to be allowed at least one day off over a period of seven consecutive days, except in cases of exceptional business circumstances.

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### **Non-discrimination**

All employees, irrespective of colour, race, nationality, social background, possible disability, sexual orientation, political and religious beliefs as well as of gender and age, have to be treated in accordance with their capabilities and qualifications in every decision regarding employment, including, but not limited to employment, promotion, compensation, benefits, training, dismissal and termination of the contract.

### **Health and safety and sustainability**

Employees have to be provided with a safe and healthy working environment in accordance with the legislation, however, is expected from them to contribute to it with responsible action. The health and safety policy of the Group applies to all employees of FRAGMAT TIM, its managers, as well as to subcontractors and other service providers. Respect for their principles is also expected from the suppliers.

### **Environment**

FRAGMAT TIM also includes in its strategy for a long time already environmental aspects. The environmental policy of the Group determines the environmental responsibilities of the Group in its functioning. Suppliers must comply with applicable environmental regulations and standards.

### **Freedom of association and collective bargaining**

The company FRAGMAT TIM undertakes to respect the legal right of employees to freedom of association and collective bargaining. They expect the same from their suppliers.

### **Protecting FRAGMAT TIM'S assets**

To proprietary and/or confidential information and data of FRAGMAT TIM belong non-public information and data of all types (eg. strategic, financial, technical, legal, business information and data) and personal data relating to FRAGMAT TIM's employees, customers and / or suppliers.

From all employees and executives of FRAGMAT TIM and from all suppliers with access to such confidential and/or proprietary information and data, it is expected that they will use them with due care and take all necessary measures to prevent their alteration or inappropriate disclosure or use.