

# THE ENERGY OF OUR ACTIONS

The Petrol Code of Conduct

2012

**PETROL**



PETROL

## A THOUGHT FOR THE CODE

To accomplish great things, we must not only act,  
but also dream; not only plan, but also believe.

*Anatole France, Nobel Prize winner for literature*



# PETROL VALUES

## RESPECT

We respect our fellow humans and the environment.

## TRUST

We build partnerships by being honourable.

## EXCELLENCE

We want to be the best in everything we do.

## CREATIVITY

We create progress through our ideas.

## COURAGE

We work with commitment and courage.

# BUSINESS PRINCIPLES

## A passion to be the best

**W**e employees are dedicated to our work. In our work we encourage originality, creativity and imagination. We trust in ourselves, and we work with commitment and responsibility, since we believe in ourselves and our abilities. In our work we are guided by an infinite passion to win. For this reason, through our everyday effort and endeavour in our jobs we create greater value than in the majority of other companies.

## Business performance

**P**rofitability is decisive for the long-term success, existence and development of our company. Only a financially successful Petrol can guarantee the fulfilment of the high business targets expected by employees, shareholders, business partners and society as a whole. We employees take personal responsibility for our work and for the success of the company. Through highly professional work and effort every day, we ensure the outstanding performance of the company, which in turn guarantees the sustainability of outstanding jobs and the creation of new ones in the future.

## We create the best value for customers

**W**e work for the benefit of the customer. Through honourable employees and high-quality products and services, we build trust among our customers. As motivated and enterprise-focused employees, we work to ensure their satisfaction. Although our current methods of work are good, we constantly aspire through new ideas towards greater competitiveness, offering better products and services that will satisfy the high expectations of our customers.

## Sustainable development

**T**hrough our actions we show social responsibility and a commitment to sustainable development. We believe that only a Petrol that is commercially successful and profitable can adapt successfully to all the demands of the times, and in this way bring benefits not only to the shareholders, but also to all those it touches in its operations. Our commitment – to serve local communities, environmental protection and people – is exceptional and steadfast.

## Commitment to ethics

**I**n our work we adhere to high standards of business ethics. Employees respect and implement the law in all areas of our operations. With boldness, courage and commitment we are building the best energy company, which will be a source of pride for our employees, shareholders, clients, business partners and society.

# BECAUSE THIS IS WHAT WE WANT

## WHAT IS A CODE OF CONDUCT?

Petrol's Code of Conduct is a set of rules, standards of behaviour and expected actions. It sets out how we operate in the company, and guides us in all ways and at all times.

**T**he actions of us, the people of Petrol, affect the standing of the company. For this reason they must accord with the law and with Petrol's values and principles, as enshrined in the Code. It serves us as a tool in our everyday actions, and helps us avoid situations that would break the law, damage the company or in any other way harm its standing.

**T**he Code does not provide answers to all questions. We must also be familiar with the substance of internal acts and legislation for specific fields, and adhere to them in our work. We must be aware that violations or disregard of the Code's rules also signify violations of internal regulations or legislation, and give rise to disciplinary as well as indemnity liability, or even criminal liability, of the individual.

## TO WHOM DOES IT APPLY?

The Code of Conduct applies to all employees in the Petrol Group (Petrol d.d. Ljubljana and all companies in the Group), irrespective of position or job location.

**W**e also expect people who work on behalf of Petrol to respect the Code. We will explain to business partners that we are bound by the Code and expect them also to respect similar principles and standards. Each manager is an example to employees through his or her actions. Managers have the job of familiarising staff with the substance of the Code and helping them when they need it.

## WHERE CAN HELP BE FOUND?

The Code of Conduct does not provide all the answers. There are a number of avenues available for questions, advice or for reporting violations.

**A**t the end of the Code there is a list of persons and bodies to which you can turn if you have doubts or identify a violation. And you can always approach your direct superior. In doing so, your anonymity and security are guaranteed. In judging actions we can do a great deal ourselves. We should ask ourselves: Am I proud of my actions? Can I talk about my actions openly and confidently? Could they harm the company?



## EMPLOYEES

The energy between us ensures creativity and the attaining of common goals, and enables the long-term success of the company.

## OUR EMPLOYEES

At Petrol we are strengthening the company's values, building an organisational culture and maintaining a stable organisational climate.

**W**e are committed to good and honourable interpersonal relations. It is for staff to assume responsibility and initiatives, and to trust and respect each other. We create a relaxed and nurturing environment that is vital to the development of creativity.

**W**e expect each employee to operate in line with Petrol's values. In this way they can show a responsible attitude towards their work and their co-workers. Employees can also express their affiliation to the company through consistent fulfilment of obligations and by taking on additional jobs and assignments where necessary.

**I**nvesting in continuous development and education is one of our permanent tasks, and the acquisition and transfer of new knowledge to co-workers is the duty of each one of us. Through the acquisition of knowledge and skills we are constantly raising the quality of products and services and strengthening our self-confidence, while enjoying greater standing among commercial clients.

**P**etrol employees are aware of their responsibility for achieving both common business targets and personal development goals. We pursue activities that enable the successful coordination of professional and private life. In this way we reduce stress at work and increase employee satisfaction.

**A**t Petrol we honour the association of workers in various forms of worker representation, and we maintain an open dialogue with worker representatives.

**W**e are aware that it is important both to recruit employees with the relevant competence and to place them in appropriate jobs, since only highly motivated and committed employees can enable the long-term growth and development of Petrol.

## At Petrol:

- we strive to ensure good interpersonal relations,
- we praise work well done and offer constructive criticism,
- we take responsibility for our work,
- we work to ensure the acquisition of knowledge needed for our work,
- we participate in in-house training,
- we transfer our knowledge and experience to co-workers,
- we offer initiatives for change,
- we praise good ideas,
- we never reject a co-worker's ideas without studying them appropriately,
- we ensure respect of personality at the workplace,
- we support measures that make our professional and family lives easier.

## SAFETY AND HEALTH AT WORK AND SECURITY

Efficient and high-quality work is possible only in a safe, secure and healthy working environment.

**O**ur health is the basis for high-quality life and work. As employees we can do most for our health by consistently heeding safety measures, since responsible actions and behaviour reduce the risk of injury or health impairment.

**E**nsuring the safety of people at Petrol is made possible by the constant identification and assessment of risks, which spur the introduction and improvement of safety measures both for employees and for our business partners.

**T**hrough preventive measures, Petrol reduces hazards and workloads as well as the occurrence of occupational illness, while improving the safety culture among employees and increasing their efficiency.

**I**n the desire to ensure greater safety for employees and clients, and in our concern for a better working environment, we are implementing numerous measures that will reduce or prevent the possibility of criminal acts by third persons (for instance robberies and deliberate bodily harm).

### At Petrol:

- we ensure our health at home and at the workplace,
- we are familiar with the risk assessment for our individual workplace,
- we attend preventive health examinations in line with the risk assessment,
- we ensure a safe working environment through the appropriate organisation of the work process and the necessary means of work,
- we strive to ensure our own safety and the safety of our co-workers at the workplace,
- we are involved in continuous training and raise awareness of the importance of safety and health at work,
- we do not work under the influence of alcohol or other illicit psychoactive substances,
- we always use personal protective equipment,
- we alert co-workers and superiors if we identify any danger,
- we immediately inform our manager and expert services of any accident at work,
- we adhere to the recommendations on self-protection behaviour,
- we point out any violations of self-protection behaviour in others.



## PROHIBITION OF DISCRIMINATION, HARASSMENT AND ILL-TREATMENT

At Petrol we are aware that we wield great influence on the lives and rights of individuals and communities wherever we operate. For this reason we are committed to the equality and equal treatment of all people and we respect those that differ in their views.

**W**e honour all rights guaranteed by the Constitution and law, as well as all international documents in the field of human rights.

**W**e operate in different countries and in different languages, so we are all the more attentive to potential misunderstandings.

**I**n all procedures we ensure equal rights and possibilities for all individuals. These include, for instance, protection of privacy, freedom of conscience, freedom to associate, employment and promotion regardless of gender, race, skin colour, age, state of health or disability, religious, political or other persuasion, membership of unions, nationality or social origin, family status, wealth, sexual orientation or other personal circumstance.

**A**t Petrol we do not permit any kind of violence or harassment (emotional, psychological, verbal or sexual) at the workplace.

**W**e link together with partners and other stakeholders that respect human rights and fundamental freedoms.

### At Petrol:

- we are friendly, polite, respectful and appreciative of our co-workers, regardless of the position they hold,
- we ensure that our behaviour does not cause any disagreeable feelings in our co-workers,
- we do not permit conflict communication between co-workers (raised voices, insults, denigration, contempt, defamation or mobbing),
- in procedures where we make decisions about the rights of co-workers, we are mindful of fair and equal treatment of all,
- we immediately draw attention to offensive and inappropriate behaviour by individuals in our working environment.

## PRIVACY AND THE PROTECTION OF PERSONAL DATA

In modern society, the right to privacy is one of the most important human rights. At Petrol we respect the privacy of employees and ensure the protection of personal data.

**W**e understand the privacy of the individual as the unimpeded and free enjoyment of personal and family life, without any kind of impermissible interference or control. Interference by the employer in the privacy of employees may only be permissible in essential situations as defined by law or internal acts. In any such intervention we are bound to protect confidentiality. This also applies to intervention in information media.

**A**t Petrol we handle personal data responsibly, carefully and in accordance with internal acts.

**P**ersonal data are deemed to be any data relating to the individual, irrespective of the form in which it is expressed. Personal data may be monitored only if so provided by law or with the personal assent of the individual. Access to personal data is permitted only to those employees that require such data for official company business, and to those authorities provided by law.

**W**e guarantee the protection of personal data both for our own employees and all our clients and other stakeholders.

### At Petrol:

- we respect the privacy of each individual,
- we communicate personal data to professional services or third persons only on the basis of a written and substantiated request, where such data are needed for the unimpeded flow of work,
- before communicating personal data we always consider whether such communication is permissible,
- we have a person in charge of personal data protection to whom you can always turn if you have any questions.



## SOCIAL RESPONSIBILITY AND ENVIRONMENTAL PROTECTION

We express our sense of corporate, social and environmental responsibility through the commitment that we achieve the targets of today without endangering the needs of current and future generations.

## SOCIAL RESPONSIBILITY AND ENVIRONMENTAL PROTECTION

Petrol operates in a social and natural environment that has an important impact on our operations. We always incorporate into our business policy a concern for the individual, wider society, local communities and the environment. Petrol's social responsibility thus goes beyond the boundaries and expectations of legal frameworks and legislation.

**W**e live together is the overarching title of our commitment to social responsibility, both in terms of help for those who need it most and of promoting creativity and highlighting compassion for our fellow humans.

**I**n business decisions we always balance set targets with a concern for employee social security and for nature, and also with the equal and fair treatment of business partners. At Petrol we do everything to ensure that our decisions have the lowest possible impact on the ecosystem, and in this we make the most efficient possible use of energy, water and other natural resources.

**T**hrough its operations, Petrol maintains competitiveness and reliable supply to accompany growing demand, and is successfully bringing on stream environmentally cleaner resources and more efficient energy solutions.

**W**e prevent irresponsible activities such as child labour, discrimination of all sorts, excessive exploitation of natural resources, environmental pollution, abuse of worker rights, corruption and so forth.

**O**ur aim is to operate without environmental disasters, fires and explosions. In achieving the set objectives we exercise care for the environment and people in a professional and friendly way.

## At Petrol:

- we make sparing use of energy products and other resources (water, paper, cleaning agents and other materials),
- we manage waste prudently and separate it,
- we prevent the spillage of hazardous substances into water or the ground, and in the event of accidents we ensure appropriate remediation,
- we prevent emissions of harmful substances into the air or reduce them to the lowest possible level,
- we immediately notify superiors and the competent authorities of events that could lead to environmental pollution or could pose a threat to humans,
- we constantly strive to prevent fires, explosions and other environmental disasters,
- we expect our business partners to act responsibly towards the environment and people, and this is something we take into consideration in selecting them,
- we accept social initiatives that promote the sparing consumption of natural assets and preserve biodiversity.



## FAIR AND TRANSPARENT OPERATIONS

Through the fair and transparent actions of all employees we build trust and ensure the long-term success of Petrol.

## FAIRNESS OF OPERATIONS

We enter truthful and fair data on business events in the business books, documents or records of Petrol, pursuant to the valid regulations and accounting standards.

**A**t Petrol we keep business books, accounting documents and other records in accordance with regulations and the valid accounting standards. We enter truthful and fair data in them. We are aware that any other action is a punishable act by law.

**W**e keep all business documents for the prescribed period, in which on no condition do we destroy, conceal, damage or in any other way make them unusable. If you yourself identify some error in business documents, you should inform your direct manager of this immediately.

**A**t Petrol we always provide complete, timely, updated, accurate and fair data on all aspects of our operation that are not a business secret. In this way we enable our current and potential owners and investors to be familiarised with our operations and to be able to make appropriate business decisions. Equally this allows us to earn and retain the trust of the public.

**I**n order to demonstrate a professional approach and ensure the accuracy and completeness of information provided, only authorised persons should provide such information to the public and interested parties.

**N**on-disclosure of certain kinds of information, its untruthfulness or incompleteness can, in certain cases, represent a breach of the valid legislation, and in any event damages the reputation and integrity of the company. If data communicated from Petrol appears in the public domain, and you are convinced that such data are not truthful or complete, you should immediately notify your direct manager, who will in turn notify the person responsible for public relations.

## At Petrol:

- we execute transactions without delay and in line with our authorisations, or at such time as they are approved by the authorised person,
- we immediately enter completed transactions truthfully and fairly in the business books and documents,
- detected errors in business documents should be immediately brought to the attention of your direct manager,
- during audits we cooperate with auditors, furnish them with all explanations they need and supply all the necessary business documents,
- during the legally prescribed period for keeping business documents we do not destroy, conceal, damage or in any other way make them unusable,
- we present or receive documents that are the result of actually provided services, goods or assets,
- your direct manager should be immediately informed of any data you possess that is or could be important for the operation of the company or its value,
- you should not disclose to anyone any data on the operations of the company unless you are expressly authorised to do so.

## CONFLICTS OF INTEREST

Through our work at Petrol we fulfil our common vision and the objectives of the company, and thereby also our own personal goals and legitimate interests. We do not seek to fulfil our non-legitimate interests or the interests of natural and legal persons with whom we are associated.

Legitimate personal interests and goals include attaining adequate skills and education levels for the proper fulfilment of professional duties, salary, pension and disability insurance and standing in the company. Our activities outside the company, in which we are entirely free to choose for ourselves, should not encroach on the interests of Petrol or affect decisions we take in the company that would be counter to its objectives. Through our actions we strive to ensure that others also know that we are acting fairly and that they also see this in us.

You should notify your manager or the person appointed by the company management for this purpose:

- whenever you believe that your goals are bringing you into conflict with the objectives and mission of the company,
- if you have the view that your personal, political, business or similar links with other people or organisations affect your work in the company in conflict with its objectives.

You should then act in line with the employer's decision.

Those persons who decide on conflicts of interest take special care to protect data on your personal, political, business and similar links.

## At Petrol:

- we work fairly, impartially and to the benefit of the company,
- we take care not to come into any situation where our decisions could be affected by interests that are not the interests of our company or our legitimate interests,
- special care should be taken to avoid conflicts of interest if you are one of the executive staff of the company,
- we do not make any decisions in human resources procedures that relate to ourselves, our relatives, friends or acquaintances, and we do not exercise any influence over such decisions,
- we do not participate in making business decisions that affect the material standing of ourselves, our relatives, friends or acquaintances or of organisations with which we are in any way associated,
- we do not disclose unlawfully any data on the personal, political, commercial or similar associations of our co-workers that we have learned in deciding on conflicts of interest,
- we do not abuse business links gained within the company after concluding our career in the company,
- we do not exploit our previous career in the company to establish business contacts with Petrol on behalf of and for the account of other legal persons.

## DONATIONS, SPONSORSHIP AND FINANCING POLITICAL PARTIES

At Petrol we provide donations and conclude sponsorship agreements exclusively in accordance with the company's mission, vision and values. Petrol funds are not used to finance the activities of political parties and their election campaigns or the election campaigns of individual candidates, nor do we finance referendum campaigns.

**D**onations are unilateral legal transactions, constituting gifts from Petrol's commercial assets, while sponsorship agreements are bilateral, where in exchange for the commitment of sponsorship funds Petrol gains benefits on which a material value can be placed.

**T**he commercial assets of Petrol are not used to provide any financial or other assistance to the activities of political parties and their individual members. In this way we maintain a politically neutral stance and pursue our primary mission and the subject of our operations. In addition to cash, Petrol's commercial assets are deemed to include material and technical equipment, premises, vehicles, telecommunications assets and so forth.

### At Petrol:

- we only provide donations that accord with the company's mission and the orientation to social responsibility,
- we do not provide donations or conclude sponsorship agreements that could damage the reputation or commercial standing of the company,
- we do not conclude any sponsorship agreements where in exchange for sponsorship funds Petrol gains no benefit comparable to the committed sponsorship funds,
- we do not abuse donations or sponsorship agreements to cover up possible unlawful or immoral purposes,
- we decline all requests for the financing of political parties and election and referendum campaigns,
- we do not pursue personal political projects and activities in such a way that anyone could interpret them as the political projects and activities of the company, and we do not exploit our employment, position and influence in the company to persuade others to finance political activities.



## GIFTS AND HOSPITALITY

Gifts and expressions of hospitality that we receive as employees of Petrol should in no way influence our business decisions.

**I**n no instance should Petrol employees demand or request gifts or expressions of hospitality from business partners or any other person. In principle such gifts or expressions of hospitality should not be accepted, either, but we are aware that such minor expressions are sometimes necessary to establish or maintain good business relations.

**I**n no instance should a received occasional gift or expression of hospitality affect our business decisions. We are aware that the indiscriminate acceptance of gifts harms not just our own personal reputation and integrity, but also the reputation of Petrol.

**Y**ou should notify your manager or the person tasked by the company management for this purpose of any gift or expression of hospitality received. Special attention is also needed regarding gifts offered to the company itself.

## At Petrol:

- we fully respect the established, valid law of our own and other countries regarding the acceptance and giving of gifts, and only then do we honour local customs,
- we make clear our attitude to the accepting and giving of gifts and expressions of hospitality in an appropriate way at the start of each business relationship,
- we accept and give exclusively occasional gifts and expressions of hospitality, which cannot influence any business decisions nor give any such impression,
- you should notify your direct manager or the person tasked by the company management for this purpose of any gift or expression of hospitality offered or received,
- in accepting gifts we should be especially careful not to come into an actual or apparent conflict of interest,
- in the organisation or co-financing of social events we should take care to ensure that their type, form or value does not create the impression that we are trying to influence the business decisions of those invited,
- we do not accept or give gifts in the form of cash, securities or precious metals, loans, personal favours or gifts or expressions of hospitality of an inappropriate nature in an inappropriate place,
- in a period when we are negotiating with partners over important business and must make important business decisions, we should accept no gifts from such partners nor should we promise or offer any gifts.

## BRIBERY

At Petrol we do not promise, offer, provide or accept any illicit benefits to or from our business partners or any other person. Equally, we reject any kind of promise or offer of benefit not permitted by regulations, internal acts or ethics.

We understand the term “benefit” to mean objects, favours and services that represent a material and non-material benefit (e.g. employment or enrolment in school). Illicit benefits also cover those that are in themselves legitimate, but their intent is to influence our or another person’s business decisions.

We continually make this resolve clear to all our business partners, representatives, agents, intermediaries and other persons with whom we come into contact in our work.

## At Petrol:

- we provide to business partners, officials and others only such gifts or offers of benefits as are permitted by the valid regulations, internal acts or ethics,
- we take care that our gifts and benefits, and the procedure of their delivery, can in no way be understood as providing illicit benefits,
- in any instance of unclear or debatable gift-giving, as soon as is possible, and where possible before the actual gift-giving, you should contact your manager or the person appointed for such purposes by the company management, and consult with them,
- the appointed persons in the company and competent authorities outside the company should be notified immediately of any giving or receiving of illicit benefits or the promise or offer thereof,
- we provide no illicit benefits under the guise of some other business (donation, sponsorship etc.),
- we do not agree to any request or coercion regarding benefits, irrespective of who is providing them and what their purpose is.

## INTERNAL INFORMATION

At Petrol we handle internal information that could affect the price of our securities or other financial instruments lawfully, carefully and fairly.

**I**nformation that is not public and that is learned through a position at Petrol or through employment or the performance of activities at Petrol, and which might influence the price of our shares, other securities or financial instruments, is deemed to be “internal information”. Such information may not be used for ourselves or others, nor may it be communicated to others so that it might be used indirectly or directly to acquire or dispose of such securities or financial instruments. Nor do we advise others regarding the acquisition or disposal of such securities or financial instruments. We are aware that all the described actions represent criminal acts.

**E**qually, we do not spread false information that could affect the price of our shares, other securities or financial instruments.

## At Petrol:

- we continually update or supplement the list of all those acquainted with internal information,
- whenever you are in doubt about information being internal in nature, prior to the acquisition or disposal of Petrol shares, other securities or financial instruments, you should inform the person appointed by the company management for this purpose of the intended acquisition or disposal, and ask for advice,
- we protect data on intended acquisitions or disposals of Petrol shares, other securities or financial instruments on the part of our co-workers, unless we believe in good faith that such acquisitions or disposals involve abuse of internal information,
- we do not abuse the internal information of Petrol or other companies,
- in no way do we seek to influence by speculation or some other illicit way the value of our own or others' securities.

## PREVENTION OF MONEY LAUNDERING

At Petrol we observe all the regulations and good practices for the prevention of money laundering.

At Petrol, money laundering is understood to be the exchange or any other kind of transfer of cash or other assets deriving from a criminal act and the concealment or covering up of the true nature, origin, location, movement, disposal, ownership or rights in relation to such cash or other assets deriving from a criminal act. Money laundering is any legal and actual transaction involving cash or assets of illicit origin, and this includes the use of cash or other assets from legal sources for the purposes of terrorism. We are aware that any of these described actions is a criminal act.

At Petrol we are especially careful in the acquisition of financial and other assets, where this involves especially complex or extensive transactions, an unusual composition, value or association of transactions that have no clear commercial or legally substantiated purpose. Equally, we are especially careful with transactions that are not in line with or are disproportionate to typical or expected operations or other circumstances associated with the status or other qualities of traits of our business partners.

The most suspicious transactions are those where data on the business partner are not entirely known or verifiable, where the business partner wishes to pay more than is necessary, and also transactions that are the result of unusual compensations that are unnecessary or inexplicable, that are in cash (cheques, cash, etc.), that represent compensation between otherwise unassociated business subjects or transactions through unnecessary or unknown intermediaries.

### At Petrol:

- we determine the origin, source, purpose and actual addressee of all assets we acquire,
- we immediately notify our direct manager of any suspicious transaction,
- we do not conduct any transactions in cash or assets of illicit or suspicious origin,
- we do not try to determine for ourselves the circumstances associated with the suspicion of money laundering,
- we do not inform any business partners of our suspicions, especially not those that have generated such suspicions.



## MANAGEMENT AND PROTECTION OF ASSETS

Petrol's assets are material, financial and intellectual. The company's assets must be handled responsibly, so the protection of assets and information is managed in a systemic way.

## PROTECTION OF COMPANY ASSETS

We make sparing use of Petrol assets and protect them against loss.

Petrol's assets are composed of a material (movable property and real estate) and financial component and of intellectual property rights. We treat Petrol assets prudently and responsibly, and protect them against damage, destruction, alienation, abuse or loss. We use these assets exclusively to achieve the company's commercial goals and never for private purposes, something for which we are personally responsible.

Petrol's assets are truthfully and fairly registered in accounting documents, which serve as a basis for correct business decisions and for the fulfilment of financial and legal obligations and for notifying all public circles. Any forgery, destruction, concealment or alienation of such documents may incur criminal penalties both for individuals and the company.

Neither do we allocate working time – except in urgent cases – for private purposes, and we record work done and the time needed for it in a timely and fair manner.

## At Petrol:

- we make sparing use of the company's assets, for business purposes and in line with our specific authorisation,
- we prevent damage, destruction, loss, alienation or abuse of company assets,
- we work to ensure the greatest possible control over assets to prevent unjustified alienation,
- we maintain material assets professionally, with the aim of achieving their greatest yield in their lifetime,
- we perform the recommended and prescribed handling and storage of cash,
- business travel is organised and conducted in a sparing and rational way,
- we do not burden Petrol with the costs of private activities on business travel,
- we register appropriately our working hours and each use of company assets,
- we do not use working time for private purposes,
- we do not cheat by making false claims of working hours.

## INTELLECTUAL PROPERTY

Prior to any public presentation, the results of our own creativity must be appropriately protected, for in this way we can prevent others enjoying the results of our work. Copyright covers a wide selection of intellectual creations, so we must be especially cautious not to breach it.

**I**ndustrial property rights include patents, trademarks and models. A patent is a right to exclusive use of an invention – new, creative and industrially useful solutions to a specific problem. Trademarks serve to protect brands with which we are present on the market and are intended to increase the recognisability of products and services. Whenever we wish to use exclusively the appearance of a certain product, we may do so by acquiring a model.

**C**opyrights are used to protect written works (e.g. literary works, articles, manuals, studies and computer programmes), musical, photographic, audio-visual, artistic and architectural works (e.g. sketches, plans and objects in the field of architecture, urban planning and landscape architecture), works of applied art and industrial design, and presentations of a technical nature (e.g. technical drawings, plans, sketches, tables and expert opinions). Such creative work is protected at the moment it is created, and no special procedure for registration is needed. We must exercise special attention regarding the protection of copyright in cooperation with business partners.

## At Petrol:

- we do everything necessary in good time to protect industrial property rights,
- we hold off on giving public presentations of products until all the necessary procedures have been concluded for the protection of our products,
- we are always careful not to encroach upon the industrial property rights of third persons,
- we do not install software ourselves, but always turn to the IT Department,
- we do not copy the copyright work of third persons, nor do we make any other use of such work without permission,
- we are careful to make proper contractual provision for intellectual property rights.

## MANAGING INFORMATION SECURITY

Managing information security ensures unimpeded and secure operations, and involves the contribution of each individual through their responsible handling of information.

**A**t Petrol we protect information from unauthorised access. We ensure its confidentiality, integrity and availability. We fulfil the requirements of the information security policy and coordinate information security with business needs.

**W**e ensure unimpeded operations and establish appropriate security procedures based on a risk analysis.

### At Petrol:

- users make responsible use of their identification or digital log-on signature and password, along with their allocated access to Petrol's information technology (IT) assets, and share these with no one, thereby preventing and forestalling any access by unauthorised users to such IT assets or any theft of data and IT assets,
- we do not use the identity of another user,
- we do not request access to the IT assets of users beyond our authority,
- we regularly report changes in the status of employed users that are linked to allocated access to IT assets (transfers, leaving the company),
- we enable access for business partners to IT assets in line with a contract detailing access and the way in which it may be cancelled,
- we report security incidents immediately,
- we observe the rules of safe use of IT assets and strive to ensure that we ourselves do not cause any security incidents.



## DATA HANDLING

At Petrol we are aware that data represent assets and a competitive advantage. For this reason we protect data very carefully and share them only with those who need it for their work. We handle data securely throughout the period of their generation and use.

**I**n our work we may encounter data of a confidential nature. Data are confidential when so labelled, but also if they do not have such a label, yet it is clear that substantial damage would be caused if they were disclosed to an unauthorised person. Confidential data relate to all areas of operation (e.g. strategy, business plans, financial data, contracts, data on sales and prices, development of new products, services, trademarks and similar) and are deemed to be such until they become public. Prior to exchanging confidential data with third persons, we generally sign a contract on the protection of confidential data or business secrets, laying down the obligations of the parties.

**A** commitment to the protection of business secrets continues to be binding on us after our employment is terminated.

**I**f employees come into contact with commercial data that are not a part of their work, such data should be immediately passed on to their superior or to an authorised person. We also respect and protect data communicated to us by third persons.

**E**mployees are bound to honour the policy of a clean desk and empty screen. In this way we protect data that is accessible in business premises, and data accessible via computer screens.

## At Petrol:

- we protect data carefully and communicate data in line with the principle that they may only be received by persons authorised to do so and where they need such data for their work,
- any confidential data on the operations of Petrol should be handled as such, until explicit authorisation is given for the communication of such data to the public or to interested stakeholders,
- your immediate superior should be immediately notified of any appropriation or attempted appropriation of Petrol business secrets,
- we should be especially careful regarding the handling of IT assets that hold confidential data,
- confidential data are not communicated to unauthorised persons, even though they may be trusted or related,
- care must be taken to ensure that all data carriers (paper or electronic) are stored in locked drawers, cupboards or premises when not in use,
- upon leaving work, you should log off on your computer and lock the screen,
- we use secure printing and during printing you should always be present at the printer; the document should be immediately removed,
- data stored on portable media should be immediately erased when there is no longer a business need for the storage of such data.

## USE OF INFORMATION ASSETS

Information assets and the information they contain are the property of Petrol. We use them responsibly and in line with high ethical standards.

Information assets include desktop and portable computers, tablets, smart phones, USB keys, data and smart cards and all devices on which data can be electronically stored and processed.

Independent installing of software and hardware components and changing the settings on IT assets is not permitted and is generally disabled.

Petrol's IT assets may be used for private purposes only in exceptions and within reasonable boundaries, and in such a way that does not disturb working processes. Petrol's IT assets may not be used for private profit.

In the use of IT assets we observe high ethical standards, the requirements of the information security policy, the law and Petrol's internal regulations. Users accept responsibility for private information on Petrol IT assets.

For all business communication (sending or receiving information, documents, negotiations with business partners) we use only the allotted Petrol e-mail address.

The internet is to be used principally for business purposes.

## At Petrol:

- whenever we need any non-standard software, we always approach the IT Department regarding its purchase and installation,
- we do not install any software ourselves, even if this is technically possible,
- we do not allow anyone else to use IT assets allocated to us (children, friends, etc.).



## COMMUNICATION

All communication within the company and outside it is a mirror of our actions and of Petrol as a whole.

## OUR COMMUNICATION

When we communicate, we should always be focused on Petrol's values and act accordingly. Our communication is open, respectful, well-intentioned, we know how to listen and we respond both to positive and negative information.

**G**ood communication has a positive influence on the flow of information, the satisfaction of employees and business partners and also on company performance.

**P**etrol employees should always communicate in a way that our words and actions are an example to the best. In doing so we are well-intentioned and positive, and we respond rapidly and always speak truthfully. We provide information in a carefully considered, precise and timely manner. We communicate clearly, intelligibly and unambiguously – continually checking that our communication has been properly understood, especially where it involves work instructions.

**W**e work to ensure that co-workers receive all important information on the operations of Petrol and its companies, even before they are acquainted with it from other organisational units and the media.

**I**f misunderstandings arise in an organisational unit where you are working, first talk with those directly involved; and if necessary, with your manager. Talks are also possible with those in the human resources department and with the company management, but the rule still applies that we go through the chain of management.

**A**nother component of the communication of each employee at Petrol is appropriate behaviour, along with care for one's personal appearance and dress. Regardless of one's taste in clothing outside work, at the work place we should always be dressed in a proper and business-like manner, and should wear protective clothing where this is required. All employees should also respect the rules of business etiquette.

## At Petrol:

- we communicate in such a way that we make the most efficient possible use of time, we observe agreed deadlines and respect mutual agreements,
- we use all available electronic communication means, but in doing so we do not neglect interpersonal relations,
- we call meetings in a timely and responsible manner, and in doing so use the tools available in our information system,
- we arrive for meetings on time and take an active part in them,
- we strengthen the culture of providing feedback, by indicating to co-workers what is good and what can be even better,
- we provide timely and substantiated praise and build upon this,
- we do not use any swear words or offensive expressions and we do not communicate in a way that might hurt or denigrate any person; within the company and outside it we do not talk inappropriately about co-workers,
- we do not use any kind of communication that would harm the reputation of our company,
- outside the company we do not talk about matters beyond our authority.

## MEETINGS, JOINT MEETINGS AND PUBLIC APPEARANCES

Meetings are intended for providing information, decision-making, solving problems and also for building group affiliation to the company. All joint meetings, especially those with business partners, and public appearances should be exploited to strengthen the reputation of Petrol.

**A**t Petrol, two types of meeting are called: informative and decision-making. Meetings should be organised in good time. In this we use all the tools of the information technology system. We arrive for meetings on time and prepared, take an active part in them.

**A**t joint meetings intended for the external public, we are always good hosts. If the event is being organised by us, we take care that our guests feel welcome.

**W**henever we are speaking on behalf of Petrol, we should always notify the public relations representative of public appearances.

### At Petrol:

- we prepare in advance for meetings of all kinds, we participate in the discussion and propose decisions that are in line with Petrol's business policy,
- all participants of a meeting are equal and always have the opportunity to express their opinion,
- we respect the different cultural customs of those attending the meeting,
- we prepare well for public appearances that we are involved in on behalf of Petrol,
- we do not make inappropriate jokes and comments at meetings,
- regardless of the topic, we behave respectfully towards those participating, and never insultingly.

## VERBAL, WRITTEN AND ELECTRONIC COMMUNICATION

Verbal communication is still the most common and fastest form of communication, and in doing so we are always friendly and respectful at Petrol. Everything we write leaves traces in the company and outside it, so in written and electronic communication we are especially careful.

All co-workers should greet and address each other in the manner agreed. Business partners should always be greeted in a friendly way, and if the situation is appropriate, we shake hands.

While communicating by telephone we are always friendly, and before starting any conversation we introduce ourselves to all external callers. When we receive an external call, we introduce ourselves with the name of the company and our own name. For internal calls we simply greet the caller in a friendly manner.

When we write letters, documents and e-mails, we follow the principle of being “brief and to the point”. Written communication, too, is governed by the general rules of communication. We are aware that each document or e-mail that leaves Petrol reflects our corporate culture and the relations among employees.

Letters sent to external addresses should be printed on letterhead paper, and we should adhere to all the rules of the Petrol corporate image. Equally, we heed the rules of the corporate image in computer presentations.

In the use of e-mail we should be brief and to the point; the “less is more” principle applies to the substance of the message and the number of recipients. We always write out the subject of a message, thereby making immediately clear to the recipients the content. We make sparing use of the tag “urgent”, and if a matter is truly urgent, it is better to call a co-worker or talk to them personally. For those times when we are absent, we set up an automatic response e-mail.

## At Petrol:

- we first consider it thoroughly and then write the message,
- we adhere to the rules of written communication,
- in e-mails we use only the agreed signature,
- we work to ensure that there is no flood of e-mails,
- we always respond to e-mails if this is expected in the communication,
- we do not misuse e-mail for private purposes,
- we do not forward e-mails to persons who are not authorised and involved in dealing with certain topics and projects,
- we answer telephone calls within four rings,
- we always respond to unanswered calls,
- while talking, we speak clearly and intelligibly; we are always friendly, polite and patient.

## COMMUNICATION IN SOCIAL NETWORKS

At Petrol we accept communication in social media, yet at the same time we are aware of the advantages and risks inherent in such methods of people connecting.

At Petrol we are aware that there is a big difference in whether we are speaking “on behalf of Petrol” (as an official or authorised speaker) or “about Petrol”, in other words our products, services and business partners. It is important for us always to be aware on whose behalf we are speaking and what our role is in social networks (such as Facebook, YouTube, Twitter and LinkedIn).

As in all other media, communication in social networks is both an opportunity and responsibility to safeguard the reputation of Petrol and to enhance it. Any of our words or thoughts could in a very short time be circulated on very extensive networks, so we make sure that we communicate very carefully, in line with our values, ethical standards and local law.

At Petrol we respect the freedom of speech of all co-workers, yet at the same time we know that the substance of what we write on social networks is accessible to anyone, including co-workers, clients and competing companies. We are aware that content initially intended for a small circle of people can be communicated very quickly to an extraordinarily large number of social network users.

### At Petrol:

- we ourselves are responsible for all our actions; everything we write remains permanently saved – if we harm the operations and reputation of Petrol, this is our responsibility,
- on social networks we respect the rights and fundamental freedoms of each individual,
- we are aware that different cultures involve different habits and customs, and they may be governed by different legal frameworks,
- on social networks we do not spread information about the company, apart from information that is public,
- we do not spread any intolerance on social networks, regardless of the content under discussion.

## COMMUNICATION WITH CLIENTS

In communicating with clients we observe the basic principles of business communication and business etiquette.

The aim of communicating with clients is to recognise and understand their wishes and needs, and to get feedback which we can use to improve relations with them. In this way we seek to establish and nurture a long-term partnership, so we try to understand their expectations and needs. We strive to communicate with the client in such a way that they understand the properties and advantages of our products, services and solutions.

We communicate with clients in various ways: in writing and verbally, with and without words, formally and informally. We receive each client with a smile and are friendly and helpful to them.

### At Petrol:

- we always have a respectful attitude to clients,
- we take into account that clients communicate in different ways,
- we should be especially responsive and quick in communication with clients – even where this involves complaints,
- we regard every complaint as an opportunity to become even better; we deal with them in line with internal regulations,
- we always provide clients with clear, accurate and unambiguous information and we do not conceal any information that would be important for them to make decisions,
- we communicate with clients in such a way that they will recommend us to others because of our manner of business communication,
- we never promise clients anything that we cannot fulfil.



## MEDIA RELATIONS

The media play an important part in creating the Petrol image, since their reporting makes a major contribution to shaping public opinion. For this reason we carefully build responsible, planned and proactive relations with the media that contribute to satisfying the needs of the entire public for information.

All employees are ambassadors for their company. In everyday relations with the public we are respectful regarding our company and we operate on the principle of maintaining the company's reputation.

At Petrol we communicate with the media in a planned and professional way, since we can reach key target audiences through them. We do not make differences among the media, we communicate with general and specialised, print, electronic, web, national and local, domestic and foreign media. Systematic and proactive relations are a strategic decision of Petrol.

Media relations are the responsibility of the chairman of the board, members of the board and the public relations representative, as well as other person authorised by the chairman of the board.

## At Petrol:

- we cooperate with journalists, we respect their method of working and we stick to certain rules and principles,
- the public relations representative communicates with the media and represents a point of contact between the press and the company; the public relations representative first approves each contact with the press, and confirms the information we intend to communicate to the media,
- when/if we are called (or contacted in some other way) by a journalist or editor, we are polite and stress that we are not competent to issue statements; we direct the journalist in a friendly manner to the public relations representative,
- upon talking to the journalist we notify the public relations representative and communicate data on the journalist and the information being sought,
- we do not communicate to the press information defined as a business secret, price-sensitive information or information that can affect trading on the stock exchange (e.g. precise numbers regarding investments, data on planned strategic projects, information on competition),
- we do not permit journalists to enter company premises without an escort.



## REPORTING DISHONEST BEHAVIOUR

## REPORTING DISHONEST BEHAVIOUR

At Petrol we do not permit unlawful or unethical behaviour, and we strive to detect such behaviour.

This company, too, can experience dishonest, in other words unlawful, unprofessional or unethical behaviour by individuals. These individuals may be employed in the company, and they may also be our business partners, or merely persons visiting the company. It is also possible for individuals in the company to demand, order or coerce co-workers into such behaviour. All instances should be reported to the competent body in the company.

There are certain avenues available to ensure the transfer of information and the protection of our identity from those for whom this is not their business. The company management will guarantee for the person making such report protection from any pressures they could experience as a result of their ethical action in reporting.

### At Petrol:

- we do not act in a dishonest, in other words unlawful, unprofessional or unethical manner, and we are watchful for such behaviour regardless of who it involves – employees, business partners or other persons,
- we decline any demand, order or coercion from superiors to pursue unlawful, unprofessional or unethical actions,
- we do not demand, order or coerce dishonest actions from our co-workers,
- we report any unlawful, unprofessional or unethical actions or any demand, order or coercion to pursue such actions,
- we protect the identity and integrity of employees and others who in good faith and for good reasons provide notification of dishonest behaviour in the company,
- we protect well-intentioned persons making such reports from potential negative consequences of their justified reports.



## CONTACTS AND LINKS

### Contacts for reporting non-respect of the Code:

Human Resources Department: +386 1 47 14 116

Legal Department: +386 1 47 14 390

Labour Director: +386 1 47 14 114

Internal Audit: +386 1 47 14 379

Strategic and Corporate Communication: +386 1 47 14 581

E-mail: [kodeks@petrol.si](mailto:kodeks@petrol.si)

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# SUBJECT INDEX

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