

Iskra ISD d.o.o. COMPANY CODE OF CONDUCT

The company code of conduct is a document that sets ethical guidelines, values and expectations for employees and other stakeholders in the company, and ensures compliance with ethical standards, legislation and the company's core values.

We are committed to taking into account the long-term effects of our activities and business decisions regarding the environment, society and management. We strive to find sustainable solutions which should be a guiding principle for both our employees and the operations of the company in Slovenia and more widely in the regions where we do business. We strive to include the principles of sustainable development in all our activities.

INTRODUCTION

Iskra ISD has a long tradition of manufacturing components for various industries. Over the past decade, we have transformed ourselves from a manufacturer of simple components to a development supplier. Our vision is to become a global development supplier of innovative components and assemblies.

We follow a strategy of sustainable growth, which includes both increasing revenues and increasing added value with the aim of creating benefits for all our stakeholders. We focus on the production of technically demanding innovative components and assemblies by combining materials and connecting technologies. More and more of our projects are related to electrification and reducing environmental emissions.

We follow the example of our business partners, who include care for nature and the reduction of environmental impacts in their business practices. This is how we came to preparing a strategy and plan for reducing our carbon footprint. We also strive for sustainable growth and mutual progress through long-term cooperation with our suppliers.

As a responsible group of companies, we have adopted a code of conduct that obliges us to respect legislation, standards and good business practice in everything we do. It refers both to caring for employees, ensuring fair working conditions and a safe and stimulating working environment, as well as to our commitments regarding the protection of nature, cooperation with business partners and involvement in the local environment.

ENSURING BUSINESS COMPLIANCE

We operate honestly and in accordance with the law

Iskra ISD undertakes to operate honestly and in accordance with all applicable laws and regulations. We prohibit all forms of unfair business practices, and are committed not to do business with any business partner who operates in such a manner. Business decisions are based on objective and professional judgment, and are made in the best interests of the company.

- **Fair and transparent practices**

We produce financial statements as well as business and other documents in accordance with legislation, regulations and applicable accounting standards. We record accurate and true data that paint a fair picture of the company's assets and business results. We store business documents in accordance with the law.

- **Data protection**

We store personal and other data in accordance with applicable legislation. We collect and process the abovementioned data in a way that respects the privacy and basic rights, freedoms and dignity of those involved. We ensure adequate protection of our databases against access by third parties.

- **Protection of trade secrets**

We are committed to protecting confidential business information. We do not disclose commercially sensitive information to third parties, and we ensure adequate protection against unauthorised access or distribution of such information.

- **Information security**

We respect the principles of information security according to generally established standards. For this purpose, we have adopted sectoral information handling policies, the purpose of which is to improve the level of protection of all information in the company, reduce the possibility of information unavailability, increase the level of integrity and authenticity of information, and ensure business continuity. To ensure the implementation of the aforementioned policies, we conduct the necessary employee training. Employees are obliged to immediately inform the competent persons in the company about any behaviour aimed at the unauthorised discovery, disclosure, transmission or destruction of confidential data, as well as about other impermissible behaviour regarding confidential and other information sources.

- **Protection of intellectual property**

We respect the intellectual property rights of others, and by applying for patents for our own innovations, we ensure adequate protection of the company's intellectual property.

- **Zero tolerance for corruption**

The company employs a zero tolerance policy for all forms of corruption, bribery, extortion, embezzlement, criminal acts and exploitation. Our employees will not promise, offer or give any unauthorised benefits to business partners or any other person, nor will they themselves accept such benefits. They must refuse any promises or offers of benefits that are not permitted by the law, internal regulations or ethical principles.

- **Prevention of money laundering**

We comply with legal regulations and good practices to prevent money laundering. We will refuse or abandon transactions suspected of being used for money laundering.

- **Avoiding conflicts of interest**

We avoid situations and activities that could lead to a conflict of interest, or that would affect the ability to make business decisions in favour of the company. We make business decisions based on objective and professional judgement. Employees must not use their connection with Iskra ISD for personal gain, and must avoid participating in transactions that conflict with the interests of the company.

- **Free competition**

We comply with all applicable rules of competition and antitrust legislation. We do not participate in concerted practices with other companies with the aim of concluding cartel agreements or restricting competition.

We respect employee rights and ensure workplace safety

We respect and support the fundamental rights and freedoms of employees which are defined within the current legislation. We fully and consistently comply with all provisions of labour law.

- **Ensuring fair working conditions and pay**

We guarantee fair working conditions and fair pay for our employees. We observe all legal minimums and prescribed payment and reward schemes, and we observe legislative provisions regarding the amount of working hours, breaks and overtime.

- **Prevention of child labour and forced labour**

In accordance with the convention of the International Labour Organisation, we only employ people who have reached the statutory minimum age for work in accordance with the applicable legislation. At Iskra ISD, we do not employ children and reject all forms of forced labour.

- **Prohibition of discrimination and harassment**

The company has already issued Rules on the Protection of Workers in the Workplace, committing ourselves to providing a safe and stimulating working environment. This includes the protection of employees from sexual and other harassment and ill-treatment in the workplace, the prohibition of discrimination and retaliatory measures, measures for the protection of workers and the protection of the dignity of workers at work.

- **Health and safety at work**

We ensure a safe and healthy working environment for all employees of Iskra ISD. We comply with all applicable workplace safety and health standards, and promote a healthy lifestyle in the context of workplace health promotion.

GUIDELINES AND COMMITMENTS FOR EMPLOYEES

Core values

When making decisions and performing tasks, employees are guided by our key values:

COLLABORATION: We are Iskra ISD, one team.

- We encourage open communication aimed at finding solutions.
- We share knowledge and good practices.
- We strengthen partnerships with other organisations.

INNOVATION: More knowledge for development.

- We encourage the collecting of ideas and suggestions from all employees.
- We regularly introduce new technologies and new working methods.
- We look for inspiration in new trends, at trade shows and with partnerships.

SATISFIED CUSTOMERS: We do our best.

- We respect agreements with customers and consistently realise them.
- We build partnerships and long-term relationships with our customers.
- We are responsive and deliver up-to-date feedback.

ENTREPRENEURSHIP: We bravely take on new challenges.

- We are constantly looking for new business opportunities in all areas.
- We set our goals boldly and ambitiously, and strive to realise them.
- We are not afraid of changes, and turn them into opportunities.

Code of conduct

In addition to the operational guidelines defined by the company's core values, employees are also bound by rules on expected behaviour in various situations. In particular, employees are obliged to observe the following:

- We show each other respect, help and cooperate with each other.
- We communicate sincerely, openly and fairly.
- We respect everyone and respect basic human rights in our work.
- We do not slander our employees and do not engage in slander in general.
- We immediately stop the spread of false information.

- We do not show our beliefs (philosophical, religious, political or any other beliefs) through conduct or actions (e.g. through the way we dress), or express them with words.
- We warn colleagues about irregularities.
- In the workplace or during working hours, we are not under the influence of alcohol or illegal drugs.
- We do not use mobile phones while operating vehicles, machinery or carrying out operations where there is a risk of injury, and while walking on transport routes.
- We share information and knowledge with colleagues.
- We create an environment where everyone can express their opinion.
- We encourage creative thinking.
- We stick to time limits and agreements.
- We notify colleagues in a timely manner if a task will not be completed.
- We commend our colleagues for a job well done.
- We act responsibly towards the environment in which we live and do business.

ENVIRONMENTAL PROTECTION

Our company has an environmental management system in place, which takes into account applicable environmental regulations and the principles of careful management of natural resources. We demonstrate the compliance of our activities in the environmental field with the international SIST EN ISO 14001 standard. We have obtained the appropriate environmental protection permit for our activities that affect the environment. We carefully observe the operation of environmental technologies through appropriate management and the implementation of prescribed monitoring.

With environmental responsibility, the company contributes to reducing the depletion of natural resources, strives to maintain ecological balance, improves the quality of life in society, reduces the costs and use of energy products and improves the visibility of the company in local and global markets.

All employees are responsible for protecting the environment, which is demonstrated by employees observing and performing the following activities:

- We consistently separate all generated waste and hand it over to authorised receivers.
- We work towards a constant reduction of the amount of waste generated and the reuse of waste as a secondary raw material.

- By modernising production, we increase process efficiency and reduce the consumption of energy and raw materials.
- By introducing cleaner technologies, we reduce emissions into the environment.
- We incorporate materials into our products that comply with legislation and regulations (e.g. REACH, RoHS, CMRT,...)

Because we want to actively contribute to a cleaner environment and careful use of natural resources, we also expect our business partners to respect the same commitments.

COOPERATION WITH SUPPLIERS

To ensure the sustainable development and growth of the company, we want to establish and develop long-term relationships with suppliers who share our vision and goals for innovative, high-quality and reliable cooperation. We support the introduction of continuous improvements in quality assurance, environmental protection and the provision of a safe and stimulating work environment.

We require ISO 9001 certification from our suppliers, with the goal of upgrading to IATF 16949 and ISO 14001 certification. In addition to the "General Purchase Conditions", all suppliers of components and cooperators of Iskra ISD must also meet the requirements regarding quality and environmental protection, which are defined in the manual for suppliers.

At the same time, we require all suppliers to comply with the following commitments:

- We respect the rights of individuals, act in accordance with the foundations of fair business, marketing and advertising activities, and we are committed to the continuous development of the safety and quality of our products and processes.
- We respect the law, do business fairly and we are responsible for our actions.
- We continuously work towards reducing the negative impact of our activities on the environment and public health.
- We do not participate in illegal activities and we do not conduct illegal activities.
- We do not tolerate offering, soliciting or accepting bribes.
- We undertake to report any identified violation of the law to the appropriate authorities.

EMBEDDED IN THE LOCAL ENVIRONMENT

We participate in programmes that contribute to improving the quality of life in the local community. Among other things, we support local associations and organisations that help socially weaker groups with donations.