

	Employment, working conditions and human rights policies	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX-EWH
		Approved by:	Terzić, S.	Version: 1.0
				Page: 1 of 5
				Release date: 23.4.2025

Policy on employment, working conditions and human rights

Preamble

We create an environment where we value and respect open, honest and transparent communication within our organization. This Policy serves to comply with applicable labor laws in all areas of the business.

§ 1

Purpose and Scope of the Policy

1. This Policy sets forth the principles of human rights-related activities and behavior.
2. The primary objectives of establishing this Policy include:
 - a) shaping a work environment free of practices that undermine human rights,
 - b) building employee awareness and continuous improvement of conduct in the protection of human rights in internal and external relations,
 - c) counteracting any situation in which the Company's actions could directly or indirectly violate human rights.
3. This Policy applies to all employees of the Company regardless of their position, seniority, location and working hours.
4. The provisions of the Policy are also required of the Company's subcontractors and suppliers as part of its efforts to ensure an ethical, fair and sustainable value chain.

§ 2

Commitments

1. Creation of a safe work environment

Our top priority is the safety, health and well-being of our employees. We provide a safe and healthy workplace in accordance with applicable safety and health regulations, minimizing the risk of

	Employment, working conditions and human rights policies	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX- EWH
				Version: 1.0
		Approved by:	Terzić, S.	Page: 2 of 5
				Release date: 23.4.2025

accidents, injuries and health hazards. Together with our employees, we are constantly improving our health and safety environment, identifying potential risks and improving all health and safety issues.

2. Anti-discrimination practices

We do not tolerate attitudes that violate human dignity, including abusive behavior involving harassment, bullying or intimidation. Our goal is a work environment free from discrimination or harassment on the basis of race, gender, color, nationality, social origin, religion, age, disability, sexual orientation, political opinion or any other form defined by applicable law.

3. Promotion of diversity and creation of a friendly work environment

We value the diversity of our employees and the contributions they make to our organization. We are committed to promoting values, principles and ethical standards to foster an atmosphere of acceptance and deepen the understanding of diversity and its importance in the organization. Through our actions, we create conditions for an open and tolerant workplace. We strive to create a friendly working environment, free from violence, harassment, intimidation and other disruptive internal and external factors.

4. Guarantee of the equality of opportunity

We provide every employee with equal employment and promotion opportunities. In all aspects of the recruitment, hiring, promotion and transfer processes, we make decisions on the basis of an objective and fair assessment of qualifications, skills, experience, fulfillment of the requirements and standards of the position, and performance. Employees are provided with access to development and training programs in accordance with the requirements of each position. We determine compensation systems on the basis of objective considerations. Our goal is to define an effectively functioning bonus system that motivates employees to achieve their performance targets. In addition, we offer employees a package of fringe benefits.

	Employment, working conditions and human rights policies	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX- EWH
		Approved by:	Terzić, S.	Version: 1.0
				Page: 3 of 5
				Release date: 23.4.2025

5. Respect of the right to rest

We recognize that every employee has the right to rest and leisure time, including a reasonable reduction in working hours, and periodic paid vacations.

6. Guarantee of the workers' right to freedom of assembly

We respect workers' right to freedom of assembly without fear of repressive action or any form of intimidation.

7. Prevention of child labor and forced labor

We oppose the employment of children, i.e., people who are under the age for work under generally applicable law. We do not accept forced labor, including prison labor, or any form of modern slavery. Employees have the right to enter into and terminate employment relationships according to their will.

§ 3

Reporting and clarifying irregularities

- Any violations of the rules under this Policy and concerns about the Policy's compliance with the law, customs and workplace practices should be reported to the following email address: info@pax.si.
- The Company undertakes to promptly analyze all reports, including anonymous reports, and take appropriate action to negate violations.
- The Company allows anonymous reporting in paper form submitted to the Company's address with the notation "Violations" or "Management".

§ 4

Procedure in case of discrimination

- If discrimination occurs, an employee has the right to file a written complaint with the HR

	Employment, working conditions and human rights policies	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX-EWH
				Version: 1.0
		Approved by:	Terzić, S.	Page: 4 of 5
				Release date: 23.4.2025

Department.

2. The complaint should include a statement of the facts, any evidence to support the asserted circumstances and identify the perpetrators of discrimination, inequality or injustice in the workplace. The aggrieved party should sign the complaint in his own hand and date it.
3. Before filing a complaint, an employee may seek to clarify the circumstances of discrimination, inequality or injustice in the workplace on his own with his immediate supervisor or the director of the department concerned.
4. The complaint is investigated by the Anti-Discrimination Commission, which is tasked with clarifying whether the complaint has merit.
5. The composition of the Anti-Discrimination Commission is determined by the Employer from time to time.
6. The commission shall consist of no less than three members, with an odd number of commission members.
7. Administrative support for the Commission's meetings will be provided by the **HR Department** who:
 - a) collects documentation related to the investigation for a period of 3 years,
 - b) retains written statements containing the decisions of the Commission's meetings for a period of 3 years.
8. Legal services for the Commission, if any, shall be provided by the **Legal Counsel** designated by the Employer.
9. The Anti-Discrimination Commission operates in accordance with the rules of:
 - c) immediate response
 - d) confidentiality,
 - e) impartiality,
 - f) targeting comprehensive clarification of the facts and resolution of the problem.
10. The Commission shall initiate proceedings no later than 14 days from the date of filing a complaint.
11. The Commission conducts the proceedings with the participation of the persons indicated in paragraphs 6 and 8.
12. The member of the Commission may not be the person who is the subject of the complaint.
13. The employer is obliged to exclude a member of the Commission from participation in the proceedings if there are probable circumstances that may raise doubts about his impartiality. In this

	Employment, working conditions and human rights policies	Compiled by:	Resnik, A.	Doc. No.: 25-4-ESG-PAX-EWH
		Approved by:	Terzić, S.	Version: 1.0
				Page: 5 of 5
				Release date: 23.4.2025

case, the member of the Commission shall be designated by the Employer.

14. After hearing the explanations of the Employee who filed the complaint and the Employee(s) accused of discrimination and taking evidence, the Anti-Discrimination Commission shall make a decision on the submitted complaint by a simple majority.

15. The Commission prepares a written justification containing the resolution of the case, which is provided within 14 days of the start of the proceedings to the Employee making the complaint, as well as to the Employee(s) accused of discrimination, inequality or unfair treatment, which they confirm with their own signature. If it is not possible to make personal delivery of the written decision, it is sent by mail to the employee's home address.

16. If the complaint is found to be justified, the Employer shall take organizational measures to eliminate the causes of the occurrence of discrimination, inequality or unfair treatment.

17. If possible, the employer may transfer the injured Employee, at his request or with his consent, to another work position.

18. The decision to take appropriate action against an Employee accused of discrimination is made by the Employer on the basis of the Committee's recommendation.

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

