



SORBIT VALJI D.O.O. Dobja Vas 250 2390 Ravne na Koroškem Slovenia

ETHICS

Our Ethic policy, statement including guiding principles are as follows:

- The management system is transparent;
- Honesty and sincerity to employees, business partners and the society;
- Compliance with laws, rules and regulations;
- Protection of confidential information and proprietary information of our customers;
- Protection and proper use of company assets;
- Dealing with conflicts of interest (other business opportunities, employment outside the company, bribes, gifts);
- Reporting breaches: every employee has the right and is obliged to report on individual behavior that violates a code of business ethics;
- Treating employees with respect and under consideration of human rights;
- Rewarding employees: employees with the same experience, performance and education receive the same pay;
- Protection of workers against violence, maltreatment, mobing and other harassments.

Health and safety;

We are not certificated as per ISO18001, but we fulfill the requirements as follows:

- The safety & health at work policy is defined;
- Before a new employee starts working in Sorbit, the safety at work test has to be performed;
- For new employees, we use a special training program regarding the Safety at work and also all the necessary work protective equipment (glasses, helmet, working suit, shoes...) is handed out;
- For each workplace, the risk evaluation is defined - Declaration of safety with risk assesment;
- On the workplace, there are Safety instructions with machine manuals;
- Each machine and work equipment is inspected by an external institution; there are certifications for the safety of the machines;
- Measurements of working conditions (noise, illumination, dust) are performed periodically;
- Safety sheets for dangerous substances are available;
- We respect the Slovenian health and safety legislation;
- in the case of accidents at work, we report to the inspection services; last two year we did,t have any accidents at work;

KODEKS VAROVANJA ČLOVEKOVIH PRAVIC

Pri vsakdanjem delu upoštevamo kodeks varovanja človekovih pravic, ki temelji na osnovnih človekovih pravicah, ki so:

- Vodstvo zagotavlja poštene pogoje zaposlovanja do vseh potencialno zaposlenih,
- Nihče od zaposlenih ne sme siliti in ne sme biti prisiljen v kakršnokoli delo, zaradi katerega bi telesno ali duševno trpel,
- Vsi zaposleni svobodno, mirno in zakonito ustanavljajo združenja in se vanje tudi vključujejo ter imajo pravico do kolektivnega pogajanja z delodajalcem,
- Ne dovoljujemo zaposlovanja otrok,
- Nihče ne sme biti diskriminiran zaradi svoje rase, barve kože, spola, spolne usmerjenosti, zakonskega stanu, nosečnosti, starševstva, vere, političnega prepričanja, nacionalnosti, etičnih prepričanj, socialnega izvora, socialnega statusa, invalidnosti, starosti ali članstva v sindikatu,
- Vsi zaposleni imajo pravico do varnega delovnega mesta ter zdravih delovnih pogojev,
- Vsak zaposlen je upravičen do poštenega plačila opravljenega dela.

POLITIKA VARNOSTI IN ZDRAVJA PRI DELU

Zagotavljanje varnih delovnih razmer ter skrb za zdravje zaposlenih je primarna naloga vodstva, kot tudi pravica, dolžnost in odgovornost vseh zaposlenih.

Varnost pri delu in zdravje zaposlenih je vrednota, ki jo odgovorno upoštevamo. Zavedamo se, da zdravje, varnost in dobro počutje zaposlenih na delovnem mestu, zagotavljajo zadovoljstvo ter dobre pogoje za delo, kar vodi k skupnemu uspehu.

V podjetju skrbimo za urejene delovne razmere in ohranjanje zdravja zaposlenih z/s:

- Izdajo in dopolnitvami izjave o varnosti z oceno tveganja za vsako delovno mesto,
- uporabo ustrezne delovne opreme in sredstev za delo, ki zagotavljajo delavcem varno delo ter periodičnim pregledovanjem le-te,
- izdelavo navodil za varno delo in nadzorom nad izvajanjem ukrepov za varno delo,
- spremljanjem stanja v zvezi s poškodbami pri delu in poklicnimi boleznimi ter z odkrivanjem in s preprečevanjem njihovih vzrokov,
- rednim usposabljanjem delavcev za varno delo,
- izpolnjevanjem zakonskih in drugih zahtev povezanih z varnostjo in zdravjem zaposlenih,
- uvajanjem in uporabo varnih tehnologij ter varnostnih ukrepov z namenom preprečitve morebitnih poškodb pri delu,
- omejeno, nadzorovano rabo nevarnih snovi,
- zaposlovanjem le zdravstveno ustreznih delavcev in periodičnim preverjanjem njihovega zdravja,
- periodičnimi meritvami delovnega okolja (mikroklima),

- zagotavljanjem in uporabo ustrezne osebne varovalne opreme in sredstev, ki jih varujejo pred škodljivimi vplivi delovnega okolja,
- upoštevanjem pobud, priporočil za izboljšanje delovnega okolja in varnosti vseh zaposlenih

KODEKS POSLOVNE ETIKE

Dobri odnosi med sodelavci, dobavitelji, zunanji izvajalci kot tudi kupci so za nas temeljnega pomena. S poštenim delom in etičnim vedenjem zagotavljamo, da nam kupci trajno zaupajo.

Vodilna načela:

- **Preglednost vodenja** in poslovanja,
- **Odkritost in iskrenost** do zaposlenih, poslovnih partnerjev in družbe,
- **Skladnost z zakoni**, pravili in predpisi,
- **Varovanje zaupnih lastniških informacij** in informacij naših kupcev,
- **Varovanje in pravilna uporaba sredstev družbe**,
- **Obravnavanje navzkrižij interesov** (druge poslovne priložnosti, zaposlitve izven podjetja, podkupnine, poslovna darila)
- **Poročanje o kršitvah**; vsak zaposleni ima pravico in je dolžan poročati o vedenju posameznika, ki krši kodeks poslovne etike
- **Spoštljivo ravnanje z zaposlenimi in varovanje človekovih pravic**,
- **Nagrajevanje zaposlenih**: zaposleni z enakimi izkušnjami, delovno uspešnostjo in izobrazbo prejmejo enako plačilo.

Responsible Minerals Sourcing Policy

Sorbit is committed to responsible sourcing of minerals, including 3TG and cobalt, using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other CAHRAs, while avoiding de facto embargoes. This position is consistent with Sorbit's Human Rights Policy, Supplier Responsibility Code and Sorbit's respect for human rights in our own operations and our supply chains, as well as with the OECD Due Diligence Guidance and UN Guiding Principles. Sorbit global suppliers are required to:

- Per Sorbit's relevant Contract agreement templates purchase order terms & conditions; Supply materials to Sorbit that are "Conflict-Free," meaning minerals that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the Democratic Republic of Congo, adjoining countries or any other CAHRAs as determined by regulatory bodies.
- We expect our suppliers to be transparent and responsibly source from the DRC, adjoining countries, and CAHRAs, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems consistent with OECD Guidance to identify, prevent, mitigate and, where appropriate, remediate risks associated with minerals, including 3TGs and cobalt, as well as require their suppliers to adopt similar policies and practices. Sorbit expects suppliers to cooperate with Sorbit in evaluating compliance with these requirements.
- Provide Sorbit information on the presence of requested minerals, including 3TGs and cobalt in their products and data on the smelters and refiners in their respective supply chains, consistent with the industry standard for Supply Chain Transparency provided in the Conflict Mineral Reporting Template (CMRT) or Cobalt Reporting Template (CRT)
- Procure, directly or indirectly, from smelters and refiners validated under the Responsible Minerals Assurance Process (RMAP) of RMI or other recognized third-party audit / validation programs (for suppliers whose sourcing originates from the DRC, adjoining countries or other CAHRAs).
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation or non-conformance with Sorbit's policy.
- Collaborate with others on cross-industry efforts, such as with RMI, to support responsible minerals sourcing, including on-going education and training.

Janez GNAMUŠ

direktor