



telemach

Code of Conduct for Telemach group suppliers

Velja od 1. 1. 2022

I. INTRODUCTION

At Telemach d.o.o. and all its affiliated companies (hereinafter referred to as: the Company), we believe that achieving socially responsible objectives is a value that is achieved, among other ways, by implementing the highest ethical and business standards within the Company as well as in business relationships with external stakeholders.

On that basis, the Company is hereby adopting the Code of Conduct for Telemach d.o.o. group suppliers, which include suppliers, service providers as well as other business partners (hereby referred to as: the Suppliers).

By entering into a business relationship with the Company, you play an important role in our operation and you are expected to follow national and international legislation and ethical operation. In order to achieve those objectives, you will establish and maintain your own system of compliance management. The compliance management system has to include the entire supply chain. In case the obligations referred to in the Code of Conduct are stricter than in the national or international legislation, you are expected to fully respect the obligations, laid down in this Code. In the event of a derogation between the provisions of the contract and this Code, the Code rules apply.

The Code is published and accessible on the Company website.

II. EMPLOYMENT AND WORK

The Supplier is obliged to protect the human rights of their employees, their privacy and integrity and implement legal and efficient mechanisms for safety and health at work. The Supplier is bound by national and international labour legislation.

The Supplier encourages an inclusive working environment on the basis of the diversity of employees and treats all the employees equally, regardless of their personal circumstances. The working environment has to ensure protection from discrimination, harassment and mobbing. The Supplier does not introduce or implement any form of forced or volunteer work. All the relationships with employees are based on free and agreed upon contractual obligations. The Supplier does not punish or implement any psychological or physical force on the employees, all discipline procedures are laid down clearly in advance and the employees have been informed about them.

The Supplier's working time must not exceed the limitations laid down in the legislation applicable to the Supplier, or the limitations laid down by the International Labour Organisation standards.

The Supplier meets all the relevant international and national standards and all other binding rules regarding employee salaries and compensations. The salaries are paid in due time and in a competitive amount, and the principle of equal pay for equal work is supported.

The Supplier respects the rights of the employees to free association, membership in trade unions, employee representative bodies, and participates in negotiations about the collective agreement in good faith.

The employees' choice of participation in free association and collective discussions is free, wherein they must not be exposed to any threats, intimidation, retaliation or any other acts which would limit those rights.

The Supplier does not employ any children, younger than the statutory age limit for employment in their country. In case the lowest statutory age in a certain territory is not defined, the age of 15 applies. The Supplier is obliged to ensure all the employees below the age of 18 work in accordance with legal requirements and taking into account any requirements regarding their education or training.

You are expected to share our efforts for fair and proper relationships with the employees.

III. HEALTH AND SAFETY AT WORK

The Supplier strives for respecting the standards of health and safety at work at a high level, by applying a suitable approach to managing health and safety. Appropriate oversight, safe working procedures, appropriate maintenance and the required technical protective measures aimed at mitigating health and safety risks and avoiding accidents and occupational diseases have to be ensured. A system for reporting incidents and a system for implementing corrective measures have to be established; employees have to be regularly informed and trained about the health and safety risks. The Supplier requires all the employees to respect the regulations in the field of health and safety at work. During extraordinary health and safety risks, the Supplier undertakes to follow the instructions of competent bodies and ensure that the employees can perform their work safely.

IV. BUSINESS ETHICS

Business activities are carried out in accordance with good business practices and strive to implement the highest ethical standards. The Supplier explicitly renounces, without limitation, any acts of corruption, money laundering, unlawful restriction of competition, encouraging terrorism, and pursues the objectives of comprehensive personal data and intellectual property protection, respecting the confidentiality of business secrets, payment discipline in relation to business partners and competent authorities in the field of paying tax liabilities. The Supplier avoids, refuses and eliminates any situations which could result in the violation of good business ethics.

V. LONG-TERM SUSTAINABLE BUSINESS PRACTICE

You are expected to make reasonable decisions which take into account the best practice and your industry standards aimed at reducing the negative impacts on the environment. The Supplier undertakes to act in accordance with applicable legislation and international environment protection standards. For that purpose, the Supplier continuously strives to reduce their carbon footprint and other emissions that are

harmful for the environment. In addition, the Supplier undertakes to introduce improvements in their system of operation and strive for using renewable energy sources in order to contribute to preventing negative impacts on the environment and preserving nature and natural sources. The Supplier has to avoid or mitigate accidental spillages or emissions of hazardous substances into the environment and strive for the lowest possible level of emissions and waste produced during operation.

VI. PRIVACY

You are expected to safeguard and correctly use all the information or means that we share with you and to respect all legally binding rules of information safety and personal data protection. You are expected to safeguard and respect the privacy of your employees, customers and business partners and handle that information with due diligence. You have to ensure that only the duly qualified persons have access to the data concerned and that you do not share said data with others, save in cases that are required by national or international legislation.

In case we have shared personal or business information with you and said information has been lost, disposed of, used inappropriately or shared with others, you undertake to inform the contract custodian about this without delay, even in case there is only suspicion.

VII. VIOLATION OF SUPPLIER'S COMMITMENTS

The Supplier undertakes to set up a mechanism for the regular detection, assessment and management of risks regarding the present Code. The Supplier allows the Telemach d.o.o. group to carry out a revision of that field at the Supplier, subject to prior notification.

Respecting the provisions of this Code is crucial for the business relationship between the Company and the Supplier and an essential component of their business relationship. In case the Company determines that the Supplier has violated the Code, the Company may, irrespective of all other contractual provisions between the parties, withdraw from business cooperation without notice.

Ljubljana, 19. 1. 2021

Adrian Ježina
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