

MS-4 Politika preprečevanja korupcije

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Ime in Priimek	Pregledal	Vstavi e-podpis
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1 Namen in področje uporabe

Namen Politike preprečevanja korupcije (v nadaljevanju: Politika) je jasno opredeliti zavezanost Skupine GEN k preprečevanju, odkrivanju in obravnavanju korupcije, skladno z veljavno zakonodajo [1] ter mednarodno uveljavljenimi najboljšimi praksami.

Politika velja za vse zaposlene, člane organov vodenja in nadzora ter poslovne partnerje, ki delujejo v imenu ali za račun Skupine GEN.

OSNOVNA NAČELA

Uresničevanje vizije, poslanstva in strateških ciljev Skupine GEN temelji na etičnem in zakonitem ravnanju vseh zaposlenih. Pri svojem delovanju izhajamo iz temeljnih načel poslovne etike, ki vključujejo:

- **ničelno toleranco** do vseh oblik koruptivnega ravnanja;
- **zagotavljanje transparentnosti** v sprejemanju in izvajanju poslovnih odločitev;
- **izkazovanje osebne integritete** v odnosih med zaposlenimi ter v sodelovanju z zunanjimi deležniki;
- **zavezanost trajnostnemu razvoju** ter odgovornemu upravljanju vplivov na okolje in družbo;
- **dosledno uveljavitev skladnosti poslovanja** v vseh poslovnih procesih.

2 Izjava o Politiki

V Skupini GEN je strogo prepovedano vsako neposredno ali posredno ponujanje, obljubljanje, dajanje, sprejemanje ali zahtevanje koristi katere koli vrednosti ali oblike (finančne ali nefinančne) za pridobitev poslovne prednosti ali vplivanja na odločitve.

Prepovedana so naslednja dejanja:

- uporaba daril ali gostoljubnosti v nasprotju z zakonodajo in notranjimi pravili Skupine GEN,
- zagotavljanje kakršnih koli koristi prek tretjih oseb,
- prikrivanje resničnih namenov plačil, pogodb ali donacij ali drugih transakcij,
- vplivanje na kadrovske odločitve z namenom zagotavljanja koristi sebi ali povezanim osebam,
- vsako drugo ravnanje, ki pomeni kršitev dolžnega ravnanja zaposlenega v zameno za pridobitev koristi zase ali za drugega.

3 Vloge in odgovornosti

Skupina GEN uresničuje visoke etične standarde z vzpostavitvijo in nenehnim izboljševanjem sistema upravljanja s tveganji korupcije, ki izpolnjuje zahteve mednarodnega standarda ISO 37001:2025 [2]. V ta

namen je vzpostavljen ustrezen program s postopki, ki podpira učinkovito preprečevanje, odkrivanje in obravnavo koruptivnih ravnanj.

Vzpostavljena je **Funkcija za preprečevanje korupcije**, v okviru katere se v najboljše prakse delovanja sistematično vključujejo zahteve standarda ISO 37001:2025. Ta funkcija nudi strokovno podporo zaposlenim pri prepoznavanju in obvladovanju korupcijskih tveganj, izvaja aktivnosti nadzora nad izvajanjem ukrepov ter poroča vodstvu o učinkovitosti delovanja sistema upravljanja s tveganji korupcije.

Odgovornost za dejavno sodelovanje pri izvajanju, vzdrževanju in nenehnem izboljševanju sistema vodenja za preprečevanje korupcije nosijo vsi zaposleni, člani organov vodenja in nadzora ter poslovni partnerji, ki delujejo v imenu ali za račun Skupine GEN. V okviru svojih pristojnosti in odgovornosti prispevajo k prepoznavanju in obvladovanju korupcijskih tveganj ter krepitvi kulture integritete in ničelne tolerance do korupcije.

4 Prijava nepravilnosti

Skupina GEN je vzpostavila notranjo pot za prijavo kršitev, ki zaposlenim omogoča, da v dobri veri ali na podlagi razumnega prepričanja zaupno prijavijo nepravilnosti. Vsem prijaviteljem je zagotovljena zaupnost identitete ter zaščita pred vsakršnimi oblikami povračilnih ukrepov, diskriminacije ali škodljivih posledic zaradi podane prijave [3]. Skupina GEN se zavezuje, da bo vsako prijavo obravnavala skrbno, nepristransko in v razumnem roku.

5 Spremljanje učinkovitosti in veljavnost politike

Ta Politika dopolnjuje Etični kodeks Skupine GEN [4] in je del sistema vodenja GEN, kjer se skupaj z vpeljanim programom ter povezanimi postopki redno pregleduje in po potrebi posodablja, da odraža zakonske spremembe ali spremembe v delovanju Skupine GEN.

Vsakršno odstopanje od Politike bo obravnavano v skladu z veljavno zakonodajo [1] in notranjimi pravili Skupine GEN.

6 Reference

- [1] Zakon o integriteti in preprečevanju korupcije (ZIntPK), 5. 6. 2010. [Elektronski]. Dostopno: <https://pisrs.si/pregledPredpisa?id=ZAKO5523>. [Poskus dostopa 17. 6. 2025].
- [2] SIST ISO 37001:2025; Sistemi vodenja za preprečevanje korupcije – Zahteve z napotki za uporabo, ISO/TC 309, 2025.
- [3] SIST ISO 37002:2021; Sistem vodenja prijavljanja nepravilnosti – Smernice, ISO/TC 309, 2021.
- [4] Etični kodeks Skupine GEN.

7 Priloge

7.1 Priloga 1: Anti-Bribery and Corruption Policy (angleški prevod)

7.1 Priloga 1: Anti-Bribery and Corruption Policy (angleški prevod)

7.1.1 Purpose and Scope

The purpose of the Anti-Bribery and Corruption Policy (hereinafter referred to as: the Policy) is to set out GEN Group's commitment to preventing, detecting and responding to corruption in accordance with applicable legislation [1] and internationally recognised best practices.

The Policy applies to all employees, members of the management and supervisory bodies and business partners acting on behalf of or on the account of the GEN Group.

GENERAL PRINCIPLES

The implementation of GEN Group's vision, mission and strategic goals are grounded in the ethical and lawful conduct of all employees. Our operations are guided by fundamental principles of business ethics, including:

- **zero tolerance** for any form of corrupt behaviour;
- **ensuring transparency** in the adoption and implementation of business decisions;
- **demonstrating personal integrity** in employee relations and in cooperation with external stakeholders;
- **commitment to sustainable development** and responsible management of environmental and social impacts;
- **embedding consistent compliance** standards across all business processes.

7.1.2 Policy Statement

It is strictly prohibited within the GEN Group to directly or indirectly offer, promise, give, accept, or request any benefits of any value or form (both financial and non-financial) for the purpose of securing an undue advantage or influencing decision-making.

The following actions are prohibited:

- The use of gifts or hospitality in violation of applicable legislation and the GEN Group's internal rules,
- providing any benefits through third parties,
- concealing the true purpose of payments, contracts, donations or other transactions,
- influencing staffing or recruitment decisions with the intent to secure benefits for oneself or related persons,

- any other conduct that constitutes a breach of an employee's duty to obtain benefits for oneself or for another person.

7.1.3 Roles and Responsibilities

The GEN Group upholds high ethical standards by establishing and continually improving its Anti-Bribery and corruption management system, which meets the requirements of the ISO 37001:2025 international standard [2]. To this end, a comprehensive programme, supported by internal procedures, has been established to ensure effective prevention, detection, and handling of corrupt practices.

A dedicated Anti-Bribery and Corruption Function has been established to systematically integrate the requirements of ISO 37001:2025 into the best operating practices. This function provides professional support to employees in identifying and managing bribery and corruption risks, conducts oversight activities related to the implementation of mitigation measures and reports to the management on the effectiveness of the its Anti-Bribery and corruption management system.

Responsibility for actively participating in the implementation, maintenance and continuous improvement of the Anti-Bribery and corruption management system rests with all employees, members of the management and supervisory bodies, as well as business partners acting on behalf or on the account of the GEN Group. Within the scope of their respective roles and responsibilities, they contribute to identifying and managing bribery and corruption risks, strengthening a culture of integrity and zero tolerance for corruption.

7.1.4 Whistleblowing Procedures

The GEN Group has established an internal reporting channel that enables employees to confidentially report any irregularities in good faith or on the basis of a reasonable belief. All reporting persons are guaranteed the confidentiality of their identity and protection against any form of retaliation, discrimination, or adverse consequences arising from their report [3]. The GEN Group is committed to handle every report with due care, impartiality and within a reasonable time frame.

7.1.5 Monitoring Efficiency and Policy Validity

This Policy complements the Code of Ethics of the GEN Group [4] and is, as a part of the GEN management system, regularly examined and updated as necessary, in line with the implemented programme and related procedures, in order to reflect statutory changes or any changes in the operation of the GEN Group.

Any deviation from the Policy will be dealt with pursuant to the applicable legislation [1] and internal rules of the GEN Group.