

# DOMEL

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## **CODE OF CONDUCT OF THE DOMEL GROUP**

Železniki, 16. October 2017



## MESSAGE FROM THE MANAGEMENT

With the adoption of the CODE OF CONDUCT, we at the DOMEL Group have made a commitment to act in accordance with its principles wherever we are, in our work and in our lives. It is a general directive and a recipe for building excellent relations with clients and colleagues. It directs us towards responsible and well-considered conduct.

Respecting the principles of the Code enhances our work and contributes to the creation of a good atmosphere among employees, business partners and other partners. We are bound by the values of creativity, responsibility, economy, ambition, respect, cooperation, care and belonging. Our rich history and tradition have given us a distinguished reputation, something that is extremely valuable to us. We aim to continue this tradition through our vision, constant growth, social responsibility and adherence to ethical principles. In this manner, we also realise our mission of the sustainable development of the DOMEL Group.

## THE CODE APPLIES TO ALL EMPLOYEES

All our employees are required to know and observe the Code of Conduct (hereinafter: the Code). Together with the Fundamental Principles and the Environmental Policy of the DOMEL Group, the Code is the basis for the way we work. Observing the principles and guidelines of this Code is the moral obligation and professional duty of every employee of the DOMEL Group.

All managers and directors are responsible for communicating the content of the Code and putting it into effect within their organisations. Failure to observe and comply with the Code can lead to disciplinary proceedings.

The Code has been adopted by the management of the DOMEL Group. It is based on the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, OECD Guidelines for Multinational Enterprises, and the Universal Declaration of Human Rights adopted by the United Nations.

The DOMEL group requires suppliers, sub-suppliers, customers, subcontractors and other business partners to accept and observe these principles. The DOMEL Group's evaluation and selection of business partners is partly based on their ability to observe this Code.

## Notification of infringements

If you learn of actions that are contrary to the provisions of this Code, we expect you to communicate your observations to the legal department at [etika@domel.com](mailto:etika@domel.com) or by letter to: Domel, d.o.o., Pravna služba (Legal Department), Otoki 21, 4228 Železniki. When reporting alleged infringements, you may choose to reveal your identity or remain anonymous. In no case will reporting infringements in good faith result in consequences for the employee concerned. If you require additional instructions or explanation, contact your line manager, the general operations director or the legal department.

## OUR BUSINESS PRINCIPLES

Companies of the DOMEL Group must follow and observe the legislation and regulations of the country in which they operate. The Code sets the lowest level of approved conduct. In the case of stricter local laws, these shall take precedence over the Code.

### **Fairness, the rules of business and the prevention of corruption**

We collaborate in a correct manner with business partners and stakeholders. Business decisions are based on the best interests of the DOMEL Group, irrespective of personal acquaintance or personal prejudice.

Employees may not accept gifts, benefits, favours or entertainment that could influence or appear to influence the objectivity and professional judgement of employees. In the same way, the DOMEL Group will also offer no rewards or benefits to any business partner or stakeholder that would constitute or appear to constitute an infringement of the applicable legislation or would influence their relationship to the DOMEL Group. Any form of corruption and bribery is unacceptable.

The DOMEL Group operates in a manner that is ethical and fair, and is not involved in any inappropriate activity or unfair business practices.

### **Fair competition**

We are committed to free and open competition. We therefore adhere to laws on preventing the restriction of competition and do not enter into agreements that could lead to competition being restricted.

### **Accurate accounting and reporting**

The DOMEL Group is committed to ensuring accuracy in financial reporting and the communication of data. All financial transactions must be recorded in accordance with universally accepted accounting standards contained in the applicable legislation. Accounting records must show all transactions in a correct and non-misleading form. All internal financial reports must conform to the applicable organisational regulations.

### **Personal financial interest**

Employees may not use their connection with the DOMEL Group for personal gain, and must avoid participation in other financial interests that could conflict with the interests of the DOMEL Group. Interests that must be avoided include personal or family interests in any other organisation or enterprise that does business with the DOMEL Group.

## **Political involvement**

The DOMEL Group adopts a neutral position with regard to all political candidates and political parties. The name or resources of the DOMEL Group and its brands may never be used to promote the interests of political candidates and political parties.

## **Conflicts of interest**

Employees may not engage in activities outside the DOMEL Group that could conflict or appear to conflict with the interests of the DOMEL Group without the prior approval of management.

## **Responsibility towards owners**

The DOMEL Group has a responsibility towards the holders of capital, irrespective of the type of ownership. Their interest accords with the interests of those working within the Group and other stakeholders.

## **Handling of confidential information**

Employees frequently have access to information about the DOMEL Group and information about third parties that is not in the public domain. Such confidential information may not be communicated to anybody outside the DOMEL Group, including family members. This obligation continues to apply even after termination of employment in the DOMEL Group.

Employees are not permitted to trade shares on the basis of insider information, i.e. information which is accessible to employees in the course of their work within the DOMEL Group and which is not public.

## **Cooperation with the local community and civil society**

The DOMEL Group contributes to economic growth and to raising the standard of living in the environment in which it operates. We are obliged to provide the public with regular, complete, intelligible and open information about our activities and intentions.

## HUMAN RIGHTS AND WORKING PRACTICES

### Respect for individuals and the prohibition of discrimination

All employees of the DOMEL Group have the right to be treated fairly, courteously and with respect by their superiors, subordinates and colleagues.

The DOMEL Group guarantees equal opportunities of employment to all individuals regardless of gender, race, religious belief, age, disability, sexual orientation, nationality, social or ethnic origin, citizenship, membership of a trade union and/or political party, or any other characteristic that is protected by the applicable legislation.

Physical, psychological, sexual or verbal violence against colleagues or business partners is not permitted.

### Self-responsibility

The DOMEL Group supports and encourages the responsibility of employees towards themselves and their families. Employees must therefore take care of their health and ensure that they lead a balanced life.

### Personal growth and development

The DOMEL Group is aware that capable and committed personnel are the foundation of a company's success. Their energy and knowledge enable development and success. We are therefore committed to the well-being of all those who work with us. We provide employees with continuing education and training with the aim of promoting their professional and personal development.

### Fair employment conditions

Employment conditions and pay must be fair and justified. All employees, including those on fixed-term contracts, must be aware of the obligations and rights arising from the employment relationship.

### Freedom of association

All employees have the right to form, join or refrain from participating in trade unions or similar organisations for the purpose of collective bargaining.

## **Forced labour and child labour**

The DOMEL Group does not allow work by persons under the age of 15 (or another legal minimum working age in the country in question), either in its own companies, in the companies of its suppliers or in any other parties with which it does business. It does not allow any form of illegal or forced labour in the company or in the company of any party with which it does business. The DOMEL Group does not permit any form of human trafficking or any business that would facilitate human trafficking.



## **ENVIRONMENT**

Through its Environmental Policy, the DOMEL Group is committed to protecting the environment and to sustainable development. Our commitment also includes reducing the consumption of energy products and reducing the environmental impact of our operations, products and processes.

We adopt a methodical approach to the use of environmental management systems. Our environmental programmes contribute to constant improvement, technical progress and the efficient use of resources.

We comply with environmental regulations, and follow European and global guidelines on environmental management.

## **HEALTH AND SAFETY**

The DOMEL Group endeavours to ensure a healthy, safe and high-quality working environment.

Employees at the DOMEL Group are aware of our responsibility for our own safety and health. To this end, we observe safety instructions.

The consumption of drugs and alcohol in the workplace is prohibited.

The DOMEL Group is committed to supplying a range of products and services that meet all relevant safety and quality criteria.

## **RESOLUTION OF COMPLAINTS**

The DOMEL Group uses transparent and effective procedures to deal with customer enquiries and complaints, and endeavours to resolve all disputes involving our stakeholders in a fair and timely manner.

## **VALIDITY OF THE CODE**

The original DOMEL Code of Conduct was published on 15 July 2011. The updated code was reviewed and approved by management on 16 October 2017.

The Code is published on the internet and intranet pages of the DOMEL Group.