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1. COMPANY PRINCIPLES

At ŠUMER d.o.o., we are committed to socially and environmentally responsible business conduct. Our operations are based on respect for human rights, integrity, legality and responsible behaviour towards employees, business partners, the local community and the environment.

We systematically integrate sustainable development into all aspects of business operations, management and decision-making. In doing so, we strive for long-term value creation and responsible management of impacts, risks and opportunities related to our activities.

In our operations, we apply a due diligence approach based on the systematic identification, prevention, mitigation and monitoring of actual and potential adverse impacts on human rights, working conditions, health and safety, the environment and business integrity, both within our own operations and throughout the supply chain. In the event of identified non-conformities, we ensure appropriate corrective actions and remediation measures.

In our operations, we take into account:

- the principles of the United Nations Global Compact;
- the International Bill of Human Rights;
- the International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- the United Nations Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Responsible Business Conduct;
- applicable legislation of the Republic of Slovenia and the European Union.

2. SOCIAL RESPONSIBILITY AND ETHICS

Respect for Human Rights

We treat employees and all other stakeholders with respect, fairness and responsibility, while consistently adhering to internationally recognized human rights standards. Respectful and equal treatment represents one of the fundamental principles of our operations.

We pay special attention to vulnerable, disadvantaged and marginalized groups and strive to prevent all forms of discrimination, unequal treatment and violations of human rights.

Equal Opportunities and Equal Treatment of Employees

All employees have the right to fair, dignified and respectful treatment. In mutual relations, we act professionally, responsibly and openly.

In employment, promotion, remuneration, education and termination of employment, we do not tolerate discrimination based on personal circumstances. We do not tolerate any form of violence, harassment or workplace bullying.

We are committed to an inclusive working culture that promotes diversity, cooperation, and respect for the individual abilities and views of each person.

Prohibition of Child Labour and Forced Labour

We respect international standards and maintain zero tolerance for child labour, forced labour and human trafficking.

The minimum age for employment is determined in accordance with applicable legislation. For employees under the age of 18, we ensure special protection and adapted working conditions.

Employment is based on the free choice of the individual without any form of coercion or restriction of personal freedom.

Education and Awareness

We recognize that knowledge, competencies and employee motivation are key factors for successful business operations. Therefore, we encourage continuous education, competency development and personal growth of employees.

We regularly provide training in the areas of sustainability, safety, business integrity, ethical conduct and information security.

Working Hours and Compensation

We comply with legislation and regulations related to working hours, breaks, rest periods and public holidays.

We provide employees with fair remuneration in accordance with applicable legislation, collective agreements and internal acts. Overtime work is properly recorded and additionally compensated.

We encourage work-life balance and, where possible, enable flexible forms of work.

Freedom of Association and Collective Bargaining

We respect employees' rights to freedom of association, trade union membership and collective bargaining.

We encourage open dialogue, transparent communication and constructive cooperation between employees, their representatives and management.

3. OCCUPATIONAL HEALTH AND SAFETY

We consider occupational health and safety to be one of the fundamental values and an integral part of the company's sustainable development.

We have established a systematic approach to occupational health and safety management, including hazard identification, risk assessment and control, and the implementation of preventive and protective measures.

We are committed to preventing work-related accidents, occupational diseases and other health-related risks. We regularly provide employee training and actively involve employees in improving the working environment and processes.

We ensure ergonomic workplace arrangements, safe use of work equipment and chemicals, appropriate personal protective equipment, monitoring of the working environment, and preparedness for emergency situations.

We also promote activities aimed at preserving the physical and mental health of employees and developing a positive safety culture.

4. ENVIRONMENT, ENERGY AND CLIMATE CHANGE

Environmental Responsibility

We systematically identify, monitor and manage the environmental impacts of our activities. We comply with applicable legislation and strive for continuous improvement of environmental performance.

In planning products, processes and investments, we apply life-cycle principles and strive to reduce environmental impacts throughout all stages of our activities.

Climate Change

We are committed to reducing greenhouse gas emissions, taking into account emissions from our own operations (Scope 1 and Scope 2) and, where relevant, emissions throughout the supply chain (Scope 3).

We promote efficient energy use, the use of renewable energy sources and the development of technological solutions to reduce carbon footprint, with the long-term goal of strengthening climate resilience and sustainable development.

In risk management, we also consider local climate and environmental conditions and their impact on business operations, the supply chain and the company's resilience.

Biodiversity and Land Use

We recognize the impact of our operations on the natural environment, ecosystems and biodiversity. We are committed to protecting natural habitats, preventing environmental degradation and ensuring responsible land use.

In planning and carrying out activities, we take protected areas and natural values into account.

Resource Use and Circular Economy

We promote efficient use of natural resources, reduction of material consumption and increased use of secondary raw materials.

Our products and processes follow circular economy principles, including reuse, recycling and waste reduction.

Water Use

We manage water resources responsibly, monitor water consumption and quality, and reduce negative impacts on the aquatic environment.

Chemicals and Materials

We handle chemicals and materials responsibly and in compliance with legislation and applicable requirements. We reduce the use of hazardous substances and replace them with safer alternatives whenever possible.

Waste

In waste management, we follow the waste hierarchy: prevention, reuse, recycling and disposal.

Emergency Events

We manage risks related to natural disasters, climate impacts and industrial events such as fires, spills and other emergency situations, and we maintain response plans and measures to strengthen business resilience.

5. SUPPLY CHAIN AND MATERIAL SOURCING

We are committed to responsible supply chain management.

We expect suppliers and business partners to comply with legislation and the principles of this Code of Conduct. We promote transparency, traceability and responsible conduct throughout the supply chain.

We perform supplier risk assessments, monitor supplier compliance and require appropriate corrective actions in the event of non-conformities. The company reserves the right to verify supplier compliance.

Responsible Sourcing of Raw Materials

In sourcing raw materials, we follow OECD guidance for responsible supply chains of minerals from conflict-affected and high-risk areas.

We use materials whose extraction, production, transportation and processing do not contribute to human rights violations, environmental harm or other non-compliance issues.

Prevention of Deforestation

We are committed to ensuring that our supply chain does not involve materials linked to illegal deforestation, and we expect suppliers to ensure traceability and compliance with legislation.

6. BUSINESS CONDUCT IN COMPLIANCE WITH LAWS AND ETHICS

We conduct business legally, fairly and transparently.

We do not tolerate corruption, bribery, fraud, unfair business practices or any other conduct that could damage the integrity of the company or stakeholder trust.

Employees avoid conflicts of interest and act responsibly and in the best interest of the company.

We respect fair competition rules and legislation related to the prevention of money laundering.

Information Protection

We ensure the protection of personal data and business information and safeguard the confidentiality of data, information assets and trade secrets.

Reporting of Violations

We have established a mechanism for reporting violations, including the possibility of anonymous reporting.

We ensure confidentiality, impartial treatment and protection against retaliation for whistleblowers. All reports are handled in a timely manner, and appropriate corrective actions are implemented.

Risk Management

We recognize that risks are an integral part of business operations; therefore, we systematically identify, assess and manage them.

Monitoring and Auditing

The implementation of this Code of Conduct is regularly monitored, reviewed and continuously improved.

7. REFERENCE DOCUMENTS

- Company Management Manual;
- General Acts and Internal Rules;
- Quality Policy;
- Environmental Protection and Energy Efficiency Policy;
- Occupational Health and Safety Policy;
- Strategic Company Documents;
- Sustainability Reports;
- Purchasing Conditions;
- Applicable Legislation and International Standards.

Managing Director, 01 May 2026

Boris NOVAK