



**FORTENOVA  
GRUPA**

# **KODEKS POSLOVNEGA RAVNANJA DOBAVITELJEV** SUPPLIER CODE OF CONDUCT

**Standardi poslovnega ravnanja, ki se pričakujejo  
od vseh udeležencev v dobavni verigi**

Standards for business conduct expected from all  
participants in the supply chain



# KODEKS POSLOVNEGA RAVNANJA DOBAVITELJEV

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# SUPPLIER CODE OF CONDUCT

Standards for business conduct expected from all participants in the supply chain

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## 1. KODEKS POSLOVNEGA RAVNANJA DOBAVITELJEV

### 1.1. Cilj in namen kodeksa

Skupina Fortenova priznava korporativno družbeno odgovornost podjetij; zato je cilj Skupine še naprej graditi trajnostno in dobičkonosno poslovanje, ki povečuje vrednost celotne Skupine z vodenjem poslovanja v skladu z družbeno, upravljaljsko in okoljsko odgovornostjo.

Splošni cilj skupine Fortenova je povečati spoštovanje človekovih pravic, pravic zaposlenih, varstva okolja in splošnega etičnega poslovanja znotraj skupine in med vsemi udeleženci dobavne verige Skupine.

Dobavitelj za namene tega dokumenta pomeni vsako osebo v dobavni verigi, to je fizično ali pravno osebo, pri kateri Skupina nabavlja blago in/ali storitve (vključno s finančnimi in svetovalnimi storitvami).

Poleg uporabe in spremljanja veljavnih nacionalnih zakonov in mednarodnih konvencij Skupina meni, da je uporaba tega kodeksa bistvena za sodelovanje s sedanji in prihodnjimi dobavitelji.

S tem kodeksom Skupina oblikuje, izvaja in svojim dobaviteljem sporoča kriterije, po katerih Skupina vstopa v odnos z dobaviteljem. Ti kriteriji morajo biti v skladu s poslovnimi cilji skupine Fortenova in osredotočeni na pridobivanje in zagotavljanje najboljšega možnega izdelka in/ali storitve, hkrati pa se je treba izogibati kakršnimkoli diskriminatornim praksam. Ti kriteriji vključujejo dober ugled, poklicne kvalifikacije, skladnost z vsemi ustreznimi zakonsko predpisanimi predpogoji, ter spoštovanje pravil in obveznosti iz tega Kodeksa.

Skupina pričakuje in spodbuja svoje dobavitelje in njihove podizvajalce, da razvijejo in uvedejo ustrezne sisteme vodenja, primerne za podjetje njihove velikosti in panoge, da bi zagotovili skladnost z veljavnimi zakoni in predpisi ter pričakovanji iz tega Kodeksa, kar naj bi prispevalo k temam trajnostnega razvoja, ki so še posebej pomembne za Skupino.

## 1. SUPPLIER CODE OF CONDUCT

### 1.1. Aim and purpose of the Code

Fortenova Group recognises corporate social responsibility; hence, Group objective is to keep building a sustainable and profitable business that increases the value of the entire Group through conducting its business operations in harmony with social, governance and environmental responsibility.

Fortenova Group's overall objective is to increase respect for human rights, employee rights, environmental protection, and general ethical business within the Group and among all participants in Groups' supply chain.

Supplier, for the purpose of this document, shall mean any person in the supply chain, i.e., a person or a legal entity from whom the Group procures goods and/or services (including financial and advisory services).

In addition to applying and observing applicable national laws and international conventions, Group considers the application of this Code to be essential for cooperation with its current and future suppliers.

Through this Code the Group devises, implements and communicates to its suppliers the criteria under which Group enters a relationship with a supplier. These criteria must be in line with Fortenova Group's business aims and focus on acquiring and providing the best possible product and/or service while avoiding any discriminatory practices. These criteria shall include good reputation, professional qualifications, compliance with all the relevant prerequisites prescribed under law, and adherence to the rules and obligations outlined in this Code.

Group expects and encourages its suppliers and their subcontractors to develop and implement relevant management systems appropriate for a company of their size and industry to ensure compliance with applicable laws and regulations and the expectations from this Code,

Od vseh udeležencev v dobavni verigi se pričakuje, da bodo s podpisom posebnih pogodbenih klavzul o skladnosti, posebnih izjav o skladnosti in tem podobnih priznali in se zavezali k spoštovanju načel odgovornega poslovanja tega Kodeksa. Dobavitelji zagotovijo, da njihovi poddobavitelji, delavci, svetovalci in drugi pogodbeniki ravnajo v skladu s tem Kodeksom. S tem bodo smernice vplivale na celotno vrednostno verigo.

Skupina oceni skladnost dobaviteljev s Kodeksom na podlagi revizij, samoocen, ocen in pregledov dokumentacije glede na vrsto poslovanja in delitev Skupine.

## 1.2. Poslovna etika

Skupina Fortenova je zavezana k etičnemu poslovanju in od svojih dobaviteljev zahteva, da poslujejo s sprejemanjem najvišjih standardov etičnega ravnanja, ki so posebej opredeljeni v Etičnem kodeksu skupine Fortenova in tem Kodeksu.

Dobavitelj zato:

- se bo izogibal sodelovanju v korupciji, izsiljevanju ali podkupovanju ali zavestni koristi od korupcije, izsiljevanja ali podkupovanja;
- bo upošteval veljavne zakone, direktive in uredbe proti korupciji in podkupovanju, ki urejajo delovanje v državah, v katerih posluje;
- se bo izogibal se plačilom za pohitritev postopka (angl. facilitation payment) in si prizadeval za njihovo odpravo;
- bo spoštoval protimonopolno in drugo konkurenčno pravo;
- bo razkril vsa potencialna ali dejanska navzkrižja interesov, kar med drugim vključuje tudi identifikacijo končnih dejanskih lastnikov;
- bo upošteval veljavne gospodarske sankcije in predpise o nadzoru izvoza/uvoza;
- bo spoštoval predpise o varstvu podatkov s posebnim poudarkom na varstvu osebnih podatkov ter izpolnjevati pogodbene zahteve glede zaupnosti in varnosti informacij;

which should contribute to the topics of sustainable development, particularly important for the Group.

All participants in the supply chain are expected to acknowledge and commit to the adherence of responsible business principles of this Code by signing specific compliance contract clauses, specific compliance statements, or the like. The suppliers shall ensure that their sub-suppliers, workers, consultants, and other contractors comply with this Code. By this, the guidelines will affect the entire value chain.

Group shall assess suppliers' compliance with the Code through audits, self-assessments, assessments, and documentation reviews depending on the type of business and division of the Group.

## 1.2. Business ethic

Fortenova Group is committed to conducting business ethically and requires its suppliers to run their business by adopting the highest standards of ethical behaviour which are specifically defined in the Code of Ethics of Fortenova Group as well as this Code.

Hence, the supplier shall:

- Avoid participation in or knowingly benefit from any corruption, extortion, or bribery;
- Adhere to applicable anti-corruption and anti-bribery laws, directives and regulations that govern operations in the countries in which they operate;
- Avoid facilitation payments and work towards eliminating them;
- Adhere to anti-trust and other competition laws;
- Disclose any potential or actual conflict of interest, including but not limited to the identification of ultimate beneficial owners;
- Comply with applicable economic sanctions and export/import control laws;
- Adhere to data privacy laws, with specific emphasis on personal data protection, as well as comply with contractual requirements on confidentiality and information security;

- ne bo sodeloval in pomagal pri ter olajševal nobene oblike pranja denarja, financiranja terorizma ali drugih gospodarskih kaznivih dejanj in bo sprejel vse razumne ukrepe za zagotovitev, da se finančne transakcije, v katere je vpleten, ne bodo uporabile za pranje premoženjske koristi, pridobljene z nezakonito dejavnostjo;
- bo spoštoval pravice intelektualne lastnine in zagotovil, da prenos tehnologije ter strokovnega znanja in izkušenj poteka na način, ki varuje pravice intelektualne lastnine.

### 1.3. Delovni pogoji in človekove pravice

Za Skupino Fortenova je spoštovanje mednarodno priznanih človekovih pravic temelj vseh poslovnih odnosov. Dobavitelji Skupine se zavežejo, da bodo spoštovali pravice zaposlenih in drugih deležnikov ter jih obravnavali v skladu z najvišjimi standardi delovnega prava, kar med drugim vključuje:

#### a) Diskriminacija in nadlegovanje

Dobavitelj bo:

- vse delavce obravnaval spoštljivo in dostojanstveno ter ne bo dopuščal nadlegovanja ali delovnih praks, ki vključujejo ostro ali nečloveško ravnanje z delavci;
- sprejel vse možne ukrepe za preprečitev kakršnihkoli primerov sodobnega suženjstva ter trgovine z ljudmi in izkoriščanja;
- podpiral enake možnosti in preprečeval kakršnokoli obliko diskriminacije;
- zagotovil, da varnostniki, ki delujejo v prostorih dobaviteljev, delujejo v skladu s splošno priznanimi standardi človekovih pravic.

#### b) Nadomestila in delovni čas

Dobavitelj bo:

- izpolnjeval ustrezne zahteve glede delovnega časa, vključno z nadurami, odmori in časom počitka, kot je določeno v nacionalnem pravu, ustreznih kolektivnih pogodbah in mednarodnih standardih;
- upošteval ustrezne nacionalne zakone, standarde stroke in mednarodne standarde v zvezi z minimalnimi plačami, plačami

- Not engage in, assist, or facilitate any form of money laundering, terrorism financing or other economic crimes and should take all reasonable steps to ensure that financial transactions in which they are involved in are not used to launder proceeds of illegal activity;
- Respect intellectual property rights and ensure that technology and know-how transfer shall take place in a way that protects intellectual property rights.

### 1.3. Labor conditions and human rights

For the Fortenova Group, respect for internationally recognised human rights forms the basis of all business relationships. Groups' suppliers shall undertake to respect the rights of employees and other stakeholders and treat them according to the highest labour law standards, including but not limited to:

#### a) Discrimination and harassment

Supplier shall:

- Treat all workers with respect and dignity and not permit harassment or labour practices that involve the harsh or inhumane treatment of workers;
- Take all possible steps to prevent any instances of modern slavery and human trafficking and exploitation;
- Support equal opportunities and not allow any form of discrimination;
- Ensure that security guards operating at suppliers' premises act in accordance with universally recognised human rights standards.

#### b) Compensations and working hours

Supplier shall:

- Comply with appropriate working hour requirements, including overtime, breaks, and rest periods, as established by national law, relevant collective agreements and international standards;
- Adhere to relevant national laws, industry standards and international standards relating to minimum wages, overtime

za nadurno delo in zakonsko določenimi ugodnostmi; plačani bolniški dopust, plačan letni dopust in plačan starševski dopust;

- zagotovil vse z lokalnimi predpisi predpisane pravice delavcev ter pisne, razumljive delovne pogoje.

c) Svoboda združevanja

Dobavitelj bo:

- spoštoval pravico svojih zaposlenih, da se svobodno združujejo, se (ne) včlanijo ali ne včlanijo v sindikat in/ali svet delavcev ter sodelujejo v kolektivnih pogajanjih v skladu z nacionalno zakonodajo in mednarodnimi konvencijami
- v zvezi s sindikalnimi pravicami podpiral in uveljavljal lokalne socialne in kolektivne pravice delavcev ter zagotavljal obstoj postopka za vlaganje in reševanje pritožb.

d) Varnost in zdravje pri delu

Dobavitelj bo:

- zagotovil zaščito svoje delovne sile z zagotavljanjem obvezne osebne varovalne opreme, primerne naravi dela, in ustreznim usposabljanjem o zdravstvenih in varnostnih sistemih;
- zagotovil varne in zdrave delovne pogoje za svoje zaposlene ter varne in zdrave bivalne prostore ob tovarniških prostorih, kadar to zahteva lokalna zakonodaja;
- imel zdravstvene in varnostne postopke, ki so v vsakem trenutku prosto dostopni vsem zaposlenim;
- dokazal skladnost s postopki in si prizadeval za zmanjšanje nesreč in tveganj, vključno z rednim ozaveščanjem in usposabljanjem zaposlenih.

e) Delo otrok in varstvo mladih zaposlenih

Dobavitelj:

- ne bo zaposloval otrok za katerekoli storitve ali izdelke v nobeni državi in se bo zavezal, da bo to neposredno ali posredno preprečeval v celotni dobavni verigi;
- ne bo zaposloval delavcev, mlajših od zakonsko predpisane starosti ali najnižje zakonsko določene starosti, karkoli je strožje;
- bo zagotovil, da zaposleni, vključno s pripravniki, mlajšimi od

wages, and legally mandated benefits; paid sick leave, paid annual leave and paid parental leave;

- Provide all locally required workers' benefits and written, understandable labour conditions.

c) Freedom of association

Supplier shall:

- Respect the rights of their employees to associate freely, join or not join trade unions and/or workers' councils, and engage in collective bargaining in accordance with national laws and international conventions;
- With respect to union rights, support and apply local social and collective rights of workers, ensuring the existence of a process for submitting and resolving complaints.

d) Occupational health and safety

Supplier shall:

- Ensure the protection of their workforce by providing essential personal protective equipment appropriate to the nature of work and relevant training on health and safety systems;
- Provide safe and healthy working conditions for their employees and safe and healthy living quarters adjacent to factory premises when local law requires;
- Have health and safety procedures that are freely available to all employees at any time;
- Demonstrate compliance with the procedures and strive to minimise accidents and risks, including regular employee awareness and training sessions.

e) Child labour and protection of young employees

Supplier shall:

- Not employ child workers for any services or products in any country and will be committed to preventing it throughout the whole supply chain directly or indirectly;
- Not employ workers below the legally prescribed age or the locally applicable minimum legal age, whichever is more stringent;
- Ensure that employees, including trainees under the age of 18,

18 let, ne opravljajo nočnega izmenskega dela, nadurnega dela ali opravljajo nevarnega ali škodljivega dela za njihov telesni ali duševni razvoj.

f) Trgovina z ljudmi

Dobavitelj v nobenem primeru in pod nobenim pogojem ne bo sodeloval pri kakršni koli obliki trgovine z ljudmi, vključno z novačenjem, posredovanjem, premestitvijo, zadrževanjem ali uporabo žrtev trgovine z ljudmi za namene izkoriščanja za delo.

Skupina ne posluje s posamezniki, podjetji, organizacijami ali združenji, za katere se sumi ali ugotovi, da so vpleteni v trgovino z ljudmi ali izkoriščajo žrtve trgovine z ljudmi za delo.

#### 1.4. Okolje ter zdravje in varnost pri delu (OHS)

Skupina Fortenova je zavezana zmanjšanju vpliva svoje dobavne verige na okolje in podpora trajnostnim operativnim in proizvodnim praksam. S trajnostnim delovanjem in sodelovanjem z dobavitelji, ki imajo isti cilj, Skupina Fortenova izkazuje odgovornost do lokalne skupnosti, potrošnikov, okolja in družbe.

Skupina od svojih dobaviteljev zahteva, da v svoje poslovanje vključijo okoljske dejavnike in si prizadevajo za nenehne izboljšave z namenom zmanjšanja in blaženja morebitnih vplivov na okolje v največji možni meri.

Dobavitelji bodo zato:

- upoštevali vse ustrezne lokalne in nacionalne okoljske predpise ter mednarodne standarde ob upoštevanju veljavnih tehnoloških in ekoloških smernic;
- pridobili in vzdrževali vsa potrebna okoljevarstvena dovoljenja, soglasja in registracije;
- razvijali in izvajali učinkovite sisteme upravljanja z varstvom okolja, ki podpirajo prepoznavanje tveganj, merjenje in spremljanje uspešnosti ter spodbujanje nenehnih izboljšav za ublažitev ali zmanjšanje tveganja škodljivih vplivov na okolje;
- razvijali pristop načela previdnosti ter spodbujanja okolju prijaznih

do not undertake night-shift work, work overtime, or carry out hazardous or harmful work to their physical or mental development.

f) Human trafficking

The supplier shall not participate in any part of human trafficking under any circumstances, including recruiting, brokering, transferring, retaining or using trafficked persons for labour exploitation.

The Group shall not do business with individuals, companies, organisations or associations suspected or found to be involved in human trafficking or use trafficked persons for labour.

#### 1.4. Environment and occupational health & safety (OHS)

Fortenova Group is committed to reducing its supply chain's environmental impact and supporting sustainable operational and production practices. By operating sustainably and working with suppliers who share the same objective, Fortenova Group shows responsibility to the local community, consumers, the environment, and society.

The Group requires its suppliers to integrate environmental considerations into their operations and strive for continuous improvements to minimise and mitigate any environmental impacts.

Hence, suppliers shall:

- Comply with all relevant local and national environmental regulations as well as international standards, adhering to applicable technological and ecological guidelines;
- Obtain and maintain all the necessary environmental permits, approvals and registrations;
- Develop and implement effective environmental management systems that support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise the risk of adverse effects on the environment;
- Develop a precautionary principle approach and promote environmentally friendly technologies and processes in their operations and across the supply chain;

- tehnologij in postopkov pri svojih dejavnostih in v celotni dobavni verigi;
- se zavezali, da bodo proaktivno prevzeli pobude za varstvo okolja pred škodo in degradacijo v zvezi s svojim poslovanjem;
- zaposlenim in vsem osebam, ki izvajajo aktivnosti v prostorih Skupine (z ustreznim dovoljenjem) zagotovili varno delovno okolje, v katerem nihče ni izpostavljen nepotrebnim tveganjem.

Skupina Fortenova se zavezuje, da bo zagotavljala varnost posameznikov v vseh prostorih Skupine in zaščitila zaposlene in premoženje Skupine Fortenova ter vse informacije, povezane s poslovanjem Skupine in njenim ugledom, pred varnostnimi grožnjami.

V okviru standardov OHS bodo dobavitelji:

- spoštovali zakone in predpise ter najvišje standarde, politike, navodila, postopke in ukrepe, namenjene zagotavljanju OHS ter varnosti pri vsaki odločitvi, ki jo sprejmejo;
- vedno upoštevali OHS in varnostne zahteve predmetnega delovnega mesta ter upoštevali navodila OHS in varnostnega osebja;
- udeležili se tečajev usposabljanja, seminarjev, predavanj ali katerihkoli drugih oblik izobraževanja na področju OHS, še posebej, če je takšno izobraževanje obvezno v skladu z veljavno zakonodajo ali zahtevano v skladu z opisom delovnega mesta;
- vzdržali se škodovanja ljudem, njihovemu okolju, zdravju ali varnosti in bodo prevzemali samo dela, za katera so bili usposobljeni in za katero so izurjeni, zdravstveno sposobni, dovolj spočiti in pozorni;
- vzdržali se dela pod vplivom alkohola ali narkotikov;
- prenehali z vsemi dejavnostmi, ki postanejo nevarne ali negotove, in o tem takoj poročali nadzornemu vodji;
- nadzornemu vodji nemudoma poročali o vsaki nesreči, poškodbi, bolezni, nevarnih ali nezdravih razmerah, incidentu, morebitnem incidentu ali skorajšnjem izpustu, razlitju ali izpustu snovi, škodljive za okolje;
- sprejeli takojšnje ukrepe za sanacijo, preprečitev ali nadzor kakršnihkoli incidentov OHS in svetovali drugim, naj upoštevajo pravila in smernice OHS.

- Commit to proactively undertake initiatives to protect the environment from harm and degradation in relation to their operations;
- Provide employees and all the persons who carry out activities at the Group's premises (with due permission) with a safe and secure work environment where no one is exposed to unnecessary risk.

Fortenova Group is committed to assuring the security of individuals on any of the Group's premises and protecting employees and Fortenova Group's property, as well as any information related to the Group's business and its reputation, against security threats.

In the context of OHS standards, the suppliers shall:

- Abide by the law and regulations, as well as by the highest standards, policies, instructions, procedures and measures intended to ensure OHS and security in every decision they make;
- Always comply with OHS and security requirements of their respective workplace and follow OHS and security personnel instructions;
- Attend training courses, seminars, lectures or any other forms of education in the OHS area, especially if such education is obligatory under the applicable legislation or required under their respective job description;
- Refrain from bringing any harm to people, their environment, health or safety, and take on only the work for which they have been trained and for which they are competent, medically fit, sufficiently rested and alert to carry out;
- Refrain from working under the influence of alcohol or narcotics;
- Cease any activity that becomes unsafe or insecure and immediately report it to the supervising manager;
- Promptly report any accident, injury, illness, hazardous or unhealthy conditions, incident, potential incident or near-miss, spill or release of a substance harmful to the environment to the supervising manager;
- Take immediate measures to correct, prevent or control any OHS incidents and advise others to comply with OHS rules and guidelines.



## 1.5. Zagotavljanje kakovosti izdelka

Skupina Fortenova je predana zagotavljanju varnih, visokokakovostnih izdelkov, enako zavezo pa pričakujejo tudi od svojih dobaviteljev, vključno z vsemi segmenti dobavne verige – od proizvodnje in predelave surovin do oskrbe svoje maloprodajne mreže. Ukrepi, sprejeti v okviru tega Kodeksa, podpirajo visoke standarde varnosti hrane, ki temeljijo na regulativnem okviru EU in standardih varnosti hrane.

Posebno pozornost poleg visoke varnosti izdelkov namenjamo tudi dobaviteljem surovin/izdelkov, ki so v svoji dobavni verigi vzpostavili sledljivost, pridobivanje in potrjevanje s trajnostnimi certifikati.

Skupina Fortenova je zavezana k zagotavljanju storitev in izdelkov najvišje možne kakovosti, zato promovira in uporablja enaka načela in standarde zagotavljanja kakovosti in zadovoljstva potrošnikov, kot veljajo za njene neposredne potrošniške odnose z izdelki in storitvami, ki jih Skupina zagotavlja svojim strankam za nadaljnjo prodajo.

Dobavitelji bodo zato:

- popolno in odprto sodelovali s Skupino na način, ki Skupini Fortenova omogoča zagotavljanje ustrezne kakovosti izdelkov in storitev, ki jih ponuja;
- delili informacije s Skupino v zvezi z izdelki in storitvami Skupine, še posebej, če bi se morali seznaniti s kakršnimikoli pritožbami v zvezi z njimi;
- takoj prenehali distribuirati katerikoli izdelek Skupine Fortenova na izrecno zahtevo Skupine Fortenova.

Dobavitelji se morajo zavedati, da Skupina izvaja stroge politike glede kakovosti surovin, ki jih skupina Fortenova uporablja v svoji dobavni verigi.

Dobavitelji bodo zato:

- omogočali spremljanje svoje celotne oskrbovalne verige z inšpekcijskimi pregledi in revizijami s strani Skupine ali strokovnjakov, ki

## 1.5. Product quality assurance

Fortenova Group is dedicated to providing safe, high-quality products, and the same commitment is expected from its suppliers, including all the segments of the supply chain – from producing and processing raw materials to supplying its retail network. Actions undertaken in the framework of this Code shall uphold the high food safety standards underpinned by the EU regulatory framework and Food Safety Standards.

Special attention, in addition to high product safety, is given to suppliers of raw materials/products who, through their supply chain, have established traceability sourcing and confirmation with sustainable certificates.

Being committed to providing services and products of the highest possible quality, Fortenova Group promotes and applies the same principles and standards of quality assurance and consumer satisfaction applicable to its direct consumer relationships to the products and services the Group provides to its clients for further sale.

Hence, suppliers shall:

- Fully and openly cooperate with the Group in a manner that enables Fortenova Group to ensure the proper quality of the products and services it provides;
- Share the information with the Group regarding the Group's products and services, especially if they should become aware of any complaints thereto;
- Immediately cease to distribute any of Fortenova Group's products per Fortenova Group's explicit request.

Suppliers must be aware that the Group applies strict policies regarding the quality of raw materials Fortenova Group uses in its supply chain.

- jih izbere Skupina kot del upravljanja zagotavljanja kakovosti Skupine;
- zagotavljali popolne, resnične in nedvoumne informacije o svojih izdelkih in storitvah, predvsem, vendar ne izključno, o poreklu, specifikacijah, količinah in pomanjkljivostih teh izdelkov in storitev;
  - vzdrževali stabilne poslovne prakse in metode, ki omogočajo vzpostavitev dolgoročnega odnosa;

## 1.6. Stalne izboljšave

Skupina Fortenova pričakuje, da bodo dobavitelji transparentni, spoštljivi in aktivno izpolnjevali pričakovanja Kodeksa.

Skupina Fortenova razume, da je za ublažitev nekaterih tveganj za skladnost potrebno več časa, saj lahko osnovni vzroki delno izvirajo iz okoliške skupnosti. Skupina Fortenova verjame v sodelovanje in je pripravljena sodelovati z dobavitelji, organi, sindikati in industrijskimi organizacijami, da bi našli rešitve v vsakem primeru.

### Integracija in skladnost

Fortenova Group sprejema vrednote, zasidrane v Kodeksu, ki se integrirajo v vsakodnevno poslovanje s strukturiranim in kompetentnim upravljanjem dobavitelja.

Dobavitelji upoštevajo vso veljavno in ustrezno zakonodajo in predpise, ki urejajo njihovo poslovanje in dejavnosti, ter imajo jasne in učinkovite smernice in politike za svoje osebje in dobavitelje v celotni dobavni verigi, ki določajo pričakovanja glede poslovne integritete. Dobavitelji morajo upoštevati tudi vse politike, kodekse in standarde Skupine, ki veljajo zanje.

Dobavitelji imajo vzpostavljene ustrezne postopke za zagotovitev, da so vse zaupne informacije skupine Fortenova, ne glede na to, ali se nanašajo na poslovanje ali ljudi, zaupne in varne z omejenimi pravicami dostopa na podlagi potrebe po seznanitvi ter da se upoštevajo vsi veljavni zakoni o zasebnosti podatkov, zlasti Splošna uredba o varstvu podatkov (GDPR).

Therefore, suppliers shall:

- Allow the monitoring of their whole supply chain with inspections and audits by the Group or experts selected by the Group as a part of the Group's quality assurance management;
- Provide complete, truthful, and unambiguous information on their products and services, primarily, but not exclusively, regarding the origin, specifications, quantities, and deficiencies thereof;
- Maintain stable business practices and methods that allow for a long-term relationship to be established;

## 1.6. Ongoing improvement

Fortenova Group expects suppliers to be transparent, respectful, and actively meet the expectations of the Code.

Fortenova Group understands that some compliance risks take more time to mitigate since the underlying causes may partly originate in the surrounding community. Fortenova Group believes in cooperation and is willing to collaborate with suppliers, authorities, trade unions, and industry organisations to find solutions in each case.

### Integration and compliance

Fortenova Group accepts the values anchored in the Code to be integrated with day-to-day business through structured and competent management of the supplier.

Business suppliers shall comply with all applicable and relevant laws and regulations that govern their business operations and activities and shall have clear and effective guidelines and policies for their staff and suppliers throughout their supply chain, setting out business integrity expectations. Suppliers shall also comply with all Group policies, codes and standards as applicable to them.

Suppliers shall have adequate procedures in place to ensure that all confidential information of Fortenova Group, whether business or people-

### Spremljanje in revizija

Skupina Fortenova si pridržuje pravico, da z ustreznimi sredstvi preveri skladnost z zahtevami Kodeksa. Od dobaviteljev lahko zahteva sodelovanje v postopku samoocenjevanja ali ocenjevanja, v katerem se dobavitelj zaveže, da bo sodeloval in zagotovil popolno preglednost. Poleg tega lahko spremljanje vključuje napotitev strokovnjakov na teren.

V skladu s svojo oceno tveganja bo Skupina Fortenova določila dobavitelje, ki bodo opravili revizijo, ki jo bo izvedla neodvisna strokovna organizacija, ali notranjo revizijo, tako da bo izpolnila vprašalnik s ključnimi merili. Podrobnosti za vsakega dobavitelja bodo sporočene posamezno.

### Neskladnost

Skupina Fortenova meni, da je skladnost s Kodeksom bistvena za njene poslovne odnose.

Skupina Fortenova si pridržuje pravico do ustreznih pravnih ukrepov, če njen dobavitelj ne izpolnjuje teh zahtev.

Vsak primer kršitve Kodeksa ali nezadostnega izvajanja Kodeksa bo ocenjen individualno z ustreznim rokom za njegovo odpravo/uveljavitve. Skupina Fortenova pa lahko sprejme končno odločitev za sprejem alternativnih ukrepov, v kolikor lahko dobavitelj verodostojno prepriča in dokaže Skupini Fortenova, da je uvedel takojšnje protiukrepe za preprečevanje podobnih kršitev v prihodnosti.

Skupina Fortenova ima pravico prekiniti pogodbo in sodelovanje z dobaviteljem v primeru kršitve ali neupoštevanja določb tega Kodeksa.

related, is kept confidential and secure with limited access rights on a need-to-know basis and that all applicable data privacy laws, in particular the EU General Data Protection Regulation, are complied with.

### Monitoring and auditing

Fortenova Group reserves the right to verify compliance with the requirements from the Code using appropriate means. Suppliers may be asked to participate in a self-assessment process or an evaluation process, during which the supplier shall undertake to cooperate and provide complete transparency. In addition, monitoring can involve the deployment of experts on-site.

According to its risk assessment, the Fortenova Group will determine the suppliers to undergo an audit conducted by an independent professional organisation or an internal audit by filling out a questionnaire with critical criteria. Details for each supplier will be communicated individually.

### Lack of compliance

Fortenova Group considers compliance with the Code essential to its business relations.

Fortenova Group reserves the right to take appropriate legal action if its /supplier does not comply with these requirements.

Each case of violation of the Code or insufficient implementation of the Code will be evaluated individually with an appropriate deadline for implementation. However, the final decision rests with the Fortenova Group to take alternative measures if the supplier can credibly convince and prove to the Fortenova Group that it has implemented immediate countermeasures to prevent similar offences in the future.

Fortenova Group has the right to terminate the contract and cooperation with/supplier in cases of violation or lack of compliance with the provisions of this Code.



# **FORTENOVA GRUPA**

V Zagrebu, dne 26.04.2024. godine / In Zagreb, on April 26<sup>th</sup> 2024