



UNIOR d.d. CODE OF CONDUCT

UNIOR d.d. is a company with more than a century of tradition, committed to maintaining a strong and stable future. We want to ensure satisfaction in terms of job security, personal success and sustainable growth that will provide jobs for future generations. We recognise that our success also depends on the way we behave and the values we uphold.

UNIOR d.d. Code of Conduct (hereinafter: the Code) represents the fundamental principles and guidelines that guide our actions in everyday business environment. It reflects our commitment to ethical and responsible behaviour, compliance with the law, and care for our employees, customers, partners and the wider community. It sets out core commitments of UNIOR d.d. to respect human rights and corporate integrity, and to exercise zero tolerance for illegal and unethical conduct by employees, management and supervisory bodies.

The Code is our commitment to our colleagues, customers, business partners and other stakeholders. Each of us is responsible for ensuring that we live up to it at all times. Let it guide our decision-making and encourage us to consistently respect the rights and dignity of all parties involved.

Best regards,

Management board of UNIOR d.d.

HUMAN AND LABOUR RIGHTS

At UNIOR d.d., we treat every individual with respect and uphold human rights throughout the business process. We act in accordance with the Constitution, legislation, generally applicable standards and principles, and the rules of international human rights law.

- **Child labour is prohibited**
- **Work is voluntary**

We do not tolerate any form of forced, compulsory or child labour. Child labour for children under 15 years of age is prohibited. Workers under the age of 18 enjoy special protection in the employment relationship. The employment relationship is voluntary and may be terminated at any time.

- **Prohibition of discrimination**

We have zero tolerance of any unlawful discrimination. We ensure equal treatment of employees, job seekers and everyone else involved in the business process, regardless of race, ethnic origin, skin colour, gender, sexual orientation, gender identity, age, disability, religion, political belief, national or social origin, trade union membership or any other protected characteristic. We are committed to respecting the rights of minorities and indigenous peoples. Human trafficking and slavery are prohibited.

- **Prohibition of sexual and other harassment and mobbing at the workplace**

We do not tolerate any form of harassment, mobbing, intimidation or stalking at the workplace, whether by employers or colleagues. To this end, we have a system of designated representatives to receive reports of alleged harassment and mobbing at the workplace at each facility/department.

We are committed to respect for human rights by our business partners and suppliers, and work with key stakeholders to make progress together in this field.

- **Dignity and personal integrity**

We respect the privacy, dignity and personal integrity of the individual.

- **We respect freedom of association and collective bargaining**

We support the freedom to join trade unions and communicate respectfully and constructively with trade union representatives. Workers' representatives are protected in accordance with the law. UNIOR d.d. has both representative trade unions and a works council.

- **Fair working conditions**

We ensure that all employees are properly remunerated for their work, and we comply with labour laws on working time and other benefits.

At UNIOR d.d., we employ foreigners, people with disabilities, older workers, pregnant women and parents, and we treat everyone with respect and equality. In accordance with the law, we respect the right to special protection in the employment relationship for all protected categories of workers.

INTEGRITY AND CORPORATE COMPLIANCE

Our integrity is built on corporate compliance, ethics and effective risk management.

Corporate compliance is our commitment to comply with all laws, regulations and standards that govern our business, both locally and internationally. Within the company, compliance is built on a number of policies and internal by-laws, non-compliance with which may lead to disciplinary action, including termination of employment, and to criminal or other legal consequences in accordance with applicable law.

The Code of Ethics of UNIOR d.d. defines the basic **ethical standards of conduct** at UNIOR d.d., which employees follow in their work.

Managing corporate integrity risks allows us to identify and manage factors that could jeopardise the company's objectives.

- **Combating corruption and bribery**

At UNIOR d.d., we have zero tolerance to bribery and corruption in all their forms. Every contract concluded by the company must contain an anti-corruption clause. An anti-corruption clause is also a mandatory component of each of the company's general terms and conditions of purchase.

- **Antifraud**

In fraud prevention, we have a zero-tolerance approach. We treat all fraudulent behaviour with diligence and respond appropriately.

- **Restrictions on accepting and giving gifts**

We observe the prohibitions and restrictions on accepting and giving gifts. In our professional and private lives, we avoid situations where an accepted gift could create the appearance of influence on our independence.

- **Avoiding conflicts of interest**

Employees must be alert to any actual or potential conflict of interest and must do everything possible to avoid it. If this is not possible, such conflicts of interest must be disclosed immediately.

- **Fair competition**

We comply with the regulations governing protection of competition, and do not distort, restrict or prevent competition with our conduct.

- **Personal data protection**

We handle the personal data of our employees and third parties carefully, securely and transparently, and in accordance with data protection regulations.

- **Confidential data and intellectual property rights**

At UNIOR d.d., we are committed to ethical and fair business practices, which is why it is essential that we carefully protect trade secrets and the confidential information of others, and respect intellectual property rights.

- **Whistle-blower protection**

We protect the identity of the *bona fide* whistle-blower and provide adequate protection against retaliation.

ENVIRONMENT AND HEALTH AND SAFETY AT WORK

Protecting the environment

We recognise the importance of protecting the environment and pursuing sustainable development. Accordingly, we identify and assess environmental aspects and set targets to reduce negative impacts on the environment. Development and implementation are carried out in accordance with the principles of sustainable environmental development.

Social environment

UNIOR d.d. is strongly integrated in its environment and is connected with a wide range of stakeholders. We firmly believe that investing in the places where we live and work pays rich dividends. We show our care for the local environment through sponsorship of associations, donations, cooperation with various educational institutions, participation in humanitarian campaigns and similar activities.

Health and safety at work

We ensure safe and healthy working conditions in accordance with all applicable occupational health and safety regulations. We do everything in our power to prevent accidents at work.

We strengthen our culture of safety through continuous training and awareness-raising. We run a workplace health promotion programme to maintain and improve the physical and mental health of all employees.

All employees are responsible for their own safety and the safety of everyone around them. Employees must not consume, possess or be under the influence of alcohol, drugs or other illegal substances in the workplace. The use of personal protective equipment and prompt reporting of any irregularities is a shared responsibility of us all.

We are constantly striving to improve health and safety at work and fire protection. To this end, we regularly inspect and test work equipment, carry out fire safety measures, evacuation drills and similar activities. We have procedures in place to deal with emergencies.

REPORTING UNETHICAL OR ILLEGAL BEHAVIOUR

In the event of any breach of the Code or suspected non-compliance, anyone may make a report in writing or verbally in the following ways:

- directly to the corporate integrity and fraud officer;
- by email to prijava.povejmo@unior.com; or
- via the free anonymous telephone number 080 10 90, which is managed by an external company.

All reports received, including anonymous reports, will be dealt with by the corporate integrity and fraud officer. The confidentiality and safety of all our stakeholders are of the utmost importance to us, so please feel free to raise any concerns or observations you may have.

Thank you for your contribution to maintaining the integrity and high ethical standards of UNIOR d.d.

About the Code:

Version: 1.0

The Code was adopted by a resolution of the company's management board on 13 May 2024 and entered into force on the same date.

The latest Code of Conduct is always available on www.unior.si and on the company's intranet. The Code is also translated and published in English.

If you have any questions or concerns about topics covered in the Code, you can contact your line manager or the compliance officer at skladnost@unior.com.