



Supplier Code of Conduct

Content:

SUPPLIER CODE OF CONDUCT

Purpose and Objective.....	3
Compliance with Applicable Regulations	3
Employment and Work	4
Respect for Human Rights, Prohibition of Discrimination and Harassment.....	4
Prohibition of Child and Forced Labour	4
Safety and Health at Work	4
Other Work-Related Rights	5
Reporting Procedures and Whistleblower Protection.....	5
Quality and Compliance	5
International Deliveries.....	5
Product and Service Safety and Suitability.....	5
Environmental Protection	6
Training and Development	6
Provision of Information on Sustainability Reporting.....	7
Business Ethics	7
Prevention of Corruption and Gift Restrictions	7
Prohibition of Restricting Competition	8
Prohibition of Money Laundering and Terrorism Financing.....	8
Prevention of Conflicts of Interest	8
Transparency in Business Operations.....	8
Protection of Personal Data, Trade Secrets and Intellectual Property	8
Information Security and Business Continuity Planning.....	9
Monitoring Compliance with the Supplier Code of Conduct.....	9
Final Provisions.....	10
Supplier Questionnaire.....	11

SUPPLIER CODE OF CONDUCT

Purpose and Objective

At T-2 d. o. o., we firmly believe that upholding moral and ethical standards and principles in the business world is crucial for successful operations.

The purpose of this Code is to outline the expectations of T-2 d. o. o. regarding the commitments to conduct by suppliers, representatives, consultants, and other partners who collaborate with T-2 d. o. o. (hereinafter referred to as "suppliers").

By accepting an order, suppliers agree to adhere to this Code and commit to continuously improving their business practices in line with the principles and standards derived from this Code. They acknowledge that the content of this Code is binding and constitutes an integral part of the contractual relationship with T-2 d. o. o.

Each supplier guarantees that the principles of this Code are respected by their employees and other individuals performing work for the supplier, as well as by the supplier's affiliated companies, subcontractors, and other contractual partners. The supplier ensures regular training to familiarize the aforementioned parties with the requirements of this Code.

This Code establishes the criteria that are key in selecting and evaluating suppliers. Failure to meet the requirements of the Code shall be considered a material breach of contract by the supplier.

Compliance with Applicable Regulations

The supplier undertakes to comply with all applicable national and international laws and other regulations governing its business operations. In the event of discrepancies between the regulations applicable in the supplier's country and the regulations applicable in the Republic of Slovenia, or the standards and principles outlined in this Code, the supplier commits to adhering to the stricter rules.

Employment and Work

Respect for Human Rights, Prohibition of Discrimination and Harassment

Respect for the human rights of employees and individuals working for the supplier is an essential requirement that suppliers must uphold in all areas of their operations. Suppliers are obligated, among other things, to adhere to the prohibition of discrimination based on personal circumstances. They shall not engage in unfair treatment or restrict the rights of individuals based on gender, age, race, religion, disability, or other personal characteristics at any stage of business cooperation. Any form of harassment in the workplace is strictly prohibited. This includes any unwelcome behaviour that causes discomfort or fosters a hostile work environment. Harassment may include verbal, non-verbal, or written behaviour and covers a wide range of inappropriate actions, such as sexual harassment, offensive communication, or other unethical conduct. The supplier must ensure compliance with these principles both in relation to employees and all other individuals performing work on behalf of the supplier.

Prohibition of Child and Forced Labour

Every supplier of T-2 d. o. o. is obligated to comply with all International Labour Organization (ILO) conventions ratified by the Republic of Slovenia, including Convention No. 138, which sets the minimum age for employment. Accordingly, only workers aged at least 15 years, or 14 years if such a minimum age is permitted by the laws of the country of employment, may be employed by the supplier. Such employees must be afforded special protection against physical harm, abuse, and exploitation. Their work environment must be safe, appropriate to their age and physical condition, and free from tasks that could endanger their health, safety, or development, including work that might interfere with their education or physical, mental, moral, or social well-being. In line with ILO Conventions No. 29 and No. 105, the supplier is strictly prohibited from engaging in any form of forced labour, including work performed under coercion, threats, or any form of punishment compelling an individual to work. The supplier must ensure free choice of employment and protection against slavery, slave trade, human trafficking, and other forms of forced labour. Additionally, the supplier is required to provide special protection against forced labour for vulnerable groups such as children, migrants, and women.

Safety and Health at Work

To prevent hazards and risks to the life and health of its employees and other individuals performing work for the supplier, the supplier is obligated to ensure that all work processes,

VALID, version 1

equipment, and practices comply with applicable laws and regulations governing occupational health and safety. The supplier must conduct regular risk assessments in the workplace and implement necessary measures to reduce risks to an acceptable level. It is essential that individuals working for the supplier receive adequate training and information on occupational health and safety, safe working procedures, and use appropriate personal protective equipment. The supplier is expected to promote and maintain a healthy work environment that includes appropriate temperature, lighting, ventilation, and other factors affecting employee well-being. The supplier should continuously improve safety standards based on experience, risk assessments, performance, and new technological developments.

Other Work-Related Rights

Individuals performing work for the supplier must receive appropriate and timely remuneration for their work. The supplier is also obligated to comply with all regulations regarding working hours, breaks, education, freedom of association for employees, and provisions on collective bargaining. Furthermore, the supplier must maintain accurate records of working hours and wages for its employees and individuals performing work, all in accordance with legal requirements.

Reporting Procedures and Whistleblower Protection

The supplier must establish procedures for reporting suspected violations of regulations observed within the work environment. These procedures must ensure the confidentiality of the whistleblower, except where exceptions are mandated by law. The supplier must also guarantee protection against retaliatory measures directed at the whistleblower.

Quality and Compliance**International Deliveries**

When supplying products, suppliers are obligated to comply with applicable regulations in the areas of customs clearance, import, and export of goods. They must provide accurate and authentic information to the authorities responsible for customs clearance. Suppliers are also required to comply with all sanctions imposed by the competent authorities.

Product and Service Safety and Suitability

The supplied products and services must meet the agreed specifications, be assessed and certified by the competent authorities, and comply with all relevant permits, certifications,

VALID, version 1

approvals, applicable standards, and other regulations. Suppliers commit to providing T-2 d. o. o. with safe products. Upon request by T-2 d. o. o., the supplier is obliged to submit test results confirming the absence of hazardous substances in the products and compliance with all relevant regulations. T-2 d. o. o. expects suppliers to keep up-to-date with legislative and standard changes and adjust their production processes accordingly to maintain the highest safety standards. The supplier guarantees that products supplied to T-2 d. o. o. do not contain metals derived from minerals originating in conflict-affected or high-risk areas that directly or indirectly fund armed groups or contribute to or cause human rights violations. T-2 d. o. o. requires transparency regarding any changes that could affect the characteristics of the supplied products or services. The supplier is obligated to immediately notify T-2 d. o. o. of any such changes. Without prior written consent from T-2 d. o. o., the supplier is prohibited from making any changes to the product. The use of counterfeit parts or materials in products supplied to T-2 d. o. o. is strictly prohibited. Every supplied product must be accompanied by clear and comprehensible instructions and warnings regarding its proper use and any potential risks associated with its use.

Environmental Protection

The supplier must conduct its business with environmental consideration at every step. It is expected that, in the course of its activities, the supplier will promote sustainable development, introduce environmentally friendly practices and innovations, and strive to reduce the negative impact of its operations on the environment. Among other things, the supplier is committed to establishing and developing a responsible environmental policy by safely sourcing, labelling, transporting, recycling, and storing hazardous substances, carefully planning and using natural resources in an economical way, reducing fuel consumption, waste, and emissions to a minimum, making use of digitalisation for internal operations and paperless communication with customers, using sustainable mobility solutions, adopting other environmentally friendly technologies, and improving energy efficiency. The supplier is obliged to obtain all permits, licences, registrations, and approvals related to environmental protection that are required for the lawful conduct of its activities. It must also comply with the operational requirements and reporting obligations associated with these regulations. The supplier is required to record information related to waste management and provide such information to T-2 d. o. o. upon request.

Training and Development

T-2 d. o. o. requires the supplier to continuously train and further educate its employees and other individuals performing work on its behalf to ensure that its staff possesses the best possible knowledge and skills needed to perform their work for the supplier. T-2 d. o. o. expects the supplier to strive for continuous improvements and innovations in its operations and to align its practices with the best business standards.

Provision of Information on Sustainability Reporting

The supplier, who is obligated to report in accordance with Directive (EU) 2022/2464 of the European Parliament and Council of 14 December 2022 (CSRD), must conduct its business in compliance with the European sustainability reporting standards (ESRS), which are derived from the European Commission's delegated regulation (EU) 2023/2772 of 31 July 2023 and any other relevant acts related to sustainability reporting. The supplier is also obligated to provide T-2 d. o. o., upon its request and within the timeframe specified by T-2 d. o. o., with the information needed for T-2 d. o. o. to prepare sustainability reports in accordance with these regulations. This information concerns the company's significant impacts, risks, and opportunities related to sustainability requirements concerning environmental, governance, social factors, and human rights. The sustainability reporting information provided to T-2 d. o. o. by the supplier must be understandable, relevant, verifiable, comparable, and accurate.

Business Ethics

Ethical conduct, integrity, and honesty are among the key values that T-2 d. o. o. pursues in its relationships with suppliers. These same values must be upheld by the suppliers themselves.

Prevention of Corruption and Gift Restrictions

T-2 d. o. o. condemns all forms of corruption, including bribery and extortion. Each supplier is therefore obligated to ensure that its employees or other individuals performing work on behalf of the supplier do not request or accept gifts or benefits for their work or position in the company, either for themselves or for their family members, close relatives, friends, or individuals from the public or private sector, in a way that could create the appearance of influencing the impartiality of the employee or individual performing the work in the execution of specific tasks. In relation to the acceptance and giving of gifts, suppliers are required to act with the utmost care and in a manner that does not create the impression that the gifts are intended to influence objective and impartial business dealings with T-2 d. o. o. or other business entities. Gifts may be given, offered, or accepted when they are appropriate and there is no risk of creating the impression of undue influence on the recipient's decision-making. Gifts must be symbolic or of modest value. A supplier must not accept or offer gifts in the form of money, securities, vouchers, cards, or precious metals, regardless of their value. If a supplier encounters an intention to offer or accept inappropriate gifts, hospitality, or other benefits that could create the impression of improper influence on business decisions, they must report this to T-2 d. o. o. or submit a violation report via the secure whistleblowing line at <https://www.t-2.net/varna-linija-za-prijavo-krsitev>. The supplier is obliged to take all necessary and appropriate measures to prevent bribery and corruption, both within the supplier's company and throughout its supply chain.

Prohibition of Restricting Competition

We expect every supplier to adhere to the principle of fair competition. It is prohibited to engage in practices that deliberately reduce or restrict competition in the market. Each supplier commits not to enter into agreements with competitors regarding price-fixing or any other form of limiting production, marketing, or sale of specific products or services. Furthermore, each supplier is obliged to adopt preventive measures to ensure fair competition.

Prohibition of Money Laundering and Terrorism Financing

Suppliers are committed to avoiding any activities related to money laundering and terrorism financing. This applies both to the internal operations of each supplier and to business relationships within the supplier's supply chain.

Prevention of Conflicts of Interest

Preventing conflicts of interest between suppliers and T-2 d. o. o. is essential. The supplier is obliged to transparently and promptly communicate any interests that could affect its business relationship with T-2 d. o. o. The supplier commits not to engage in activities that could directly or indirectly compete with the interests of T-2 d. o. o., unless explicitly permitted by written consent from T-2 d. o. o. The supplier shall avoid any actions or decisions that could jeopardise the interests of T-2 d. o. o. Business decisions will be made independently and objectively, free from bias or self-interest that could affect the quality of services or deliveries. The supplier commits to establishing effective internal controls and processes to identify and prevent potential conflicts of interest. If the supplier identifies such a conflict of interest, they are obligated to notify T-2 d. o. o. and cooperate in the resolution process to eliminate the conflict.

Transparency in Business Operations

Each supplier commits to transparency in all business transactions. Records from which information about business operations, transactions, and financial ownership structure is derived must be clear and reliable. Falsifying records or misrepresenting practices or conditions in the supply chain is prohibited. Financial statements must be prepared in accordance with generally accepted accounting standards.

Protection of Personal Data, Trade Secrets and Intellectual Property

In addition to complying with regulations related to the processing of personal data (General Data Protection Regulation – GDPR, Personal Data Protection Act – ZVOP 2, etc.), the supplier

VALID, version 1

is obliged to maintain the confidentiality of all confidential information and trade secrets acquired during the business relationship with T-2 d. o. o. To this end, the supplier is required to establish and maintain effective security practices to protect data. The supplier also commits to respecting the intellectual property rights of T-2 d. o. o., avoiding the copying, distribution, or use of intellectual property without proper legal basis or permission, as well as the use of T-2 d. o. o. trademarks or other business identifiers without explicit permission, and not to create confusion regarding the origin of products or services of T-2 d. o. o.

Information Security and Business Continuity Planning

Each supplier is required to have appropriate physical, security, technical, and organisational measures in place to ensure information security. Through these measures, the supplier ensures the protection of the integrity and confidentiality of information stored in its systems. The supplier is also obligated to educate and train its employees and individuals working on its behalf to deal with risks and security threats, to ensure the security of web applications, networks, data, and processes, to implement a password management policy that ensures employees create strong passwords and protect them, and to have a data and process recovery policy in place to restore operations in case of loss, all aimed at ensuring business continuity.

Monitoring Compliance with the Supplier Code of Conduct

T-2 d. o. o. monitors compliance with the provisions of this code through a questionnaire completed by the supplier. The questionnaire is an integral part of this code, attached as an appendix. Each supplier commits to establishing appropriate procedures for regularly identifying, assessing, and managing risks in all areas outlined in this code. In the event of any discrepancies between the supplier's operations and this code, the supplier is required to promptly inform T-2 d. o. o. via the secure reporting line at <https://www.t-2.net/varna-linija-za-prijavo-krsitev>.

T-2 d. o. o. reserves the right to conduct monitoring to ensure compliance with the commitments in this code by the supplier. To this end, T-2 d. o. o. may request that the supplier complete the questionnaire again, provide relevant certificates, supplier statements, third-party statements, and may carry out monitoring at the supplier's premises. The supplier is obliged to allow T-2 d. o. o. to conduct the monitoring to the extent necessary for its execution. If violations are found with a potential supplier, T-2 d. o. o. will not enter into a business relationship with such a supplier. In the event of a violation of this code by a supplier already in business with T-2 d. o. o., the supplier is required to promptly rectify all deficiencies identified during the monitoring process. The supplier must provide T-2 d. o. o. with documents outlining the corrective actions taken. If the supplier fails to rectify the identified

VALID, version 1

irregularities, T-2 d. o. o. reserves the right to terminate the business relationship with the supplier immediately due to fundamental breaches of the code. In the event of contract termination due to violations of this code by the supplier, T-2 d. o. o. may demand reimbursement of all costs incurred due to the contract cancellation, along with payment of any potential compensation.

Final Provisions

This Code of Conduct shall come into effect on the date it is signed by the President of the Management Board of T-2.

The Management Board will review the appropriateness of the Code and, if necessary, update it as part of the annual self-assessment of T-2's operations.

The Code will be publicly available on T-2's website.

Ljubljana, 11 November 2024

Robert Erzin,
President of the Management Board

Appendix:

- Supplier Questionnaire

Compliance with Applicable Regulations

1.) Are any legal proceedings initiated against your company due to serious breaches of legislation?

YES NO

2.) Are any other proceedings initiated against your company that could potentially damage the reputation of T-2 d.o.o. in the event of a business relationship?

YES NO

Employment and Work

1.) Have any sanctions been imposed on your company in the last two years for violations of applicable labour law regulations?

YES NO

If the answer is yes, please provide details of the nature of the violation and the sanctions imposed:

Nature of violation: _____

Sanctions imposed: _____

2.) Do you comply with and act in accordance with all national and international regulations governing human rights, the prohibition of discrimination, harassment, and child or forced labour?

YES NO

3.) Does your company have procedures in place for conducting workplace risk assessments?

YES NO

If the answer is yes, please specify how often the risk assessments are reviewed and updated:

4.) Do you have a business policy in place that protects individuals working for you from verbal, physical, or sexual harassment?

YES NO

VALID, version 1

5.) Do you meet all other employment-related obligations arising from applicable regulations and employment contracts in a timely manner?

YES NO

6.) Do you meet all other obligations arising from contracts with individuals working for you under other arrangements?

YES NO

7.) Do you ensure that all your work processes, equipment, and practices comply with applicable laws and regulations governing occupational health and safety?

YES NO

8.) Do you inform and train individuals working for you on occupational health and safety matters?

YES NO

9.) Do you have procedures in place for reporting suspicions of regulatory violations identified in the business environment?

YES NO

Quality and Compliance

1.) Do you comply with and act in accordance with all national and international regulations governing customs procedures and the import and export of goods?

YES NO

2.) Are your products or services certified by the relevant authorities (where required) and compliant with the applicable permits, approvals, certificates, standards, and regulations?

YES NO

3.) Do you have a strategy and policy in place for sustainable development management?

YES NO WILL BE ESTABLISHED SOON

4.) Do you use green energy sources?

YES NO

If yes, please provide the percentage of use:

VALID, version 1

5.) Do you provide ongoing training and additional education for individuals working for you on all areas necessary for them to perform their duties in compliance with regulations and to a high standard?
YES NO

6.) Do you report in accordance with European sustainability reporting standards (ESG)?
YES NO

7.) Do you monitor and report on carbon emissions and other greenhouse gases?
YES NO

8.) Have you set targets for reducing your carbon footprint?
YES NO

If yes, how do you plan to achieve these targets and by which year?

Business Ethics

1.) Do you have an adopted code of ethics?
YES NO

2.) Do you implement a business policy that complies with regulations regarding the prevention of corruption, bribery, and extortion?
YES NO

3.) Do you implement a business policy that complies with regulations concerning the prohibition of competition restrictions?
YES NO

4.) Do you implement a business policy that complies with regulations regarding money laundering and the financing of terrorism?
YES NO

5.) Do you have effective internal controls and processes in place to identify and prevent any conflicts of interest?
YES NO

VALID, version 1

6.) Will your company process personal data for which T-2 d.o.o. is the data controller?

YES NO

If the answer to the previous question is yes, do you comply with and act in accordance with the applicable regulations on personal data protection?

YES NO

7.) Do you implement a business policy related to the protection of the company's trade secrets?

YES NO

8.) Do you have physical, security, technical, and organizational measures in place to ensure information security, all with the aim of protecting the integrity and confidentiality of the information stored in your systems?

YES NO

With my signature, I expressly declare that the answers given are true.

Date: _____

Supplier name: _____

Name, surname, title, and signature of the responsible person of the supplier:
