

# CODE OF CONDUCT FOR POŠTA SLOVENIJE GROUP SUPPLIERS

### 1. COMPLIANCE

Pošta Slovenije d.o.o. and all its subsidiaries: EPPS, IPPS, PS Logistika, Moj paket and all companies in the Intereuropa Group (hereinafter: the Company) strive to adhere to the highest ethical and business standards in compliance with the regulations, and to the applicable legislation on human rights and on the environmental, social and governance aspects of business.

The Code of Conduct for Pošta Slovenije Group Suppliers (hereinafter: the Code) defines the basic principles and standards for goods suppliers, service providers and other business partners (hereinafter: suppliers) of the Company in accordance with the Company's general acts.

A supplier shall act in accordance with the applicable national and international regulations in its operations. It shall undertake to adhere to the highest standards of ethical and business conduct, thereby adhering to the provisions of this Code. Relative to the scope and field of its business operations, a supplier undertakes to maintain an adequate business compliance monitoring system.

A supplier shall ensure that its suppliers and subcontractors also adhere to the same standards as set out in the previous paragraph (responsibility for the entire supply chain).

Adherence to the provisions of this Code is key to maintaining successful business relationships between the Company and its suppliers. The Company reserves the right to check that a supplier's conduct complies with the Code. If the Company finds that a supplier has breached the Code, it may, regardless of any other contractual provisions between them, withdraw from contractual cooperation without a period of notice.

### 2. RESPECT FOR FUNDAMENTAL HUMAN RIGHTS

## **Human rights**

A supplier shall undertake to safeguard the fundamental and internationally recognised human rights of its employees and to adhere to the applicable labour law. It shall, in particular:

 provide its employees with a working environment free of any form of discrimination or harassment on grounds of race, skin colour, religion, gender, age, social status, family origin, physical or mental disability, sexual orientation, nationality, political conviction or any other characteristic;

- comply with the prohibition on child labour or forced labour. A supplier undertakes not to employ individuals who are under the age of 15 (or 14 if that is the age stipulated in the law of the country in which the work is being performed);
- provide its employees with decent pay in compliance with statutory provisions on the minimum wage, and social benefits in accordance with the applicable legislation, which also includes settling liabilities due to its subcontractors by the statutory or contractual deadlines;
- respect individuals' personal dignity, privacy and other rights;
- respect statutory provisions on the calculation and payment of employees' social security contributions and the relevant tax liabilities;
- adhere to limits on working hours that apply in the country in question, including limits on overtime:
- respect the right of employees to freedom of association and freedom to engage in collective bargaining.

## Occupational health and safety

A supplier must make occupational health and safety its highest priority. It shall be responsible for the occupational health and safety of its employees and shall, to this end, set up adequate organisational processes by which it meets statutory occupational health and safety requirements. A supplier shall identify and assess safety risks and take all necessary measures to prevent them. It shall inform employees of any possible risks to their safety, provide them with the appropriate education and training, and promote workplace health.

#### 3. ENVIRONMENT

### Climate change, pollution, water resources, circular economy

A supplier must act in accordance with the applicable legislation and international standards in the area of environmental protection. It shall do so by taking measures to adapt to and mitigate the effects of climate change (increasing energy efficiency and using renewable energy sources), reducing pollution, using water resources efficiently, engaging in the circular economy and ensuring that it continuously introduces measures that help to improve environmental management systems. Production processes must be designed so that they prevent negative impacts on the environment and conserve natural resources to the greatest possible extent.

#### 4. GOVERNANCE

#### Compliance with competition law

A supplier shall comply with national and international protection of competition regulations that aim to prevent concerted practices on the part of companies that are designed to prevent, limit or distort competition and abuse a dominant position. A supplier shall not engage in price fixing, the division of markets, customers or supply sources, or in any way coordinate with competitors when submitting tenders. A supplier shall not enter into business relationships or ally with other companies in order to obtain a benefit if this would breach competition legislation.

## **Conflicts of interest**

A supplier shall avoid situations that would constitute a conflict of interest and could affect or create the impression of affecting the impartial and objective assessment of business decisions. If such situations arise, the supplier shall take steps to eliminate them.

## **Corruption**

A supplier shall comply with the applicable anti-corruption legislation, reject any form of bribery or corruption designed to influence the business decisions of another party, and adhere to the highest standards of corporate integrity.

## Money laundering and terrorist financing

A supplier shall comply with the applicable legislation on the prevention of money laundering and terrorist financing, put in place internal controls, and take appropriate measures to prevent money laundering and terrorist financing.

### **Compliance with tax regulations**

A supplier shall comply with all national and international tax regulations in force at any time.

## Personal data protection and information security

A supplier shall comply with all applicable laws and regulations on personal data protection and information security. A supplier shall act as diligently as possible when processing or collecting personal data or using it in any other way, and take comprehensive steps to ensure that data and information systems are protected against unauthorised access, use, disclosure, alteration or destruction.

## Trade secrecy and intellectual property

A supplier shall safeguard the confidentiality of all trade secrets, and handle confidential information and data in line with the necessary and permitted scope of use and in a way that prevents unauthorised disclosure. A supplier shall comply with all national and international laws and regulations applicable at any time in relation to copyrights and respect for others' intellectual property.

## Reporting of infringements and the prohibition of retaliatory measures

A supplier shall ensure that it has in place a range of whistleblowing channels, in accordance with the legislation, through which employees and other stakeholders can express their concerns and reservations regarding unethical or unlawful conduct. It shall deal with any complaints carefully and in confidence, and respond with appropriate measures. If a supplier does not have its own whistleblowing channel or if it prefers to lodge a complaint about the Company's conduct via the Company's own communication channel, it may use the online channel available at: <a href="InterWB">InterWB</a> (intereuropa.si)

If a breach of this Code is reported, and generally, a supplier shall ensure that it does not engage in any unlawful or inappropriate retaliatory measures.

This Code of Conduct is published on the Company's intranet and internet website and shall apply from 1 January 2024.