

	Code of Business Conduct	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX-BC
		Approved by:	Terzić, S.	Version: 1.0
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Code of Business Conduct

INTRODUCTION

PAX svečarna Stele d.o.o. is a leading European candle manufacturer with over 324 years of experience.

The Code of Business Conduct specifies minimum standards of conduct and principles of cooperation between PAX svečarna Stele d.o.o. (hereinafter "Company") and the Company's contractors, suppliers and business partners (hereinafter "Contractors").

It also aims to promote honesty, ethics and responsibility in business relations with an emphasis on compliance with laws and regulations, counteracting corruption and bribery, compliance with social and working conditions, compliance with workers' rights and respect for the natural environment.

COMPLIANCE WITH LAWS AND REGULATIONS

Contractors are required to comply with all applicable national and international laws and regulations, including the provisions of the International Labor Organization (hereinafter: "ILO") and the UN Universal Declaration of Human Rights, industry standards and all other applicable statutory requirements, regardless of which of them impose the highest standards of conduct.

CONTINUOUS IMPROVEMENT

PAX svečarna Stele d.o.o. understands that achieving the standards set out in this Code is not a one-time action and encourages suppliers to continue their efforts to improve the quality of their business.

INTEGRITY IN BUSINESS

Contractors of the Company are required to conduct their business in accordance with the highest ethical standards. They should comply with all applicable laws and regulations regarding corruption,

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bribery, fraud and unfair and prohibited business practices, which are described in a separate document made available to Contractors, which is the Anti-Corruption Policy.

SOCIAL AND WORKING CONDITIONS

Contractors recognize and are committed to respecting the human rights of their employees and treat them with dignity and respect as internationally recognized. Company contractors adhere to the following standards:

FREEDOM TO EMPLOYMENT CHOICE

The use of forced, bonded or involuntary prison labour is strictly prohibited. Employment is always voluntary.

PROHIBITION OF CHILD EMPLOYMENT

Company contractors shall not, under any circumstances, use child labour as defined by the ILO and the United Nations Convention and/or national law, whichever is more stringent.

WAGES

Company contractors shall comply with all applicable laws, regulations and industry standards regarding wages and benefits. Wages and benefits paid for a standard workweek shall meet at least legal or industry minimum standards and shall at all times be sufficient to meet the basic needs of employees and their families. Deductions from wages as a disciplinary measure shall not be permitted.

WORKING HOURS

The Company's contractors shall comply with all applicable laws, regulations and industry standards regarding working hours. Unless applicable laws, regulations or industry standards are more restrictive, the maximum weekly workweek shall not regularly exceed 48 hours and the maximum permissible

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overtime hours in a week shall not exceed 12 hours. Overtime work shall be voluntary and employees shall be provided with at least one day off in each 7-day period.

PROHIBITION OF DISCRIMINATION, MOBBING AND VIOLENCE

The Company's contractors are obliged to comply with all applicable laws and regulations prohibiting discrimination in employment and work on the basis of race, religion, age, nationality, skin color, gender, sexual orientation, physical ability, health condition, political opinions, denomination or other grounds prohibited by law.

The Company's contractors are obliged to implement a policy of equal opportunities and equal treatment in employment and occupation, in order to eliminate all discrimination in this area.

The Company's contractors do not tolerate harassment, including sexual harassment and threats, physical and mental violence, punishments and persecution of employees.

WORKING CONDITIONS, HEALTH AND SAFETY

The Company's contractors are obliged to provide their employees with a safe and healthy workplace in accordance with applicable laws, regulations and industry standards.

The Company's contractors are obliged to provide their employees with appropriate working conditions that guarantee at least access to drinking water and sanitary facilities, fire safety, access to emergency medical care and adequate heating, lighting and ventilation.

The Company's contractors are obliged to prevent accidents and health damage resulting from work performed, related to work or occurring in the work process, will regularly train employees in the field of occupational health and safety and will provide appropriate protective clothing.

The Company's contractors monitor the impact of working conditions on employees, identify threats to occupational diseases and take actions to protect the health of employees.

The Company's contractors systematically improve the occupational health and safety qualifications of all employees, including conducting mandatory and additional training and taking actions aimed at

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continuous improvement of the occupational health and safety status and treat concern for employee safety as a paramount value.

ENVIRONMENT

The Company's contractors recognize that environmental responsibility is an integral part of producing high-quality products and will comply with all applicable laws, regulations and industry standards regarding environmental protection, such as requirements for the treatment and discharge of industrial wastewater, air emission control, recycling, management and disposal of chemicals and waste, environmental permits and environmental reporting.

The Company's contractors strive to continuously improve the environmental management system while respecting the natural resources of the environment and eliminating the risk of creating a situation of serious environmental pollution.

INFORMATION SECURITY

PAX svečarna Stele d.o.o. attaches importance to issues related to information security, in particular to trade secrets, the disclosure of which could expose the Company to damage.

The Company's contractors are obliged to maintain the highest standards of protection of the information provided, which in practice means primarily that this information cannot be transferred or made available to third parties and must be protected against unauthorized use, in particular against obtaining access to it from outside. Confidential information may be disclosed only when required by law or when it has been approved for business reasons. The Company's contractors are obliged to comply with the regulations regarding the processing of personal data. All personal data provided by PAX svečarna Stele d.o.o., in particular the data of our employees and associates, are always appropriately secured by the Contractor. This applies in particular to the IT systems used, which should guarantee an appropriate level of cybersecurity protection.

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INTERNAL ASSESSMENTS AND POTENTIAL IMPACT ON BUSINESS RELATIONS

The Company's contractors are obliged to conduct regular internal assessments to ensure compliance with this Code. PAX svečarna Stele d.o.o. also reserves the right to conduct (or commission designated individuals or entities) announced audits of business partners and their facilities to verify compliance with the Code. Failure to comply with the Code may result in termination of cooperation.

<i>Kamnik, 23.4.2025</i>	PAX Svečarna Stele, d.o.o. 1241 Kamnik, Bakovnik 3 tel&fax: 01 8392-339 <i>stamp</i>	 <i>Sandro Terzić, director</i>
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