

Code of Conduct for Suppliers of SIJ Group Companies

The Code of Conduct for Suppliers of all SIJ Group companies (hereinafter referred to as the SIJ Group) establishes general principles and rules of conduct and obliges all SIJ Group suppliers to act honestly, respectfully and ethically, and to act responsibly in their daily work. This Code establishes zero tolerance for any action that constitutes legally unacceptable conduct or a violation of established values and ethical standards and may adversely affect the company's reputation. This commits SIJ Group suppliers to conduct business lawfully and act responsibly towards all stakeholders:

1. Compliance with Legal Regulations

The supplier undertakes:

- to follow the principles of the United Nations on Entrepreneurship and Human Rights, the United Nations' Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, and to comply with national law, and in particular with the requirements set out in this Code;
- to protect data, information and facts entrusted, known or otherwise accessible, as confidential business information in accordance with the law and the requirements of the purchaser;
- to apply honest, ethical, and transparent business practices.

2. Anti-Corruption and Anti-Bribery Policy

The supplier undertakes:

- to implement anti-corruption and anti-bribery measures and have zero tolerance for any form of corruption or bribery; in its daily operations it may not claim, receive, offer or confer any unjustified benefit related to business activities, if contrary to moral norms, or any other advantage;
- to prevent corrupt acts being committed by any employees regardless of their type of employment or level of hierarchy in the company;
- to report any perceived corrupt act.

3. Respect for Employees' Basic Rights

The supplier undertakes:

- to ensure equal opportunities and equal treatment of all parties – regardless of ethnicity, race, gender, possible physical impairments or disabilities, ideological belief, religion, nationality, sexual orientation, social environment or political conviction – provided that all of the above are based on democratic principles and respect for otherwise-minded people;
- to respect the dignity, privacy and rights of every employee;
- not to force anyone to work against his or her will;
- not to allow inappropriate treatment of employees, such

- as physical, psychological and sexual violence, mobbing and discrimination;
- not to allow inappropriate behaviour towards employees such as gestures, rumours and touching;
- to provide adequate remuneration, the statutory minimum wage, and paid contributions;
- not to exceed the statutory maximum working time;
- that employees may be members of a trade union and recognised as being equal to other employees (not treated as privileged or inferior).

4. Prohibition of Child Labour

The supplier undertakes:

- not to employ persons younger than permitted by law.
 SIJ Group strongly opposes the exploitation of child labour and expects the same from its suppliers. In the case of the absence of applicable legislation in a particular country where the supplier operates, the employment of children below the age required to complete primary education is not permitted;
- not to tolerate child labour, and to comply at least with the International Labour Organisation (ILO) Convention No. 138 of 26 June 1973 concerning the minimum age for admission to employment and ILO Convention No. 182 of 17 June 1999 on the prohibition of and immediate and effective measures to eliminate the worst forms of child Labour:
- that the employment of young workers does not endanger their health, safety, or development.

5. Employees' Health and Safety

The supplier undertakes:

- to take responsibility for the health and safety of employees;
- to reduce occupational hazards and to provide the best preventative measures against injuries and occupational diseases;
- to educate employees on occupational safety and health, and to ensure that employees comply with occupational health and safety requirements;
- to establish and implement efficient and adequate occupational safety and health system;



- to ensure that proper working procedures, written instructions, preventative measures, adequate protective equipment, adequate training of workers and the organisation of the working environment are provided so as not to impair the health and safety of employees;
- that employees have the right to refuse work that may endanger their health or safety;
- to monitor the stock and use of chemicals (hazardous and/ or flammable substances) and, where used, to implement chemical safety measures and train employees on the safe handling, storage and use of chemicals, as well as on spillage and disposal protocols.

6. Environmental Protection

The supplier undertakes:

- to comply with legal regulations and international standards in the field of environmental protection;
- to reduce the impact on the environment and to constantly improve environmental protection;
- to establish and implement an appropriate environmental preservation system;
- to produce products with the least possible environmental impact and to preserve natural renewable resources;
- to comply with applicable laws which define the procedures for labelling, recycling or disposal of chemicals, waste materials and especially hazardous waste;
- to reduce or eliminate all types of waste or irrational energy use, including energy and water, and to introduce various measures for the sustainable use of resources, recycling, or reuse of raw materials.
- to keep SIJ Group informed of its efforts to reduce greenhouse gas emissions and its efforts to extend this to its supply chain.

7. Supply Chain

The supplier undertakes:

- to ensure that its indirect suppliers comply with the requirements of this Code;
- to comply with all applicable laws and regulations on conflict minerals (tin, tantalum, tungsten, gold and cobalt) and to provide information on their origin and supply chain;
- to comply with the basic requirements of this Code when selecting and cooperating with suppliers, and to responsibly select, develop and periodically evaluate suppliers;

- to immediately notify the purchaser, i.e. a company of the SIJ Group, of any deviation in processes, products or services and obtain guidelines and approval for further actions:
- to prevent counterfeit products or the alleged use of counterfeit parts in products delivered to the purchaser;
- to establish a system that is socially, ethically and ecologically responsible and promotes continuous improvements and progress in all areas;
- to establish a system of responsibilities and liabilities in the supplier development process, including periodic evaluations and audits of supplier processes
- to establish a system for identifying and complying with applicable laws and the provisions of this Code;
- to establish and sustain a risk management system that can identify risks in all fields of work and put in place appropriate preventative and corrective measures;
- to establish an appropriate education system for all employees of the company, regardless of their workplace, to make them aware of their contribution to product compliance, service and product safety and the importance of ethical behaviour;
- to involve employees in the process of continuous progress and improvement;
- to establish a system of periodic audits of suppliers and contractors:
- to establish a system of corrective actions in the event of inconsistencies found in internal and external audits, inspections and investigations;
- to establish a system of personal data protection;
- to establish a system for storing all documentation relating to legal transactions with SIJ Group and to the delivered goods, unless otherwise specified.

8. Reporting misconduct

SIJ Group has established a complaint procedure for all stakeholders and has made it possible to submit a complaint through various channels.

By signing this Code of Conduct, the Supplier acknowledges that it is aware of the possibility of submitting a complaint or reporting misconduct to pritozbe@sij.si and that a complaint can be filed about any misconduct that has been suspected or discovered.

REVISION 4

Ljubljana, May, 16th 2023

Andrey Zubitskiy, President of the Management Board

We declare that we agree with the requirements in the Code of conduct for suppliers of the SIJ Group and undertake to fully comply with them.







Supplier (company name and adress): Name, surname, title and signature of the responsible person:

Date. place and stamp: