

# KODEKS POSLOVNEGA RAVNANJA

poslovnih partnerjev družbe Surovina d.o.o.

## CODE OF CONDUCT

for Business Partners of Surovina d.o.o.





# KODEKS POSLOVNEGA RAVNANJA POSLOVNIH PARTNERJEV DRUŽBE SUROVINA d.o.o.

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# CODE OF CONDUCT FOR BUSINESS PARTNERS OF SUROVINA d.o.o.

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## KODEKS POSLOVNEGA RAVNANJA POSLOVNIH PARTNERJEV DRUŽBE SUROVINA d.o.o.

Surovina, družba za predelavo odpadkov d.o.o. je eden največjih predelovalcev odpadkov v Sloveniji in se že od svojega začetka zavzema za odgovorno delovanje na vseh ravneh – do svojih lastnikov, okolja in družbe. S svojo dejavnostjo ravnanja z odpadki že v svojem bistvu prispeva k današnjim principom trajnostnega razvoja, zelenega prehoda in krožnega gospodarstva.

Naše bogato strokovno znanje in skoraj osem desetletij izkušenj, nadgrajenih z inovativnostjo in poslušom za okolje ter skupnost, nam omogočajo implementacijo trajnostnih praks na vseh področjih delovanja. Zavezani smo k nenehnemu izboljševanju in iskanju novih rešitev, ki prispevajo k boljši prihodnosti za vse.

### 1. NAMEN KODEKSA

Družba Surovina d.o.o. se v skladu s svojo Politiko kakovosti, okolja ter varstva in zdravja pri delu zavzema za etično, odgovorno in trajnostno poslovanje, kar vključuje tudi sodelovanje z dobavitelji in drugimi poslovnimi partnerji, ki delijo naše vrednote in zaveze.

Namen tega kodeksa je zagotoviti, da vsi naši poslovni partnerji (v nižji in višji dobavni verigi) delujejo v skladu z najvišjimi standardi poslovne etike, spoštovanja človekovih pravic, delovnih pogojev in varovanja okolja. Kodeks določa jasne smernice in pričakovanja glede ravnanja, ki ga pričakujemo od naših poslovnih partnerjev, da bi skupaj ustvarili odgovorno in trajnostno dobavno verigo. S tem kodeksom želimo spodbuditi transparentnost, poštenost in zaupanje v vseh naših poslovnih odnosih.

Pojem »Poslovni partner« za namen tega kodeksa vključuje vse posameznike in organizacije, ki zagotavljajo blago, storitve ali materiale našemu podjetju. To vključuje, vendar ni omejeno na, proizvajalce, distributerje, trgovce na debelo, izvajalce storitev, svetovalce in druge poslovne partnerje, ki sodelujejo v naši dobavni verigi. Prav tako izraz vključuje vse poslovne partnerje v nižjem delu vrednostne verige (kupci, izvajalci prevoza do kupcev ipd.). Menimo, da je vsak poslovni partner ključni partner v našem prizadevanju za doseganje visokih standardov zagotavljanja kakovosti, etike in trajnostnega ravnanja.

## CODE OF CONDUCT FOR BUSINESS PARTNERS OF SUROVINA d.o.o.

Surovina, družba za predelavo odpadkov d.o.o. is one of the largest waste processors in Slovenia which from its very beginning has advocated for responsible business on all levels – responsibility to its owners, the environment and society. Since waste management is its business activity, the company essentially contributes to the modern principles of sustainable development, green transition and circular economy.

Our enormous expertise and almost eight decades of experience, upgraded with innovation and attention to the environment and community, enable us to implement sustainable practices in all of our activities. We are committed to constant improvement and search of new solutions which contribute to a better future for all.

### 1. PURPOSE OF THE CODE

Surovina d.o.o. in accordance with its Quality, environment, and health and safety at work policy, is committed to an ethical, responsible and sustainable business which includes cooperation with suppliers and other business partners who share our values and commitments.

The purpose of this Code is to enable all our business partners (downstream and upstream in the supply chain) to work in accordance with the highest business ethics, human rights, work conditions and environmental protection standards. The Code defines clear guidelines and expectations regarding the conduct that is expected from our business partners in order to create a responsible and sustainable supply chain together. This Code aims to encourage transparency, fairness and trust in all our business relationships.

The term "Business Partner" includes for the purpose of this Code all individuals and organisations which deliver goods, services and materials to our company. This includes, but is not limited to, producers, distributors, wholesalers, service providers, consultants and other business partners who cooperate in our supply chain. The term also includes all business partners downstream in the supply chain (buyers, transport contractors providing transport to the buyer's addresses, etc.). We believe that each business partner is crucial for our commitment to achieving high quality, ethics and sustainable conduct standards.

Od poslovnih partnerjev, ki bodo podpisali ta sporazum, pričakujemo, da bodo delovali v skladu z vsemi veljavnimi zakoni in predpisi ter da si bodo na vseh ravneh delovanja prizadevali za spoštovanje trajnostnih načel tega kodeksa. Pričakuje se, da podpisniki tega sporazuma enak nivo spoštovanja načel trajnostnega ravnanja, kot izhajajo iz tega kodeksa, terjajo tudi od svojih dobaviteljev in drugih poslovnih partnerjev, znotraj lastne (nižje in višje) dobavne verige. Poslovni partnerji se s podpisom tega kodeksa zavezujejo, da bodo redno preverjali skladnost svojih praks s tem kodeksom in poročali družbi Surovina d.o.o. o morebitnih neskladnostih ter s tem zagotovili, da vsi skupaj delujemo v skladu z najvišjimi standardi trajnostnega ravnanja.

Zahteve, definirane v tem kodeksu, predstavljajo ključen element izbora in ocene poslovnih partnerjev s strani družbe Surovina. Kršitev zahtev, definiranih v tem kodeksu, pomeni bistveno kršitev pogodbe s strani poslovnega partnerja.

## 2. POSLOVNA ETIKA IN INTEGRITETA

Družba Surovina d.o.o. se zavezuje k najvišjim standardom poslovne etike in integritete in se zaveda pomembnosti etičnih dimenzij pri opravljanju svoje dejavnosti. Verjamemo, da so poštenost, preglednost in odgovornost temeljni gradniki trajnostnega poslovanja. Vsi naši poslovni partnerji morajo delovati v skladu s temi načeli, saj so ključna za vzpostavitev in ohranjanje zaupanja med vsemi deležniki.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo dosledno spoštoval pozitivno zakonodajo ter predpise in standarde, ki urejajo njegovo poslovanje,
- bo preprečeval oz. ne bo udeležen v kakršnikoli obliki koruptivnega ravnanja, podkupovanja ali neetičnega ravnanja ter da bo v svoji organizaciji vzpostavil ustrezne vzvode za odkrivanje (prijavo) in preprečevanje takšnih praks,
- bo deloval v skladu z načeli poštene konkurence in se izogibal vsakršnemu ravnanju, ki bi lahko omejevala ali izkrivljala trg,
- ne bo neposredno ali posredno sodeloval pri nobeni obliki pranja denarja, financiranja terorizma ali drugih gospodarskih kaznivih dejanj in bo sprejel vse razumne ukrepe za zagotovitev, da se finančne transakcije, v katere je vpleten, ne bodo uporabile za pranje premoženjske koristi, pridobljene z nezakonito dejavnostjo,
- bo razkril vsa potencialna in dejanska navzkrižja interesov, vključno z razkritjem končnih dejanskih lastnikov,

It is expected that our business partners who sign this agreement shall act in accordance with all valid laws and regulations and shall strive to respect the sustainable principles of this Code on all business levels. The signatories to this Agreement shall demand the same level of respect for the sustainable conduct principles of this Code from their suppliers and other business partners within (down- and upstream) their own supply chain. By signing this Code, business partners commit to regular verification of the compliance of their practices with this Code and reporting to Surovina d.o.o. about potential non-compliance while ensuring that all conduct business in accordance with the highest standards of sustainable management.

The requirements defined in this Code represent a crucial part of the selection and evaluation of business partners by Surovina. Breaches of the requirements defined in this Code represent a substantial breach of agreement by the business partner.

## 2. BUSINESS ETHICS AND INTEGRITY

Surovina d.o.o. commits to the highest ethics and integrity standards and is aware of the importance of ethical dimensions of the business pursuit. The company believes that fairness, transparency and responsibility are fundamental building blocks of sustainable business. All our business partners shall comply with these principles as they are crucial for the establishment and maintenance of trust among all stakeholders.

By signing this Code, the business partner commits to the following:

- Consistent following of the positive laws and regulations, as well as standards governing their business.
- Prevention or absence of involvement in any type of corrupt practices, bribery or unethical conduct, and the partner shall implement relevant measures for the detection (reporting) of such practices and their prevention across their own organisation.
- Cooperation in accordance with the principles of fair competition and avoidance of any conduct which could restrict or distort the market.
- There shall be no direct or indirect participation in any form of money laundering, terrorism financing or other economic crimes, and shall take all reasonable measures to ensure that all financial transactions in which they are involved shall not be used for the laundering of the proceeds of crime gained by illegal activity.
- All potential and actual conflicts of interest shall be disclosed, including the disclosure of ultimate beneficial owners.

- bo vzpostavil ustrezne prijavne poti za zaščito prijaviteljev («žvižgačev») in ukrepe pred povračilnimi ukrepi v skladu z zakonodajo EU,
- bo spoštoval predpise s področja intelektualne lastnine, vključno s patenti, blagovnimi znamkami, avtorskimi pravicami in poslovnimi skrivnostmi ter v celoti poskrbel za njihovo varstvo,
- bo upošteval vse veljavne trgovinske in uvozne predpise, vključno s sankcijami in embargi, ki veljajo za njegovo dejavnost,
- bo vzpostavil sistem, ki omogoča prijavo neprimernih praks na vseh področjih delovanja in ki prepoveduje povračilne ukrepe zoper tistega, ki bi prijavil neprimerno prakso.

### 3. ČLOVEKOVE PRAVICE IN PRAVICE DELAVCEV

Surovina d.o.o. se zavezuje k spoštovanju temeljnih človekovih pravic in pravic delavcev, kot so določene v mednarodnih standardih in zakonodaji. Naši poslovni partnerji morajo zagotavljati varno, pravično in spoštljivo delovno okolje, kjer so pravice vseh zaposlenih zaščitene, ter spodbujati enakopravnost, dostojanstvo in vključenost.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo v svojem delovanju nasprotoval kršitvam človekovih pravic, vključno z delom otrok, prisilnim delom, zlorabo starejših, suženjstvom in trgovino z ljudmi in vzpostavil ustrezne vzvode, ki preprečujejo, da bi bil sam ali njegovi poslovni partnerji vključeni v zlorabe človekovih pravic (varstvo človekovih pravic v celotni dobavni verigi),
- bo aktivno spodbujal enake možnosti za vse zaposlene, ne glede na spol, raso, vero, starost, invalidnost ali druge osebne okoliščine in se zavezuje k ustvarjanju vključujočega delovnega okolja, kjer se vsak posameznik počuti cenjenega in spoštovanega ter preprečeval kakršnokoli obliko diskriminacije,
- bo zagotavljal takšno delovno okolje, v katerem so zaposleni zaščiteni pred diskriminacijo, nadlegovanjem in trpinčenjem,
- bo upošteval vse veljavne mednarodne standarde, nacionalne zakone in druge predpise glede plačila za delo in nadomestil ter da bo delavcem zagotavljal pravočasno in pravično plačilo za opravljeno delo,
- bo delavcem zagotavljal dostojno plačo v skladu z evropskimi oziroma sprejetimi nacionalnimi standardi,
- bo izpolnjeval ustrezne zahteve glede delovnega časa, vključno z nadurami, odmori in časom počitka, kot je določeno v nacionalnem pravu, ustreznih kolektivnih pogodbah in mednarodnih standardih,
- bo spoštoval pravico delavcev do svobodnega združevanja, članstva v sindikatih, članstva v predstavniškem telesu delavcev in sodelovanja v po-

- In accordance with the EU legislation, relevant reporting channels shall be established for the protection of reporting persons (“whistle-blowers”), as well as measures against retaliation.
- Intellectual property regulations shall be followed, including patents, brands, copyrights and business secrets, and their protection shall be fully taken care of.
- All valid trade and import regulations shall be followed, including sanctions and embargoes that apply to their business.
- A system that enables the reporting of inappropriate practices in all fields of activity and prohibits retaliation against the person reporting an inappropriate practice shall be established.

### 3. HUMAN RIGHTS AND WORKERS' RIGHTS

Surovina d.o.o. commits to respect fundamental human rights and the rights of workers as they are defined in international standards and legislation. Our business partners shall ensure a safe, fair and respectful working environment, where the rights of all employees are protected, and encourage equality, dignity and inclusion.

By signing this Code, the business partner commits to the following:

- In its operation, they shall oppose violations of human rights, including child labour, forced labour, elder abuse, slavery and human trafficking, and shall establish relevant measures to prevent themselves or their business partners from participating in human rights abuses (protection of human rights in the entire supply chain).
- Equal opportunities for all employees shall be actively promoted, regardless of gender, race, religion, age, disability or other personal circumstances, and the partner shall commit to establishing an inclusive working environment, in which each individual feels appreciated and respected, and shall prevent all forms of discrimination.
- A working environment that protects the employees from discrimination, harassment and mobbing shall be ensured.
- All valid international standards, national laws and other regulations regarding work payment and allowances shall be followed, and timely and fair payment for work done shall be ensured to workers.
- Workers shall be ensured a decent wage in accordance with the European or adopted national standards.
- Relevant requirements regarding working time shall be fulfilled, including overtime, breaks and rest periods, as is determined in the national law, relevant collective agreements and international standards.
- The right of workers to freely associate and the right to trade union member-

gajanjih o kolektivni pogodbi in bo s svojimi ravnanji težil k ustvarjanju odprtega in podpornega delovnega okolja,

- bo delavcem v skladu z nacionalno zakonodajo nudil socialno zaščito pred izgubo dohodka zaradi pomembnih življenjskih dogodkov,
- bo zaposlenim omogočal ustrezno usposabljanje in izobraževanje za razvoj kariere.

#### 4. ZDRAVJE IN VARNOST PRI DELU

V družbi Surovina d.o.o. je zagotavljanje zdravja in varnosti pri delu ključnega pomena za dobrobit vseh zaposlenih in ima vzpostavljene ukrepe za vzdrževanje varnega delovnega okolja, z namenom znižanja tveganj za nesreče in poklicne bolezni na minimalni nivo.

Surovina ima pridobljen certifikat sistema vodenja varnosti in zdravja pri delu ISO 45001, ki izkazuje odgovornost do poklicnega zdravja in varnosti pri delu. Podjetje od poslovnih partnerjev pričakuje in jih spodbuja, da tudi sami presežejo zakonske zahteve in uvedejo sisteme varnosti in zdravja pri delu na nivoju ISO 45001 ali enakovrednega standarda.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo v skladu z veljavno mednarodno in nacionalno zakonodajo zagotovil varne in zdrave delovne pogoje za vse svoje zaposlene,
- bo poskrbel za primerne delovne postopke, pisna navodila, primerno zaščitno opremo, primerno usposobljenost delavcev in ureditev delovnega okolja tako, da ne bo škodoval zdravju in varnosti delavcev,
- bo ocenil zdravstvena in varnostna tveganja svojih dejavnosti in delovnih mest ter izvedel ukrepe za obvladovanje teh tveganj,
- si bo prizadeval za zmanjšanje nesreč in tveganj s področja varstva in zdravja pri delu, vključno z rednim ozaveščanjem in usposabljanjem zaposlenih.

#### 5. VARSTVO OKOLJA

Surovina d.o.o. se zaveda ključne vloge, ki jo ima varstvo okolja pri zagotavljanju trajnostne prihodnosti. Kot izvajalec dejavnosti ravnanja z odpadki že v svojem bistvu veliko prispeva k varstvu okolja in krožnemu gospodarstvu, pri čemer si pri izboljšanju okoljskih praks nenehno prizadevamo postavljati še višje in bolj ambiciozne cilje.

ship, membership in the representative body of workers and participation in collective bargaining shall be respected, and with all their actions the business partner shall strive to establish an open and supportive working environment.

- In accordance with national legislation, workers shall be offered social protection from the loss of revenue due to important life events.
- Employees shall be provided with appropriate training and education for career development.

#### 4. HEALTH AND SAFETY AT WORK

In Surovina d.o.o., promoting health and safety at work is a crucial aspect of the welfare of all employees, and measures are taken for ensuring a safe working environment with the purpose of reducing the risk of accidents and occupational disease to a minimum.

Surovina has acquired the ISO 45001 occupational health and safety management system certificate which demonstrates responsibility to occupational health and safety at work. Business partners are expected and encouraged to exceed legal requirements themselves and implement health and safety management systems in accordance with ISO 45001 or an equivalent standard.

By signing this Code, the business partner commits to the following:

- In accordance with international and national laws, safe and healthy working conditions shall be ensured to all employees.
- Appropriate working processes, written instructions, suitable protection equipment, suitable worker's training and arrangement of the working environment shall be ensured so that the health and safety of workers shall not be harmed.
- The health and safety risks of their operations and workplaces shall be evaluated and risk management measures shall be taken.
- Pursuit of accident and risk reduction in the field of health and safety at work, including regular awareness-raising and training of employees.

#### 5. ENVIRONMENTAL PROTECTION

Surovina d.o.o. is aware of the crucial role of environmental protection in ensuring a sustainable future. As a waste management service provider, the company already contributes a lot to environmental protection and circular economy, whereby it strives for higher and more ambitious goals in improving environmental practices.

Surovina ima pridobljen certifikat sistema okoljskega ravnanja ISO 14001, ki je osnova za njeno delovanje na vseh področjih skladnosti. Podjetje poslovne partnerje spodbuja oz. od njih pričakuje, da tudi sami presežejo zakonske zahteve in uvedejo sisteme okoljskega ravnanja v skladu z mednarodnimi standardi, kot je ISO 14001 ali enakovrednimi standardi.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo upošteval vse ustrezne nacionalne okoljske predpise ter mednarodne standarde ob upoštevanju veljavnih tehnoloških smernic
- bo pridobil in vzdrževal vsa potrebna okoljevarstvena dovoljenja, soglasja in registracije za opravljanje svoje dejavnosti in bo opravljal dejavnost v skladu s temi dovoljenji, soglasji in registracijami,
- bo razvijal in izvajal učinkovite sisteme upravljanja z varstvom okolja, ki podpirajo prepoznavanje tveganj, merjenje in spremljanje uspešnosti ter spodbujanje nenehnih izboljšav za ublažitev ali zmanjšanje tveganja škodljivih vplivov na okolje,
- bo deloval tako, da bo spoštoval načelo ohranjanja biotske raznovrstnosti,
- bo zagotavljal varno in s predpisi skladno ravnanje z odpadki (prevoz, skladiščenje, postopki predelave),
- ima ustrezen načrt za zmanjševanje negativnih vplivov na okolje – denimo zmanjševanje emisij v zrak, preprečevanje onesnaževanja voda, zmanjševanje hrupa, zmanjševanje obsega odpadkov, recikliranje odpadkov in zmanjševanje drugih negativnih vplivov, v kolikor s svojo dejavnostjo kakorkoli negativno vpliva na okolje,
- bo z namenom ohranjanja naravnih virov (npr. vode, zemlje, gozdov, virov energije, surovin) le-te uporabljal na gospodaren način,
- ima vzpostavljene postopke za varno, trajnostno in gospodarno ravnanje z vodo in sisteme za zagotavljanje kakovosti vode,
- si bo prizadeval neugodne vplive na okolje in podnebje, ki jih povzroča oz. nastanejo v njegovi dobavni verigi, zmanjšati na najnižjo možno raven (predvsem emisije toplogrednih plinov) in da bo vzpostavil učinkovit sistem za spremljanje teh vplivov na okolje,
- si bo v svojem poslovanju prizadeval, da bo ravnal in izvajal aktivnosti, ki so v skladu z načeli krožnega gospodarstva (npr. zmanjšanje porabe materiala, nadomeščanje, zbiranje, izmenjava, vzdrževanje, ponovna uporaba, ponovna distribucija, prenova, uporaba obnovljivih virov, predelava in recikliranje).

Surovina has acquired the ISO 14001 environmental management system certificate which forms the foundation of their activities in all areas of compliance. Business partners are encouraged or expected to exceed the legal requirements themselves and implement an environmental management system in accordance with international standards, such as ISO 14001 or equivalent.

By signing this Code, the business partner commits to the following:

- All relevant national environmental regulations and international standards shall be followed by taking applicable technological guidelines into account.
- All necessary environmental permits, consents and registrations for their activities shall be obtained and maintained, and business shall be conducted in accordance with those permits, consents and registrations.
- Efficient environmental protection systems which support risk identification, performance measurement and monitoring, and promote constant improvements for the mitigation and reduction of risk of adverse environmental effects shall be developed and implemented.
- Business shall be conducted in a manner that follows the principle of biodiversity conservation.
- Safe and compliant waste management (transport, storage, recovery operations) shall be ensured.
- A suitable plan for reducing negative impacts on the environment shall be established – such as reduction of emissions to air, prevention of water pollution, noise reduction, reduction of waste amount, waste recycling and reduction of other negative effects – if their business in any manner negatively affects the environment.
- For the purpose of the conservation of natural resources (e.g. water, soil, forests, energy sources, raw materials), resources shall be used in an economically efficient way.
- Procedures for safe, sustainable and economical handling of water are implemented with water quality assurance systems.
- Efforts to reduce and minimise adverse effects on the environment and climate that are caused by them or arise in their supply chain (especially greenhouse gas emissions) shall be pursued, as well as efforts for the implementation of an efficient system for monitoring these environmental impacts.
- In business, efforts for the conduct and implementation of activities that are consistent with the principles of circular economy (e.g. reduction of material consumption, replacement, collection, exchange, maintenance, reuse, redistribution, renovation, use of renewable resources, recovery and recycling) shall be pursued by them.

## 6. VARSTVO PODATKOV

Surovina d.o.o. spoštuje pravico do zasebnosti in ima vzpostavljene ustrezne sisteme za zagotavljanje varnosti in varstva osebnih in drugih podatkov.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo upošteval veljavne zakone in predpise o varstvu osebnih podatkov, vključno z Uredbo (EU) 2016/679 (Splošna uredba o varstvu podatkov - GDPR) ter upošteval vse zahteve zakonodaje glede zbiranja, obdelovanja, posredovanja in uporabe osebnih podatkov,
- bo varoval zaupne informacije in poslovne skrivnosti družbe Surovina d.o.o. in drugih poslovnih partnerjev ter jih uporabljal na ustrezen in dogovorjen način,
- bo zagotovil ustrezno upravljanje svojih informacijskih sistemov, ki vsebujejo zaupne informacije ali podatke, ter jih zavaroval pred nepooblaščenim dostopom, uporabo, razkritjem, spremembo ali uničenjem.

## 7. ZAGOTAVLJANJE KAKOVOSTI IN SISTEMOV UPRAVLJANJA

Zagotavljanju kakovosti družba Surovina d.o.o. že vrsto let namenja veliko pozornosti in izvaja aktivnosti, ki izboljšujejo procese zagotavljanja kakovosti v podjetju. Podjetje ima pridobljen certifikat Standard ISO 9001 in poslovne partnerje spodbuja oziroma od njih pričakuje, da tudi sami presežejo zakonske zahteve in uvedejo sisteme vodenja kakovosti v skladu z mednarodnimi standardi, kot je ISO 9001 ali enakovredni standardi.

Poslovni partner se s podpisom tega kodeksa zavezuje, da:

- bo izpolnjeval dogovorjene splošno dogovorjene standarde kakovosti ali pogodbeno dogovorjene zahteve in standarde kakovosti za zagotavljanje izdelkov in storitev,
- bo nemudoma obravnaval vsa vprašanja, ki lahko neugodno vplivajo na kakovost blaga ali storitev in družbo Surovina d.o.o. obveščal o morebitnih spremembah v svojem dobavnem/proizvodnem procesu, ki bi lahko vplivale na specifikacijo dobavljenih izdelkov/storitev,
- jamči, da je dobavljeno blago skladno s pogodbo in vsemi tehničnimi opisi blaga ter v skladu z mednarodnimi, nacionalnimi in tehničnimi standardi,
- ima vzpostavljen sistem za prepoznavanje neskladnosti svojih proizvodov, blaga, tako, da se proizvodi oz. blago, ki ne izpolnjujejo tehničnih zahtev naročniku ne dobavijo,
- ima vzpostavljene učinkovite mehanizme za redno ugotavljanje, oceno in upravljanje tveganj na vseh področjih, navedenih v tem kodeksu in področ-

## 6. DATA PROTECTION

Surovina d.o.o. respects the right to privacy and has established relevant systems for ensuring the safety and security of personal and other data protection.

By signing this Code, the business partner commits to the following:

- All valid laws and regulations on personal data protection shall be followed, including Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR), and all legislative requirements regarding collection, processing, transfer and use of personal data shall be complied with.
- Confidential information and business secrets of Surovina d.o.o. and other business partners shall be protected and used in an appropriate and agreed manner.
- Proper management of information systems containing confidential information or data shall be implemented and protected from unauthorised access, use, disclosure, amendment and destruction.

## 7. QUALITY AND MANAGEMENT SYSTEMS ASSURANCE

Quality assurance has been the centre point of attention of Surovina d.o.o., and activities have been implemented to improve quality assurance processes in the company. The company has acquired the ISO 9001 certificate and business partners are encouraged or expected to exceed the legal requirements themselves and implement quality management systems in accordance with international standards, such as ISO 9001 or equivalent.

By signing this Code, the business partner commits to the following:

- Generally agreed quality standards or contractually agreed quality requirements and standards for providing products and services shall be followed.
- All questions that can have a negative impact on the quality of goods or services shall be resolved immediately and Surovina d.o.o. shall be sent notification of potential amendments of the supply/production process that might influence the specifications of the delivered products/services.
- A guarantee is given that the delivered goods are consistent with the agreement and all technical descriptions of the goods, as well as international, national and technical standards.
- A non-conformity detection system for their products and goods has been implemented, so that products or goods that do not comply with the technical requirements are not delivered to the client.
- Efficient mechanisms for regular identification, assessment and management of risks in all areas stated in this Code and areas that should be taken into

- jih, ki jih je dolžan upoštevati v skladu s pozitivno zakonodajo,
- bo zagotovil redno komuniciranje in usposabljanje zaposlenih za seznanitev z zahtevami tega kodeksa,
  - bo izvajal redne notranje revizije svojih sistemov upravljanja kakovosti in izvajal potrebne izboljšave za zagotavljanje skladnosti in učinkovitosti,
  - bo vzpostavil sisteme za sledenje in dokumentiranje vseh procesov, povezanih z zagotavljanjem kakovosti, ter zagotovil, da so vsi zapisi natančni in dostopni za pregled.

## 8. UPOŠTEVANJE KODEKSA IN NESKLADNOSTI

Družba Surovina d.o.o. si pridržuje pravico, da z ustreznimi sredstvi preveri skladnost z zahtevami tega kodeksa pri poslovnem partnerju. Od poslovnih partnerjev lahko zahteva sodelovanje v postopkih ocenjevanja, anketiranja ali drugih podobnih dejanjih, pri čemer poslovni partner s podpisom tega kodeksa potrjuje, da bo pri tem polno sodeloval in da bo podal verodostojne informacije.

Poslovni partner je dolžan družbi Surovina d.o.o. sam poročati o morebitnih nastalih neskladnosti oz. ravnanju v nasprotju s tem kodeksom v razumnem roku.

Surovina d.o.o. si pridržuje pravico do ustreznih pravnih ukrepov, če poslovni partner ne bo izpolnjeval zahtev tega kodeksa. Vsak primer kršitev ali nezadostnega izvajanja kodeksa, kot tudi nesodelovanje pri preverjanju ali poslovni partner kodeks upošteva, bo obravnavan individualno. Surovina bo poslovnega partnerja na kršitev predhodno opozorila in določila ustrezen rok za odpravo.

Surovina d.o.o. ima pravico prekiniti pogodbo in sodelovanje s poslovnim partnerjem v primeru kršitev in neupoštevanja določb tega kodeksa s strani poslovnega partnerja.

- consideration in accordance with the positive law have been implemented.
- Regular communication and training shall be performed in order to familiarise employees with the requirements of this Code.
  - Regular internal audits of their quality management systems shall be performed, as well as necessary improvements for ensuring compliance and efficiency.
  - Tracking and documentation systems for all processes connected with quality assurance shall be established and it shall be ensured that all records are accurate and accessible for inspection.

## 8. CODE COMPLIANCE AND NON-COMPLIANCE

Surovina d.o.o. reserves the right to verify the compliance of the business partner with the requirements of this Code. Participation in evaluation procedures, surveys or other similar actions may be requested from business partners, whereby business partners shall, by signing this Code, confirm to be fully cooperative and shall provide credible information.

The business partner is obliged to report to Surovina d.o.o. on potential non-compliance or conduct contrary to this Code within a reasonable period of time.

Surovina d.o.o. reserves the right to appropriate legal measures if the business partner does not fulfil the requirements of this Code. All cases of Code violation or insufficient implementation of the Code, as well as non-cooperation in the verification process, shall be investigated individually. Surovina shall give the business partner a prior warning and determine an appropriate deadline for bringing an infringement to an end.

In case of violations and non-compliance with the provisions of this Code by the business partner, Surovina d.o.o. is entitled to terminate the agreement and cooperation with the business partner.



