



CORPORATE SOCIAL RESPONSIBILITY CODE

TECHNOBELL d.o.o. Koper
Engineering Innovative Technologies

November 2022

INDEX

1	PURPOSE	3
2	STAKEHOLDER RELATIONS	4
2.1	CHOOSING SUPPLIERS OF PRODUCTS AND SERVICES.....	5
3	CONFLICT OF INTERESTS	7
3.1	THIRD-PARTY EMPLOYMENT	7
3.2	PERSONAL FINANCIAL INTEREST.....	7
4	MANAGEMENT AND EMPLOYEES	9
4.1	USE OF FINANCIAL AND OTHER OPERATING ASSETS.....	10
5	USE AND DATA PROTECTION	11
6	IMPLEMENTATION OF THE CORPORATE SOCIAL RESPONSIBILITY CODE	12
7	COMPLAINTS AND REPORTS OF MISCONDUCT	12
8	CONFIRMATION PROCESS	12
9	VALIDITY	12
	ANNEX A – CORPORATE SOCIAL RESPONSIBILITY CODE – EMPLOYEE STATEMENT	13
	ANNEX B – CORPORATE SOCIAL RESPONSIBILITY CODE – SUBCONTRACTORS STATEMENT	14

1 PURPOSE

This Corporate Social Responsibility Code defines the conduct of TECHNOBELL d.o.o. Koper (hereinafter: the Company), which is in compliance with the requirements of the SR 10 standard (Corporate Social Responsibility Management System), Technobell's Sustainable Business Strategy for the period 2021-2026 and provides guidance on the Company's ethics, stakeholder, asset management and environmental policies.

The Company policy consists of the policy of the social responsibility management system and the quality management system. The Company policy applies to all employees and other interested stakeholders who work or act on behalf of the Company. In the Company, we all strive for the highest level of social responsibility.

The implementation of the Corporate Social Responsibility Code must be conscious and subject to constant attention and monitoring by both management and employees.

Assumption: Employees are all full-time employees and contractual partners who work in the Company or for the Company on other legal bases (e.g., entrepreneurs, copyright contracts, subcontracts, supplementary work, etc.).

2 STAKEHOLDER RELATIONS

Customers - Our customers are the reason for our existence. The Company recognizes their requirements and expectations, works closely with them and provides them with ongoing and focused support. Our knowledge and experience are fully available to them anywhere and at any time. We provide high quality solutions that are also environmentally friendly. The reliability and quality of our work is reflected in high level of mutual trust and long-term cooperation. The Company will not employ individuals known to be related by kinship, marriage, or adoption (other than third-generation relationships) to a person from a private or public business entity who has an influence on the purchase decisions of the Company's products or services. Such employment is only permissible if management provides adequate safeguards to prevent business unethical conduct.

Employees - The greatest value of the Company are our employees and teamwork. The Company provides all employees with high level of safety and health at work (free entry to the pool, fitness, sports days, etc.) and various bonuses (parking space, catering, etc.). In addition, our business follows the guidelines of the European Green Office. We are an energetic and generationally and professionally diverse team. This enables us to develop services and products that are competitive on the market and at the same time respect trends in the field of environmental protection. A relaxed work environment and adequate infrastructure available to employees is a prerequisite for employee well-being and motivation. We enable employees to self-realize and achieve their business goals and their private goals. To the greatest extent possible, we enable them to reconcile work responsibilities with their private lives (taking annual leave in accordance with the needs of employees when work obligations so permit). We are also a family-friendly Company (parental leave, New Year's event for employee's children, etc.).

Owners - The Company strives, while respecting all principles of corporate social responsibility, to ensure a lasting and profitable growth of the value of the property for the owners who have invested in our business and our professional advancement. This requires constant monitoring of the requirements and expectations of all stakeholders and managing them to mutual satisfaction.

Subcontractors - The Company only selects subcontractors that are socially responsible and provide the required quality to the customer's standards and requirements. We also include subcontractors in business and social events organized by the Company or other organizers (annual meetings, fairs, business conferences, etc.). The Company assures subcontractors that all processes and materials transferred by the Company to subcontractors are in full compliance with all occupational safety and health requirements and comply with environmental legislation.

Suppliers - The Company evaluates and thus selects suppliers where no suspected breach of corporate social responsibility is detected. The Company guarantees all its suppliers unconditional respect for all contractual obligations. We also include suppliers in business and social events organized by the Company or other organizers (annual meetings, fairs, business conferences, etc.). The Company is aware that suppliers always

need to achieve a win-win situation, so our relationship with suppliers is always fair, consistent with all business practices and long-term cooperation.

Government and Public Sector - We comply with all provisions of national and international law and comply with all related standards and principles. We act honestly and with integrity and follow all guidelines that ensure corporate social responsibility. We maintain good relations with the state and the public sector. They are based on an understanding of the needs and requirements of the state and public sector and on effective communication. The Company does not interfere with local and state policy. We regularly meet all obligations to our country of origin (reporting, taxes, contributions, etc.) and in all areas where we do business.

Competitors - The business policy of the Company disables business practices that contain elements of unfair competition. The Company respects (tangible and intangible) property rights of competitors, does not use unethical practices (e.g., industrial espionage), does not endorse or conclude contracts that unlawfully or otherwise restrict competition (e.g. price agreements and market sharing). With its business and pricing policies, the Company does not market at dumped prices and does not disseminate false or misleading information about competitors. We treat our competitors with respect and maintain proper business relationships.

Financial Sector (Banks and Insurance Companies) - The Company provides complete transparency in its operations with financial institutions. All financial transactions are supported by appropriate supporting documents to ensure the legal and responsible financial management. All insurance policies concluded by the Company are based on the true value of the goods. In the case of loss cases, the Company always shows only the actual situation and the claim for damages always has a basis in the actual estimated damage.

Community and society / Alliances and joint efforts - The Company is a longstanding member of the Chamber of Commerce (PGZ), cooperates with various faculties of the University of Ljubljana, promotes the local economy (buying domestic products and promoting Slovenia as a tourist destination), supports activities in the local community, seeks synergies between European and other funds and the local economy with a view to developing new green technologies for waste recovery and thereby reducing the environmental footprint.

2.1 Choosing suppliers of products and services

The Company correctly and impartially treats all submitted offers of its suppliers. The evaluation of the offer, the assignment of the contract and the handling of the contract must be based on strictly professional and socially responsible criteria and carried out in a transparent manner. It is not allowed to favour an individual supplier in the process of contracting.



We require suppliers to respect the general principles of corporate social responsibility, which is also one of the elements of their assessment. A serious breach of the chosen supplier in social responsibility, which can jeopardize the integrity of the Company social responsibility, results in the termination of business cooperation.

When negotiating with suppliers, employees respect the laws, customs, and traditions of the countries where the procurement process takes place. Our personal integrity does not allow us to participate in an act that may be contrary to the accepted Corporate Social Responsibility Code or business ethics, even if it is legal, customary, and accepted in the supplier's country.

Employees, subcontractors, or other agents of the Company:

- may not accept payments, gifts, awards of any kind (including any services that may be considered as placing employees under certain obligations to third parties who are already in business or wish to do business with the Company);
- may receive gifts, assets or services from suppliers not exceeding the statutory value for non-taxable business gifts;
- in cases where the rejection of a gift or reward is not possible without damaging the legitimate business interest of the Company, the decision of the acceptance of the gift is in the domain of the top management.

Unless otherwise prohibited, the Company may, for any reasonable business or socially responsible purpose, pay transportation and living costs to attendees (equipment inspection, training, negotiations, event invitations, etc.), subject to the prior approval of management for payment of these costs.

All such costs must be accounted for in accordance with applicable tax law. General costs, such as sales promotion, should not be billed as travel expenses.

3 CONFLICT OF INTERESTS

The Company acts in accordance with ZGD-1 Article 38a (Companies Act), thus eliminating conflicts of interest. In doing so, we follow Article 16 of the ZDDPO-2 (Corporate Income Tax Act), which defines who is a related party.

3.1 Third-party employment

Employees and subcontractors of the Company may not, without the prior consent of the Company management:

- be employed or contractually involved in any other Company or person, including self-employment, if such Company or person is a competitor or significant supplier of the Company;
- perform any other activity where personal skills and knowledge is transferred or used for activities that deviate from the present or future business interests of the Company;
- have any relationship with any other company or stakeholder (e.g., political party) that could affect the independence of the employee's judgment in transactions between the Company and other companies or non-business entities or otherwise impede the proper performance of the employee's duties in the Company;
- accept the function of a leading or supervisory body outside the Company, except for charitable, educational, political, and religious organizations or similar groups.

3.2 Personal financial interest

Supplier / Customer Relationships: Employees and subcontractors, in collaboration with Company management, speak openly about any interest in any supplier or customer whose interest could affect their loyalty to the Company.

Competitor Relationships: Employees should have no interest in doing business with another company, a competitor of the Company. In doubt, employees should obtain the opinion of the Company management.

Conflict of interest: Employee interest in connection with a supplier, subcontractor, customer or competitor may lead to a conflict of interest, depending on the facts and circumstances of each case.

In the Corporate Social Responsibility Code, "conflict of interest" is understood as:

- A kinship relationship between a Company employee and a person who, through his or her function, may influence decisions related to the business of the Company or its social responsibility and lives in his household, or with any person with whom he has a personal relationship.

- Relationship with a customer, competitor, supplier or cooperative in which the employee has a financial interest; the employee's relationship with the Company creditor or debtor; or with anyone else who may provide an employee with a personal benefit that can reasonably be expected to relieve the employee of an obligation or to provide some personal benefits or advantages to the employee to the detriment of the Company and / or is contrary to the accepted Corporate Social Responsibility Code.

All employees are aware of the duty to disclose potential or actual conflicts of interest. Employees inform the Company management with the appropriate internal communication method. Any concealment of conflicts of interest constitutes a serious breach of duty which is subject to appropriate disciplinary sanctions. To this end, the Company has set up a documented Statement of Conflict of Interest, which is kept in the employee's personal file.

4 MANAGEMENT AND EMPLOYEES

Business success and social responsibility must go hand in hand to ensure the long-term success of the business. Our business is sustainable, based on a vision of growth strategy and key strategic goals. We strive for the highest level of social responsibility and quality assurance in all areas.

Leadership and Trust: All employees are committed to the Corporate Social Responsibility Code and leadership is an example. The Company cultivates an atmosphere of trust in which its leaders are responsible for ensuring all the conditions for the implementation of the Corporate Social Responsibility Code.

Tolerance and equal opportunities: The Company respects human rights worldwide. As a Company with global reach, it works with employees and business partners of different nationalities, cultures, and customs. The Company provides all persons with equal treatment (non-discrimination) regardless of skin colour, ethnicity, gender or sexual orientation, religion or belief, political opinion, education, and age. The Company knows positive discrimination in the case of performing parenting roles and in cases encouraged by the state through its activities (active employment of young people, the elderly, the disabled, etc.).

Employees should avoid hate speech (this also applies to social networks) to prevent the dissemination or forwarding of information that could incite racial or other hatred, glorify violence or other unacceptable acts, or have offensive content.

Appropriate working conditions: The Company provides its employees with fair and non-discriminatory remuneration and ensures appropriate working conditions in accordance with all legal requirements and principles of good practice. It rejects all forms of forced labour and child labour in all the environments in which it operates. The Company undertakes not to interfere with the legal representation and eventual organization of employees, which is not contrary to general social norms.

Forced labour and child labour: The Company has mechanisms in place to ensure that both forced labour and child labour are not used in the Company or its value chain. With suppliers who are more strongly influenced by the Company, we establish safeguards to prevent child labour or forced labour from being used in any workplace, including jobs in other countries. The concept of forced labour is understood in accordance with all the international norms that address it. In no case shall we expose minors to working conditions or environments that are unhealthy, risky, degrading, or dangerous, and in full compliance with labour law and the internal document "Safety Statement with Risk Assessment".

Asset protection: The Company creates the conditions for its employees to effectively protect the Company's tangible and intangible assets and assets entrusted to us by our business partners. These assets include real estate, manufacturing and inventory equipment, securities and cash, office equipment and supplies, information system, software, copyright, personal information, trade secrets, patents, trademark rights,



knowledge, and other intellectual property. All perceived practices that are contrary to the guidelines of good conduct in the field of asset protection, such as fraud, theft, and embezzlement, will be reported to the appropriate national authorities. Machines and appliances may only be used for work-related purposes unless private use is expressly permitted.

4.1 Use of financial and other operating assets

The financial and other operating means of the Company may not be used, directly or indirectly, to make any illegal payments, gifts, and thanks of any kind, whether lawful or unlawful, which directly or indirectly provide the personal benefit of the intermediary or employee of any entity with which the Company operates. Unless it is contrary to the customer's business policy, the Company may donate the usual promotional items or products or objects of lower value bearing the name or Company logo.

Under no circumstances should a payment be made to a government official or political party for appreciation or as a tip (or gift of any kind), either in recognition of effective service or any other act.

The financial and other Company assets should not be used directly or indirectly for political contributions, whether legal or illegal. The term "political contributions" is used in the broadest sense and includes dinners, banquets, meet-ups, or other fundraising opportunities locally, provincial or national (including free or reduced cost for the use of property or services) targeted directly or indirectly at a political candidate, party, committee or organization.



5 USE AND DATA PROTECTION

Employees are expected to exercise caution when using Company-owned data.

Confidentiality: All information relating to internal business matters that has not been disclosed to the public is considered confidential, in particular any information relating to any documented or undocumented technological know-how. Employees must therefore not disclose any data owned by the Company in any form to third parties. This also applies after termination of their employment in accordance with the signed employment contract. It is not permitted to obtain personal benefits or benefits to others through the use of inside information.

Right to privacy: The Company ensures that its conduct will not violate the privacy rights of employees and their families. The practices of implementing the GDPR regulation and the ZVOP-1 requirements ensure the confidentiality of employees' personal data. The Company also provides the necessary practices to inform employees about the use of their personal data.

Documented data security: Global electronic data exchange is essential for effective work and business success in general. However, in addition to benefits, electronic communication can pose a risk to all areas of data protection. All documents and storage media must be protected at all times from various undesirable influences, such as high temperature, third party access or unauthorized persons, etc. Management and employees comply with effective safeguards against the risks to the security of documented data. IT software and hardware are considered in terms of risks and opportunities, which ensures that we have safeguards in place for all significant IT risks.

True information: In oral or written internal or external information, everyone in the Company is required to provide true information. Data manipulation is unethical and unacceptable in our environment.

6 IMPLEMENTATION OF THE CORPORATE SOCIAL RESPONSIBILITY CODE

Everyone in the Company must comply with this code, effective from the date of approval.

7 COMPLAINTS AND REPORTS OF MISCONDUCT

All employees are required to report violations of the Corporate Social Responsibility Code to the Ethics Committee, consisting of the Company's director and employee representative.

Company management ensures that an employee who, on the basis of tangible evidence, assesses that the Corporate Social Responsibility Code has been violated and exercises the right to report, does not suffer any inconvenience or retaliation. The management will, to the fullest extent possible and within the legal framework, maintain the confidentiality of the identity of each employee who will participate in the process of reporting a breach of the Corporate Social Responsibility Code. The same applies to the identity of employees who are involved as witnesses in investigating such violations.

8 CONFIRMATION PROCESS

All employees of the Company and those stakeholders designated by the management of the Company, by signing the statement in the Annex "Corporate Social Responsibility Code - Statement", declare that they have read, understood, and will comply with this code. The signed attachment is kept for employees in the personal folder and for everyone else in the fireproof file cabinet.

9 VALIDITY

This Corporate Social Responsibility Code is effective from November 16, 2022.

TECHNOBELL d.o.o. Koper

Luka Dolenc, Director

Annexes:

Annex A - Corporate Social Responsibility Code – Employee Statement

Annex B - Corporate Social Responsibility Code – Subcontractors Statement



ANNEX A – CORPORATE SOCIAL RESPONSIBILITY CODE – EMPLOYEE STATEMENT

Employee's name and surname / Entrepreneur:

Job title:

I certify that I have read and understand the contents of the "Corporate Social Responsibility Code of TECHNOBELL d.o.o. Koper" and I confirm that I will fully abide by the above.

Are you aware of circumstances that may constitute a "conflict of interests" under the Corporate Social Responsibility Code? (Mark accordingly)

- NO, I do not know any circumstances that may constitute a "conflict of interests".
- YES

Please describe below the relationships, transactions, positions, or circumstances that you think may present a conflict of interest:

Do you understand that any change declared on this Statement constitutes the need to re-declare conflict of interest? (Mark accordingly)

- YES
- NO

Date: _____

Signature: _____



ANNEX B – CORPORATE SOCIAL RESPONSIBILITY CODE – SUBCONTRACTORS STATEMENT

Name of subcontractor:

Company / Entrepreneur:

I certify that I have read and understand the contents of the "Corporate Social Responsibility Code of TECHNOBELL d.o.o. Koper" and I confirm that I will fully abide by the above.

Date: _____

Signature: _____