

# **CODE OF ETHICS AND BUSINESS CONDUCT**



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## 1 Message from the management

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Welcome to one of the most important documents that we have at INTEC MKD: the Code of Ethics and Business Conduct (hereinafter: the Code).

Regardless of the fact that we are no longer a small company, as we can already stand alongside the biggest and best in this segment, the atmosphere of a family business still prevails. The fact that we have long-term and warm-hearted colleagues and are present in the local environment provides a special sense of familiarity and also the willingness to come together when challenges arise. That is why we are constantly improving the methods and results of our work.

Our goals are high, yet achievable. We have the courage to overcome obstacles and accept mistakes from which we can learn. We encourage education and progression in the workplace, while at the same time strive to achieve a balance between work and family. We are committed to creating an environment that promotes diversity, lifelong learning, equal opportunities and a safe work environment. We have strong principles that respect people, society and our environment. These principles, which are set out below, will remain at the heart of our business and conduct.

The rules of our Code define the ethical behaviour that we must all demonstrate when working for INTEC MKD. The Code reinforces our values and provides clear guidelines on what we expect from all our employees and colleagues. Therefore, the Code is mandatory for all employees. Although the Code is primarily intended for internal use, we also expect the same degree of commitment from other stakeholders, i.e. our suppliers and business partners. We also familiarise existing and potential new partners with the Code and its content.

INTEC MKD has zero tolerance when it comes to corruption, violation of human rights and violation of rules in the field of health, safety and environmental protection. We have a clear common interest and goal to strengthen and protect the ethical foundations of our business and to protect our core values.

We invite you to read our Code (at least once), because it is important.

Thank You.

Gorazd Križaj  
Director

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## 2 Introduction and basic guidelines

INTEC MKD's Code represents the principles, behaviour and actions that create an ethical culture and transparent business in accordance with legislation and internal regulations. It also sets the foundation for the business and conduct of the company as well as all employees for:

- maintaining the company's positive reputation among its employees, customers, partners and the general public;
- correct business relationships that are based on mutual trust and long-term collaboration;
- professional, respectful, honest and honourable behaviour of both management and all other colleagues.

## 3 Responsibility

The Code applies to all those employed by INTEC MKD, as well as to those who are in a relationship with the company based on a civil law contract, students who work through the student service, as well as those on internships or training, etc. (hereinafter referred to as: employee(s)). INTEC MKD also requires that all its suppliers, contractors, distributors, contractors, partners who the company sponsors or supports and all other stakeholders comply with the Code.

The basic responsibilities of employees of INTEC MKD are:

- to read the Code, be familiar with its content and understand it in its entirety. In the event that anything is unclear or there are additional questions, contact the Human Resources department or your direct superior;
- to behave in accordance with the Code;
- to immediately report any violation discovered or potential violation of the laws, regulations and the Code.

The additional responsibilities of all managers are:

- to set an example to encourage colleagues to behave ethically and act in accordance with laws and regulations;
- to encourage colleagues to fully understand the Code and its requirement and constantly monitor compliance with ethical principles;
- Support employees who raise questions and concerns in good faith;
- Ensure that employees who draw attention to certain matters or problem will never be exposed to any kind of retaliation;
- Take into consideration the standards of ethical operation when evaluating the personal success of employees;
- Immediately report any deviations from ethical compliance.

## 4 Principles of ethnic business conduct

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The principles of the company's Code have been divided into five sections:

- The fight against corruption.
- Respect for employees.
- Protection of information.
- External cooperation.
- Sustainable development.

## 4.1 The fight against corruption

INTEC MKD does not act in a corrupt manner and does not tolerate corruption in any form or at any scale (including bribery, payments for granting favours, services in return, extortion, abuse of power for personal gain, obtaining unjustified benefits or gifts for the purpose of influencing), whether private or public sector.

The company adheres to this principle, even if the commitment to this rule puts it in an uncompetitive business position, or if acting in contrast with such activities means a loss of business for the company. INTEC MKD is committed to zero tolerance when it comes to corruption and bribery in its entire value chain, social framework, charity and sponsorships.

Fraud, including falsifying reports or financial and non-financial information, money laundering and insider trading are prohibited.

### 4.1.1 Preventing bribery and corruption

INTEC MKD supports both governmental and international efforts to prevent influencing or interfering with competition through bribery and is against any corrupt conduct and conduct that may be damaging to business.

INTEC MKD does not use the company's business relationships for its own benefit or for that of others or to the detriment of the company. This primarily means that no one at the company is allowed to directly or indirectly give, promise, accept or demand unauthorised personal benefits (e.g. money, property or services) intended to influence decisions or break laws.

Corruption also includes abuse of office or position by unlawfully influencing someone and requesting or receiving illegal benefits or accepting promises of such benefits. INTEC MKD does not tolerate corruption in any form. The company is committed not to enter into business or terminate business relations with anyone involved in corrupt practices. No one should suffer degradation, punishment or negative consequences for refusing to pay or accepting a bribe, even if it results in loss of business.

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INTEC MKD conducts procurement processes in a fair and transparent manner. The company conducts due diligence as appropriate when evaluating suppliers and contractors to ensure they have effective anti-corruption commitments and policies.

#### 4.1.2 Gifts and hospitality

Gifts and invitations are items and services of value offered or accepted by an individual or members of a person's family. Gifts include money and other items, such as gadgets, favourable terms and discounts on products/services, loans, use of vehicles, travel or accommodation, tickets or gift vouchers. Entertainment and invitations, such as business lunches, recreation, cultural or sporting events, etc., are also treated as gifts.

INTEC MKD only gives and accept gifts and invitations that are of a business nature and are not material, and are not intended to unduly influence the decision-making process. Gifts and invitations are given without the expectation of anything in return and should never influence or appear to influence the impartiality of anyone's decision-making. They must never be offered or accepted in exchange for more favourable treatment in any arrangement.

Gifts with a total value of less than EUR 50 – promotional gifts (e.g. pens, keyrings, calendars), other business gifts, objects, services, business lunches, drinks and invitations to attend conferences that were given without the intention to exert influence – may be accepted without being registered as gifts. All gifts and invitations with a total value of EUR 50 must be recorded and reported to Human Resources, regardless of whether they were accepted or declined. If in doubt about the value, contact your immediate superior.

If the gift cannot be refused for polite and practical reasons (e.g. it has already been delivered and it does not make sense to return it), the director of the company may decide whether to allow the gift to be kept or to donate it as a charity for the good of the community.

#### 4.1.3 The fight against money laundering

The company is committed to the highest standards of money laundering prevention. Money laundering is the process of disguising illegal funds to make them appear legitimate, so that the illegal origin or nature of the funds is concealed behind legitimate business activities. It also includes the use of legal means to support crime or terrorism.

#### 4.1.4 Accurate records, correct reporting and the transparency of business processes

Records and reports are valuable company assets and must be made according to actual, true conditions and events and comprehensively. INTEC MKD records and reports company data openly, accurately and objectively.

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Records and reports include financial data (bookkeeping) and non-financial data, such as descriptions of projects and results, technical details, performance evaluations, HR department records, human rights information and all other information that proves business activities and is required by law or is otherwise important for decision-making and the company's corporate archive.

Falsification of records or misrepresentation of facts can never be justified or justifiable. INTEC MKD does not tolerate any form of false reporting or concealment of facts in reports and even interpretation of the same facts in different ways in different situations in order to achieve current goals.

The honesty of financial or non-financial records and reports is crucial in making the right decisions, protecting the company's credibility and reputation, fulfilling its legal and statutory obligations, as well as its obligations to owners and all external stakeholders.

Mistakes in the correct keeping of records and reports can increase business risks that lead to legal consequences and damage the company's reputation, financial condition and competitiveness.

Avoid:

- intentional, incorrect or misleading entries in the company's system, records, documents, reports or confirmations of expenses;
- manipulation or falsification of any information, financial or non-financial document, report or record;
- removal or destruction of records prior to the end of the specified retention period and without prior approval;
- concealment, alteration, destruction or any other kind of interference with company information or property in connection with actual, ongoing, future or potential audits, lawsuits or legislative or legal investigations.

#### 4.1.5 Avoiding conflicts of interest

INTEC MKD is involved in a complex and wide range of activities, therefore it can be challenging to determine whether or not any activity is in contradiction with the company's interests. Therefore, should a situation arise, it is expected that the employee/employees seek(s) advice with a view to avoiding conflicts of interest.

The company respects the privacy of its employees, therefore it is usually not interested in what people do outside of working hours. Nevertheless, there are relationships between the company and its employees, as well as other partners, based on trust, thus conflicts of interest may arise if employees' private activities could potentially affect the expected loyalty to the interests of the company.

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A conflict of interest occurs when a personal relationship, participation in external activities or interests in other companies, influences or appears to influence the illegal influence of decisions. Conflict of interest situations must be avoided; employees must refrain from all activities that could in any way interfere with their ability to make impartial and objective decisions on behalf of INTEC MKD or threaten the company's interests. A conflict of interest can threaten both your own reputation and that of the company, can cause damage to the company's interests and have a negative impact on work morale. There are many different situations where a conflict of interest can arise, typical situations that involve influencing factors include:

- an additional job or mandate;
- collaboration in business partnerships or with private companies;
- jobs or partnerships of close relatives or a close relative or someone with whom you have a personal relationship as a colleague who reports to you or is your superior.

Therefore:

- inform your direct superior about any additional jobs, services you offer and collaborations with competitors, customers, suppliers or contractors, and obtain written approval;
- notify your immediate superior if you intend to invest in competitors, customers, suppliers or contractors and obtain written approval; except in the case of the acquisition of shares in a public joint-stock company;
- notify your immediate superior and Human Resources of any relationship that may cause, or may appear to cause, a conflict of interest.

#### 4.1.6 Protection of company assets and intellectual property

INTEC MKD has extensive **tangible and intangible assets** as well as financial and non-financial assets of great value. It is the company's duty to safeguard these funds for appropriate and prudent business purposes. Improper or insufficient management of the company's assets and any of its resources is considered an abuse of the interests of the company and its owners.

- All employees and any authorised individual(s) may use company funds exclusively for legitimate and permitted business purposes;
  - Employees have a duty to report any theft, misuse or loss of company funds as soon as they become aware of it;
  - When planning and implementing activities, employees must always strive for economical, prudent and economical use of the company's resources in the long term;
  - Never use the company's assets and premises for private purposes, except in cases where the explicit authorisation of the director has been given, and is in accordance with the applicable rules;
  - Do not use work time for private activities.
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In its essence, **intellectual property** is something unique that someone has designed. It includes copyrights, patents, designs, trademarks, trade secrets and know-how rights, among others. It can be:

- something that has been invented, such as a new product, technological solution, internal development or business process;
- the design or appearance of a product;
- a trademark or logo;
- written work, including content on the website or in brochures;
- a work of art, such as a photograph or illustration;
- computer software.

INTEC MKD creates valuable business ideas, strategy processes and other business information, which are the property of the company and must be protected. Intellectual property created or purchased using company funds becomes the property of INTEC MKD and cannot be treated as private/personal property.

Important:

- ask lawyers to draft non-disclosure agreements if a project is extremely complex and involves multiple parties with intellectual property;
- ensure that licences, sales agreements and technology transfer agreements protect the company's intellectual property;
- ensure that the research, development and marketing of any new or modified product or process does not violate the intellectual property rights of others;
- do not 'steal' someone else's ideas or copy a specific product or service;
- never knowingly infringe the intellectual property rights of others.

## 4.2 Respect for employees

INTEC MKD respects all rights guaranteed by the constitution and laws, as well as all international documents in the field of human rights.

### 4.2.1 Health and safety at work

The health and safety of workers is one of the company's main priorities. INTEC MKD is committed to respecting its responsibility in relation to the safety and health protection of employees. Occupational health and safety protection is provided in accordance with applicable occupational health and safety laws. The company maintains and improves the health, productivity and satisfaction of all employees through continuous improvements of the working environment and various preventive and health promotion measures in the workplace.

Each employee is responsible for fully complying with applicable occupational health and safety laws and for knowing, understanding and following internal safety policies, practices and

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procedures. Each employee is personally responsible for maintaining safety in the workplace, for using INTEC MKD's personal protective equipment in a safe manner, and for acting judiciously in everyday business life.

## 4.2.2 Respect, dignity and fair treatment

INTEC MKD strives for the equality of all people and respects those who think differently. The company guarantee the same rights and opportunities for all individuals in all procedures, except when specific professional skills justify the selection. These include e.g. protection of privacy, freedom of thought, freedom of association, employment and reward and promotion, regardless of gender, race, skin colour, age, state of health or disability, religious, political or other belief, trade union membership, national or social origin, family status , wealth, sexual orientation or other personal circumstances, including marital or parental status.

INTEC MKD provides its employees with a complete package of benefits that meets or exceeds the minimum legal standards in accordance with the provisions on the minimum wage in the Republic of Slovenia, the Employment Relationship Act (hereinafter ZDR-1) and the industry Collective Agreement on the Metal Industry. The company strives to offer its employees a fair financial package that enables them to live a decent life and have an adequate standard of living.

The company does not tolerate any form of forced, compulsory or child labour or any other form of unethical employment practices, such as withholding wages, denial of sick leave or daily breaks, abuse of alternative forms of employment or fraud relating to health care contributions. The minimum age for non-hazardous jobs is 15 and 18 for hazardous jobs. Workers who have not yet reached the age of 18 enjoy special protection in their employment conditions, as stipulated in ZDR-1.

Disciplinary procedures are carried out in a fair, impartial and transparent manner. Redundancies are carried out in a humane manner and, whenever possible, former employees are provided with support in the procedures.

INTEC MKD does not tolerate harassment or any other activity, conduct or behaviour that is humiliating, offensive, intimidating or hostile. Everyone in society is entitled to be treated with courtesy and respect. Sexual harassment and defamation or slander are considered serious violations of human dignity.

The company:

- does not employ or force anyone against their will;
  - the working week and working hours are in accordance with ZDR-1 and the collective agreement;
  - respects the right to workers' organisations and does not discriminate on this basis;
  - respects the right to free expression of opinion;
  - provides support to employees with special needs;
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- selects, recruits and supports employees based on their qualifications and skills;
- connects with partners and other stakeholders who respect human rights and fundamental freedoms.

## 4.3 Protection of information

The company's handling of all information and data is based on the principle of confidentiality. INTEC MKD maintains confidentiality in the field of work and all matters in the company that are important for the company or its business partners. The company acts in accordance with the rules on personal data protection, business secrets and protection of information.

### 4.3.1 Protection of INTEC MKD data

The subject of data protection is data that the company defines as business secrets or that which is marked as confidential data, as well as data that the company has not otherwise defined as a business secret, but it is obvious that significant damage could occur if it was obtained by an unauthorised person.

Trade secrets include, but are not limited to, any information recorded in documents or media that relates in particular, but not exclusively, to processes and methods, product specifications, customer lists or other customer-related information, information about costs and prices, legal data, financial data, personnel data, lists of suppliers and other supplier-related data or any other data that are not intended for the public and are related to the company's operations, matters or business plans, matters or plans of the company's customers or suppliers as also all business documentation on any computer that is created in connection with the company's operations (which includes but is not limited to emails, Word and Excel documents and information systems).

Any written, drawn, printed, reproduced, recorded, photographed, magnetic, optical or any other record of a trade secret is considered a document. Media is any medium that contains trade secrets.

### 4.3.2 Duty to protect trade secrets

Employees as well as external colleagues have a duty to protect business secrets, i.e. those who are entrusted with business secrets or who are aware of them in another way. These persons may not exploit trade secrets for their own personal use or disclose them to a third party.

Any person, even if unauthorised, who becomes familiar with such a document is obliged to protect it as a business secret. An unauthorised person who becomes aware of a business secret through no fault of their own is obliged to immediately inform the HR department or the company director. The person in question must state what they have found out, from whom and how they found out it. The HR or the company director is obliged to take appropriate measures to ensure

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additional protection of the trade secret and to take all possible measures that can be used to prevent further unauthorised dissemination of the trade secret, as well as to appropriately sanction the person who disclosed the trade secret.

### 4.3.3 Information about competitors

Competition is the best incentive for efficiency and innovation. While INTEC MKD is competitive in many business activities, the company conducts them in accordance with the norms of fair competition and in accordance with the relevant competition laws. Full compliance with competition law is not only a legal obligation, but is also linked to attitudes and cultures that can have a positive impact on business. INTEC MKD respects its competitors and is not involved in any unfair activities that could unjustifiably damage the good will and reputation of a competitor. The company obtains information about the competition in accordance with the law.

Basic guidelines:

- use only public and legally available information and resources to evaluate business, customers, suppliers and technology trends; information must be obtained in a legal manner;
- make sure there is a legitimate and legal reason for any discussion with competitors;
- pay attention to competition law; limit all contact with competitors to the absolute minimum and only when necessary;
- request training in the field of competition law;
- distance yourself from any marketing behaviour that does not comply with the laws;
- contact HR if you have any doubts about how to proceed.

Never:

- spread false, malicious or harmful information or rumours about competitors and their products and do not tarnish the competition in any way;
  - discuss pricing, business or marketing plans, customers or sensitive business information with competitors;
  - agree to split markets, territories or customers;
  - create rules, specifications and conditions that favour only one or a limited number of potential partners;
  - enter into an agreement to limit production;
  - agree on the determination of distribution margins and never sanction the formation of the selling price (e.g. a deviation from the recommended price);
  - obtain information about competitors from new employees or in similar illegal ways.
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## 4.3.4 Privacy and protection of personal data

The right to privacy is one of the most important human rights in modern society. INTEC MKD respects the privacy of its employees and ensures the protection of personal data. The company only makes permissible encroachments into the privacy of employees in the case of an emergency, and such encroachments are defined by law or internal acts. The company is obliged to protect confidentiality in all such encroachments.

INTEC MKD only collects, processes and uses personal data to the extent necessary for a clear and legitimate purpose. The company handles personal data responsibly, carefully and in accordance with internal acts. It guarantees the protection of personal data for both employees and all its customers.

## 4.3.5 Use of information technology

The Code prescribes how employees should use INTEC MKD equipment and systems or personal devices to access company information. It must be responsible and secure in accordance with all relevant laws and regulations and the internal document titled 'Protocol for the security and protection of personal data': [Z:\000 - ISO 9001-2015 and ISO 14001-2015\17 - Rules\06 - GDPR\Protocol for the security and protection of personal data.](#)

When using company equipment and systems it is necessary to:

- use the equipment/system (telephones, mobile phones, tablets, computers, laptops, scanners, etc.) correctly and protect it from damage, loss or theft;
- use PINs/username and passwords to prevent access by unauthorised persons in order to protect the company's data;
- immediately report the loss or theft of equipment to the responsible person in the IT department and/or your immediate superior;
- in the event that you need to leave your workstation, be sure to lock company systems and equipment in order to prevent access by unauthorised persons (clean screen policy) using the WIN+L keys;
- ensure that equipment and other paper and digital data containing personal data are not left on desks and other open spaces where other employees or third parties could freely access them (clean desk policy).

The provisions of the Personal Protection Act (ZVOP-2) are directly applicable in matters not regulated by this Code, as well as the General Data Protection Regulation (GDPR) and the internal Regulations on the protection of personal data: [Z:\000 - ISO 9001-2015 and ISO 14001-2015\17 - Regulations\06 - GDPR](#)

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## 4.4 External cooperation

Throughout the value chain, from innovation to our suppliers and business partners, INTEC MKD and its employees must demonstrate the same ethical standards when working with others outside the company as when dealing with colleagues.

### 4.4.1 Supply chain

INTEC MKD supports and encourages its business partners and suppliers to comply with this Code. Failure to comply with the rules of the Code may be grounds for termination of a business contract. In the Code, the company defines its operating norms, which must also become the basic operating principles of business partners and suppliers and the basis for cooperation between them and the company. The company checks and selects suppliers in the spirit of a good employer, and conducts selection processes among suppliers impartially, transparently and in accordance with the law.

### 4.4.2 Relationships and communication with business partners and suppliers

Relations with customers, business partners and suppliers are based on trust, respect and responsibility. INTEC MKD ensures compliance with business agreements and consistently settles its obligations to its customers, suppliers and business partners. The company constantly monitors, evaluates and improves its products, services, technologies and business processes in order to ensure quality, safety and reliability at every step of the business chain. An open and appropriate approach to customers, suppliers, contractors, partners and other business partners is the foundation for successful and long-term business relationships.

### 4.4.3 Donations and sponsorship

The company makes donations of its own choice and without expecting anything in return, and allocates sponsorship funds exclusively within a certain legal framework and in accordance with the relevant internal rules. All activities related to sponsorships and donations are carried out transparently with verifiable documentation.

### 4.4.4 Public announcements and social media

INTEC MKD is committed to responsible communication, which includes regular, comprehensive, transparent and balanced two-way communication with external interest groups.

Posts on the company's social media channels are managed by the HR department. Employees' activity on social media corresponds with their private life, which the company respects. However, employees are not entitled to act on behalf of the company on social media and are not allowed

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to publish, share or otherwise disclose company data, especially protected business information, nor are they allowed to mention or tag the company in any way that is contrary to its values.

#### 4.4.5 Political activities

INTEC MKD does not aspire to participate directly in political activities, nor does it want to follow any political goals, but at the same time it strictly observes all laws.

The company does not sponsor, donate or support political programmes, parties or any organisations and events organised for them. The company respects the right of its employees to freely decide to get involved in politics and does not prohibit them from getting involved in politics. Employees' political activities must not be carried out on behalf of the company and in conflict with the interests of the company.

## 4.5 Sustainable development

INTEC MKD attaches the highest value to the safety and well-being of its employees, as well as the safety and well-being of the communities and environments in which it operates. To this end, the company has been maintaining and is committed to environmental standards in accordance with ISO 14001 for many years. It also partially adopted an Environmental, Social and Governance (ESG) strategy in 2023, which is being upgraded and gradually incorporated into its operations.

### 4.5.1 Environmental protection

INTEC MKD pays special attention to responsible environmental management and also has an established environmental management system. It is committed to continuously improving environmental management and pollution prevention.

The company develops and carries out various activities to protect the environment and preserve natural resources. It is systematically reducing its impact on the environment and living space as well as regularly monitoring the use of resources, energy and costs. INTEC MKD sets and achieves environmentally friendly strategic and implementation goals that are balanced with the specifics of its business and development. The company is focused on continuous improvement of environmental protection.

INTEC MKD:

- operates in accordance with environmental protection legislation;
- minimises environmental pollution and constantly implements measures to reduce it;
- has established an environmental management system in accordance with ISO 14001.

## 5 Conclusion

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INTEC MKD welcomes and strives for values such as respect for laws, responsibility, honesty, diligence, justice and reliability. Just as it needs exceptional products and services, it also needs exceptional individuals with a high degree of integrity and principle.

In the digital age, companies are more exposed than ever, therefore transparency and sustainable reporting is fundamental for all further activities.

Here's to extraordinary achievements!

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