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**UNIOR d.d. CODE OF  
CONDUCT FOR  
SUPPLIERS**

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We are one of the largest forges in Europe and one of the world's leading forges for the automotive industry. We make top quality hand tools that are used all over the world. With our extensive knowledge and experience, we design and manufacture machine tools for medium and high-volume machining. Development based on a rich tradition is our mission.

In addition to our focus on superior product quality and innovation, we also recognise the importance of sustainable development. We want to build a future that is kind to the environment and society, while allowing the company to continue to grow and thrive. We recognise that our success also depends on the way we treat our suppliers and the values we uphold.

The UNIOR Supplier Code of Conduct (the Code) represents the fundamental principles and guidelines that guide the actions of our suppliers in the everyday business environment. The requirements defined in this Code are a key element in the selection and evaluation of suppliers. A breach of the requirements defined in this Code constitutes a material breach of contract by suppliers.

Suppliers must comply with all the regulations that apply to their business. They must comply with the United Nations Guiding Principles on Business and Human Rights, the United Nations Universal Declaration of Human Rights, the 1998 ILO Declaration on Fundamental Principles and Rights at Work, act in accordance with national law and, in particular, respect the requirements specifically defined in this Code. In the conduct of their business, suppliers shall comply with the UNIOR Code of Business Conduct, the UNIOR Code of Ethics and the UNIOR policies, which are available on the UNIOR website [www.unior.com](http://www.unior.com).

Suppliers must ensure that all suppliers in their supply chain are bound by all the requirements they are obliged to comply with under this Code.

## HUMAN AND WORKERS' RIGHTS

UNIOR d.d. suppliers must act in accordance with national legislation, generally applicable standards and principles, and the rules of international law on human rights and workers' rights.

- **Child labour is prohibited**
- **The work is voluntary**

Suppliers shall ensure that they do not use any form of forced, compulsory or child labour. Suppliers do not employ any children under the legal age limit for employment in the relevant country. If there is no minimum age limit for employment, the age of 15 applies. Workers under the age of 18 enjoy special protection in the employment relationship (e.g. in terms of working conditions, working hours, etc.). The employment relationship must be voluntary and can be terminated at any time.

- **Prohibition of discrimination**

Suppliers must have zero tolerance for any unlawful discrimination. They must ensure equal treatment for all workers, jobseekers and everyone else involved in the business process, regardless of race, ethnic origin, colour, gender, sexual orientation, gender identity, age, disability, religion, political belief, national or social origin, trade union membership or any other personal circumstance. Trafficking in human beings and slavery are prohibited.

- **Prohibition of sexual and other harassment and mobbing at the workplace**

Suppliers must not tolerate any form of harassment, bullying, intimidation or stalking in the workplace. Suppliers must have a system in place to receive reports of alleged harassment and ill-treatment in the workplace.

- **Dignity and personal integrity**

Suppliers must respect the privacy, dignity and personal integrity of the individual.

- **Respecting the freedom of association and collective bargaining**

In accordance with the applicable legislation, suppliers must respect the rights of their employees to freedom of association, trade union membership, membership in an employee representative body and participation in collective bargaining. Employee representatives must be protected in compliance with the legislation.

- **Fair working conditions**

Suppliers must provide adequate remuneration for the work performed, and comply with labour laws on working time and other benefits. Suppliers must respect the right to special protection in the employment relationship for all protected categories of workers, in accordance with the law.

- **Health and safety at work**

Suppliers must provide a safe and healthy working environment that meets or exceeds national occupational safety and health standards. This includes identifying, assessing and managing hazards, and providing appropriate personal protective equipment and instructions for its use to meet legal requirements in the field of occupational safety and health. In addition, suppliers should develop contingency plans, including response procedures and corrective actions, and consider implementing an ISO 45001 occupational health and safety management system or similar system to ensure that safety objectives are met. Suppliers have a duty to maintain and improve health and safety at work, fire safety and health promotion.

Suppliers must be committed to respecting human rights and working with key stakeholders to make progress together in this area.

## CORPORATE INTEGRITY AND BUSINESS COMPLIANCE

UNIOR d.d. in its Code of Conduct undertakes to act with integrity and in compliance with all applicable laws, regulations and standards governing its business, both locally and internationally. It reasonably expects the same from its suppliers:

- **Fighting corruption and bribery**

Suppliers are obliged to comply with all national and international standards relating to the prevention of bribery and to comply with applicable laws, regulations and standards relating to the prevention of corruption. Suppliers shall ensure that they do not tolerate any form of corruption, bribery or other illegal practices in their business dealings. In their activities, they shall not solicit, receive, offer or grant any undue advantage or other benefit contrary to moral standards.

- **Fraud**

Suppliers must respect the principle of zero tolerance to fraud. Any fraudulent conduct must be dealt with carefully and sanctioned accordingly.

- **Money laundering**

Suppliers must comply with applicable laws and follow best practices to prevent money laundering. They are obliged to refrain from all transactions that could be used for money laundering.

- **Restrictions on accepting and giving gifts**

Suppliers must take into account that it is prohibited to offer, promise, accept or solicit, directly or indirectly, gifts, benefits, services or anything of a similar nature that may affect the independence of employees at work. Any gifts, entertainment or activities must be legal, in accordance with the rules of the donors and/or recipients, and in line with local customs and practices.

- **Avoiding conflicts of interest**

Suppliers must be alert to any actual or potential conflict of interest and must take all reasonable steps to avoid it. If this is not possible, such conflicts of interest must be disclosed immediately.

- **Fair competition**

Suppliers must comply with the rules governing the protection of competition and must not distort, restrict or prevent competition.

- **Personal data protection**

Suppliers must handle personal data of employees and third parties carefully, securely and transparently and in accordance with personal data protection regulations. Suppliers are obligated to store and archive data in accordance with the statutory provisions. The collection and processing of personal data must be done in a manner that respects the fundamental rights, freedoms, and dignity of everyone involved.

- **Confidential information, intellectual property rights**

Suppliers must be committed to ethical and fair business practices, and must carefully protect trade secrets, the confidential information of others and respect intellectual property rights. Suppliers must ensure that sensitive business, technical and financial data and know-how is properly handled.

- **Encouraging fair and responsible conduct, prohibiting retaliation**

Suppliers must have a system in place to report inappropriate practices in all areas of their business. Suppliers must protect the identity of the bona fide whistleblower and provide them with adequate protection against retaliation.

If the Supplier or its employees become aware of inappropriate practices by UNIOR d.d. or its employees (e.g. endangering the health and safety of people, violation of legal obligations under applicable legislation and general acts, causing environmental damage, unprofessional conduct, etc.), they must report it on the website [prijava.povejmo@unior.com](mailto:prijava.povejmo@unior.com).

- **Fair and transparent practices**

The books, accounts and other documents of our suppliers must be kept in accordance with applicable legislation and accounting standards, ensuring that accurate and reliable information is entered. Our suppliers are aware that any conduct contrary to these requirements shall be considered an offence. All business documents must be kept in accordance with the time limits set by law and must not be destroyed, hidden, damaged or otherwise rendered unusable during that period.

- **Transfer of obligations**

Suppliers may only transfer their obligations under their contractual relationship with UNIOR d.d. with the prior written consent of UNIOR d.d.

- **Compliance check**

UNIOR d.d. reserves the right to take appropriate measures to verify compliance with the Code. Suppliers are obliged to actively participate in all necessary compliance checks.

UNIOR d.d.'s suppliers must be committed to high standards of corporate integrity and business compliance and work with key stakeholders to jointly advance progress in this area.

## **SECURITY AND PRIVACY: IT SECURITY MANAGEMENT AND DATA PROTECTION**

Suppliers of UNIOR d.d. shall be aware that security and privacy are very important when handling information. It is important to maintain confidentiality, availability, and integrity of information while also preventing its dissemination without authorization.

Suppliers are required to meet the legislative requirements of NIS2 and the Information Security Act and demonstrate maturity, such as TISAX or similar standards (ISO 27001, 27017, ISO 27018). Protecting personal data in accordance with the law is our top priority to avoid data breaches and cyber-attacks. To meet UNIOR d.d.'s requirements, IT security suppliers must have strict security measures and policies that comply with relevant regulations and applicable laws, regulations on data protection, security and antitrust (e.g. data protection, cyber security and industry-specific regulations). The recovery of IT systems and data in case of a crisis requires suppliers to have security incident response, business continuity, and disaster recovery plans available. Furthermore, suppliers are required to regularly instruct employees on security awareness and put in place programs to manage the risks that arise from working with external suppliers and third-party providers. Suppliers are required to ensure that UNIOR d.d. retains ownership of its data and information. Establishing close cooperation between IT departments is necessary for both parties to facilitate a smooth exchange of information, including the establishment of standard and emergency contacts. This Code ensures that UNIOR d.d., their suppliers, and sub-suppliers maintain a safe and productive relationship by safeguarding information, personal data, and trade secrets.

## ENVIRONMENTAL PERFORMANCE

UNIOR d.d. suppliers must be aware of the importance of environmental protection. The development and implementation of their processes must be in line with the principles of sustainable environmental development, taking into account legal and other regulations at international and national level in the fields of sustainability, environment, energy and chemicals.

- **Reducing the environmental pollution**

Suppliers should aim to monitor and reduce emissions to air, water and soil, prevent environmental pollution, reduce noise emissions to the environment, rationalise the use of natural resources, water consumption, promote sustainable production and consumption. They must ensure continuous improvement of their environmental performance – monitoring and assessing environmental aspects and setting targets to achieve them as part of their environmental management programme.

- **Promoting the principles of circular economy**

Suppliers should aim to reduce raw material consumption, substitution, waste minimisation, separate waste collection, maintenance, reuse, refurbishment, use of renewable resources and enforcement of the waste hierarchy.

- **Nature conservation**

Suppliers must strive to preserve biodiversity and minimise adverse impacts on animals.

- **Building a low-carbon society**

Suppliers must strive to use energy efficiently, conserve natural resources, manage energy economically and introduce modern and energy-saving technologies.

- **Reducing the use of hazardous substances**

Suppliers must aim to replace substances that have harmful effects on human health and the environment.

- **Educating employees, partner companies, suppliers and stakeholders**

Suppliers have a duty to continuously raise awareness and educate employees about the importance of protecting the environment and nature, working safely with chemicals, and of the environmental sustainability. UNIOR d.d. expects its suppliers to communicate environmental and energy policies to their stakeholders and to encourage customers and suppliers to adopt similar principles.

About the Code of Conduct for Suppliers of UNIOR d.d.

Version: 1.0

The Code of Conduct for Suppliers of UNIOR d.d. was adopted by the Management Board of UNIOR d.d. by resolution on 01/10/2024 and entered into force on the same date.

The latest version of the Code of Conduct is always available on the website [www.unior.si](http://www.unior.si) and on the Company's Intranet.

If you have any questions or concerns about topics covered in the Code, you can contact the Compliance Officer at [skladnost@unior.com](mailto:skladnost@unior.com).

UNIOR d.d. is in the process of implementing the European Sustainability Reporting Standards (ESRS). The ESRS implementation process is expected to be completed next year (first phase – reporting for 2024), but will be subject to changes in the years to come.

UNIOR d.d. accepts no liability whatsoever for the contents of this document or for any consequences or damages arising directly, indirectly or are incidental to this document. The information in this document is subject to change or may be replaced by other information (and/or data) as a result of the ongoing ESRS implementation process.

## SUPPLIER'S DECLARATION

I, the undersigned, declare that I am an authorised representative of the supplier indicated below and that I have thoroughly examined and understood the contents of the above document. I hereby confirm that the company (Supplier) indicated below complies fully with the Code of Conduct for Suppliers of UNIOR d.d.

Name of company (supplier):

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Name of the supplier's agent:

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Place and date:

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Signature and stamp:

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