



# KODEKS RAVNANJA DOBAVITELJEV VAR SUPPLIER CODE OF CONDUCT

NZD-222

Izdaja: 1

Datum: 23.09.2026

Stran: 1/8

## KODEKS RAVNANJA DOBAVITELJEV VAR

### Izjava vodstva

VAR gradi dolgoročna partnerstva na kakovosti, zanesljivosti, zakonitem poslovanju in spoštovanju ljudi ter okolja. Od dobaviteljev pričakujemo, da enaka načela vključijo v svoje upravljanje, vsakodnevne odločitve in dobavno verigo. Ta kodeks določa minimalne okoljske, družbene in upravljaljske zahteve. Kadar zakonodaja, pogodba ali zahteva kupca določa strožji standard, velja strožja zahteva.

### 1. Namen in področje uporabe

Kodeks velja za vse dobavitelje blaga in storitev, podizvajalce, posrednike, svetovalce in druge poslovne partnerje, ki poslujejo ali želijo poslovati z VAR d. o. o. Spoštovanje kodeksa in drugih veljavnih pogojev podjetja VAR je pogoj za začetek in nadaljevanje poslovnega sodelovanja, kadar je kodeks vključen ali naveden v nabavnih pogojih, naročilu, pogodbi, sporazumu o kakovosti ali drugem dokumentu, ki ureja sodelovanje. Dobavitelj mora zahteve kodeksa vključiti v svoje poslovanje in jih v sorazmernem obsegu prenesti na poddobavitelje, zlasti kadar ti vplivajo na izdelke, storitve ali tveganja v dobavni verigi VAR.

### 2. Temeljna načela

- spoštovanje veljavne zakonodaje, pogodbenih zahtev in standardov kupcev;
- spoštovanje človekovih pravic, dostojanstva in temeljnih pravic pri delu;
- preprečevanje negativnih vplivov na ljudi, okolje in skupnosti;

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### Management Statement

VAR builds long-term partnerships on quality, reliability, lawful business conduct and respect for people and the environment. We expect suppliers to integrate the same principles into their governance, day-to-day decisions and supply chains. This Code sets out minimum environmental, social and governance requirements. Where applicable law, a contract or a customer requirement sets a stricter standard, the stricter requirement shall apply.

### 1. Purpose and Scope

This Code applies to all suppliers of goods and services, subcontractors, intermediaries, consultants and other business partners that conduct or intend to conduct business with VAR d. o. o. Compliance with this Code and other applicable VAR terms and conditions is a prerequisite for commencing and continuing the business relationship where the Code is incorporated or referenced in purchasing terms, purchase orders, contracts, quality agreements or other documents governing the relationship. The supplier shall integrate the requirements of this Code into its operations and cascade them proportionately to its sub-suppliers, particularly where they affect products, services or supply-chain risks relevant to VAR.

### 2. Fundamental Principles

- compliance with applicable laws, contractual requirements and customer standards;
- respect for human rights, human dignity and fundamental rights at work;
- prevention of adverse impacts on people, the environment and communities;



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- ničelna toleranca do korupcije, ponarejanja, prisilnega in otroškega dela;
- preglednost, sledljivost, resničnost podatkov in sodelovanje pri preverjanju;
- pristop, ki temelji na tveganju, nenehnem izboljševanju in učinkovitem odpravljanju neskladnosti.
- zero tolerance for corruption, counterfeiting, forced labour and child labour;
- transparency, traceability, accuracy of data and cooperation in verification activities;
- a risk-based approach, continual improvement and effective remediation of nonconformities.

### 3. Človekove pravice in delovni pogoji

- **Otroško delo:** prepovedano je zaposlovanje oseb pod zakonsko določeno minimalno starostjo. Mlade delavce je treba posebej varovati pred nevarnim delom, nočnim delom in nalogami, ki bi škodovalе njihovemu zdravju, varnosti ali izobraževanju.
- **Prisilno delo in trgovina z ljudmi:** prepovedani so suženjstvo, prisila, zadrževanje osebnih dokumentov, depoziti, nedovoljene omejitve gibanja in plačevanje zaposlitvenih pristojbin s strani delavcev.
- **Enaka obravnava:** prepovedani so diskriminacija, nadlegovanje, trpinčenje, nasilje, ponižujoče ravnanje in povračilni ukrepi. Odločitve o zaposlovanju, plačilu, usposabljanju in napredovanju morajo temeljiti na zakonitih in objektivnih merilih.
- **Delovni čas in plačilo:** delovni čas, odmori, počitki, dopusti in nadurno delo morajo biti zakoniti, evidentirani in pregledni. Plačilo mora biti pravočasno, v celoti izplačano ter skladno z zakonodajo in dogovorjenimi pogoji.
- **Svoboda združevanja:** dobavitelj spoštuje pravico delavcev do organiziranja, predstavnštva in kolektivnega dogovarjanja brez zastraševanja ali povračilnih ukrepov.
- **Ranljive skupine in skupnosti:** dobavitelj spoštuje pravice manjšin, avtohtonih ljudstev, agencijskih in migrantskih delavcev, mladih, invalidov in drugih ranljivih skupin ter preprečuje

### 3. Human Rights and Working Conditions

- **Child labour:** the employment of persons below the legally applicable minimum working age is prohibited. Young workers shall be specifically protected from hazardous work, night work and tasks that could harm their health, safety or education.
- **Forced labour and human trafficking:** slavery, coercion, retention of identity documents, deposits, unlawful restrictions on freedom of movement and recruitment fees paid by workers are prohibited.
- **Equal treatment:** discrimination, harassment, bullying, violence, degrading treatment and retaliation are prohibited. Decisions on recruitment, remuneration, training and promotion shall be based on lawful and objective criteria.
- **Working time and remuneration:** working hours, breaks, rest periods, leave and overtime shall comply with the law and be accurately and transparently recorded. Remuneration shall be paid on time, in full and in accordance with applicable law and agreed terms.
- **Freedom of association:** the supplier shall respect workers' rights to organise, be represented and bargain collectively without intimidation or retaliation.
- **Vulnerable groups and communities:** the supplier shall respect the rights of minorities, indigenous peoples, agency and migrant workers, young workers,



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nezakonite prisilne izselitve in posege v pravice do zemlje, gozdov, vode in življenjskega prostora.

- **Varnostne službe:** uporaba zasebnih ali javnih varnostnih služb mora biti zakonita, sorazmerna in nadzorovana ter ne sme voditi v mučenje, nečloveško ravnanje ali nesorazmerno uporabo sile.

persons with disabilities and other vulnerable groups, and shall prevent unlawful forced evictions and interference with rights to land, forests, water and living space.

- **Security services:** the use of private or public security services shall be lawful, proportionate and supervised, and shall not result in torture, inhuman treatment or disproportionate use of force.

#### 4. Varnost in zdravje pri delu

Dobavitelj zagotavlja varno in zdravo delovno okolje. Sistematično ocenjuje tveganja, uporablja hierarhijo ukrepov, zagotavlja ustrezno osebno varovalno opremo, varnost strojev in opreme, ergonomijo, varno ravnanje s kemikalijami in biološkimi dejavniki, požarno varnost, pripravljenost na izredne dogodke ter usposabljanje zaposlenih. Nezgode, skorajšnje nezgode in poklicna obolenja se evidentirajo, preiskujejo in obravnavajo s korektivnimi ukrepi. Enake zahteve veljajo za pogodbene delavce in obiskovalce.

#### 4. Occupational Health and Safety

The supplier shall provide a safe and healthy working environment. It shall systematically assess risks, apply the hierarchy of controls, provide suitable personal protective equipment, ensure machinery and equipment safety, ergonomics, safe handling of chemicals and biological agents, fire safety, emergency preparedness and employee training. Accidents, near misses and occupational illnesses shall be recorded, investigated and addressed through corrective actions. The same requirements apply to contract workers and visitors.

#### 5. Poslovna etika in skladnost

- **Korupcija, podkupovanje, izsiljevanje in pranje denarja:** prepovedano je neposredno ali posredno ponujanje, obljubljanje, dajanje, zahtevanje ali sprejemanje nedovoljene koristi. Plačila in transakcije morajo biti zakonita, sledljiva in pravilno evidentirana.
- **Darila in gostoljubje:** dovoljena so le občasna, primerna in simbolična darila ali gostoljubje, ki ne vplivajo in ne ustvarjajo videza vplivanja na poslovno odločitev.
- **Nasprotje interesov:** dejanska ali potencialna nasprotja interesov je treba nemudoma razkriti VAR in jih ustrezno obvladati.
- **Poštena konkurenca:** prepovedani so dogovori o cenah, razdelitvi trgov ali kupcev, prirejanje ponudb in

#### 5. Business Ethics and Compliance

- **Corruption, bribery, extortion and money laundering:** directly or indirectly offering, promising, giving, requesting or accepting an improper advantage is prohibited. Payments and transactions shall be lawful, traceable and accurately recorded.
- **Gifts and hospitality:** only occasional, appropriate and symbolic gifts or hospitality are permitted, provided they do not influence or create the appearance of influencing a business decision.
- **Conflicts of interest:** actual or potential conflicts of interest shall be disclosed to VAR without delay and appropriately managed.
- **Fair competition:** price fixing, market or customer allocation, bid rigging and



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nedovoljena izmenjava konkurenčno občutljivih informacij.

- **Izvozne kontrole in sankcije:** dobavitelj spoštuje carinske predpise, izvozne omejitve, embargoe in mednarodne sankcije ter zagotavlja pravilno klasifikacijo in dokumentacijo.
- **Varstvo podatkov in informacijska varnost:** osebni podatki, poslovne skrivnosti, tehnična dokumentacija in dostopi se varujejo z ustreznimi organizacijskimi in tehničnimi ukrepi; incidente je treba nemudoma prijaviti VAR.
- **Intelektualna lastnina:** dobavitelj spoštuje avtorske pravice, patente, modele, znamke, programske licence, znanje in zaupne informacije VAR ter njegovih kupcev.
- **Ponarejeni deli in evidence:** prepovedani so ponarejeni, nedovoljeno spremenjeni ali napačno deklarirani materiali, deli, meritve, certifikati in zapisi. Zagotovljene morajo biti sledljivost, nadzor izvora in takojšnje obveščanje ob sumu.

## 6. Okolje in podnebje

- spoštovati okoljsko zakonodajo, dovoljenja in zahteve glede izdelkov ter voditi dokazila o skladnosti;
- prepoznavati okoljske vidike in tveganja ter postavljati merljive cilje za nenehno izboljševanje;
- meriti in zmanjševati porabo energije ter emisije toplogrednih plinov, vključno z relevantnimi emisijami, ter povečevati energetska učinkovitost in uporabo obnovljivih virov;
- učinkovito uporabljati vodo, surovine in druge naravne vire ter preprečevati onesnaženje zraka, vode in tal;
- preprečevati nastajanje odpadkov, spodbujati ponovno uporabo, recikliranje in krožne rešitve ter zakonito ravnati z nevarnimi odpadki;

unlawful exchange of competitively sensitive information are prohibited.

- **Export controls and sanctions:** the supplier shall comply with customs regulations, export restrictions, embargoes and international sanctions and ensure correct classification and documentation.
- **Data protection and information security:** personal data, trade secrets, technical documentation and access rights shall be protected through appropriate organisational and technical measures; incidents shall be reported to VAR without delay.
- **Intellectual property:** the supplier shall respect copyrights, patents, designs, trademarks, software licences, know-how and confidential information of VAR and its customers.
- **Counterfeit parts and records:** counterfeit, unauthorisedly modified or incorrectly declared materials, parts, measurements, certificates and records are prohibited. Traceability, origin control and immediate notification of suspected counterfeiting shall be ensured.

## 6. Environment and Climate

- comply with environmental legislation, permits and product-related requirements and maintain evidence of compliance;
- identify environmental aspects and risks and set measurable continual-improvement objectives;
- measure and reduce energy consumption and greenhouse gas emissions, including relevant emissions, and increase energy efficiency and the use of renewable energy;
- use water, raw materials and other natural resources efficiently and prevent pollution of air, water and soil;
- prevent waste generation, promote reuse, recycling and circular solutions, and manage hazardous waste lawfully;



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- voditi register kemikalij, varnostne liste in izjave o skladnosti ter upoštevati veljavne omejitve snovi in zahteve kupcev, vključno z REACH in RoHS, kadar so uporabljive;
- obvladovati hrup, rabo prostora, vplive na biotsko raznovrstnost in življenjski cikel izdelkov oziroma storitev;
- VAR na zahtevo predložiti podatke, potrebne za izračun okoljskega in ogljičnega odtisa izdelka.
- maintain a chemicals register, safety data sheets and declarations of conformity and comply with applicable substance restrictions and customer requirements, including REACH and RoHS where applicable;
- manage noise, land use, biodiversity impacts and the life cycle of products or services;
- provide VAR, upon request, with data needed to calculate product environmental and carbon footprints.

### 7. Odgovorno pridobivanje surovin

Dobavitelj izvaja tveganju prilagojen skrbni pregled izvora in dobavne verige surovin. Za izdelke VAR mora posebno pozornost nameniti aluminiju oziroma boksitu, niklju, jeklu oziroma železu in cinku. Kadar so glede na sestavo izdelka ali zahteve kupca relevantni, pregled zajema tudi kositer, tantal, volfram in zlato (3TG), kobalt, naravno sljudo ter druge zahtevane minerale ali surovine. Cilj je preprečiti prispevanje k oboroženim konfliktom, hudim kršitvam človekovih pravic, otroškemu ali prisilnemu delu, korupciji in težkim okoljskim vplivom. Dobavitelj mora na zahtevo VAR razkriti države izvora in, kadar je relevantno, talilnice oziroma rafinerije ter predložiti aktualni CMRT, EMRT, AMRT ali primerljivo izjavo. Ugotovljena tveganja mora dokumentirano preprečiti, zmanjšati, spremljati in na zahtevo razkriti VAR.

### 8. Prijave kršitev in zaščita prijaviteljev

Dobavitelj vzpostavi dostopen, zaupen in nepristranski mehanizem za prijavo kršitev, ki je na voljo zaposlenim, pogodbenikom in drugim prizadetim osebam. Omogoči anonimno prijavo, kjer je zakonsko dopustna, prepove povračilne ukrepe, zagotovi pravočasno obravnavo in spremlja učinkovitost ukrepov. Kršitve tega kodeksa, ki se nanašajo na poslovanje z VAR, se lahko prijavijo po kanalu VAR: **zaupnik@var.si**.

### 7. Responsible Sourcing of Raw Materials

The supplier shall conduct risk-based due diligence on the origin and supply chain of raw materials. For VAR products, particular attention shall be paid to aluminium/bauxite, nickel, steel/iron and zinc. Where relevant to product composition or customer requirements, the review shall also cover tin, tantalum, tungsten and gold (3TG), cobalt, natural mica and other required minerals or raw materials. The objective is to prevent contribution to armed conflict, severe human-rights abuses, child or forced labour, corruption and severe environmental impacts. Upon request, the supplier shall disclose countries of origin and, where relevant, smelters or refiners, and provide an up-to-date CMRT, EMRT, AMRT or comparable declaration. Identified risks shall be documented, prevented, mitigated, monitored and disclosed to VAR upon request.

### 8. Reporting Violations and Whistleblower Protection

The supplier shall establish an accessible, confidential and impartial reporting mechanism available to employees, contractors and other affected persons. Anonymous reporting shall be enabled where legally permitted, retaliation shall be prohibited, reports shall be handled in a timely manner and the effectiveness of measures shall be monitored. Violations of this Code relating to business with VAR may be reported through the VAR reporting channel: **zaupnik@var.si**.



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### 9. Izvajanje, dokazila in sodelovanje

Zahteve tega kodeksa so javno objavljene na spletni strani VAR. Dobavitelj mora na zahtevo VAR pravočasno, popolno in resnično razkriti informacije ter predložiti verodostojna dokazila o izpolnjevanju zahtev. Zahtevani obseg informacij in dokazil se določi glede na ocenjeno tveganje dobavitelja. VAR lahko sam ali prek pooblaščenih tretje osebe izvede pregled dokumentacije ali presojo na lokaciji, pri čemer upošteva varovanje zaupnih informacij. Dobavitelj mora na zahtevo VAR razkriti tudi pomembne kršitve, incidente, preiskave pristojnih organov ali spremembe, ki bi lahko vplivale na skladnost, dobavo, kakovost, varnost ali ugled.

Ob neskladnosti dobavitelj izvede analizo vzroka, takojšnje omejitvene ukrepe, korektivni načrt z odgovornostmi in roki ter preverjanje učinkovitosti. VAR lahko ob hudih, namernih, prikritih ali ponavljajočih se kršitvah omeji nova naročila, zahteva dodatno presojo, suspendira odobritev ali prekine poslovno razmerje.

### 10. Dodatek A – postopek ESG obvladovanja dobaviteljev

- **Predkvalifikacija:** dobavitelj mora pred začetkom poslovnega sodelovanja sprejeti in spoštovati ta kodeks ter druge veljavne pogoje podjetja VAR.
- **Ocena ESG tveganja:** nabava ocenjuje dobavitelje glede na državo, dejavnost, surovine, okoljske vplive, delovne pogoje, incidente, kritičnost dobave, zahteve kupcev in informacije o skladnosti.
- **Razvrstitev:** nabava upošteva verjetnost in resnost vpliva, inherentno in preostalo tveganje ter dobavitelja razvrsti v nizko, srednje ali visoko tveganje; rezultat se evidentira.
- **Razkritje in dokazila:** dobavitelj mora na zahtevo VAR pravočasno, popolno in resnično razkriti informacije ter predložiti ustrezna dokazila. CMRT,

### 9. Implementation, Evidence and Cooperation

The requirements of this Code are publicly available on the VAR website. Upon request, the supplier shall disclose information and submit credible evidence of compliance in a timely, complete and truthful manner. The scope of information and evidence required shall be determined according to the supplier's assessed risk. VAR may review documentation or conduct an on-site audit itself or through an authorised third party, subject to protection of confidential information. Upon request, the supplier shall also disclose significant violations, incidents, investigations by competent authorities or changes that could affect compliance, delivery, quality, safety or reputation.

In the event of nonconformity, the supplier shall perform root-cause analysis, implement immediate containment, prepare a corrective-action plan with responsibilities and deadlines, and verify effectiveness. In cases of serious, intentional, concealed or repeated violations, VAR may restrict new orders, require an additional audit, suspend approval or terminate the business relationship.

### 10. Appendix A – ESG Supplier Management Process

- **Prequalification:** before the business relationship begins, the supplier shall accept and comply with this Code and other applicable VAR terms and conditions.
- **ESG risk assessment:** Purchasing assesses suppliers based on country, activity, raw materials, environmental impacts, working conditions, incidents, supply criticality, customer requirements and available compliance information.
- **Classification:** Purchasing considers likelihood and severity of impact, inherent and residual risk, and classifies the supplier as low, medium or high risk; the result is recorded.
- **Disclosure and evidence:** upon request, the supplier shall disclose information



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EMRT, AMRT ali primerljiva panožna dokazila se zahtevajo, kadar so relevantna.

- **Preverjanje:** pri povišanem tveganju lahko VAR zahteva dodatna pojasnila, pregled ali presojo, po potrebi tudi na nižjih ravneh dobavne verige.
- **Korektivni ukrepi:** dobavitelj pripravi analizo vzroka in načrt ukrepov z odgovornostjo, rokom in preverjanjem učinkovitosti.
- **Ponovna ocena:** visokotvegani dobavitelji se ocenijo najmanj letno; drugi po internem postopku; izredna ocena se izvede ob pomembnih spremembah ali incidentih.
- **Eskalacija:** hude ali ponavljajoče se kršitve se predložijo pristojnim funkcijam in vodstvu.

## 10.1 Merila za povišano ESG tveganje

- visoko tvegane države ali območja izvora;
- kritične surovine;
- delovno intenzivne dejavnosti in ranljive skupine;
- nevarni procesi ter pomembni okoljski vplivi;
- incidenti, regulatorni ukrepi, prijave ali nesodelovanje;
- visoka kritičnost za proizvodnjo, kakovost ali zahteve kupcev.

## 11. Odgovornosti in pregled

Ta kodeks operativno dopolnjuje Kodeks etike NZD-111, navodilo Trajnostno upravljanje in družbena odgovornost NZP-19, Politiko podjetja PK-15, Priročnik kakovosti za dobavitelje in pravila zaščite prijaviteljev PK-13. Podrobnejši način notranjega ocenjevanja, potrjevanja, spremljanja in eskalacije dobaviteljev se izvaja po veljavnih notranjih postopkih VAR.

Nabava vključuje zahteve kodeksa v izbor, odobritev in spremljanje dobaviteljev, ocenjuje ESG tveganja in določa potrebna razkritja,

and provide appropriate evidence in a timely, complete and truthful manner. CMRT, EMRT, AMRT or comparable industry evidence is required where relevant.

- **Verification:** where elevated risk is identified, VAR may request additional explanations, a review or an audit, including lower tiers of the supply chain where necessary.
- **Corrective actions:** the supplier shall prepare root-cause analysis and an action plan with ownership, deadline and effectiveness verification.
- **Reassessment:** high-risk suppliers are reassessed at least annually; other suppliers according to the internal procedure; an extraordinary reassessment is performed following significant changes or incidents.
- **Escalation:** serious or repeated violations are escalated to the relevant functions and management.

## 10.1 Criteria for Elevated ESG Risk

- high-risk countries or sourcing regions;
- critical raw materials;
- labour-intensive activities and vulnerable groups;
- hazardous processes and significant environmental impacts;
- incidents, regulatory measures, grievances or failure to cooperate;
- high criticality for production, quality or customer requirements.

## 11. Responsibilities and Review

This Code operationally supplements the NZD-111 Code of Ethics, NZP-19 Sustainability Management and Social Responsibility instruction, PK-15 Corporate Policy, the Supplier Quality Manual and PK-13 Whistleblower Protection Rules. Detailed internal assessment, approval, monitoring and escalation of suppliers is carried out in accordance with applicable VAR internal procedures.

Purchasing integrates the Code requirements into supplier selection, approval and



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dokazila, ukrepe ali preverjanje. Kakovost oziroma nosilec ESG ter druge strokovne funkcije sodelujejo glede na vsebino tveganja. Vodstvo odloča o pomembnih eskalacijah in najmanj letno pregleda učinkovitost sistema.

### 12. Veljavnost in objava

Ta kodeks ne zahteva podpisa ali druge posebne potrditve dobavitelja. Kodeks je javno objavljen na spletni strani VAR, dobavitelj pa je o njegovi objavi oziroma spremembi obveščen po elektronski pošti. Za posameznega dobavitelja začne veljati z dnem prejema elektronskega obvestila.

Nabava hrani dokazilo o objavi in obvestilu, vključno z veljavno različico, datumom objave, datumom obvestila, seznamom obveščenih dobaviteljev in odzivi.

Dobavitelj lahko v desetih delovnih dneh poda obrazložene pisne pripombe. Pripombe ne zadržijo veljavnosti, razen če VAR pisno določi drugače. Če pripomb ni, se šteje, da je dobavitelj seznanjen. Sprejem in spoštovanje kodeksa sta pogoj poslovnega sodelovanja.

monitoring, assesses ESG risks and determines the required disclosures, evidence, actions or verification. Quality or the designated ESG owner and other specialist functions participate according to the nature of the risk. Management decides on significant escalations and reviews system effectiveness at least annually.

### 12. Validity and Publication

This Code does not require the supplier's signature or any other specific confirmation. It is publicly available on the VAR website, and the supplier is notified of its publication or amendment by email. For each supplier, it becomes effective on the date the email notification is received.

Purchasing retains evidence of publication and notification, including the applicable version, publication date, notification date, list of notified suppliers and responses received.

The supplier may submit reasoned written comments within ten working days. Comments do not suspend the effectiveness of the Code unless VAR determines otherwise in writing. If no comments are submitted, the supplier is deemed to have been informed. Acceptance of and compliance with the Code are conditions of the business relationship.