SALUS

Document

Code of Conduct for THIRD PARTIES

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Introduction

Adherence to the highest ethical standards and social responsibility are the fundamental values that the companies of the SALUS Group consistently follow and implement. In this way, we maintain and continue a long-standing tradition of integrity, trust and credibility.

The basic principles, values, rules and guidelines in which we believe, and act are defined in the Code of Conduct of the company SALUS, Ljubljana, d.d. and the SALUS Group.

Our business processes, which we regularly update, are set out in internal procedures, policies, instructions and guidelines. Every employee of the SALUS Group must familiarize themselves with the relevant internal documents, understand and strictly follow them. Every employee is also required to report any discrepancies or potential irregularities they observe.

In the SALUS Group, we emphasize the importance of responsible and sustainably oriented operations that extend beyond the SALUS Group and also include our business partners, i.e. third parties. We are convinced that only together can we create an environment that promotes the development of the wider community, respect for people and responsible use of resources. We implement sustainable operations together with all our stakeholders, as we believe that responsibility towards the environment and society is a partnership process. We advocate a connecting approach, as we are aware that the efforts of individual stakeholders alone are not enough. Our relationships are based on trust, professionalism and shared concern for a more sustainable and environmentally friendly future.

With this **Code of Conduct for THIRD PARTIES**, we express the expectation that you share our values and responsible approach to business with us, and that your actions contribute to a safe, transparent and trustworthy business environment. Together, we strive to make progress that benefits both our organizations and the broader business ecosystem.

In the SALUS Group, we strive to cooperate with third parties who respect the applicable legislation, relevant regulations, standards and good business practices, as well as the principles defined in this Code. We expect a high level of responsibility, integrity and compliant behavior from all partners.

We also expect third parties to meaningfully transfer these principles and standards to their subcontractors and related entities, and to ensure that appropriate measures are in place to ensure their consistent compliance throughout the value chain.

Compliance with these principles is the foundation of trust, transparency and responsible cooperation. Adherence to these principles is essential for establishing and maintaining quality business relationships and for long-term and successful business cooperation.

Compliance with established principles and standards is therefore one of the key criteria that we at the SALUS Group consider when selecting and continuing to cooperate with you, our business partners.

1. RESPONSIBILITY

In the SALUS Group, we operate honestly, responsibly and in accordance with the law, regulations and internal standards. In conducting our business, we consistently adhere to ethical principles, professional integrity, and the rules of transparent and compliant business practices, and we expect the same from you, our business partners.

Fair competition and ethics

Strict adherence to fair business practices, including respect for fair competition, ethical and respectful behavior and lawful conduct, are the commitments that we in the SALUS Group take into account in our operations.

The business of you, third parties, must also reflect high ethical standards and must be fair, understandable and in accordance with applicable legislation and all relevant regulations.

Communications between you, third parties, and your business partners and competitors must be careful and thoughtful and must not contain any content or manner of expression that would constitute anti-competitive behavior or that could be interpreted as such. You must comply with and act in accordance with competition law.

Prevention of corruption

In the SALUS Group, we adhere to industry regulations and the highest standards of business ethics, act honestly and transparently, and implement a zero-tolerance policy when it comes to any form of corruption.

You must not, directly or indirectly, give, offer, accept, or solicit the giving, offering, or acceptance of any gifts, entertainment, or anything of value to any healthcare professional, public officials, holder of public authority, state functionary or candidate for state office, official of political parties or their representatives, or anyone else for the purpose of:

- acquiring or retaining a business,
- influence a business decision, or
- providing an unfair advantage.

Gifts and hospitality

The basic principle that we follow in the SALUS Group and expect the same from you, third parties, is that it is forbidden to encourage, induce, give, offer, promise or accept gifts or hospitality that would be considered corruption or bribery.

If gifts and/or hospitality are permissible in accordance with local law or general industry principles, as an expression of culture or local customs, they may be of modest or negligible value, unsolicited, reasonable and merely occasional.

You, third party, must not give gifts or hospitality in the name, on behalf of or in connection with business with the SALUS Group, unless this has been expressly agreed and approved in advance, whereby you must always act in accordance with applicable law.

Donations and charitable contributions

Donations and charitable contributions are usually intended to help in natural and other disasters, support the sick, the helpless and individuals living at or below the poverty line, or address the social aspect and broader social responsibility, are allowed and represent an important part of responsible action.

Such activities, if any, must always be carried out transparently, in good faith and in accordance with applicable law. Their purpose must be purely charitable, without vested interests or influencing business decisions.

It is prohibited to receive, solicit, or expect any direct or indirect benefits, favors, or preferential treatment in connection with donations or charitable contributions. Any form of conditioning or linking donations or charitable contributions to the achievement of business benefits is unacceptable.

Facilitation payments

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

Facilitation payments are prohibited.

Policy contributions

At the SALUS Group, we do not oppose the political definitions of you, third parties, or your employees, and we respect your and their right to hold personal political beliefs and engage in political activities.

You may make political contributions to political activities, but only in your own name and on your own behalf and never in the name and/or on behalf of the SALUS Group. In doing so, you must act in accordance with the applicable law and avoid any impression that you represent the views of the SALUS Group.

In the SALUS Group, we do not make, promise or commit political contributions, and we maintain political neutrality in our business.

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 purposes or influence on decisions that could result in any undue benefits.

Conflict of interest

A conflict of interest is when an individual is involved in decision-making, voting or participation in a matter in which his/her impartiality and objectivity may be compromised due to his/her direct or indirect, personal, financial, family, social, political or other interests, which may include the interests of his/her family members, or his/her association with a third party. A conflict of interest also occurs when an individual exploits business opportunities of the company where he/she is employed or with which he/she otherwise cooperates, for personal gain.

We expect you, a third party, to ensure that appropriate measures are in place to identify, prevent and manage conflicts of interest and that your employees and individuals with whom you otherwise interact do not act contrary to your interests or interests of the SALUS Group.

Confidentiality of information and protection of trade secrets

When performing business processes, you, third parties and your employees may obtain or become acquainted with certain information, documents or objects that the SALUS Group defines as a trade secret. A trade secret includes undisclosed know-how, experience, documents, business information and/or objects that meet the following conditions:

- is a secret that is not generally known or easily accessible to persons in circles that normally deal with this type of information,
- has a market value, and
- in the SALUS Group, as their holder, we have taken reasonable steps to maintain their secrecy under the circumstances.

Trade secrets also include information that is designated as such in writing by the board of directors or management of a company within the SALUS Group, or by a person authorized by them, and that meets the legal requirements for a trade secret.

Persons who have access to a trade secret are obliged to protect it and store it in such a way that unauthorized persons cannot access it, and not to disclose or transmit it without a proper legal basis or in violation of the express permissions of the SALUS Group.

The obligation to protect a trade secret arises at the moment that you, as a third party, become acquainted with it and continues even after the termination of business or other cooperation with the SALUS Group.

Public disclosure, consideration or publication of information constituting a trade secret is permitted only based on the prior written consent of the board of directors or management of a company from the SALUS Group.

Money laundering, terrorism financing and blocked companies and individuals

Money laundering

Money laundering is any handling of money or property obtained through a criminal offence which includes:

- the exchange or transfer of money or other property arising from a criminal offence,
- concealing or disguising the true nature, source, location, movement, disposition, ownership, or rights relating to money or other property derived from a criminal offense.

Money laundering is prohibited.

It is also prohibited to engage in transactions that facilitate money laundering or cause illegal diversions of funds.

Terrorism financing

Terrorism financing is the provision or collection or attempt to secure or collect money or other property of legal or illegal source, directly or indirectly, with the intention or knowledge that it will be used, in whole or in part, to carry out a terrorist act or other act related to terrorism, or that it will be used by a terrorist or terrorist organization.

Terrorism financing is prohibited.

Blocked companies and individuals

Third parties with whom we cooperate, as well as your key owners, management and affiliated companies, must not be included in any official lists of persons or entities subject to international sanctions or other legal restrictions imposed by competent official authorities.

You must also not act on behalf of or in the interests of sanctioned or blocked persons or entities. You must also not supply or otherwise facilitate products or services originating from sanctioned persons or entities.

If you or any person associated with you is added to an official list of sanctioned, blocked or restricted persons or entities during the duration of your business cooperation with the SALUS Group, you must immediately notify the SALUS Group company with which you cooperate.

Whistleblowing and reporting of misconduct

At the SALUS Group, we adhere to the principle of open communication, support an open-door policy, and encourage all stakeholders to report any irregularities or violations in good faith.

We take all reports of alleged violations in the SALUS Group seriously and are fully committed to their effective and timely investigation, objective assessment of the facts and, if necessary, taking appropriate measures and sanctions. We guarantee whistleblowers adequate protection, including the possibility of anonymity, without the risk of retaliation, reprisals, penalties or other negative consequences.

We expect you, a third party, to have effective whistleblowing mechanisms and systems in place through which your employees, contractors or other stakeholders can raise potential breaches in good faith, and to ensure that they are dealt with appropriately and in a timely manner.

At the same time, the SALUS Group expects third parties to immediately notify us of any violations that could affect the business or reputation of the SALUS Group and to cooperate constructively with us in the investigation and elimination of any identified irregularities.

Communication with the media

You may not communicate with the media on behalf of or in connection with the SALUS Group, unless the SALUS Group has approved and confirmed such communication in writing in advance. This includes any form of public statement, comments, announcements or information that could relate to the activities, operations, employees or reputation of the SALUS Group. You must ensure that any media enquiries relating directly or indirectly to the SALUS Group are immediately redirected to the competent persons within the SALUS Group.

Attitude towards animals

We expect third parties doing business with the SALUS Group to consistently comply with all applicable local laws, regulations, and standards governing animal welfare. You must ensure the proper care of animals, based on scientifically proven practices and aimed at minimizing unnecessary pain, stress, or suffering. In all activities involving animals, third parties must carry out procedures that comply with legislation, recognized guidelines, and good practices in the field of animal welfare.

2. LABOR

Equal employment opportunities

At the SALUS Group, we are committed to maintaining and upholding our reputation as a good and reputable employer, therefore, we ensure equal employment opportunities and treat job applicants and employees fairly and equally.
The SALUS Group also expects the same treatment from you, third parties, both in employment and in the day-to-day treatment of employees. Third parties must ensure a work environment in which everyone is treated with respect, free from discrimination or inappropriate behavior, and in which employment opportunities are available to all under the same conditions.

Prohibition of discrimination and violence

In the SALUS Group, we provide equal treatment to all employees, regardless of gender, race, skin color, religion, age, sexual orientation, nationality, marital status, etc., and we respect and protect the employee's personality and privacy.

We expect you to adhere to the same principles and guidelines. Furthermore, third parties must ensure that their employees have a work environment free from sexual or any other form of harassment, inhuman treatment or violence, bullying, abuse and intimidation, offensive, disrespectful, humiliating, unethical, intimidating, or hostile behavior, and psychological, physical, or any other form of violence.

Third parties must allow employees to report any such behavior and ensure fair treatment without any potential sanctions for whistleblowers.

Personal data protection

The SALUS Group is aware of the importance of protecting personal data and acting in accordance with the applicable legislation in this area.

We expect third parties to conduct their business in accordance with the applicable legislation on the protection of personal data and to ensure the lawful, secure and responsible processing of personal data. We expect you to process personal data only for permitted purposes, to the extent necessary and by providing appropriate measures.

Child and adolescent labor

In the SALUS Group, we comply with the applicable legislation and regulations in the field of employment and work of children and adolescents.

Third parties undertake to also comply with all applicable laws and regulations in the field of work and employment of children and adolescents.

3. HEALTH AND SAFETY

Safe working environment

You, third parties, must provide a safe working environment that prevents exposure to risks and health hazards. Workers must be informed in advance of exposure and health hazards, if necessary trained and adequately protected against the consequences of such risks and hazards.
Furthermore, you must also put systems and processes in place to protect workers from chemical, biological and physical hazards and injuries, both in the workplace and in your other business premises.

Third parties must have protocols in place to eliminate or reduce the effects of the consequences of emergency situations, which include, in particular, but not exclusively, earthquakes, floods, injuries, fires, explosions, leaks of flammable, chemical or other substances, wars, etc.

Workplace risks and safety measures

Third parties, like the SALUS Group, must have processes and systems in place to identify occupational and other hazards in the workplace. You must have established and defined risk levels and assessments, which are the basis for the preparation of programs for the prevention or reduction of such risks. You need to regularly monitor and update risks according to changes in work processes.

4. MANAGEMENT SYSTEM

Continuous and uninterrupted operations

Third parties must implement measures to ensure the uninterrupted and continuous operation and performance of contractual or other agreed-upon activities with the SALUS Group, even in the event of unforeseen circumstances such as fires, floods, earthquakes, etc.

Information security

In the SALUS Group, we consistently protect our information systems, data and communication networks, considering all applicable regulations, internal information security policies and good practices. We carefully ensure the protection of business and personal data against unauthorized access, loss, alteration or misuse, and we use secure and approved IT solutions.

We expect third parties to provide at least the same level of information security as the SALUS Group and to comply with all relevant laws, regulations and contractual provisions in the field of information and data protection in their operations. We also expect third parties to have appropriate technical and organizational measures in place to prevent security incidents and

to immediately notify the SALUS Group of any potential security incident that could affect the operations or data of any company in the SALUS Group.

Bookkeeping 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 must maintain accounting records that fully, accurately, reliably, and correctly reflect business transactions, thereby ensuring complete, fair, timely, and understandable financial and other disclosures.

Furthermore, third parties must have accepted procedures for the retention and destruction of documentation to ensure that business books and documentation are kept and destroyed in accordance with applicable regulatory, environmental, tax, labor and other regulations.

Right to audit

For the purpose of ensuring compliance with the contractual or agreed activities of a third party, a company from the SALUS Group may carry out an assessment of you, a third party, as provided for in the concluded contract or agreement.
The purpose and details of the audit are agreed in advance between the SALUS Group company and the third party.

5. SUSTAINABLE BUSINESS

Sustainable development

At SALUS Group, we are committed to sustainable development and consider key environmental, social and governance (ESG) aspects in our operations. We act in accordance with applicable legislation and other relevant guidelines and standards, for responsible use of resources, reduction of environmental impacts, respect for human rights, safe working conditions and ethical and transparent management.
We expect third parties to conduct in accordance with the same principles of sustainable development and to incorporate ESG factors into their operations. This includes the responsible use of natural resources, the prevention of negative impacts on the environment and society, and the observance of high ethical, human and governance standards. You must also ensure that your suppliers and subcontractors comply with the same requirements and thus contribute to the common goals of sustainable operation.

Environmental goals and resource management

In the SALUS Group, we strive to develop, offer and market products or services in a way that consistently respects environmental legislation and good practices, with the aim of reducing

negative environmental impacts. In our operations, we proactively address environmental challenges and promote the responsible use of natural resources.

The key environmental requirements in the SALUS Group include safe handling, storage, recycling and disposal of waste, control of air emissions, prevention of spills and leaks, reduction of carbon footprint, responsible use of energy and water, and prevention of waste generation.

We expect third parties to comply with environmental legislation in their operations and to act in a manner that minimizes negative impacts on the environment. We expect responsible management of resources, prudent use of energy, raw materials and water, and efforts to reduce emissions and other environmental burdens.

Third parties should act in a manner to prevent pollution and manage waste appropriately in accordance with applicable requirements. You should also promote practices that contribute to the long-term protection of the environment and ensure that your suppliers and subcontractors adhere to similar principles.

6. INTERPRETATIONS

Terms used in this Code

Third party refers to a legal entity of any legal form that is considered a business entity under local law. For the purposes of this Code, this also includes sole entrepreneurs or one-person companies and entities of other organizational forms with which the SALUS Group enters a business relationship.

Code means the Code of Conduct for THIRD PARTIES.

Corruption is any breach of the duty of conduct of official and responsible persons in the public or private sector, as well as the conduct of persons who are the initiators of violations or persons who may benefit from the violation for the sake of a directly or indirectly promised, offered or given or requested, accepted or expected benefit for themselves or for another. Corruption takes many forms, from bribery, extortion, fraud, to fraud, embezzlement, nepotism, clientelism, and others.

The SALUS Group is a group of legally independent companies that are in such a mutual relationship that, according to the provisions of the Slovenian Companies Act in force at any time, they are considered to be affiliated companies, whereby SALUS, Ljubljana, d.d. is the controlling company.