



1. Namen dokumenta

Etični kodeks ravnanja dobaviteljev vseh družb Skupine SIJ (v nadaljevanju Skupina SIJ) uveljavlja splošna načela in pravila ravnanja ter zavezuje vse dobavitelje Skupine SIJ k poštenemu, spoštljivemu in etičnemu ravnanju ter odgovornemu odnosu pri vsakodnevem delu. Ta kodeks določa ničelno toleranco do vsakršnega delovanja, ki predstavlja zakonsko nedopustno ravnanje ali kršitev vzpostavljenih vrednot in etičnih standardov ter lahko negativno vpliva na ugled družbe. S tem v Skupini SIJ dobavitelje zavezuje k zakonitemu in odgovornemu poslovanju do vseh zainteresiranih strani.

S tem kodeksom želimo seznaniti dobavitelje z naslednjimi zahtevami:

- da se zavedajo svojega prispevka k skladnosti in kakovosti procesov, proizvodov in storitev;
- da se zavedajo svojega prispevka k varnosti proizvodov;
- da se zavedajo pomena etičnega vedenja.

2. Opis postopka in dokumenta

Upoštevanje in spoštovanje načel tega kodeksa je moralna obveznost in dolžnost vsakega dobavitelja Skupine SIJ.

Kodeks je objavljen na spletni strani Skupine SIJ in posameznih družb Skupine SIJ.

Skupina SIJ si pridržuje pravico do sprememb zahtev in pričakuje, da dobavitelji te spremembe sprejmejo.

1. The Purpose of the Document

The Code of Conduct for Suppliers of all SIJ Group companies (hereinafter referred to as the SIJ Group) enforces the general principles and rules of conduct and commits all SIJ Group suppliers to fair, respectful and ethical conduct and a responsible attitude in their daily work. This Code establishes zero tolerance for any action that constitutes unlawful conduct or violation of established values and ethical standards and may adversely affect the reputation of the Company. The SIJ Group is hereby obliging its suppliers to operate legally and responsibly to all interested parties.

We would like to inform suppliers with the requirements they are obliged to comply with:

- to be aware of their contribution to the compliance and quality of processes, products and services;
- to be aware of their contribution to product safety;
- to be aware of the importance of ethical behavior.

2. Description of the Procedure and Document

Compliance with the principles of this Code is a moral obligation and a duty of every SIJ Group supplier.

The Code is published on the website of the SIJ Group and also of the individual companies of the SIJ Group.

The SIJ Group reserves the right to change the requirements and expects suppliers to adopt these changes.

Zahteve Skupine Sij do dobaviteljev so:

1. Izpolnjevanje zakonskih predpisov

Dobavitelj se zaveže:

- da bo pri delovanju upošteval načela Organizacije združenih narodov o podjetništvu in človekovih pravicah (https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf), Splošno deklaracijo Združenih narodov o človekovih pravicah in Deklaracijo Mednarodne organizacije dela o temeljnih načelih in pravicah iz dela ter deloval skladno z nacionalnim pravom, še zlasti pa upošteval zahteve, ki so posebej določene s tem kodeksom;
- da bo pri opravljanju svojega dela podatke, informacije in dejstva, ki so mu zaupani, znani ali kako drugače dostopni, varoval kot poslovno skrivnost skladno z zakonodajo in zahtevami naročnika.

2. Preprečevanje korupcije in podkupovanja

Dobavitelj se zaveže:

- da bo izvajal ukrepe proti korupciji in podkupovanju ter ne bo toleriral nobene oblike korupcije ali podkupovanja; pri svojem delovanju ne sme zahtevati, prejeti, ponuditi ali dodeliti nobene neupravičene koristi, če je v nasprotju z moralnimi normami, ali katerekoli druge ugodnosti;
- da koruptivnih dejanj ne bo izvrševal nihče od zaposlenih ne glede na vrsto zaposlitve ali hierarhijo v podjetju;
- da bo vsako zaznano koruptivno dejanje prijavil.

3. Spoštovanje osnovnih pravic zaposlenih

Dobavitelj se zaveže:

- da zagotavlja enake možnosti in enakovredno obravnavo vseh – ne glede na etnično pripadnost, raso, spol,

The Sij Group requirements in regard to suppliers are:

1. Compliance with Legal Regulations

Supplier undertakes:

- to follow the principles of the United Nations on Entrepreneurship and Human Rights (https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf), United Nations Universal Declaration of Human Rights and the ILO Declaration on the Principles and Rights at Work, and furthermore, to comply with national law, and in particular with the requirements set out in this Code;
- to protect data, information and facts entrusted, known or otherwise accessible, as a confidential business information in accordance with the law and the requirements of the purchaser.

2. Anti-Corruption and Anti-Bribery Policy

Supplier undertakes:

- to implement anti-corruption and anti-bribery measures and have zero tolerance for any form of corruption or bribery; in its daily operations it may not claim, receive, offer or confer any unjustified benefit related to business activities or any other advantage, if contrary to moral norms;
- to prevent corrupt acts committed by any of the employees regardless of the type of employment or hierarchy in the company;
- to report any perceived corrupt act.

3. Respect for Employees' Basic Rights

Supplier undertakes:

- to ensure equal opportunities and equal treatment of all parties - regardless of ethnicity, race, gender, possible physical

morebitne telesne omejitve oz. invalidnost, ideološko prepričanje, veroizpoved, narodnost, spolno usmerjenost, socialno okolje ali politično prepričanje – pod pogojem, da vse našteto temelji na demokratičnih načelih in spoštovanju do drugače mislečih;

- da bo spoštoval dostojanstvo, zasebno življenje in pravice vsakega zaposlenega;
- da ne bo nikogar prisiljeval k delu proti njegovi volji;
- da ne bo dovoljeval neprimernega odnosa do zaposlenih, denimo fizičnega, psihičnega in spolnega nasilja ter diskriminacije;
- da ne bo dovoljeval neprimernega obnašanja do zaposlenih, kot so geste, govornice in telesni dotiki;
- da bo poskrbel za primerno plačilo in zagotavljal z zakonom določeno minimalno plačo ter plačeval prispevke;
- da ne bo prekoračeval z zakonom dovoljenega maksimalnega delovnega časa;
- da so zaposleni lahko člani sindikata in se jim priznava enakovrednost z drugimi zaposlenimi (se jim ne daje prednosti ali pripisuje manjvrednosti).

4. Prepoved dela otrok

Dobavitelj se zaveže:

- da ne bo zaposlil mlajših oseb kot jih dovoljuje zakonodaja.

Skupina SIJ odločno nasprotuje izkoriščanju otroške delovne sile in enako pričakuje od svojih dobaviteljev. Če v določeni državi, kjer dobavitelj posluje, ni veljavne zakonodaje, ki bi določala najnižjo starost zaposlenih, velja, da ni dovoljeno zaposlovanje otrok pod starostjo, potrebno za dokončanje osnovnega šolanja.

impairments or disabilities, ideological belief, religion, nationality, sexual orientation, social environment or political conviction - provided that all of the above are based on democratic principles and respect for otherwise-minded people;

- to respect the dignity, privacy and rights of every employee;
- not to force anyone to work against his or her will;
- not to allow inappropriate treatment of employees, such as physical, psychological and sexual violence, mobbing and discrimination;
- not to allow inappropriate behavior towards employees such as gestures, rumors and physical touches;
- to provide for adequate remuneration and to provide for a statutory minimum wage and paid contributions;
- not to exceed the statutory maximum working time;
- that employees may be members of a trade union and are recognized as being equal to other employees (not being treated privileged or inferior).

4. Prohibition of Child Labor

Supplier undertakes:

- not to employ younger persons than permitted by law

The SIJ Group strongly opposes the exploitation of child labor and expects the same from its suppliers. In case of absence of applicable legislation in a particular country where the supplier operates, the employment of children below the age required to complete primary education is not permitted.

5. Zdravje in varnost zaposlenih

Dobavitelj se zaveže:

- da bo prevzel odgovornost za zdravje in varnost zaposlenih;
- da bo zmanjšal nevarnosti pri delu in poskrbel za najboljše preventivne ukrepe pred poškodbami in poklicnimi boleznimi;
- da bo izobraževal zaposlene o varnosti in zdravju pri delu ter preverjal, ali zaposleni pri svojem delu upoštevajo zahteve glede varnosti in zdravja pri delu;
- da bo vzpostavil in izvajal primeren sistem varnosti in zdravja pri delu;
- da bo poskrbel za primerne delovne postopke, pisna navodila, preventivne ukrepe, primerno zaščitno opremo, primerno usposobljenost delavcev in ureditev delovnega okolja tako, da ne bo škodoval zdravju in varnosti delavca;
- da bodo delavci imeli pravico zavriniti delo, ki lahko ogrozi njihovo zdravje ali varnost.

6. Varstvo okolja

Dobavitelj se zaveže:

- da bo upošteval zakonske predpise in mednarodne standarde na področju varstva okolja;
- da bo zmanjševal prekomerno obremenjevanje okolja in nenehno izboljševal varstvo okolja;
- da bo vzpostavil in izvajal ustrezen sistem varstva okolja;
- da bo proizvajal izdelke z najmanjšim možnim vplivom na okolje s ciljem ohranjanja naravnih obnovljivih virov;
- da bo upošteval veljavno zakonodajo, ki opredeljuje postopke označevanja, recikliranja ali odlaganja kemikalij,

5. Employees Health and Safety

Supplier undertakes:

- to take the responsibility for health and safety of employees;
- to reduce occupational hazards and to provide the best preventative measures against injuries and occupational diseases;
- to educate employees on occupational safety and health and to ensure that employees comply with occupational health and safety requirements;
- to establish and implement efficient and adequate occupational safety and health system;
- to ensure that proper working procedures, written instructions, preventative measures, adequate protective equipment, adequate training of workers and the organization of the working environment are provided so as not to impair the health and safety of employees;
- that employees have the right to refuse work that may endanger their health or safety.

6. Environmental Protection

Supplier undertakes:

- to comply with legal regulations and international standards in the field of environmental protection;
- to reduce the impact on the environment and to constantly improve environmental protection;
- to establish and implement an appropriate environmental preservation system;
- to produce products with the least possible environmental impact and with the aim of preserving natural renewable resources;
- to comply with applicable laws which define procedures for labeling, recycling

odpadnih materialov in še posebno nevarnih odpadkov;

- da bo zmanjševal oz. odpravil vse vrste izmeta ali nesmotrne porabe, vključno z energijo in vodo, ter uvajal različne ukrepe za smotrno rabo virov, recikliranje ali ponovno rabo surovin.

7. Dobavna veriga

Dobavitelj se zaveže:

- da bo stremel k temu, da bodo tudi njegovi dobavitelji upoštevali zahteve tega kodeksa;
- da bo upošteval osnovne zahteve tega kodeksa pri izbiri dobaviteljev in sodelovanju z njimi;
- da bo ob vsakem morebitnem odstopanju v procesih, na izdelkih ali storitvah o tem takoj obvestil naročnika, tj. družbo v Skupini SIJ, in pridobil odobritev za nadaljnje postopanje;
- da bo zagotovil dostop do organizacije, svojih strank in regulativnih organov, pa tudi do ustreznih področij objektov in ustreznih dokumentiranih informacij na kateri koli ravni dobavne verige »Right of access«;
- da bo preprečeval ponarejene izdelke ali domnevno uporabo ponarejenih delov in njihovo vključitev v proizvode, ki so dostavljeni odjemalcu;
- da bo vzpostavil sistem, ki je socialno, etično in ekološko odgovoren ter spodbuja proces stalnih izboljšav na vseh področjih;
- da bo vzpostavil sistem pristojnosti in odgovornosti v procesu razvoja dobaviteljev, vključno s periodičnimi presojami procesov pri dobaviteljih;
- da bo imel sistem identificiranja, razumevanja in usklajevanja z veljavno zakonodajo in določili tega kodeksa;

or disposal of chemicals, waste materials and especially hazardous waste;

- to reduce or eliminate all types of waste or irrational energy use, including energy and water, and to introduce various measures for the sustainable use of resources, recycling or reuse of raw materials.

7. Supply Chain

Supplier undertakes:

- to ensure that also his indirect suppliers comply with the requirements of this Code;
- to comply with the basic requirements of this Code when selecting and cooperating with suppliers;
- to immediately notify the procurement entity, i.e. company of the SIJ Group, of any deviation in processes, products or services and obtain guidelines and approval for further proceedings;
- to provide the right of access to the organization, its purchaser and regulatory authorities, as well as relevant facility areas and relevant documents and data at any level of the supply chain;
- to prevent counterfeit products or alleged use of counterfeit parts in products delivered to the purchaser;
- to establish a system that is socially, ethically and ecologically responsible and promotes continuous improvements and progress in all areas;
- to establish a system of responsibilities and liabilities in the supplier development process, including periodic evaluations and audits of supplier processes;
- to establish a system for identifying and complying with applicable law and the provisions of this Code;
- to establish and sustain a risk management system that is able to

- da bo vzpostavil in vzdrževal sistem obvladovanja tveganj, ki je sposoben identificirati tveganja na vseh področjih in vzpostaviti primerne preventivne in korektivne ukrepe;
- da bo imel vzpostavljen sistem ciljnega vodenja z jasno zastavljenimi cilji, plani uvajanja in periodičnim sistemom ocenjevanja dobaviteljev;
- da bo vzpostavil primeren sistem izobraževanja za vse zaposlene v podjetju ne glede na delovno mesto, da bi s tem dosegel, da se zavedajo svojega prispevka k skladnosti proizvoda, storitve in varnosti proizvodov ter pomena etičnega vedenja;
- bo vključeval zaposlene v proces stalnih izboljšav;
- bo vzpostavil sistem periodičnega presojanja dobaviteljev in pogodbenih izvajalcev;
- bo vzpostavil sistem korektivnega ukrepanja ob neskladnostih, ugotovljenih pri internih in eksternih presojah, inšpekcijah, pregledih in preiskavah;
- da bo vzpostavil sistem varovanja osebnih podatkov;
- da bo imel vzpostavljen sistem hrambe celotne dokumentacije v zvezi s pravnim poslom s Skupino SIJ ter v zvezi z dobavljenim blagom na način, da jo bo hranil še 25 let od dobave blaga, če ni posebej določeno drugače.

Od vsakega dobavitelja se pričakuje vzpostavitev sistema poslovanja, skladnega s tem kodeksom. Skupina SIJ lahko v ta namen zahteva od svojih dobaviteljev pisno izjavo o sprejemanju kodeksa poslovne etike. Skupina SIJ lahko skladnost s pravili tega kodeksa preverja med izvajanjem presoje procesa pri dobavitelju. O terminu in poteku presoje

- identify risks in all fields of work and put in place appropriate preventative and corrective measures;
- to have an efficient management system in place with clearly defined goals, implementation plans and a periodic supplier audit system;
- to establish an appropriate education system for all employees of the company, regardless of their workplace, in order to make them aware of their contribution to product compliance, service and product safety and the importance of ethical behavior;
- to involve employees in the process of continuous progress and improvement;
- to establish a system of periodic audits of suppliers and contractors;
- to establish a system of corrective actions in the event of inconsistencies found in internal and external audits, inspections and investigations;
- to establish a system of personal data protection;
- to establish a system for storing all documentation relating to legal transactions with the SIJ Group and to the delivered goods for additional 25 years from the delivery of goods, unless otherwise specified.

Each supplier is expected to establish a system of operations that complies with this Code. For this purpose, the SIJ Group may demand a written statement from its suppliers on the adoption and compliance with the aforementioned Code of Business Ethics. The SIJ Group may check compliance with the rules of this Code while performing the process audit of the supplier. The date and the course of the audit will be agreed with the supplier by the SIJ Group. The supplier shall perform the service primarily on



se bo Skupina SIJ predhodno dogovorila z dobaviteljem.

Dobavitelj bo delo oz. storitev po naročilu izvedel v prvi vrsti sam. Dobavitelj lahko delo oz. storitev v celoti ali delno poveri svojemu podizvajalcu, če o tem predhodno obvesti Skupino SIJ. Skupina SIJ si pridržuje pravico, da enostransko in brez navajanja razlogov zavrne katerega koli podizvajalca dobavitelja. Nobeno dano soglasje, priporočilo ali drugo konkludentno dejanje ne odvezuje dobavitelja odgovornosti za delo oz. storitev svojega podizvajalca.

Direktorica nabave Skupine SIJ
Marjana Drolc Kaluža

Ljubljana, 12. 12. 2019

its own. However, the supplier may entrust the service in whole or in part to its subcontractor provided the SIJ Group is properly informed in advance. The SIJ Group reserves the right to reject unilaterally any subcontractor of the supplier without stating reasons. No consent, recommendation, or other conclusive act shall relieve the supplier of its responsibility for the work or the service of its subcontractor.

Purchasing Director of the SIJ Group
Marjana Drolc Kaluža

Ljubljana, 12 December 2019