



# **GOLDEN RULES OF CONDUCT**

**Employee Code of Ethics  
the MSIN Group**

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January 2026

# SENIOR MANAGEMENT STATEMENT

Message from the CEO and both owners of MSIN d.o.o.

Dear colleagues,

Work is not just about meeting the needs of customers or business partners, ensuring the best products and services, effective communication or appropriate flow of information, assisting colleagues or creating a pleasant working environment. It is above all about doing the “right thing” every day at work - observing the law, respecting ourselves, knowing our roles, affiliations and values, and treating colleagues and partners with courtesy, respect and responsibility.

With MSIN Group’s renewed Employee Code of Ethics, we want to remind all our colleagues of the importance of acting with due professionalism at work, and of measuring our actions and the actions of others **against high ethical standards**. We spend a large share of our time at work, so it is important that we enter an environment in which we feel respected, safe and motivated. Good relations, cooperation and commitment to common goals are the foundation of success, personal satisfaction and stability in our working environment.

Building a solid foundation of trust and respect is not something that happens overnight. It is created day after day - through work, dedication and the conviction that we are doing the right thing and moving in the right direction. That is why the Code is not just a document, but our roadmap; the “**golden rules of our conduct**” that reflect our shared values and desired behaviors.

As the world around us is changing and it is important for us as group to act responsibly for the future, we are adding the new value of **SUSTAINABLE CONDUCT** to our existing values. This upgrade clearly reflects our focus on conduct that protects the environment, promotes the considerate use of resources and strengthens the long-term resilience of our business. Sustainable conduct is our shared commitment to future generations and to the environment in which we operate.

It is desirable that all employees comply with the Code and promote its use in practice. It is therefore right that all employees are familiar with its content. We are all responsible for creating a favorable atmosphere in our companies and within the MSIN Group. **We also share responsibility for creating our own organisational culture which reflects our values, beliefs and past actions.** We therefore invite you to read the Code and commit to it.

**In the event of questions, doubts or issues in using the Code we request you contact the HR representative at your company or the MSIN Group's Legal Department directly.**

Any questions or notifications regarding any violations of this Code or even legal violations that you observe can always be sent to the e-mail [info@msin.si](mailto:info@msin.si). Your complete anonymity is assured. **Any deviations from the commitments set out in this Code will be interpreted as undesired actions/conduct.**

The senior management of MSIN will protect the anonymity of the whistleblower, as well as preventing the whistleblower from being the target of any consequences or subject to disagreeable situations as a result of their notification. If you are subject to any disagreeable actions as a result of reporting violations of the Code or of any law, please contact MSIN's Legal Department. Anonymous letters can always be sent to the following address: MSIN d.o.o., Leskoškova cesta 6, Ljubljana.

**Do not forget: It is difficult to become a top expert without hard work and discipline!**

We appreciate your trust and wish you continued success in your work!

mag. Radenko Mijatović, General Manager

Owners of MSIN d.o.o.:

**Marko Mohar**



**Matjaž Satler**



AS HUMAN BEINGS,  
OUR GREATNESS,  
LIES NOT SO MUCH  
IN BEING ABLE TO  
**REMAKE**  
THE WORLD AS  
IN BEING ABLE  
TO REMAKE  
OURSELVES.

(MAHATMA GANDI)

# VALUES OF THE MSIN GROUP

## 1. COMMITMENT TO THE REALISATION OF OBJECTIVES

We deliver what we promise..

## 2. RESPECT

Respect yourself, your fellow man and the environment.

## 3. INTEGRITY AND TRANSPARENCY OF OPERATIONS

Our decisions and actions our transparent and consistent.

## 4. COOPERATION AND TEAMWORK

We are stronger when united.

## 5. PROFESSIONALISM AND EXPERTISE

We are reliable and know what we are doing.

## 6. BUSINESS EXCELLENCE

Being the best with a smile.

## 7. ACTIVE COMMITMENT AND CREATIVITY

Developing solutions that raise the quality of life.

## 8. SUSTAINABLE CONDUCT

Think smart – act green.

# WHAT IS A CODE?

A code is a selection of rules, standards of conduct and desired behaviour. It is an indication for employees as to how to act and operate within the MSIN Group.

The actions of anyone within the MSIN Group affects the reputation and good name of the Group or of its individual companies. **The culture of the MSIN Group and its individual companies is created** from our actions. Our culture is the reflection of our principles, values, conduct and our success.

This Code should provide assistance to employees during daily activity/conduct. By using this Code we can avoid situations in which we **do not know how to act** or react to certain behaviour. The Code can be helpful **to avoid the violation of laws and damage being caused to the company (or the Group) or to the company's (or Group's) reputation**. Ultimately, it is also a tool for creating a friendlier work environment and contributes to **motivation and the greater satisfaction of employees**.

The Code does not set stricter rules of conduct but establishes a **standard of conduct that is based on ethical and moral principles**. This means that in addition to the Code employees must also be aware of and comply with the employer's other internal rules (general bylaws) that set out the organisation of the work process and the obligations that we as employees must be apprised of during our work.

**The violation of or disregard of Code rules may constitute a breach of an employer's internal rules or even legal breaches**, which may result in disciplinary procedures, liability for damages, or even in an individual's criminal liability.

## WHO IS THE CODE INTENDED FOR?

**The Code applies to all employees within the MSIN Group.**

The Code will also apply to all employees working at companies that could become part of the MSIN Group in the future.

**We expect all our managers to comply with the Code and encourage co-workers to also comply with the Code, as the former lead by example.**

Alongside our employees, work at our companies is also often performed by students and scholars, workers that are hired via a temporary employment agency or contracted partners working under work, service, and copyright contracts. Therefore this Code also applies to them and serves as a guideline for their conduct during the period in which they part of our work process.

With the publication of the Code on our website we wish to apprise business partners of our values and standards of conduct and thus ensure that they become familiar with its content and our commitment to compliance.

# PURPOSE OF THE CODE

People comprise an organisation and every one of us co-creates a segment of our and their story.

**An individual's objectives at the company are legitimate if they coincide with the company's objectives.** We as employees at the company create the company's story together, here and now, based on the decisions that are made daily and the actions that follow these decisions. What are the grounds on which we make decisions and what drives us to act in a certain way? Are the decisions that we make the right ones? In order to be able to answer both questions we must first ask ourselves where do we want these actions and behaviour to take us? Do we know in what direction we wish to go? In order for our common story to make sense we have to have an outlined objective. Each organisation has to have it in order to justify its existence or achieve its purpose, despite each employee being an individual within the organisation with their own goals. **Without purpose (goals) there is nothing to aspire to.** Without purpose there is no happiness or satisfaction; just remember the satisfaction you felt when you reaped the benefits of your work after achieving a specific objective!

**Every company has its own vision** and the most important part of a company's aspirations is **to realise its vision.** A company's business strategy and the values that a company adopts in the process of implementing that vision contribute to this in the long-term. **The strategy is the basis for defining interim goals and the manner of achieving the final result. It provides answers as to what needs to be done to achieve these objectives, while the values give answers as to how we need to act to achieve these objectives and how we need to work to achieve them, meaning how we need to behave in that respect.** **Do the ends justify the means? Certainly NOT!**

**The MSIN Group implements high moral and ethical norms.** We are especially attentive during our daily activities to always abide by and comply with these norms. Values that are classed under the 'personality' of our Group comprise our **system of values.** **Values** have the same role in the 'life' of our Group as they do in the lives of individuals: they direct our **actions and conduct, affect the Group's attitude towards itself, towards employees, business partners, the external environment, the company in general and towards social, environmental and other phenomena.**

The organisational climate measurements that we have been carrying out among employees within the MSIN Group since 2009 is an importantly indication of the mood: the atmosphere, attitude and conduct of employees at all companies. We wish to emphasise in the long-term how important it is to be aware of that mood and how vital it is to collectively build our **own organisational culture that is a reflection of our values, past events and our tradition.** We are focused on continuously stimulating senior management and executives to **create a positive climate among employees, towards employees and co-workers, work in general, external business partners, the social environment, our assets and nature, etc.** All these tools form part of our practice which has already had success in the past and will have even more success in the future in achieving our objectives.

This Code is an upgrade of all our aspiration, and even more clearly and declaratorily notifies and **binds senior management and all employees to co-create a positive, creative and dynamic environment.** This type of environment provides us support and an incentive for all our efforts to **achieve joint success,** at the same time also providing us a safe haven and understanding at times when everything does not go our way.

Let us be part of these efforts, since no one is perfect and no one constantly reaps rewards. **Values and therefore behaviour that encourages us to give and receive are inspiring for those who give and also for those who receive ... But you never know when these roles are reversed.**

**INTEGRITY  
IS DOING  
THE RIGHT THING,  
EVEN WHEN  
NO ONE IS  
WATCHING**

**(C.S. LEWIS)**

# I COMMITMENT TO ETHICAL CONDUCT

## **We strive to maintain high moral principles and ethical standards.**

We adhere to the constitution, international treaties, laws and other regulations, commercial usances (usages), best business customs and business practices.

## **Our mutual relations are fair and based on mutual respect, dignity and personal integrity\*.**

We behave responsibly and during our work are active, honest and fair, fulfilling promises and assumed commitments.

We know that the satisfaction of our employees, business partners and other stakeholders are an essential prerequisite to achieving good results, which is why **we strive for cooperation, mutual assistance and intergenerational exchange of experience**, for encouraging and transferring knowledge to younger team members, and for respecting the older members, their knowledge and experience.

We recognise that integrity creates the conditions for stable relationships and long-term success.

**Caring for our integrity and the integrity of others is the foundation of a respectful and safe working environment.**

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\*

INTEGRITY: wholesomeness, coherence, authenticity, fairness, credibility

A person of integrity is a person who says what he/she means and does what he/she says in accordance with moral norms and applicable law.

An organisation with integrity is an organisation that employs persons of integrity and acts in accordance with the ethical norms enshrined in its code of ethics, its company acts and applicable law.

WE DELIVER  
WHAT WE  
PROMISE.

## **II COMMITMENT TO RESPECTING THE FOLLOWING VALUES:**

### **1. COMMITMENT TO THE REALISATION OF OBJECTIVES**

**We implement the outlined objectives.**

Our objectives are outlined realistically, taking into account the ethical standards and all the factors and stakeholders that exist in our environment when devising these objectives.

**The business results we pursue are based on realistic expectations of ourselves and the management.**

We implement our vision, mission and values regularly on a daily basis, thereby showing our responsible attitude to work and our colleagues.

**We act decisively and proactively.**

We are consistent in the fulfilment of issued promises provided the objectives are outlined realistically.

Each day we perform our tasks with the aim of achieving business results that strengthen productivity and contribute to the success of the company.

Our decisions and activities are designed to ensure **cost-effective and high-quality operation.**

We strive that every employee has a clearly defined suitable and useful role at the company that is tailored to their knowledge and skills, and that the employee is as independent as possible when implementing these outlined objectives.

**We act responsibly.**

**COMMITMENT means the pursuit of what you committed to long after the will to do it has disappeared.**

RESPECT  
YOURSELF,  
YOUR FELLOW  
MAN AND THE  
ENVIRONMENT.

## **2. RESPECT**

**Respect yourself.** Every individual is important.

If we lead by example we encourage respectful relations in the workplace.

**We do not tolerate behaviour that creates a non-working, unstimulating or offensive work environment.**

We treat others as we would wish to be treated.

**We encourage equality** regardless of gender, race, age, state of health, disability, religious, political or other conviction, trade union membership, national or social background/origin, marital status, financial situation, sexual orientation or other personal circumstances.

Relations with co-workers and partners are built on mutual respect and the acceptance of their opinions, needs, feelings and contributions.

**We do not interrupt or cut into our counterpart's conversation.**

We pay close attention to the speakers and respond in good time through clearly expressed and appropriate communication.

**At meetings and workshops we avoid the use of smart phones, tablets and other media that divert our attention from the topic at hand at the meeting.**

We understand that facing challenges brings about personal and collective growth and contributes to development and success, so we support our colleagues in challenging moments.

Mutual assistance, incentives, learning and instruments for learning are regularly tailored to the individual in order for them to be able to effectively complete their work, in doing so achieving personal development and contributing to the implementation of the organisation's objectives.

**We support measures that make it easier to balance between work and family life.**

We respect colleagues who are actively committed to improvements and positive change.

We are open to new ideas from co-workers.

**Success and achievements are recognised and rewarded.**

We are grateful for the positive energy workers bring to the workplace.

**We praise work well done and criticize only when it is well-founded and constructive.\***

Constructive criticism is recognised as an opportunity for improvement.

Accepting criticism in a way that preserves the integrity of the individual is our strength and an expression of professionalism.

We are responsible for ensuring a safe and healthy work environment.

**Respect as a two-way street:  
in order to earn it, you have to show respect.**

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\* CONSTRUCTIVE CRITICISM: see indent 8 of Section III Commitment to a culture of communication.

OUR DECISIONS  
AND ACTIONS ARE  
TRANSPARENT  
AND CONSISTENT.

### **3. INTEGRITY AND TRANSPARENCY OF OPERATIONS**

**Respecting the legal frameworks within which we operate.**

We operate in accordance with the adopted work processes and procedures.

**We operate fairly, objectively (free from bias) and to the benefit of the company.**

The procedures employed for adopting decisions are transparent.

We pursue best business practices.

**The decision on the use of company assets is adopted on the basis of at least three tenders that we obtain.**

We act consistently and responsively in relation to all stakeholders\*.

We complete tasks/assignments on an on-going basis and in accordance with the issued authorisations.

**Our thoughts, wishes, ideas and criticism is expressed clearly and unambiguously.**

The protection of personal data and business secrets represents the core of our operations.

**We do not disclose the data regarding the company's performance to anyone, unless we are expressly authorised to do so.**

We inform our direct superior in good time of facts that are material to the company's operations.

**We do not conceal information and we also do not manipulate it.**

We provide correct and accurate information in good time.

We are trustworthy and are responsible for our actions and work.

We plan projects and their implementation consciously and realistically.

**Every employee is entitled to an open dialogue with their co-workers, supervisors and subordinates.**

We respect the association of workers under various forms of workers' representation.

We encourage an open and transparent dialogue between employee representatives and the company's senior management.

**»A lack of transparency results in distrust and a deep sense of insecurity.«**

Dalai Lama

\*

STAKEHOLDERS: a group of people or other entities that influence one another. The company's stakeholders include owners, customers, employees, suppliers, the local community, the state (government) etc., and influence the operations of the company and vice-versa.

WE ARE  
STRONGER  
AS A GROUP.

## **4. COOPERATION AND TEAMWORK**

**All of us collectively create the environment for successful cooperation and teamwork**

Each and every co-worker must contribute to the consolidated results.

A colleague's success is also the success of the entire company.

We are all a part of the company and together form a successful work collective.

We work together with all our colleagues in good spirits and with honourable intentions.

**We introduce colleagues to their post and into their work environment.**

Mutual help and support among colleagues is an important factor of our success.

We respect knowledge because we know that different skills complement each other and contribute to our success.

**We share/transfer knowledge and experience to co-workers.**

Motivation is vital during teamwork – we need to work and operate as a group, encourage each other and at the same time recognise our mutual differences, strengths and weaknesses.

**We foster clear information flow and open communication as the basis for successful cooperation.**

We identify and draw attention to issues in good time, as this can significantly affect cooperation and contribute to joint success.

**We resolve conflicts on an on-going basis with understanding and with the constructive confrontation of different views and opinions.**

Teamwork maximises our potential by encouraging flexibility, productivity and creativity.

**Individual goals are aligned with the group's goals** while the group also ensures the satisfaction of the individual.

The key factor for successful and effective teamwork is a high level of mutual trust and respect.

**Cooperation is that difficult realization  
when we find that no one can reach the  
goal unless we all reach it together.**

WE ARE RELIABLE  
AND KNOW WHAT  
WE ARE DOING.

## **5. PROFESSIONALISM AND EXPERTISE**

**We are polite, respectful, operate in a professional manner and have a positive attitude.**

We are aware of our role and responsibilities within the organisation.

We respect our time and the time of others – **fulfilling our tasks on time without delay.**

We contribute to our joint achievements and success at our own initiative.

**We constantly seek solutions and do not make excuses why something cannot be done.**

We complete daily assignments consistently and responsibly to the best of our abilities.

When we don't know or understand something, it is right to ask for help. This is a responsible approach to work.

**We tackle problems with a positive attitude and with optimism – as they provide us with challenges.**

When making decisions our rulings are objective and clear; our operations are thus effective and trustworthy.

**We are continuously responsible for personal and professional growth and for development which strengthens our professionalism.**

In our business we apply available knowledge and technology to create added value for our partners, the company, owners and the environment.

**Quality solutions are the result of our knowledge, competences, adherence to prescribed procedures and, last but not least, our dedication to the work that we do.**

**»Professional is not a label you give yourself – it's a description you hope others will apply to you.«** David Maister

BEING THE BEST  
WITH A SMILE.

## **6. BUSINESS EXCELLENCE**

**We act and operate in accordance with the principles of this Code and other general company acts.**

We meet the needs of our customers with excellent products and services and follow their interests.

**We know how to listen to clients and recognise their distinctive features.**

Long-term partnerships are formed by taking into account the needs of customers and strengthening mutual trust.

**We provide true, correct and accurate information about our products and services.**

We recognise that the success of our business partners is also our success.

Our relationships are based on equality and fairness.

**Processes and work procedures are continuously improved through innovation, a critical approach and adherence to high professional standards.**

We respect the principles of fair competition and support its existence.

We recognise that our work is embedded in the environment in which we operate and we actively adapt to changes in our environment.

**»Excellence is not a skill, it's an attitude.« Ralph Marston**

DEVELOPING  
SOLUTIONS  
THAT RAISE OUR  
QUALITY OF LIFE.

## **7. ACTIVE COMMITMENT AND CREATIVITY**

**Actively engaged employees add value and make a difference.**

We develop tailor-made advanced solutions.

**We ensure that we keep abreast with the most recent market developments and with the development of the sector and the relevant technologies.**

Improvements and practical suggestions help us improve the work process.

Innovative thoughts and ideas are shared with colleagues in the team.

**We actively\* respond to initiatives and proposals.**

We know that the way forward is accelerated by employee suggestions, because we know our job best.

Innovation fosters creative thinking within the team and enables the development of new solutions.

**Being proactive and innovative allows us to design creative and effective solutions.**

We honor both our own and others' intellectual property and ensure that it is adequately protected.

We recognise the need to protect creativity and take timely action to protect industrial property rights.

**We take care not to disclose our innovation activities to the public or to third parties.**

**»An essential aspect of creativity  
is not being afraid to fail.«**

dr. Edwin Land

\*

AGILITY: nimbleness, a quick reaction that can manifest itself as a change of direction; the ability to change direction quickly.



**THINK  
SMART -  
ACT  
GREEN.**

## **8. SUSTAINABLE CONDUCT**

**Sustainable operation is part of our long-term vision and strategy and a cornerstone of our commitment to responsible and thoughtful business.**

We manage our resources carefully and recognise that our choices have an impact on the environment, society and future generations.

**We act in accordance with the principles of sustainable development and applicable environmental legislation, and therefore:**

- use materials, energy, and other resources thoughtfully in our work;
- cooperate with responsible suppliers and seek solutions that reduce our environmental footprint;
- promote circular economy, reduce waste and ensure its proper separation;
- manage hazardous waste responsibly and in accordance with the law;
- consider process improvements and solutions that reduce environmental impact and increase efficiency;
- use energy-efficient technologies and renewable energy sources;
- act responsibly towards the environment in which we operate and support initiatives and projects that contribute to environmental conservation and sustainable development;
- consider the long-term sustainability of projects in their planning and implementation;
- look for solutions that reduce our carbon footprint and contribute to the development of sustainable products and services;
- prevent or minimise emissions of hazardous or noxious substances;
- promote a culture of sustainability in our companies, our Group and the wider community by our example and responsible behaviour.

### III WE ARE COMMITTED TO A CULTURE OF COMMUNICATION

WE THEREFORE:

- **recognise that communication is a reflection of our actions and affects a company's reputation;**
- communicate in a way to spend our time as efficiently as possible. In doing so we utilise all the electronic communication means available to us, **never forgetting to foster mutual relations, as meetings are also very important;**
- are responsible for issuing feedback in good time;
- **communicate clearly, unambiguously and in good time;**
- avoid the use of smart phones, tablets and other media that divert our attention from the topic at hand at meetings and social events;
- **do not tolerate conflicts in communications between colleagues (e.g. offensive behaviour, shouting, belittling, defamation, mobbing), and do not behave that way ourselves;**
- are conscious of the fact that our behaviour does not cause our colleagues to feel discomfort;
- **present and allow criticism that is constructive** – i.e. criticism that is expressed at the right time, in the right way, is substantiated and action-oriented, and is never directed against someone's personality or an individual;
- recognise that constructive criticism helps colleagues to recognise opportunities for improvement;
- recognise that if the proper and constructive criticism is unsuccessful in achieving its goal, **the criticism can be intensified; in that event we must not forget the significance of respecting and maintaining the integrity of the individual whose actions are subject to criticism;**
- attend meetings on time and actively participate in them in accordance with their purpose;
- **prepare for the topic being discussed before meetings take place;**
- remain respectful and courteous at meetings to all participants and listen attentively — even when we disagree;
- **are friendly, polite and patient in conversation and listen attentively to the other person;**
- abide by spelling rules when communicating in writing;
- respond to written communications when the purpose of the communication or it is clear that the other party expects a response;
- **do not use work email for personal matters;**
- **do not communicate outside the company on matters over which we have no authority;**
- do not appear or communicate on behalf of the company on social media or other online platforms;
- **do not share information about the company on social networks or online, except for information that is already publicly available.**

## IV COMMITMENT TO THE PROTECTION OF PRIVACY AND PERSONAL DATA\*

THAT IS WHY:

- **we recognise that the right to privacy is one of the most important human rights and therefore we must respect the privacy of each individual, even in the workplace;**
- access to personal data is only authorised to employees who require such data for the performance of their work and assignments that are connected with a specific post that they hold, and to authorities that are authorised for such access pursuant to applicable laws;
- **personal data that we manage during work or in connection therewith must not be disclosed to or shared with any third party if there are no legal grounds or authorisation expressly issued by an individual therefor;**
- we protect personal data with the highest possible standard of protection and in accordance with the company's general bylaws and applicable laws;
- we must address any questions about personal data management to MSIN's Legal Department, to the person authorised for the protection of data at the relevant company or to the information commissioner.

\*

PERSONAL DATA: Personal data is any information relating to an identified or identifiable individual.

An individual can be identified directly (e.g. by a name or an identification number) or indirectly (e.g. by a combination of identifiable information).

An individual is identifiable even when they can be identified without significant cost, excessive effort or disproportionate time.

Examples of personal data; personal ID number, tax number, address, telephone number, employment details, private sector salary, email address, vehicle registration number, etc.

**SUCCESS IS NOT FINAL,  
FAILURE IS NOT FATAL.  
IT IS THE COURAGE  
TO CONTINUE  
THAT COUNTS.**

# V COMMITMENT TO THE PROTECTION OF BUSINESS SECRETS

WE THEREFORE:

- recognise that company's business secrets comprise data that is confidential and owned by the company;
- know that business secrets include **information that gives a company or group a competitive advantage**, such as *financial, sales, technical, and other business information, personal data, internal documentation related to public tenders and bids submitted in parts that are not publicly available, pricing policy and price lists, customer data, business relationships with customers, reports, research, elaborations, studies, analyses, projects, concepts, know-how, inventions, processes and standards, work and process procedures, safety instructions, hardware and software, etc.*;
- observe the employer's general rules governing the definition and protection of business secrets);
- are able to assess when information constitutes a business secret even when it is not expressly designated as such in a general act, namely when it is by its nature **information whose disclosure to an unauthorized person could cause damage to the company**;
- as employees have a duty to maintain the confidentiality of business secrets and to prevent their unauthorised disclosure to third parties;
- recognise that the misuse or deliberate misinterpretation of business secrets can damage the company's reputation and its business interests;
- recognise that **unauthorised disclosure of business secrets jeopardises the company's business objectives and may cause irreparable damage**;
- undertake to protect the confidentiality of business secrets after the end of our employment at the MSIN Group and to refrain from any conduct that could bring the company or the Group into disrepute.

# VI COMMITMENT TO ABIDING BY OCCUPATIONAL HEALTH AND SAFETY STANDARDS

WE THEREFORE:

- **care for our own health at home and in the workplace;**
- recognise that the workplace must be safe, adequately protected and healthy and we do our best to contribute;
- are familiar with the risk assessment for our respective positions and know its contents;
- **know that we are responsible for familiarizing ourselves with the instructions for safe work;**
- act responsibly at work towards our own health and that of our colleagues – **we always use the prescribed personal protective equipment and follow the prescribed procedures;**
- are aware that ensuring safe work and working in accordance with safety regulations contributes to the safety of all employees and helps prevent damage;
- **encourage colleagues to consistently comply with occupational health and safety measures;**
- immediately notify our immediate supervisor when we notice a hazard at work or a failure to comply with occupational safety procedures;
- immediately notify our immediate supervisor and the competent professional services in the event of an accident at work;
- **do not come to work or work under the influence of alcohol, drugs or other illicit substances;**
- know that working under the influence of medication that can affect an individual's physical and mental fitness is prohibited at posts where due to increased risk of workplace accidents this is specified in the safety statement (including risk assessment). The consumption of such medication during work should be discussed with the responsible technical department (occupational medicine or visit the head of the HR Department to be properly directed to the former);
- recognise that an **employee under the influence of alcohol, drugs or other illicit substances cannot perform work and must be removed from the work process.**

## **VII COMMITMENT TO ECONOMIC MANAGEMENT OF COMPANY ASSETS\***

WE THEREFORE:

- **manage all company assets and property responsibly;**
- **company assets are used only for business purposes** unless otherwise agreed and always in accordance with the powers granted;
- strive for optimal solutions in all areas and treat company property with the same care as our own;
- use company funds reasonably and economically;
- prevent damage, destruction, misappropriation, loss or misuse of company assets;
- **carry out procurement in accordance with preliminary procedures that involve at least three competitive offers;**
- take due care to extend the life and usefulness of our assets;
- do not appropriate company assets;
- take personal responsibility for the company's resources that we use or manage;
- **ensure effective use of our time at work** to serve our employer and do not misuse it for private activities or purposes;
- always record our working hours in a timely and accurate manner and never misrepresent them;

\*

ASSETS: property, possessions.

## VIII COMMITMENT TO THE PROTECTION OF INTELLECTUAL PROPERTY\*

WE THEREFORE:

- are aware that our own creativity can result in a creation that we are obliged to protect appropriately in order to **safeguard our rights against potential unjustified exploitation by third parties**;
- protect our own creations or inventions in a timely manner before presenting them to the public in accordance with the procedures provided for by applicable law;
- never disclose details, ideas or content of our own creations or inventions until the procedures for securing intellectual property rights have been completed;
- **always check in a timely manner whether a creation can be protected as intellectual property and, if necessary, consult an expert in a timely manner, as we are aware of the wide range of possible forms of protection;**
- do not infringe on the intellectual property rights of third parties: we do not use them without permission and do not copy known copyrighted works, inventions that are subject to industrial property rights or other rights;
- ensure the **timely conclusion of relevant written legal agreements when it comes to the use or exploitation of intellectual property rights**, and ensure that these rights are properly and clearly regulated by agreement.

\*

INTELLECTUAL PROPERTY: is a type of property that originates from human intellect and intelligence. Intellectual creations are intangible as such. If they are tangible the holder of the right thereto can exploit them commercially. Intellectual property is classed into two groups: into copyrights and related rights, and industrial property. There are also other so-called *sui generis* rights that are classed under other rights. The protection of copyrights is governed by the Copyright and Related Rights Act, while the fundamental characteristics and principles of industrial property rights are governed by the Industrial Property Act.

Industrial property rights comprise patents, models, trademarks and geographical indications. Patents protect inventions originating from all technical fields that are new, apply to inventive levels and are susceptible to industrial application. Models protect the outside appearance of products. A trademark is a legally protected mark or any combination of marks that enables distinctions to be made between the same or similar merchandise or services, and can be graphically illustrated. It is used for increased market recognition. Geographical indications are used to protect produce or foodstuffs that originated from a specific geographical region and are attributed a particular quality, reputation or other feature that originates from a specific geographical region.

THE REAL  
SECRET  
OF SUCCESS  
IS ENTHUSIASM.

## IX COMMITMENT TO PREVENTING BRIBERY

WE THEREFORE:

- **do not promise, give or accept prohibited rewards, gifts or benefits to/from business partners or any other person during work or in connection with work. We also reject any promise or offer of prohibited rewards, gifts or benefits;**
- we are aware that an improper reward (gift or benefit) is one that is of disproportionate value and could influence an individual to make a decision or conclude a transaction that they would not otherwise have made;
- we recognise that a permitted reward is specified as such in the employer's general bylaws, senior management resolution or applicable laws, and is granted to us by the employer as a result of successful performance;
- we are aware that occasional gifts or gifts out of hospitality are permitted. These are gifts below EUR 40 in value or up to 80 EUR at most, given to the same person or received from the same giver during the same year;
- **we accept occasional gifts and gifts out of hospitality but they do not in any way influence our business decisions;**
- we inform our direct superior of any accepted gift;
- occasional gifts and gifts out of hospitality are only offered to partners if authorisation for this is gained from our direct superior;
- **we do not accept or give gifts in the form of money, loans, securities, personal favours or valuable items or precious metals;**
- we do not enter into sponsorship agreements or provide donations that would damage the reputation of the company;
- we do not provide financial aid or support to political parties.

## X COMMITMENT TO PREVENTING CONFLICTS OF INTEREST

WE THEREFORE:

- **operate fairly, objectively (free from bias) and to the benefit of the company;**
- take business decisions in line with the company's objectives, business plans and strategy, or as directed by the employer;
- **do not allow our personal interests or connections to affect our business decisions;**
- pay special attention in every situation to avoiding conflicts of interest – **our decisions must not be influenced by a prohibited interest, our personal interest or an interest that is not an interest that complies with the company's objectives;**
- **exclude ourselves from procedures in which decisions are taken on our rights and obligations, on the rights and obligations of our immediate family members, relatives, friends or acquaintances;**
- are obliged to inform our direct superior if we believe that our interests do not comply with the interests or mission of the company;
- are obliged to inform our direct superior if we believe that our personal, business, political or other connections with a third party could affect our business decisions;
- **must not abuse business connections acquired at the company or in connection with our work; this also applies even after our employment within the MSIN Group is terminated;**
- diligently protect data about the personal, business, political or other connections of co-workers to which we gained access during our work or in connection therewith.

# **XI COMMITMENT TO THE SECURE MANAGEMENT OF INFORMATION TECHNOLOGY**

WE THEREFORE::

- manage IT securely as it is essential for safe and smooth operation;
- handle assigned personal passwords and identification credentials responsibly and do not disclose or share them with third parties;
- never misuse personal passwords or identification credentials and do not allow unauthorised access;
- immediately report security incidents to the technical department or IT department;
- in the event of unauthorised intrusion into a computer, switch off the device immediately and notify the technical service or the IT department;
- take special care when handling information resources that contain confidential data;
- log out from the computer and lock the screen when leaving work;
- never open suspicious emails, links or attachments and report suspected phishing attempts immediately to the relevant authorities;
- do not install software or applications that are not approved by the company;
- when working remotely, use secure connections and devices approved by the company;
- do not transmit or store confidential information on unauthorised devices or unencrypted media;
- when redirecting communications or changing essential business data communicated via digital media, verify the authenticity of such data;
- strictly adhere to rules, procedures and standards that ensure the safe use of information technology.

## **XII COMMITMENT TO SOCIAL RESPONSIBILITY AND ENVIRONMENTAL PROTECTION**

WE THEREFORE:

- pursue practices that comply with environmental legislation and the principles of sustainable development;
- **ensure the economical and prudent use of energy and other resources;**
- comply with safety regulations, thereby preventing accidents, fires, explosions, and other environmental hazards;
- **regularly separate waste, reduce the amount of waste and ensure that hazardous waste is properly disposed of;**
- support projects that contribute to sustainable development and the preservation of biodiversity;
- recognise that child labour and work in inappropriate and inhumane conditions are prohibited;
- care for the environment and cooperate with the local community on environmental protection and socially responsible projects;
- **promote the use of sustainable materials and technologies that reduce resource consumption and support the transition to a circular economy;**
- seek solutions, processes and technology that reduce risks to human health and the environment;
- prevent or minimise emissions of hazardous or noxious substances;
- strive for responsible procurement in supply chains and cooperation with suppliers who act sustainably and ethically;
- cooperate and engage in dialogue with social partners, thereby contributing to the well-being of society and local communities.

# **QUESTIONS REGARDING THE CODE AND VIOLATIONS THEREOF**

## **QUESTIONS**

Questions posed and doubts or dilemmas raised in using the Code will be answered by the representatives of the HR department of a specific company or MSIN Group's Legal Department (e-mail to [info@msin.si](mailto:info@msin.si)).

## **VIOLATIONS**

Violations of the Code or the commitments set out herein entail undesired conduct and can be deemed a violation of the employment contract that is sanctioned in accordance with the provisions of the Employment Relationships Act.

## **NOTIFICATION OF VIOLATIONS**

Violations of commitments from the Code or the identified violations of the law are reported via e-mail [info@msin.si](mailto:info@msin.si), ensuring that the anonymity of the person reporting the violation is maintained.

The senior management of MSIN will protect the anonymity of the whistleblower. No one will suffer any adverse effects or be subject to procedures due to such notification of violations.

The notification can also be sent anonymously in writing to the following address: MSIN d.o.o., Leskoškova cesta 6, Ljubljana.

## **VALIDITY AND PUBLICATION OF THE CODE**

The revised Code will enter into force on 1 January 2026 and is published on the following websites [www.msin.si](http://www.msin.si) and on the websites of the companies in the MSIN Group. The previous version of the Code, dated 1 January 2018, will expire on the same date.

COMING TOGETHER  
IS A BEGINNING;  
KEEPING TOGETHER  
IS PROGRESS;  
WORKING  
TOGETHER  
IS SUCCESS.

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