

Politika preprečevanja podkupovanja in korupcije Anti-Bribery and Corruption Policy

Dokument se nanaša na krovno družbo Gorenje, d. o. o., in odvisne družbe, ki skupaj s krovno družbo sestavljajo Skupino Gorenje (v nadaljevanju Gorenje ali Skupina).

Uvod

Poslujemo pošteno in etično ter v skladu z veljavno zakonodajo. Pri podkupovanju in korupciji uporabljamo pristop ničelne tolerance. Zavezani smo k profesionalnemu in poštenemu delovanju pri vseh naših poslovnih odnosih, ne glede na to, kdo je naš poslovni partner.

Pravne ali fizične osebe, ki delujejo v imenu Gorenja ali ki sodelujejo z njim, ne smejo biti ali delovati koruptivno. Če je nespoštovanje te politike kaznivo dejanje, se lahko zaposleni ali poslovni partner sooči s kazenskim pregonom. Naša politika preprečevanja podkupovanja in korupcije je dostopna vsem zaposlenim in poslovnim partnerjem. Izvajanje politike redno spremljamo in spodbujamo. Politika preprečevanja podkupovanja in korupcije je javno objavljena in dostopna na spletni strani Skupine. Ta politika ni sestavni del nobenih pogodb in jo lahko kadarkoli spremenimo oziroma dopolnimo.

Področje uporabe

Ta politika velja za vse osebe, ki so v kakršnemkoli poslovnem odnosu z Gorenjem, za vse osebe, ki delajo za nas in v našem imenu, vključno z vsemi zaposlenimi na vseh ravneh (za poln ali krajši delovni čas), direktorji, skrbniki, uradniki, agencijskimi delavci, pripravniki, agenti, izvajalci, zunanji svetovalci, predstavniki tretjih oseb,

The document pertains to the parent company Gorenje, d. o. o., and its subsidiaries which, along with the parent company, comprise the Gorenje Group (hereinafter Gorenje or the Group).

Introduction

It is our policy to conduct our business in honest and ethical manner and in compliance with applicable legislative. We take zero tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business relationships regardless of who our business partner is.

Legal or physical persons acting on behalf of Gorenje may not act corruptly in our dealings with any other person. In case the act of non-compliance with Policy represents a criminal act, the employee or business partner may face criminal prosecution.

Our Anti-Bribery and Corruption Policy is made available to all our employees and business partners. Policy implementation is regularly monitored and encouraged. The Anti-Bribery and Corruption Policy is published and accessible through the Group website. Policy is not a part of any formal contracts and we may change and amend it at any time.

Scope

Policy applies to all persons that are in any kind of business relation with Gorenje, to all persons working for us and on our behalf, including all our employees at all levels (full or part time), directors, trustees, officers, agency workers, interns, agents, contractors, external consultants, third party representatives, business partners and other

poslovnimi partnerji in drugimi osebami, povezanimi z našim podjetjem, ne glede na njihovo lokacijo, naravo njihove dejavnosti ali kraj opravljanja dejavnosti.

Definicije

Podkupnina pomeni finančno ali drugo spodbudo ali nagrado, ki je nezakonita, neetična ali predstavlja kršitev zaupanja na kakršenkoli neprimeren način. Podkupnine imajo lahko različne oblike, na primer: denar (ali ekvivalent denarja, kot so delnice, kriptovaluta), nerazumna darila, zabava ali gostoljubnost v razširjeni obliki, posojila, honorarji, popusti ali provizije (na primer za prodajne ali tržne agente), storitve, oddaje naročila ali katerekoli druge prednosti ali koristi, ki so namenjene vplivanju na odločitev ali ukrep.

Podkupovanje vključuje dajanje, ponujanje, obljubljanje, iskanje ali sprejemanje podkupnine z namenom spodbude ali neustrezno nagrajevanje izvajanja dejavnosti, odgovornosti in dolžnosti.

Korupcija pomeni vsako obliko zlorabe pooblastil ali položaja za poslovno in/ali osebno korist in lahko vključuje, vendar ni omejena na podkupnino. Predstavlja vsako kršitev dolžnega ravnanja odgovornih oseb, kot tudi ravnanje oseb, ki so pobudniki kršitev ali oseb, ki se s kršitvijo lahko okoristijo, zaradi neposredno ali posredno obljubljenе, ponujene ali dane oziroma zahtevane, sprejete ali pričakovane koristi zase ali za drugega.

Splošna prepoved

Vse oblike podkupovanja in/ali korupcije so strogo prepovedane in jih Gorenje ne dopušča. Ne le dajanje ali prejemanje podkupnine, temveč tudi kakršnakoli s tem povezana dejavnost, kot je obljuba ali dogovor o dajanju ali prejemanju podkupnine, šteje za dejanje korupcije.

Darila in gostoljubje

Ta politika ne prepoveduje dajanja ali prejemanja razumnih in ustreznih gostoljubnih dejanj ali daril za zakonite namene, kot so zavezujoči odnosi, upravljanje podobe ali

persons related to our company regardless of their location or nature of their activities or place of performing their operations.

Definitions

Bribe means a financial or other inducement or reward by action, which is illegal, unethical or represents breach of trust in any improper way. Bribes can take many forms, for example: money (or cash equivalent like shares, cryptocurrency), unreasonable gifts, entertainment or hospitality in extended form, loans, fees, rebates or commissions (for example to sales or marketing agents), services, the award of a contract or any other advantage or benefit that is intended to influence a decision or action.

Bribery includes giving, offering, promising, seeking or accepting a bribe with the goal of inducement or reward the performance of activities, responsibilities and duties inappropriately.

Corruption means any form of abuse of power or position for business and/or personal gain and may include but is not limited to bribery. Represents any breach of the duty of responsibility of the responsible persons, as well as the conduct of the persons who are the initiators of the breach or the persons who can benefit from the breach, for the purpose directly or indirectly promised, offered or given, or claimed, accepted or expected benefits for themselves or for others.

General prohibition

All forms of bribery and/or corruption are strictly prohibited and are not tolerated by Gorenje. Not only giving or receiving a bribe, but also any related activity, such as a promise or agreement to give or receive a bribe, is considered an act of corruption.

Gifts and hospitality

Policy does not prohibit the giving or receiving reasonable and appropriate acts of hospitality or gifts for legitimate purposes such as binding relationships, managing the

ugleda podjetja ali trženje izdelkov ali storitev podjetja.

Darila in gostoljubje morajo biti splošnega pomena, razumni, dani ali sprejeti v običajnem poteku poslovanja in morajo biti v skladu z lokalnimi zakoni. Vsa darila so dana v imenu Gorenja, ne v imenu posameznika. Dajanju in prejemanju daril ali izvajanju gostoljubnih dejanj se je treba izogibati, ko potekajo zaključne faze pogajanj ter v fazi sklenitve pogodbe ali v temu podobnih dejavnostih.

Darila morajo biti primerne vrednosti in vrste, odvisno od okoliščin in upoštevajoč vzrok za obdarovanje. Darilo ne sme nikoli vključevati denarja ali denarnega ekvivalenta, prav tako se ne sme dati ali odvzeti denarja ali denarnega ekvivalenta niti v tajnosti.

Promocijska darila nizke vrednosti, kot je npr. tiskan material določene blagovne znamke, lahko dajo ali sprejmejo obstoječe ali potencialne stranke, dobavitelji in poslovni partnerji.

Kadar lokalni zakoni, predpisi ali standardi zahtevajo strožje postopke ali kontrole, se jih upošteva.

Vodenje evidenc

Z namenom transparentnosti, Skupina vodi evidence prejetih ali/in danih dejanjih gostoljubnosti in darilih. Evidence se razkrijejo lastnikom, regulatorjem in drugim deležnikom, v primeru podane zahteve.

Poročanje o kršitvah, zadevah ali iskanju dodatnih informacij

Če zaposlenemu kdorkoli ponudi podkupnino ali ga prosi za podkupnino ali če se pojavi sum o podkupovanju, korupciji ali kršitvi te politike, je zaposleni dolžan o tem obvestiti svojega vodjo za skladnost.

V primeru negotovosti ali nekatera dejanja lahko predstavljajo dejanja podkupovanja ali korupcije, odgovor poda vodja službe za skladnost.

Kontaktna oseba vodje službe za skladnost:

Vodja službe za skladnost
Gorenje, d. o. o., Partizanska cesta 12
3320 Velenje, Slovenija
cco@gorenje.com

company's image or reputation or marketing company's products or services.

Gifts and hospitality should be such of general purpose, reasonable and given or accepted in the ordinary course of business and must comply with local laws. All gifts which are given are given in the name of Gorenje, not in the name of an individual. Giving and receiving gifts or hospitalities should be avoided when conducting final stages of negotiations, signing contracts or similar decision making activities.

Gifts must be of appropriate value and type, depending on the circumstances and taking into account the reason of the gift. A gift must never include cash or cash equivalent, neither can cash or equivalent be given or taken in secret.

Promotional gifts of low value such as branded materials like stationery, may be given or accepted by existing or potential customers, suppliers and business partners. Where local law, regulations or standards, apply and require more stringent processes/controls, then such more stringent processes/controls are followed.

Record keeping

To be transparent, Group keeps records of any hospitalities and gifts given or received. This records may be disclosed to owners, regulators and other stakeholders.

Reporting breaches, concerns or seeking additional information

If anyone offers a bribe to an employee or asks for a bribe, or if a bribe, corruption or violation of this Policy is suspected, the employee is required to notify their compliance manager.

In the event of uncertainty as to whether certain acts may constitute acts of bribery or corruption, the Chief Compliance Officer shall provide an appropriate response.

Chief Compliance Officer contacts:

Chief Compliance Officer
Gorenje, d. o. o., Partizanska cesta 12
3320 Velenje, Slovenia
cco@gorenje.com