



Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

POLITIKA PREPREČEVANJA PODKUPOVANJA IN KORUPCIJE

Verzija 1

1. Namen

- 1.1. Namen te politike je opredeliti zavezanost podjetja Open Line Vitaly preprečevanju in obravnavi podkupovanja, korupcije in neetičnih poslovnih praks v svojih operacijah.
- 1.2. Ta politika podpira naše prizadevanje za spoštovanje najvišjih etičnih standardov in zagotavlja, da vsi zaposleni, izvajalci, dobavitelji in poslovni partnerji ravnajo z integriteto in v skladu z vsemi veljavnimi zakoni in predpisi.

2. Področje uporabe

- 2.1. Ta politika velja za vse zaposlene, izvajalce, zastopnike, dobavitelje in vse tretje osebe, ki delujejo v imenu podjetja Open Line Vitaly na vseh lokacijah, kjer podjetje posluje.
- 2.2. Ta politika pokriva vse vidike poslovanja podjetja Open Line Vitaly, vključno z odnosi s strankami, partnerji, dobavitelji in vladnimi organi.
- 2.3. To politiko morajo upoštevati vse stranke in so dolžne nemudoma poročati o vseh morebitnih kršitvah ali skrbih v zvezi s to politiko.

3. Izhodišča politike

- 3.1. Open Line Vitaly je zavezan k etičnemu poslovanju, z integriteto in v skladu z vsemi veljavnimi zakoni o preprečevanju podkupovanja in korupcije, vključno s slovenskim kazenskim zakonikom, Zakonom o podkupovanju Združenega kraljestva (UK Bribery Act) in sledečimi EU direktivami:

Direktive EU o preprečevanju pranja denarja (AMLD V) (Direktiva (EU) 2018/843): Ta direktiva krepi ukrepe za boj proti pranju denarja in financiranju terorizma ter podpira politike, usmerjene proti podkupovanju, korupciji in etičnemu upravljanju.

ANTI-BRIBERY AND CORRUPTION POLICY

Version 1

1. Purpose

- 1.1. The purpose of this policy is to outline Open Line Vitaly's commitment to preventing and addressing bribery, corruption, and unethical business practices in its operations.
- 1.2. This policy supports our adherence to the highest ethical standards and ensures that all employees, contractors, suppliers, and business partners act with integrity and in compliance with all applicable laws and regulations.

2. Scope

- 2.1. This policy applies to all employees, contractors, agents, suppliers, and any third parties acting on behalf of Open Line Vitaly in all locations where the company operates.
- 2.2. This policy covers all aspects of Open Line Vitaly's business dealings, including relationships with clients, partners, suppliers, and governmental bodies.
- 2.3. All parties are expected to adhere to this policy and are required to report any concerns or violations of this policy immediately.

3. Policy statement

- 3.1. Open Line Vitaly is committed to conducting business ethically, with integrity, and in compliance with all relevant anti-bribery and corruption laws, including the Slovenian Criminal Code, the UK Bribery Act, and the following EU directives:

EU Anti-Money Laundering Directives (AMLD V) (Directive (EU) 2018/843): This directive strengthens measures to combat money laundering and terrorism financing, supporting policies aimed at anti-bribery, anti-corruption, and ethical governance.





Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

EU zakonodaja o konkurenci (Pogodba o delovanju Evropske unije, členi 101–109): Ta zakon preprečuje protikonkurenčno vedenje in podpira korporativno upravljanje in etiko, neposredno podpira politiko preprečevanja podkupovanja in korupcije.

Direktiva o pravicah delničarjev II (SRD II) (Direktiva (EU) 2017/828): Ta direktiva povečuje preglednost pri upravljanju in sprejemanju odločitev, kar je ključnega pomena za ukrepe proti korupciji.

- 3.2. Podkupovanje, korupcija in neetično ravnanje so strogo prepovedani v kakršni koli obliki. Ta politika določa, da morajo vsi zaposleni v podjetju Open Line Vitaly in vse tretje osebe, povezane s podjetjem, ravnati v popolni skladnosti z lokalnimi in mednarodnimi predpisi o preprečevanju korupcije.

4. Odgovornosti

- 4.1. **Upravni odbor in vodstvo:** Odgovorni so za nadzor nad izvajanjem in uveljavljanjem te politike, zagotavljanje skladnosti in ohranjanje ničelne tolerance do podkupovanja in korupcije.
- 4.2. **Zaposleni:** Vsi zaposleni morajo spoštovati to politiko in se redno udeleževati usposabljanj, da bi razumeli pomen ukrepov za preprečevanje korupcije in svoje odgovornosti po tej politiki.
- 4.3. **Tretje osebe:** Dobavitelji, zastopniki in izvajalci, ki sodelujejo s podjetjem Open Line Vitaly, se morajo strinjati, da bodo spoštovali to politiko in vse ustrezne zakone o preprečevanju podkupovanja in korupcije.

5. Prepovedane prakse podkupovanja in korupcije

- 5.1. Open Line Vitaly opredeljuje podkupovanje in korupcijo kot ponujanje, dajanje, prejemanje ali zahtevano sprejemanje česarkoli vrednega, bodisi v denarju bodisi v naravi, z namenom nepoštenega vplivanja na ravnanje posameznika ali organizacije. To vključuje:

EU Competition Law (Treaty on the Functioning of the European Union, Articles 101–109): This law prevents anti-competitive behavior and underpins corporate governance and ethics, directly supporting the Anti-Bribery and Corruption Policy.

Shareholders' Rights Directive II (SRD II) (Directive (EU) 2017/828): This directive enhances transparency in governance and decision-making, which is crucial for anti-corruption measures.

- 3.2. Bribery, corruption, and unethical behavior are strictly prohibited in any form. This policy mandates that all Open Line Vitaly employees and associated third parties act in full compliance with both local and international anti-corruption regulations.

4. Responsibilities

- 4.1. **Board of Directors and Management:** Responsible for overseeing the implementation and enforcement of this policy, ensuring compliance, and maintaining a zero-tolerance approach to bribery and corruption.
- 4.2. **Employees:** All employees are expected to comply with this policy and participate in regular training to ensure they understand the importance of anti-corruption measures and their responsibilities under the policy.
- 4.3. **Third Parties:** Suppliers, agents, and contractors working with Open Line Vitaly must agree to comply with this policy and all relevant anti-bribery and corruption laws.

5. Bribery and Corruption Prohibited Practices

- 5.1. Open Line Vitaly defines bribery and corruption as offering, giving, receiving, or soliciting anything of value, whether in cash or in kind, to improperly





Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

- **Podkupnine:** Ponujanje ali prejemanje podkupnin, provizij ali daril z namenom vplivanja na poslovne odločitve ali vladne ukrepe.
- **Pospešitvena plačila:** Majhna plačila za pospešitev rutinskih vladnih postopkov so prepovedana.
- **Darila in gostoljubje:** Medtem ko so lahko razumna darila in gostoljubnost v določenih okoliščinah sprejemljiva, se nikoli ne smejo uporabiti za nepošteno vplivanje na odločanje. Vse takšne ponudbe morajo biti prijavljene in odobrene s strani vodstva.

6. Poročanje in preiskava

- 6.1. Open Line Vitaly spodbuja vse zaposlene, da prek vzpostavljenih kanalov za žvižgače poročajo o vseh sumih podkupovanja, korupcije ali neetičnega vedenja.
- 6.2. Vsa poročila bodo obravnavana zaupno, Open Line Vitaly pa bo zagotovil, da noben zaposleni ne bo trpel povračilnih ukrepov zaradi poštenega poročanja. Podjetje bo hitro preiskalo vsa poročila o podkupovanju in korupciji ter po potrebi sprejelo ustrezne disciplinske ukrepe.

7. Usposabljanje in ozaveščanje

- 7.1. Open Line Vitaly bo vsem zaposlenim zagotovil redna usposabljanja o zakonodaji proti podkupovanju in korupciji ter o politikah in postopkih podjetja. Zaposleni se morajo udeležiti teh usposabljanj in te principe uporabljati v svojih vsakodnevnih dejavnostih.

8. Skrbnost do tretjih oseb

- 8.1. Pred sodelovanjem s katerokoli tretjo osebo bo Open Line Vitaly izvedel skrbni pregled, da zagotovi, da se oseba drži zakonodaje o preprečevanju korupcije in etičnih standardov.

influence the actions of an individual or organization. This includes:

- **Bribes:** Offering or receiving bribes, kickbacks, or gifts with the intent to influence business decisions or government actions.
- **Facilitation Payments:** Small payments made to expedite routine governmental actions are prohibited.
- **Gifts and Hospitality:** While reasonable gifts and hospitality may be acceptable under certain circumstances, they must never be used to influence decision-making improperly. All such offers must be reported and approved by management.

6. Reporting and Investigation

- 6.1. Open Line Vitaly encourages all employees to report any suspicions of bribery, corruption, or unethical behavior through the established whistleblower channels.
- 6.2. All reports will be treated confidentially, and Open Line Vitaly will ensure that no employee suffers retaliation for making a report in good faith. The company will investigate all reports of bribery and corruption promptly and take appropriate disciplinary actions if necessary.

7. Training and Awareness

- 7.1. Open Line Vitaly will provide regular training to all employees on anti-bribery and corruption laws and the company's policies and procedures. Employees are expected to participate in this training and apply these principles in their day-to-day activities.

8. Due Diligence on Third Parties

- 8.1. Before engaging in business with any third party, Open Line Vitaly will conduct due diligence to ensure the party adheres to anti-corruption laws and ethical standards.





Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

8.2. Pogodbe s tretjimi osebami bodo vključevale določbe, ki zahtevajo spoštovanje politike podjetja Open Line Vitaly o preprečevanju podkupovanja in korupcije, kar zagotavlja preglednost in odgovornost v celotni dobavni verigi.

9. Notranje revizije in skladnost

9.1. Open Line Vitaly bo redno revidiral svoje notranje procese, da bi zagotovil skladnost s politiko preprečevanja podkupovanja in korupcije.

9.2. Revizije bodo osredotočene na prepoznavanje potencialnih tveganih področij, pregled poslov in zagotavljanje, da je bila v vseh poslovnih dejavnostih opravljena ustrezna skrbnost.

9.3. Ugotovitve bodo poročane vodstvu, po potrebi pa bodo izvedeni popravni ukrepi.

10. Spremljanje in pregled

10.1. Open Line Vitaly bo nenehno pregledoval svojo politiko o preprečevanju podkupovanja in korupcije, da bi zagotovil, da ostane usklajena s spreminjajočimi se pravnimi zahtevami in industrijskimi standardi.

10.2. Spremembe politike bodo sporočene vsem zaposlenim in tretjim osebam.

11. Disciplinski ukrepi

11.1. Kršitev te politike s strani katerega koli zaposlenega ali tretje osebe, ki deluje v imenu podjetja Open Line Vitaly, bo imela za posledico disciplinske ukrepe, ki lahko vključujejo prekinitev delovnega razmerja ali pogodb.

11.2. Kakršnekoli kaznive dejavnosti, vključno s podkupovanjem ali korupcijo, bodo prijavljene ustreznim oblastem.

8.2. Contracts with third parties will include provisions that require adherence to Open Line Vitaly's Anti-Bribery and Corruption Policy, ensuring transparency and accountability across the supply chain. Managers receive training on promoting equal opportunities and maintaining transparency and fairness in appraisals and promotions.

9. Internal Audits and Compliance

9.1. Open Line Vitaly will regularly audit its internal processes to ensure compliance with anti-bribery and corruption policies.

9.2. The audits will focus on identifying potential risk areas, reviewing transactions, and ensuring that proper due diligence has been performed in all business dealings.

9.3. The findings will be reported to the management, and corrective actions will be implemented when necessary.

10. Monitoring and Review

10.1. Open Line Vitaly will continuously review its Anti-Bribery and Corruption Policy to ensure it remains aligned with evolving legal requirements and industry standards.

10.2. Changes to the policy will be communicated to all employees and third parties.

11. Disciplinary Actions

11.1. Violation of this policy by any employee or third party acting on behalf of Open Line Vitaly will result in disciplinary action, which may include termination of employment or contracts.

11.2. Any criminal activities, including bribery or corruption, will be reported to the appropriate authorities.





Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

12. Odgovornost in posledice

- 12.1. Vodstvo je v celoti odgovorno za učinkovito izvajanje in delovanje te politike. Pričakuje se, da vodje ravnajo skladno s to politiko, vodijo z zgledom ter vzdržujejo ustrezne standarde vedenja znotraj svojih ekip.
- 12.2. Vsi zaposleni so odgovorni za spoštovanje načel te politike. Pričakuje se, da vsak posameznik prispeva k pravičnemu in vključujočemu delovnemu okolju z zagotavljanjem enakih priložnosti, spoštovanjem sodelavcev ter izogibanjem kakršnikoli obliki diskriminatornega vedenja. Zaposleni so tudi spodbujeni, da poročajo o kršitvah politike, da se zagotovi spoštljivo in pravično delovno okolje.
- 12.3. Zaposleni, ki bo kršil to politiko, bo soočen z disciplinskimi ukrepi, ki lahko vključujejo opozorilo ali prekinitev delovnega razmerja, odvisno od resnosti kršitve. S tem zagotavljamo, da se kršitve obravnavajo dosledno in pravično.

13. Zbiranje podatkov in poročanje

- 13.1. Podjetje bo redno zbiralo in analiziralo podatke, povezane z raznolikostjo, da bo spremljalo učinkovitost te politike. Za spremljanje napredka in prepoznavanje področij, kjer so potrebne izboljšave, se lahko izvajajo anonimne ankete, demografska poročila in revizije raznolikosti.

14. Pregled in spremljanje

- 14.1. Ta politika bo pregledana enkrat letno, da se zagotovi njena učinkovitost in ustreznost. Pri revizijah bomo upoštevali povratne informacije zaposlenih, napredek pa bomo spremljali z rednim spremljanjem zbranih podatkov o raznolikosti.

12. Accountability and Consequences

- 12.1. Overall responsibility for the effective implementation and operation of the policy lies with the management. Managers are expected to act in full accordance with this policy, lead by example, and maintain appropriate standards of behavior within the teams they manage.
- 12.2. All employees are responsible for upholding the principles of this policy. Every member of the workforce is expected to contribute to a fair and inclusive workplace by promoting equal opportunities, treating colleagues with respect, and avoiding any form of discriminatory behavior. Employees are also encouraged to report any violations of the policy to ensure a respectful and equitable work environment.
- 12.3. Any employee found to be in violation of this policy will face disciplinary actions, ranging from warnings to termination, depending on the severity of the violation. This ensures that breaches of the policy are handled consistently and fairly.

13. Data Collection and Reporting

- 13.1. The Company will regularly collect and analyze diversity-related data to monitor the effectiveness of this policy. Anonymous surveys, demographic reports, and diversity audits may be conducted to track progress and identify areas for improvement.

14. Review and Monitoring

- 14.1. This policy will be reviewed annually to ensure it remains effective and relevant. Employee feedback will be sought and considered in future revisions, and improvements will be tracked through the regular monitoring of collected diversity data.





Document Type: Policy

Document Title: Anti-Bribery and Corruption Policy

Version no.
1

Valid from 01.03.2025

15. Končne določbe

- 15.1. Ta politika je bila sprejeta dne 05.03.2025 in velja od 01.03.2025 dalje.
- 15.2. Ta politika je sprejeta v slovenski in angleški različici, pri čemer v primeru neskladja ali dvoma prevlada slovenska različica.
- 15.3. V tej politiki uporabljeni izrazi zapisani v moški spolni slovnični obliki so uporabljeni kot nevtralni za ženske in moške.
- 15.4. Z dnem uveljavitve te politike, prenehajo veljati vse politike in drugi dokumenti družbe, ki so urejali področje, ki ga ureja ta politika.
- 15.5. Zaposleni so bili o sprejemu in vsebini politike obveščeni na pri delodajalcu običajen način. Na enak način bodo zaposleni obveščeni tudi v primeru kakršnih koli sprememb in dopolnitev vsebine te politike ali njenih prilog.
- 15.6. Politika in njena vsakršna sprememba so objavljeni na wiki.parsek.net ter dostopen v fizični obliki v kadrovskem oddelku na sedežu družbe.

15. Final Provisions

- 15.1. This policy was adopted on 05.03.2025, and will take effect on 01.03.2025.
- 15.2. This policy is issued in both Slovenian and English. In case of discrepancies or doubts, the Slovenian version prevails.
- 15.3. All terms in the masculine form are intended as gender-neutral.
- 15.4. With the implementation of this policy, all previous policies and documents covering the same subject are no longer in effect.
- 15.5. Employees were informed about the adoption and content of the policy in the usual manner, and will be informed similarly of any changes or amendments.
- 15.6. The policy and any amendments are published on wiki.parsek.net and available in hard copy at the HR department at the company headquarters.

In Ljubljana, on 05.03.2025

Gašper Čehovin

Open Line Vitaly d.o.o.

Director

Signed by:

 4FEFD0A4DF2D4A6...

Revision History

Version	Approved by	Revision date	Description of change	Author
1	Gašper Čehovin	05.03.2025	First Issue	Tina Zakrajšek

