

# Code of Conduct of the company **KO-LOVEC d.o.o.**

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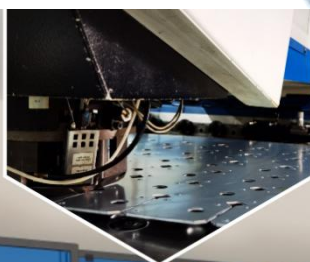
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# 1 Governance

## 1.1 Management commitment

We adhere to the highest standards of integrity and operate fairly and equitably throughout the value chain in accordance with applicable laws and regulations, international standards, and specific customer requirements, such as the GKN Automotive Supplier Code of Conduct.

From top management down, we are committed to ensuring the principles of economic, social, and environmental responsibility and sustainability at all levels. In particular, we are committed to responsibility, transparency, ethical conduct, respect for stakeholder interests, respect for the rule of law, respect for international standards of conduct, and respect for and demand for respect for human rights.

## 1.2 Certification

KO-Lovec is certified in accordance with the scope defined in the management manual, based on internationally recognized standards, including:

- ISO 9001 ("Quality Management Systems - Requirements"),
- ISO 14001 ("Environmental management systems - Requirements with guidance for use")

## 1.3 Business ethics

### 1.3.1 No corruption, extortion, bribery, or money laundering

Employees must not engage in or support corrupt practices in any form, including offering or accepting bribes, excessive gifts or hospitality, or facilitation payments. Employees must not facilitate or support money laundering and must report any suspicious transactions and be alert to signs of money laundering.

#### **Zero tolerance policy**

We have zero tolerance for all forms of bribery, corruption, extortion, and embezzlement. We comply with anti-corruption laws applicable to our business activities and the countries in which we operate.

#### **Dealing with customers**

Employees may not offer, promise, give, or accept unfair advantages in connection with business activities (money, gifts, or other services). Employees in the sales department or management have the right to grant benefits to maintain customer relationships. If invitations are sent to business partners, the management of the invited persons must also be notified in advance to the greatest extent possible.

Financial contributions to government officials, representatives of public institutions, employees or representatives of companies that are majority-owned by the state, province, municipality or political party, or to political parties and their representatives are strictly prohibited.

#### **Dealing with our suppliers**

Employees must not use their position or influence at KO-Lovec to seek, obtain, accept, or consent to personal benefits.

We require our suppliers and partners to adhere to minimum ethical standards in their business practices. We therefore publish guidelines that we expect our partners to follow and communicate them throughout the supply chain.

#### **Gift acceptance**

Gifts, invitations, and other benefits that exceed symbolic value or industry standards should be politely but firmly declined. Invitations from suppliers or customers to KO-Lovec employees must not exceed industry standards in terms of equivalent value. Gifts that are nevertheless received are collected and raffled off among all employees at the relevant location during special events.

### **1.3.2 Data protection and data security**

Employees respect privacy and civil liberties in the collection, storage, use, or dissemination, as well as in any other processing of personal data.

#### **Protection of personal data**

The protection of the personal data of our employees, customers, and suppliers, as well as compliance with national and international data protection regulations, are a matter of course for us.

We continuously update our security standards and measures to protect personal data from access and illegal use by unauthorized persons. Our business partners are also required to handle data carefully and in accordance with the law.

#### **Data security and trade secrets**

Successful business operations require that all important information reaches only the intended group of recipients. On the other hand, the unsystematic dissemination of information can cause unwanted disruptions.

All employees are therefore asked to carefully consider who should be provided with what information so that necessary decisions can be made quickly and on the basis of reliable information.

When sharing information, care must be taken to comply with relevant security standards, particularly with regard to cybersecurity. Every employee must be aware of the level of confidentiality when sharing information.

Trade secrets and other sensitive information must be treated confidentially and protected from disclosure to unauthorized persons. Employees who have access to trade secrets and confidential information may only use them for the business purposes of KO-Lovec and may not disclose them to third parties (including family members and friends), unless an appropriate contractual confidentiality agreement has been concluded in connection with the business purpose of KO-Lovec.

### **1.3.3 Financial responsibility / accurate records**

KO-Lovec conducts its business in a transparent manner and accurately reflects this in its financial reports and records. An appropriate financial reporting system control has been established.

All relevant facts relating to business and financial activities and transactions must be documented accurately, systematically, reproducibly, and in accordance with applicable laws, local accounting principles, tax requirements, and accounting standards. Statutory retention periods and internal guidelines for documentation must be observed. The relevant guidelines are available in our management system.

### **1.3.4 Disclosure of financial and non-financial information**

Financial and non-financial information is disclosed in accordance with applicable regulations and prevailing industry standards.

When disclosing sustainability information, KO-Lovec strives to follow the GKN Group's strategy.

### **1.3.5 Avoiding conflicts of interest**

Employees avoid situations in which their financial or other interests conflict with their work responsibilities, or situations that give the appearance of impropriety, and disclose them.

Decisions are made based on sound business judgment, unclouded by self-interest based on personal relationships and opinions.

#### **Private activity**

Every employee must immediately inform their manager or the person responsible for human resources of their intention to accept a position in another company, take on paid additional employment, or become actively involved in entrepreneurial activities.

This applies not only to taking on functions in a company or for a company with which KO-Lovec

has or could have a business relationship or competition, but also to capital and business interests in such a company.

Conflicts of interest between an employee's official duties and their personal interests must be avoided. This applies in particular to the processing of contracts and public procurement. Conflicts of interest must always be disclosed. This also applies to the employee's business relationships.

Even in the private sphere, behaviour that could affect the interests of KO-Lovec must be avoided.

### **Social networks**

When using the internet privately, employees must be aware of potential conflicts that may arise. A clear distinction must be made between "KO-Lovec company" and "private" pages.

On social media, our employees must ensure that the information they disclose does not discredit KO-Lovec. If employees make political statements, they must always ensure that these statements are not associated with KO-Lovec.

Sharing photos, comments, and videos related to KO-Lovec is not always desirable. Offensive comments about KO-Lovec employees should be avoided.

Employees may respond to justified criticism of KO-Lovec, but may not remove it. Blogs and other personal websites where the author is not identified as an employee of KO-Lovec and which do not concern KO-Lovec are entirely personal and therefore not subject to this code of conduct.

### **1.3.6 Protection of intellectual property**

KO-Lovec respects applicable intellectual property rights.

Employees are responsible for preserving KO-Lovec's intellectual property, such as patents, trademarks, brand names, or knowledge and experience, and must do everything necessary to protect it. This also includes refraining from any conduct that could damage the reputation and value of KO-Lovec, particularly its trademarks.

### **1.3.7 Dealing with counterfeit parts**

KO-Lovec minimizes the risk of counterfeit and/or diverted parts and materials entering its supply chain and takes the relevant technical regulations into account in its product design process.

In the event of plagiarism being discovered, the affected parts or materials must be quarantined and the original manufacturer, customer, and/or relevant authorities must be notified.

### **1.3.8 Export control, trade, and economic sanctions**

We comply with applicable restrictions on the export or re-export of goods, software, services, and technology, as well as applicable restrictions on trading with certain countries, regions, companies, or entities and individuals.

We have appropriate policies and procedures in place to ensure compliance with applicable export control and economic sanctions laws and regulations in all relevant countries.

### **1.3.9 Elimination of defects**

KO-Lovec ensures or participates in remediation through legal procedures when its business activities cause or contribute to harmful environmental or social impacts.

### **1.3.10 Protection from retaliation**

KO-Lovec avoids all forms of threats, intimidation, and physical or legal attacks on interest groups, including those exercising their legal rights to freedom of expression, association, peaceful assembly, and protest against its business activities.



## 1.4 Consideration of stakeholders

### 1.4.1 Consumer concerns

Our goal is customer satisfaction.

To achieve this goal, we strive to offer the best solutions on the market and exceed our customers' expectations, and we are committed to the principles and values of this code of conduct.

### 1.4.2 Responsible supply chain and due diligence

We expect compliance with minimum ethical requirements not only within KO-Lovec, but also from our suppliers, customers, and other contractual partners in our supply chain.

We promote transparency and traceability and do our best to implement ESG standards and minimum ethical requirements in the supply chain.

These minimum ethical requirements are set out in a specific Code of Conduct for Suppliers. Self-assessment questionnaires and supplier assessments are also used to ensure compliance with these minimum requirements.

Regular meetings held with major suppliers. Competency on supplier default communicated. Lessons learned communicated.

### 1.4.3 Involvement and development of society

Within the scope of our capabilities, we strive to contribute to the sustainable development of society, particularly in the following areas: job creation and professional training, health and well-being, wealth and income creation, gender equality, investments for the common good, and community integration.



## 2 Social

### 2.1 Compliance with legal requirements

Every employee must observe and comply with all laws and regulations applicable in their working environment.

### 2.2 Human rights and working conditions

We respect and promote the human rights of our employees, local communities, and other relevant stakeholders, and we prevent and address adverse human rights impacts associated with our business activities in accordance with the UN Guiding Principles on Business and Human Rights.

#### 2.2.1 Protection against child labor and young workers

KO-Lovec respects the minimum age for employment in accordance with the ILO Convention on the Minimum Age in its business activities and throughout its supply chain, and ensures that no form of child labor is permitted.

We are committed to prohibiting child labor and do not employ or allow the employment of workers who are under the age of 15.

Young workers under the age of 18 are only employed if the work is not dangerous and if they have reached the minimum age for employment in accordance with national legislation.

#### 2.2.2 Wages and benefits

KO-Lovec provides its employees with benefits in accordance with applicable regulations and industry collective agreements. This remuneration is adequate to cover basic needs and enables a decent standard of living for employees and their families, including compliance with the minimum wage, overtime pay, sick leave, and benefits prescribed by national legislation.

All employees receive fair, equitable, living, and comprehensible wages that comply with applicable legal regulations at the respective location and other legally binding instruments (e.g., collective agreements). The framework for this is provided, among other things, by the general wage level, the cost of living, social benefits, and the relative standard of living of other social groups.

#### 2.2.3 Working hours and employment conditions

KO-Lovec complies with local laws and collective agreements regarding working hours in accordance with national legislation.

We offer our employees flexible working time models within the scope of operational possibilities, taking into account a balanced relationship between work and private life (e.g., working from home, educational leave, transition to part-time work and back to full-time work) and are committed to appropriate working conditions in terms of pay, working hours, weekly rest, leave, overtime, health and safety, and maternity protection.

#### 2.2.4 Protection from modern slavery

KO-Lovec is committed to prohibiting all forms of forced and compulsory labor, including human trafficking.

#### 2.2.5 Ethical recruiting

KO-Lovec agrees not to mislead or deceive potential employees about the nature of the work, to require employees to pay employment fees, and/or to seize, destroy, or conceal, and/or deny access to employees' passports and other government-issued identification documents.

At the beginning of their employment, employees shall receive a written contract or notice of employment in a language they understand well, which truthfully and clearly states their rights and responsibilities.

#### 2.2.6 Freedom of association and collective bargaining

KO-Lovec enables employees to communicate openly with management about working conditions and management practices without fear of retaliation, intimidation, or harassment.

We respect the rights of employees to freely associate, join or not join unions, bargain collectively, seek representatives, and join employee councils.

Employee representatives are given sufficient time and access to facilities such as meeting rooms to carry out their duties in accordance with local law.

#### **2.2.7 Non-discrimination, protection against harassment, and interaction with each other**

KO-Lovec does not tolerate any form of discrimination or harassment in relation to employment and occupation and ensures equal employment opportunities regardless of the characteristics of the employer or applicant, such as age, gender, sexual orientation, gender identity, ethnic or national origin, disability, pregnancy, religion, political affiliation, union membership, veteran status, genetic information, or marital status.

Harassment in any form, unwanted physical contact, and intimidation are completely unacceptable and prohibited.

All employees have the right to fair, courteous, and respectful treatment. We are all obliged to respect the personal dignity of all employees and to treat them fairly, openly, appropriately, and constructively in order to ensure a trustworthy working environment.

#### **2.2.8 Problem-solving culture**

Problems should be described in a way that the author understands them well and that other employees can also understand and solve them.

Criticism should be factual and constructive, seeking not to assign blame but to identify causes that lead to solutions.

We see this as an opportunity for personal development and improvement of the entire organization.

#### **2.2.9 Equality**

KO-Lovec ensures equal employment opportunities and is committed to equal pay for equal work.

#### **2.2.10 Diversity, equity, and inclusion**

KO-Lovec develops and promotes inclusive cultures at all levels, where diversity is valued and welcomed, and everyone can contribute fully and reach their full potential.

#### **2.2.11 Land rights and forced eviction**

KO-Lovec supports the prevention of forced evictions and the seizure of land, forests, and water in the acquisition, development, or other use of land, forests, and water.

#### **2.2.12 Private or public security forces**

KO-Lovec does not hire private or public security forces to protect business projects if the use of security forces could lead to human rights violations due to inadequate training or supervision by the company.

### **2.3 Occupational health and safety**

KO-Lovec provides its employees with a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for occupational health and safety.

Occupational safety, safe production processes, and safe products are of fundamental importance to us.

All employees are expected to observe safety regulations, be aware of hazards, and exercise appropriate caution in all activities. This applies to all hazards that may arise during work or when using our products.

#### **2.3.1 Workplace and ergonomics**

KO-Lovec provides a working environment that meets or exceeds local and national legislation in the areas of safety, occupational health, and fire safety, and also encourages remote workers to understand and apply best practices.

### **2.3.2 Personal protective equipment**

Where necessary, we provide our employees with the necessary personal protective equipment (PPE) and ensure that they understand how and when to use it.

### **2.3.3 Chemical handling**

Accidents or hazards, potential hazards, and near misses must be reported immediately to the responsible manager.

All procedures for handling chemicals and other hazardous substances are carried out in accordance with applicable laws and regulations and internal instructions. All employees have the knowledge and understanding of the safe and proper handling of chemicals.

Managers are responsible for protecting their employees and must instruct, train, and supervise them appropriately. Managers are required to carry out risk assessments to identify and evaluate possible risks and potential hazards to persons, and to investigate accidents and near misses in order to permanently reduce the causes.

### **2.3.4 Machinery safety**

All applicable machinery safety laws must be observed, including appropriate safety devices and regular, documented maintenance. The employees concerned must receive appropriate training or further training to ensure that they have the knowledge and understanding necessary to operate the machinery safely and correctly. Senior management is responsible for establishing a safe organisation and monitoring it. This also includes organising health checks for employees.

### **2.3.5 Fire protection**

All local fire safety laws must be observed. Emergency exits and fire detection, alarm, and extinguishing systems are provided and must always be ready for use. Regular training, fire drills, and evacuation drills must be conducted in accordance with local laws.

### **2.3.6 Emergency Preparedness**

KO-Lovec strives to reduce occupational hazards and develops appropriate plans for emergency preparedness and response.

Health and safety information, such as emergency procedures and potential safety risks, is clearly communicated to employees and posted.

Workstations are designed and adapted based on the results of an appropriate local health and safety risk assessment to reduce physical strain.

We ensure that all locally required permits, licenses, inspection and testing reports are available in accordance with local regulations, that they are up to date and accessible.

### **2.3.7 Incident and accident management**

KO-Lovec implements hazard and risk analysis systems to reduce the possibility of incidents or accidents in the workplace. The purpose of incident and accident investigations is to determine the root cause and take corrective action to reduce the possibility of recurrence.

All relevant employees have knowledge and understanding of what protective equipment is required for a particular activity and how to use it, including its possible limitations and proper care and maintenance.

### **2.3.8 Contractors**

KO-Lovec also ensures occupational health and safety for its suppliers. We coordinate the procurement process appropriately in order to identify hazards and assess and manage risks arising from business activities with suppliers that affect the suppliers' employees.

### 3 Environment

We take our environmental responsibility very seriously.

We implement environmental protection practices, conserve natural resources, and reduce the overall environmental footprint of our products, goods, and services throughout their life cycle.

We are committed to complying with all local energy and environmental regulations and to continuously improving our efficiency. Where environmental pollution cannot be avoided, we have set ourselves the goal of continuously reducing energy consumption, all types of pollutant emissions, and the amount of waste. By systematically monitoring and reviewing our environmentally significant activities, we can identify deviations and weaknesses and initiate appropriate corrective measures.

We are striving to transition to a circular economy.

KO-Lovec is certified in accordance with the ISO 14001 standard (requirements for environmental management systems).

#### 3.1.1 Carbon neutrality, energy efficiency, and renewable energy sources

We set scientifically based and time-bound targets for reducing emissions and renewable energy sources that are in line with the Paris Agreement, and we are introducing measures that accelerate the decarbonization of the value chain.

We implement a comprehensive strategy for energy conservation and increased use of renewable energy sources. We monitor and document energy consumption and greenhouse gas emissions and strive to reduce them in a cost- and energy-efficient manner, from raw material extraction through production and transport to the end of the product life cycle.

#### 3.1.2 Water quality, consumption, and management

We reduce water consumption, reuse and recycle it efficiently through responsible wastewater treatment, and prevent potential flooding impacts from rainwater runoff, as required by and in accordance with applicable legislation.

Appropriate corrective and improvement measures are determined on the basis of the water balance.

#### 3.1.3 Air quality

We regularly monitor, appropriately control, reduce, and, as far as possible, eliminate emissions that contribute to air pollution, as required by and in accordance with applicable legislation.

#### 3.1.4 Responsible chemical management

We identify, reduce, or eliminate the use of restricted substances in production processes and end products, thereby ensuring compliance with legislation. We are aware of the use of restricted substances in processes and end products and are actively researching suitable alternatives to maintain sustainable product and environmental management.

#### 3.1.5 Circular economy, sustainable resource management, and waste reduction

We promote closed-loop systems by supporting the use of sustainable, renewable natural resources, while reducing waste and increasing reuse and recycling.

That is why we are constantly developing our products to achieve ever greater load capacity and safety for our customers with a long service life and low weight.

We set targets for reducing waste in accordance with the priority classification of prevention, reduction, reuse, recovery, recycling, disposal, and finally landfill, using safe and responsible methods to protect the environment and the health and safety of employees and local communities.

### **3.1.6 Biodiversity and land use and deforestation**

In accordance with international biodiversity regulations, including IUCN resolutions and recommendations on biodiversity, we protect ecosystems, especially key biodiversity areas affected by our activities, and avoid illegal deforestation.

### **3.1.7 Soil quality**

Where necessary, we monitor and control our impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.

### **3.1.8 Noise emissions**

Where necessary, we monitor and control industrial noise levels to avoid noise pollution.

### **3.1.9 Responsible sourcing of raw materials and minerals**

We source the raw materials and minerals used in our products responsibly by promoting traceability and transparency in the supply chain and by implementing appropriate due diligence measures for minerals from conflict-affected and high-risk areas.

## 4 Final provisions

### 4.1 Scope

The provisions of this Code of Conduct apply to all employees of KO-Lovec, regardless of their hierarchical position or function, and to companies within the group, not only literally but also in spirit. Insofar as codes of conduct for specific areas of activity or companies are specified in separate guidelines, these guidelines apply without restriction in addition to this code of conduct. In case of doubt, the stricter rule applies.

Violations of the Code of Conduct may result in disciplinary action for all employees, including managers, and ultimately in legal action and consequences as provided for by applicable laws.

The senior management of KO-Lovec ensures that all employees of the group are adequately and regularly informed about the principles and ethical values of this code of conduct.

In addition to their role as role models, all managers with disciplinary responsibility are also responsible for ensuring that employees in their area of responsibility understand and comply with the rules of this code of conduct. Managers will be asked at regular intervals to confirm that they have understood and complied with the rules of the Code of Conduct, that they have reported any violations of which they have become aware, and that they are aware of their responsibility to ensure that their employees comply with the rules of the Code of Conduct.

The KO-Lovec legal department will monitor compliance with this code of conduct by recording all reported violations and all legal countermeasures.

### 4.2 Grievance mechanism

The procedure for handling complaints is described in more detail in instruction ON.01.04. Concerns regarding business ethics, human rights, or other compliance issues can be reported to the following address:

[pritozba@ko-lovec.si](mailto:pritozba@ko-lovec.si)

Compliance contact person: employee representative for compliance and head of purchase

Compliance officers are required to treat complaints confidentially in accordance with applicable laws.

Employees and business partners will not be dismissed, threatened, harassed, or otherwise discriminated against for filing a complaint. Retaliatory measures are not permitted and constitute a disciplinary violation.

### 4.3 Internal grievance

Every employee has the right and duty to report violations of this code of conduct or guidelines applicable at KO-Lovec to their manager or compliance contact person. KO-Lovec and the companies in the group undertake not to hold any employee liable if they report a violation or suspected violation of this code of conduct or other applicable guidelines to the company's management, manager, or legal department.

### 4.4 External grievance

Complaints of any kind from our external contractual partners must be regularly forwarded to the responsible contact persons in the contractual partner support processes (e.g., supplier, customer service) and, if no solution can be found, to our compliance contact person. Interested parties whose rights are affected by the business activities of KO-Lovec and companies in our group also have access to this complaint mechanism.

### 4.5 Reporting

KO-Lovec carefully monitors both its operations and extensive sustainability aspects in accordance with legal requirements and strategic specifications. KO-Lovec will monitor compliance indicators, review them regularly, and take appropriate action. In doing so, we will set another milestone for on our path to social responsibility and social and environmental sustainability.