

## Policy on Prevention of Bribery and Corruption



The Titus Group respects the principles of fairness, integrity and transparency in all areas of its business activity and expresses its commitment to fight bribery and corruption.

The Titus Group's anti-corruption policy applies to all transactions, activities, commercial practices and other Group business activities as well as to all Group employees, business partners and related parties.

The present policy forbids corrupt practices, including bribery, committed either a) by means of abusing one's position in order to gain personal and material benefits by offering, promising, giving, receiving or inducing others to accept a benefit as encouragement for illegal, non-ethical activity or practice, or for breach of trust; or b) by means of accepting bribes, cash, loans or payments, or objects of value, gifts or other direct or indirect benefits that can be cashed in to gain proceeds to the detriment of another person or company. Any and all forms of bribery as well as illegal or non-ethical payments or benefits are equally prohibited, even if they are common practice in another country or industry in which the Titus Group operates.

The Group's objective is to ensure zero tolerance with regard to any form of corruption or bribery and to provide that in the event of reasonable suspicion or the established existence of such illegal practices, an internal investigation be initiated in line with the legislation in force and based on the internal rules of the Titus Group.

Failure to comply with the provisions of the present Titus Group anti-corruption policy shall be treated as a violation and may lead to the termination of employment or business cooperation.

Tadej Gosak, director  
Titus d.o.o. Dekani  
TitusPlus d.o.o.  
Lama Avtomatizacija d.o.o.

A large, stylized handwritten signature in blue ink, written over the printed name and title of Tadej Gosak.

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