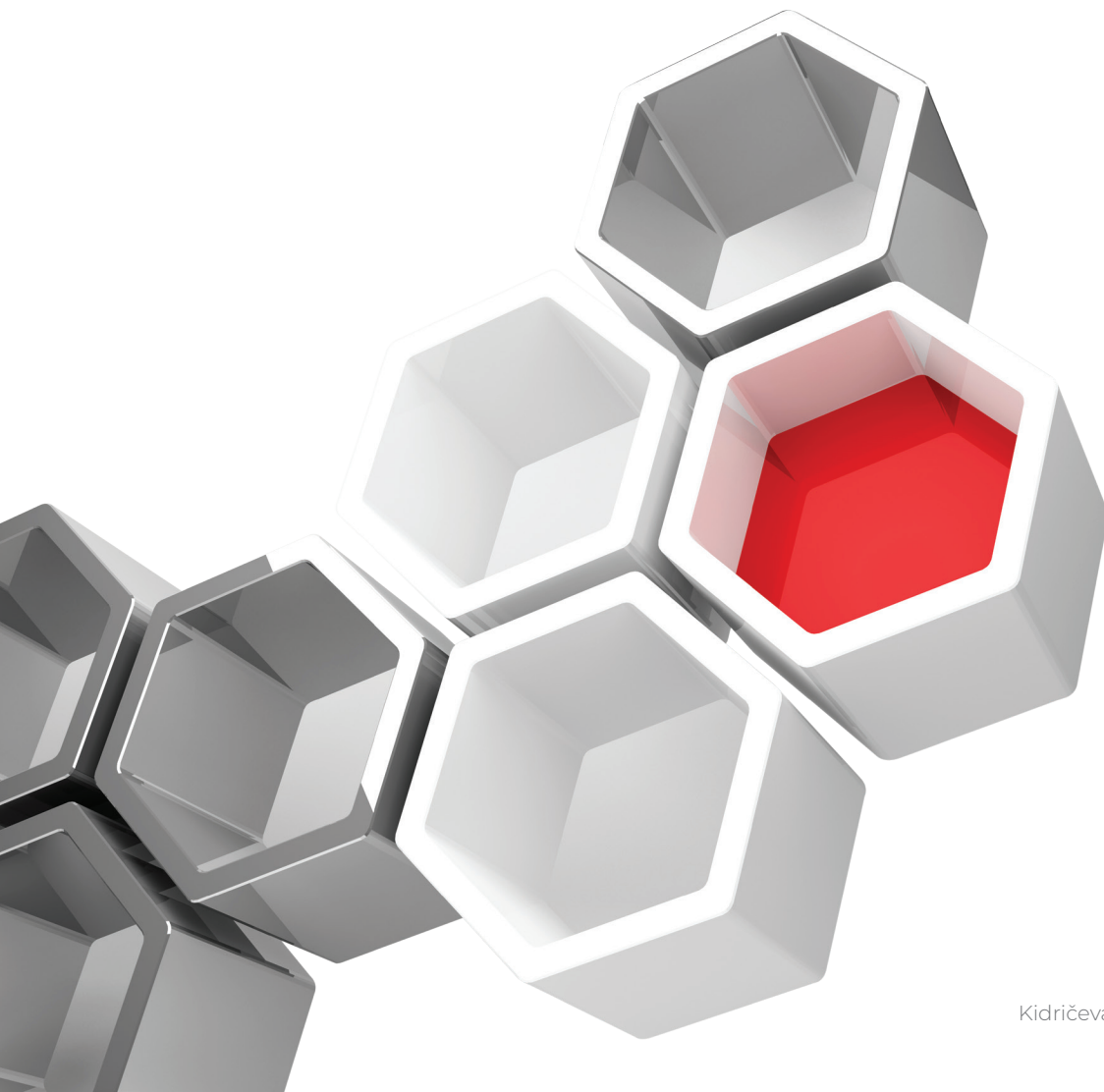


CODE OF SUSTAINABLE CONDUCT FOR BUSINESS PARTNERS OF Cinkarna Celje, d. d.





■ INTRODUCTION

Cinkarna Celje, d. d. (hereinafter referred to as Cinkarna Celje or the Company) is a modern chemical company, which, with its 150-year tradition of uninterrupted operations, is one of the most resilient Slovenian companies. Employing approximately 750 people and generating an annual turnover of around EUR 200 million - over 90% of which comes from foreign markets - it stands as the leading chemical processor in Slovenia. Cinkarna Celje's resolute focus is to ambitiously lead the transformation of the European chemical industry towards a green and digital transition with its further sustainable transformation.

Strategic objectives in the fields of environment, society and governance have been set for 2030. For the Company, achieving these strategic objectives is just as important as delivering business results. The Company actively promotes sustainable and ethical practices not only within its own operations but also throughout its entire value chain, benefiting both people and the planet.

Cinkarna Celje is dedicated to upholding the ten principles of the United Nations Global Compact for Responsible Corporate Governance in the areas of human rights, labour standards, environment/climate and anti-corruption.

We extend these expectations to our business partners as well. This Code of Sustainable Conduct for Business Partners of Cinkarna Celje, d.d. (hereinafter referred to as the »Code«) outlines our expectations and requirements for our business partners and their value chains, particularly in relation to Cinkarna Celje's significant indirect business relationships.

■ COMPLIANCE WITH APPLICABLE REGULATIONS AND THE CODE

We expect our business partners to comply with all applicable regulations in effect across EU countries and to put in place systems, controls and rules to promote compliance with applicable regulations and this Code. This includes training and monitoring mechanisms. Business Partners are accountable for verifying compliance with the Code and meeting the requirements set out in the Code, both within their own organisation and throughout their value chain.

To monitor and assess adherence to the principles outlined in this Code, Cinkarna Celje employs checklists and self-assessment questionnaires. In cases of detected non-compliance, business partners are required to take corrective actions. Should a business partner fail to resolve the non-compliance promptly, Cinkarna Celje reserves the right, at its sole discretion and without additional obligation, to suspend purchases, refuse or return goods, decline services, or terminate the contract.



■ HEALTH AND SAFETY AT WORK

Cinkarna Celje is dedicated to safeguarding the health and safety of its employees, contractors, and the communities in which it operates. Similarly, Cinkarna Celje expects all business partners to provide a safe and healthy working environment for their employees, in full compliance with applicable regulations in force within EU countries.

We expect our business partners to:

- comply with health and safety regulations in force within EU countries and obtain and adhere to all necessary permits, licenses, and registrations;
- follow regulations concerning working hours, rest periods, wages, and other employee benefits;
- protect employees from hazards, including chemical, biological, electrical, and physical risks;
- take appropriate measures to provide adequate workplace conditions, such as proper lighting, temperature control, ventilation, access to drinking water, and personal protective equipment.
- ensure employees are aware of workplace hazards and are sufficiently trained and equipped to prevent accidents and injuries;
- maintain safety in the transport and handling of raw materials and goods, provide safety data sheets and appropriate labelling for all hazardous substances;
- adhere to the safety requirements of Cinkarna Celje when working on or visiting its premises, including undergoing the necessary safety training;
- ensure that products and services meet high standards of quality and safety.

All business partners are required to pre-notify their subcontractors or co-operators in order to enter the protected area. In the event of any breaches of order within the protected area or failure to meet health and safety standards, Cinkarna Celje reserves the right to deny entry to partners, collaborators, or subcontractors.

■ RESPECT FOR HUMAN RIGHTS

At Cinkarna Celje, we treat our employees and all our business partners with dignity and respect. We aim to create an environment where employees can freely express their creativity and innovation. We are committed to continuous education and training for our employees, introducing innovative approaches to empower them. We maintain a zero-tolerance policy for unethical business practices, such as child labour, slavery, or human trafficking, in all our operations and facilities, and we expect the same from all our business partners. Practices such as confiscating passports, wages, or personal property, as well as forced overtime, are unacceptable. Cinkarna Celje is dedicated to eliminating inequality, racism, and all forms of discrimination.

We expect our business partners to:

- respect the personal dignity of each individual and avoid any form of discrimination, harassment, intimidation, oppression, or exploitation;
- protect human rights wherever they operate;
- never use child labour, forced labour, or any form of punishment, harassment, abuse, or involuntary servitude;
- respect the privacy of personal data to which they have access, process such data only for legitimate business purposes, and in a lawful, transparent, and secure manner;
- uphold the freedom of association of employees in accordance with applicable laws and recognise collective bargaining rights as a means of resolving issues;
- emphasise human resource management by providing training for employees, ensure they are well-informed, have appropriate working conditions, receive fair pay, and are engaged in responsible employment practices.

■ ETHICAL CONDUCT

Cinkarna Celje is committed to ethical behaviour in all aspects of its business activities. All employees are expected to act ethically and professionally in accordance with Cinkarna Celje's Code of Ethical Conduct and Work, the Company's values, as well as the applicable regulations and internal policies of the Company.

We expect our business partners to:

- act with integrity and transparency and in compliance with all anti-corruption rules;
- conduct its operations in accordance with the principles of fair competition and all competition rules;
- comply with applicable money laundering regulations;
- respect intellectual property rights;
- safeguard confidential information and adequately protect it against unauthorised access, use, disclosure, alteration or destruction;
- put in place processes to address confidentiality and protect employees who raise concerns in good faith, make a report or assist in any investigation relating to potential ethical or criminal breaches,
- show zero tolerance to any form of bribery and compliance with Cinkarna Celje's gift policy, which prohibits the giving of gifts beyond the usual small value occasional gifts. We expect business partners never to send invitations or offer hospitality that goes beyond normal business practices, never to send invitations that include travel, accommodation or entertainment-only events. If gifts are given, they must nevertheless be in accordance with normal business practices, have a clear business purpose, cannot be construed as a bribe, are not offered with the intent to improperly influence the business relationship, and are in compliance with applicable laws and ethical standards.



■ ENVIRONMENT

As a company committed to environmental stewardship, Cinkarna Celje systematically and integratively manages the environmental impacts of its operations and the entire value chain. The company transparently communicates its efforts to all stakeholder groups. This ambitious approach positions Cinkarna Celje as a key driver of the EU's green, low-carbon, and competitive economy, contributing significant value to broader societal well-being.

We expect our business partners to:

- reduce their environmental footprint, with a focus on decarbonisation;
- efficiently use natural resources, prioritising reduced consumption and the adoption of Best Available Techniques (BAT);
- utilise renewable resources by prioritising renewable energy and materials in the supply chain wherever possible;
- reduce waste and promote the reuse of materials by actively working to minimise waste, encourage recycling, and reuse resources;
- systematically identify and address potential environmental hazards by implementing procedures to regularly assess and manage environmental risks;
- comply with all applicable environmental regulations in force in EU countries, ensuring operations align with legal requirements and strive to exceed baseline standards;
- maintain an environmental protection system, implement an environmental management system, obtain necessary environmental permits, and regularly report on environmental impacts and actions.

■ COMPLIANCE OF MATERIAL AND GOODS

The purpose of compliance of materials and goods is to ensure the safe handling of materials and goods. A commodity compliance standard is a legal requirement (e.g. REACH).

We expect our business partners to:

- ensure updates are in line with current regulations, the latest guidelines, and standards to prevent the use of products and raw materials of unknown origin or composition;
- avoid the use of so-called conflict minerals (tin, tantalum, tungsten, coltan, niobium, gold).
- refrain from purchasing materials or goods from illegal sources.



■ FINAL PROVISIONS

By signing this Code, the business partner acknowledges that they have received, read, and understood its contents. The business partner further agrees to comply with this Code and to ensure that their employees and/or subcontractors also adhere to its provisions. The business partner also confirms their willingness to verify compliance with the Code through checklists and self-assessment questionnaires. Cinkarna Celje reserves the right to assess the compliance of business partners with this Code using both internal and external evaluation mechanisms.

I hereby confirm that I have the authority to sign on behalf of the undersigned business partner.

Business partner: _____

Signature: _____

Name and surname of the person responsible: _____

Date and place of signature: _____