



CODE of CONDUCT
for THIRD PARTIES
of the Companies
from SALUS Group

Valid from: March 27th, 2023



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Introduction

Adherence to the highest ethical standards and social responsibility are values that the companies of the SALUS Group (hereinafter referred to as the SALUS Group) consistently follow, thus maintaining and continuing a long tradition of integrity and credibility.

The basic principles, values, tenets and guidelines in which the SALUS Group and its employees believe are written in the Code of Conduct of SALUS, Ljubljana, d.d. and the SALUS Group.

Business processes, which are regularly updated, are set out in internal regulations, policies, instructions and guidelines. Every employee of the SALUS Group is obliged to familiarize himself with the relevant internal documents and to comply with them. Each employee is also obliged to proactively report any deviations.

The SALUS Group emphasises the importance of responsible management and conduct that contributes to the development of the wider social community.

SALUS Group is committed to sustainable business for a better future, to meeting the needs of wider community and to being responsible for our planet. We do this together with all the stakeholders we work with, as sustainability is a partnership process. We strive to work in a collaborative way, recognising that the efforts of individual stakeholders are not enough.

Each of the SALUS Group companies strives to conduct its business with business partners, i.e. third parties, in compliance with local legislation, all relevant regulations, guidelines, standards and practices, as well as the principles compiled in this Code of Conduct for Third Parties of the companies from SALUS Group.

SALUS Group also expects third parties to take all measures to ensure that their business partners and subcontractors also reasonably follow the same principles.

Compliance with all of the above is also one of the criteria that the SALUS Group takes into account both when selecting third parties with which to do business and when continuing to do business with them.

1. COMPLIANCE AND ETHICS

SALUS Group always conducts its business with honesty and respect, consistently observes ethical considerations and the highest standards of personal and business integrity, and expects the same from its business partners, third parties.

Fair competition and ethics

Consistent adherence to fair business practices, including fair competition, ethical and respectful behaviour and lawful business conduct are commitments that the SALUS Group adheres to in the conduct of its business.

The conduct of third parties' business must also reflect high ethical standards and be fair, understandable and in compliance with applicable laws and all relevant regulations.

Third parties' communications with their business partners and competitors must be careful and thoughtful and must not contain content or language that constitutes or could be construed as anti-competitive behaviour.

Third parties must observe and comply with competition law.

Prevention of corruption

SALUS Group follows sector specific regulations and the highest standards of business ethics, operates with integrity and transparency, and has a zero tolerance policy when it comes to any form of corruption.

Third parties shall not, directly or indirectly, give, offer, accept or solicit to give, offer or accept, any gift, entertainment or anything of value to any healthcare professional, public servant, holder of public authority, public official or candidate for public office, official of political parties or their representative or anyone else with the intent to:

- obtain or retain business,
- influence a business decision, or
- secure an unfair advantage.

Gifts and hospitality

The fundamental principle that SALUS Group follows in relation to the giving of gifts and hospitality and expects third parties to do the same is that it is prohibited to give, offer, promise or accept gifts or inducements, to show inappropriate hospitality or anything else that would result in the obtaining of unauthorised benefits.

To the extent that gifts and/or hospitality are permitted by local law or general industry principles as a reflection of respect for culture or local custom, they may be modest or of negligible value, unsolicited, reasonable and only occasional.

Gifts or hospitality must not be given on behalf of or in connection with business with the SALUS Group, unless previously agreed and authorised, in which case applicable law must be complied with.

Donations and charitable contributions

Donations and charitable contributions, which are usually intended to provide relief in the event of natural or other disasters, to help the sick, the helpless and those living at or below the poverty line, or to address a social aspect and a broader social responsibility, are permitted but no benefit should be received, demanded or expected in return.

Facilitation payments

Facilitation payments are informal payments or small transfers of value made to a holder of a public authority or a public official with a view to speeding up proceedings or otherwise influencing the due conduct of those persons.

Facilitation payments are prohibited.

Political contributions

SALUS Group has no objections to political identifications of third parties and their employees.

Third parties may make political contributions but never in the name of or on behalf of SALUS Group.

SALUS Group does not make, promise or earmark political contributions.

Lobbying

Lobbying is permitted under the conditions and to the extent permitted by local law and may not be used for any corrupt, illegal or other improper purpose or to influence decisions which may result in any improper advantage.

Conflicts of interest

A conflict of interest is a conflict where an interest, including a personal, social, financial, political or other interest of an employee or a member of his/her immediate family, conflicts or could be considered to conflict with the interests of a third party where the employee is employed or with the interests of the SALUS Group.

We expect third parties to ensure that their employees do not act in conflict of interest.

Confidentiality of information and protection of business secrets

In the course of business processes, third parties and their employees may obtain or become acquainted with certain information, documents or items that the SALUS Group considers to be trade secrets. This includes undisclosed expertise, experience, documents, business information and/or items that meet the following requirements:

- it is a secret which is not generally known or readily accessible to persons in the circles normally dealing with this type of information,
- it has commercial value; and
- the holder of the trade secret, i.e. SALUS Group, has taken reasonable steps in the circumstances to keep it secret.

Trade secrets are also information which is designated as such in writing by the management or board of directors of a company in the SALUS Group or by a person authorised by them and which meets the requirements for a trade secret under the law governing trade secrets.

The person who possesses a trade secret shall be obliged to protect it or to keep it in such a way that unauthorised persons are not able to access it or to communicate or disclose it to them.

The obligation to protect a trade secret shall arise from the moment a third party becomes aware of it and shall survive the termination of the business or other relationship with the SALUS Group.

Public disclosure of matters classified as trade secrets or discussion of such matters at meetings shall be permitted only with the prior written consent of the management or the board of directors of the SALUS Group company.

Money laundering, terrorism financing and blocked individuals and companies

Money laundering

Money laundering is any handling of money or property derived from a criminal offence, including:

- the exchange or any transfer of money or other property derived from a criminal offence,
- concealing or disguising the true nature, origin, location, movement, disposition, ownership or rights in respect of money or other property derived from a criminal offence.

Money laundering is prohibited.

Knowingly participating in transactions that facilitate money laundering or result in the illicit diversion of funds is also prohibited.

Terrorism financing

Terrorism financing is the provision or collection, or attempted provision or collection, of money or other property, whether of lawful or unlawful origin, directly or indirectly, with the intent or knowledge that it will be used, in whole or in part, to commit an act of terrorism or any other act related to terrorism, or that it will be used by a terrorist or terrorist organisation.

Terrorism financing is prohibited.

Blocked companies and individuals

It is forbidden to do business with individuals and companies that appear on lists of blocked individuals or companies published by official bodies, e.g. European, US or other countries' agencies.

Raising concerns and reporting violations

SALUS Group follows an open communication policy, supports an open door policy and encourages everyone to report possible irregularities in good faith.

SALUS Group takes all reports of alleged violations seriously and is fully committed to investigating them effectively and in a timely manner, assessing the facts and taking appropriate action and sanctions where necessary. At the same time, it provides full protection to bona fide whistleblowers, including anonymity, without retaliation or reprisals, penalties or other negative consequences.

SALUS Group expects third parties to have effective mechanisms and systems in place through which their employees or contractors can raise and address any irregularities or violations in good faith.

Communicating with the media

Third parties may not communicate with the media on behalf of or in connection with the SALUS Group unless the SALUS Group has approved and endorsed the content in writing in advance.

Attitude towards animals

SALUS Group expects third parties to ensure compliance with all local laws and regulations related to animal welfare. Animals must be treated with respect and any pain or stress must be minimised.

2. LABOUR

Equal employment opportunities

SALUS Group wants to maintain and continue its reputation as a good and reputable employer and therefore ensures equal employment opportunities and equal and fair treatment of job applicants and employees.

SALUS Group also expects third parties to treat job applicants or employees equally.

Prohibition of discrimination and violence

SALUS Group treats all employees equally, regardless of gender, race, colour, religion, age, sexual orientation, nationality, marital status, etc., and respects and protects the employee's personality and privacy.

SALUS Group expects third parties to adhere to the same principles and principles.

Furthermore, third parties must provide their employees with a work environment free from sexual or any other harassment, inhuman treatment or violence, bullying, maltreatment and abuse, abusive, disrespectful, humiliating, unethical, intimidating or hostile behaviour and psychological, physical or any other violence.

Third parties must make it possible for employees to report any such behaviour and ensure that whistleblowers are treated fairly and without potential sanctions.

Personal data protection

SALUS Group is aware of the importance of the protection of personal data and complies with the applicable legislation in this area.

It expects third parties to do the same.

Child and adolescent work

SALUS Group complies with applicable legislation and regulations on employment and work for children and young people.

Third parties undertake to comply with the applicable local and other relevant legislation and regulations in the field of work and employment of children and adolescents.

3. HEALTH AND SAFETY

Safe working environment

Third parties must provide a safe working environment that prevents exposure to risks and hazards to health. Employees must be informed in advance of exposures and health hazards, if any, and trained and adequately protected against the consequences of such risks and hazards.

Furthermore, third parties must put in place systems and processes to protect workers from chemical, biological and physical hazards and injuries, both in the workplace and on other premises of the third party.

Third parties must have protocols in place to address or mitigate the effects of emergencies, including but not limited to earthquakes, floods, storms, fires, explosions, leaks of flammable, chemical or other substances, wars, etc.

Workplace risks and safety precautions

Third parties must have processes and systems in place to identify occupational or other hazards in the workplace. They must have risk levels and assessments in place and defined, which form the basis for the development of programmes to prevent or reduce such risks.

4. GOVERNANCE SYSTEM

Continuous and uninterrupted operations

Third parties must put in place measures to ensure the smooth and uninterrupted operation of their business and the performance of their contractual or other agreed activities with the SALUS Group, including in the event of unforeseen events such as fires, floods, earthquakes, etc.

Book and record keeping

Accurate bookkeeping and record-keeping are essential for the successful management of companies and for maintaining the trust of all stakeholders.

Third parties are required to maintain books and records that fully, accurately, fairly and correctly reflect business transactions to ensure complete, honest, timely and understandable financial and other disclosures.

Further, third parties must have document retention and destruction procedures in place to ensure that books and records are retained and destroyed in accordance with applicable regulatory, environmental, tax, labour and other laws.

Right to an audit

For the purpose of ensuring compliance of the contractual or agreed activities of the third party, SALUS Group may perform an audit of the third party as provided for in the concluded contract or agreement. The purpose and details of the audit shall be agreed in advance between SALUS Group and the third party.

5. SUSTAINABLE OPERATIONS

Sustainable development

SALUS Group expects third parties to work towards sustainable development and progress.

The performance and operation of companies within the framework of the ESG factors (Environment, Social, Governance) and GRI standards (Global Reporting Initiative) and other relevant agreements and arrangements adopted at international and local levels concerning sustainable development and providing the so-called "Life Cycle Assessment" are the responsibility of all of us, both SALUS Group and third parties.

Environmental goals

The SALUS Group strives to develop, offer and market products or services, and thus to comply with environmental regulations, with the aim of continuously reducing the negative effects of its activities on the environment, and thus to address environmental challenges in a preventive manner.

Key environmental protection requirements include ensuring the safe handling, storage, recycling and management of waste, air emissions, outflows, spillages, carbon footprint reduction, water consumption and waste production, and the efficient use of natural resources, which are an important building block of the SALUS Group's business.

SALUS Group is keen to work with third parties that also recognise the above requirements as key and have processes in place to protect and preserve the environment, thus contributing to the reduction of environmental burdens.

6. INTERPRETATIONS

Terms used in this Code

Third party means any organisational form that is considered a company under local law. For the purposes of this Code, we also include independent entrepreneur or one-person companies and other organisational forms with which the SALUS Group enters into a business relationship.

The Code constitutes the Code of Conduct for third parties of the Companies from SALUS Group.

Corruption is any breach of the duty to act by public or private officials and responsible persons, as well as the conduct of persons who are the instigators of the breach or persons who may profit from the breach by reason of a direct or indirect benefit promised, offered or given, or demanded, accepted or expected, for themselves or for another. Corruption takes many forms, from bribery, extortion, fraud, embezzlement, nepotism, clientelism and others.

Subcontractors are business partners selected by third parties for the purpose of performing or realising contractual or other agreed activities for the SALUS Group.

SALUS Group is a collective name for any company of the SALUS Group or the SALUS Group as a whole.