Na podlagi 10. člena Zakona o delovnih razmerjih (ZDR-1), Zakona o zaščiti prijaviteljev (ZZPri; Uradni list RS, št. 16/23), ki prenaša Direktivo (EU) 2019/1937 o zaščiti oseb, ki prijavijo kršitve prava Unije, ter ob upoštevanju Uredbe (EU) 2016/679 (GDPR), Zakona o varstvu osebnih podatkov (ZVOP-2), Zakona o gospodarskih družbah (ZGD-1), Zakona o integriteti in preprečevanju korupcije (ZIntPK), Zakona o varstvu okolja (ZVO-2), Zakona o varnosti in zdravju pri delu (ZVZD-1), veljavnih delovnopravnih in protidiskriminacijskih predpisov, Smernic OZN za podjetništvo in človekove pravice, zlasti načel 29 in 31, Smernic OECD za večnacionalne družbe o odgovornem poslovnem ravnanju ter Direktive (EU) 2024/1760 o skrbnem pregledu v podjetjih glede trajnostnosti v vsakokrat veljavnem besedilu in v obsegu, ki je za družbo neposredno ali posredno relevanten, zlasti zaradi zahtev kupcev in skrbnega pregleda v dobavni verigi, je direktor družbe VAR d.o.o., Srečko Frumen, po predhodni seznanitvi delavcev dne 06.10.2026 sprejel naslednji splošni akt družbe.

On the basis of Article 10 of the Employment Relationships Act (ZDR-1), the Whistleblower Protection Act (ZZPri; Official Gazette of the Republic of Slovenia, No. 16/23), which transposes Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law, and taking into account Regulation (EU) 2016/679 (GDPR), the Personal Data Protection Act (ZVOP-2), the Companies Act (ZGD-1), the Integrity and Prevention of Corruption Act (ZIntPK), the Environmental Protection Act (ZVO-2), the Occupational Health and Safety Act (ZVZD-1), applicable labour-law and anti-discrimination legislation, the UN Guiding Principles on Business and Human Rights, in particular Principles 29 and 31, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, and Directive (EU) 2024/1760 on corporate sustainability due diligence, as amended from time to time and to the extent directly or indirectly relevant to the Company, in particular due to customer requirements and supply-chain due diligence, the Managing Director of VAR d.o.o., Srečko Frumen, after prior consultation with employees on 06.10.2026, adopted the following general act of the Company.

PRAVILNIK O ZAŠČITI PRIJAVITELJEV IN ESG PRITOŽBENEM MEHANIZMU

RULES ON WHISTLEBLOWER PROTECTION AND THE ESG GRIEVANCE MECHANISM

I. UVODNE DOLOČBE

1. člen

S tem pravilnikom se določajo standardi za sprejem, evidentiranje, preizkus, obravnavo in zaključevanje prijav kršitev predpisov po ZZPri ter ESG pritožb glede dejanskih ali možnih škodljivih vplivov družbe VAR d.o.o. (v nadaljevanju: družba ali delodajalec). Pravilnik določa tudi pristojnosti, roke, zaščito prijaviteljev in drugih udeležencev, sanacijske ukrepe, pritožbeni postopek,

I. INTRODUCTORY PROVISIONS

Article 1

These Rules establish standards for receiving, recording, screening, handling and closing reports of breaches of legislation under the ZZPri and ESG grievances concerning actual or potential adverse impacts of VAR d.o.o. (hereinafter: the Company or the Employer). The Rules also define responsibilities, time limits, protection of reporting persons and other participants,

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spremljanje učinkovitosti ter način javne dostopnosti mehanizma.

remediation measures, the appeal procedure, effectiveness monitoring and the manner in which the mechanism is made publicly accessible.

Namen tega pravilnika je vzpostaviti varen, zaupen, dostopen, predvidljiv, pravičen in na pravicah temelječ notranji kanal ter širši operativni ESG pritožbeni mehanizem. Za prijave kršitev predpisov, o katerih je prijavitelj izvedel v delovnem okolju, se uporabljajo pogoji, zaščitni ukrepi in roki po ZZPri. Za druge ESG pritožbe, ki jih vložijo zunanji deležniki ali se nanašajo na človekove pravice, pravice delavcev, okolje, zdravje in varnost ali etično poslovanje, se uporabljajo določbe tega pravilnika o sprejemu, obravnavi, zaupnosti, prepovedi povračilnih ukrepov, sanaciji in pritožbi, tudi kadar pogoji za zaščito po ZZPri niso izpolnjeni. Ta razmejitev ne zmanjšuje nobene pravice, ki prijavitelju pripada po zakonu.

The purpose of these Rules is to establish a safe, confidential, accessible, predictable, equitable and rights-compatible internal channel and a broader operational ESG grievance mechanism. Reports of breaches of legislation learned of in a work-related context are subject to the conditions, protective measures and time limits under the ZZPri. Other ESG grievances submitted by external stakeholders or concerning human rights, workers' rights, the environment, health and safety, or ethical business conduct are governed by the provisions of these Rules on receipt, handling, confidentiality, prohibition of retaliation, remediation and appeal, even where the conditions for protection under the ZZPri are not met. This distinction does not reduce any right afforded to a reporting person by law.

Učinkoviti interni sistem za poročanje o kršitvah in zaščito prijaviteljev podpira zakonitost poslovanja družbe in je priložnost za izboljšanje poslovnega okolja.

An effective internal system for reporting breaches and protecting reporting persons supports the lawful operation of the Company and provides an opportunity to improve the business environment.

Poročevalski sistem, ki ga ureja ta pravilnik, zagotavlja zaupnost glede identitete prijavitelja, pri čemer prijavitelj ne sme biti podvržen tveganjem kaznovalnega, nepoštenega ali diskriminatornega ravnanja.

The reporting system governed by these Rules ensures the confidentiality of the reporting person's identity, and the reporting person must not be exposed to the risk of punitive, unfair or discriminatory treatment.

2. člen

Pravilnik vsebuje:

- metode in kanale za komunikacijo, ki jih prijavitelj lahko uporabi,
- proces prijave, ki se sproži, ko je prijava vložena,
- različne faze procesa,
- osebe, ki so v proces vključene, ter njihove vloge in odgovornosti.

Article 2

These Rules contain:

- the communication methods and channels available to a reporting person,
- the reporting process initiated when a report is submitted,
- the different stages of the process,
- the persons involved in the process and their roles and responsibilities.

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V tem pravilniku uporabljeni izrazi, zapisani v moški slovnični obliki, se uporabljajo kot nevtralen izraz za moške in ženske.

Terms used in these Rules in the masculine grammatical form are intended as gender-neutral terms referring to both women and men.

II. UPORABLJENI IZRAZI

3. člen

Izrazi, uporabljeni v tem pravilniku, imajo pomen po ZZPri, kadar se nanašajo na zakonsko prijavo, za namen širšega ESG pritožbenega mehanizma pa se uporabljajo tudi naslednje opredelitve:

»Prijava po ZZPri« je ustno ali pisno sporočanje informacij o kršitvah predpisov, pridobljenih v delovnem okolju. »ESG pritožba« je ustno ali pisno opozorilo notranjega ali zunanjega deležnika o dejanskem ali možnem škodljivem vplivu, povezanem z dejavnostmi, proizvodi, storitvami ali poslovnimi odnosi družbe, zlasti na človekove pravice, okolje, zdravje in varnost ali etično poslovanje. Kadar ta pravilnik uporablja skupni izraz »prijava«, ta zajema obe vrsti zadev, razen če je iz besedila razvidno drugače.

»Notranja prijava« je prijava znotraj družbe, pri kateri je kršitev nastala ali obstaja poslovna povezava s prijavljenim vplivom.

»Zunanja prijava« je prijava organom za zunanjo prijavo.

»Javno razkritje« je dajanje informacij o kršitvi v delovnem okolju na voljo javnosti.

»Informacija o kršitvi« je informacija, vključno s podlago za sum, o dejanski ali morebitni kršitvi predpisov, ki se je ali se bo zelo verjetno zgodila v družbi, s katero je ali je bil prijavitelj v delovnem in podobnem razmerju, ter o poskusu prikrivanja takšne kršitve.

»Delodajalec« je družba VAR d.o.o.

II. DEFINITIONS

Article 3

Terms used in these Rules have the meaning assigned to them by the ZZPri when referring to a statutory report; for the purposes of the broader ESG grievance mechanism, the following definitions also apply:

“Report under the ZZPri” means an oral or written communication of information on breaches of legislation obtained in a work-related context. “ESG grievance” means an oral or written notification by an internal or external stakeholder concerning an actual or potential adverse impact connected with the Company’s activities, products, services or business relationships, in particular impacts on human rights, the environment, health and safety, or ethical business conduct. Where these Rules use the common term “report”, it covers both types of case unless the context indicates otherwise.

“Internal report” means a report made within the Company where the breach occurred or where a business relationship exists with the reported impact.

“External report” means a report submitted to the competent external reporting authorities.

“Public disclosure” means making information about a breach in a work-related context available to the public.

“Information on a breach” means information, including reasonable grounds for suspicion, concerning an actual or potential breach of legislation that has occurred or is very likely to occur in the Company with which the reporting person has or had a work or similar relationship, and concerning attempts to conceal such a breach.

“Employer” means VAR d.o.o.

»Delovno in podobno razmerje« je delovno razmerje, lahko pa tudi razmerje zunaj delovnega razmerja, če gre za prostovoljstvo, pripravništvo, vajeništvo, pogodbeno delo, študentsko delo, sodelovanje v razpisnih postopkih v vlogi kandidata, opravljanje funkcije, izvrševanje upravičenj, nalog in pooblastil delničarja, člana nadzornega ali upravnega organa subjekta, kot tudi vsako drugo sodelovanje v dejavnosti pravne ali fizične osebe, ki jo izvajajo samozaposlene osebe na podlagi pogodbe, ali delo pod nadzorom in vodstvom zunanjih izvajalcev, podizvajalcev ali dobaviteljev, ne glede na plačilo in ne glede na to, ali se je razmerje že končalo ali se šele vzpostavlja s postopkom zaposlovanja ali s pogajanji pred podpisom pogodbe.	“Work or similar relationship” means an employment relationship or a relationship outside employment, including volunteering, traineeship, apprenticeship, contractual work, student work, participation as a candidate in selection procedures, performance of an office, exercise of the rights, duties and powers of a shareholder or member of a supervisory or management body, any other participation in the activities of a legal or natural person by self-employed persons under a contract, or work under the supervision and direction of contractors, subcontractors or suppliers, irrespective of remuneration and irrespective of whether the relationship has ended or is only being established through recruitment or pre-contractual negotiations.
»Delovno okolje« je sedanje ali preteklo delovno in podobno razmerje v zasebnem sektorju, v okviru katerega posameznik pridobi informacije o kršitvi in v okviru katerega bi lahko tak posameznik utrpel povračilne ukrepe, če bi tako kršitev prijavil.	“Work-related context” means a current or past work or similar relationship in the private sector through which a person obtains information on a breach and within which that person could suffer retaliation if the breach were reported.
»Oseba, ki jo prijava zadeva« je fizična ali pravna oseba, ki je v prijavi ali javnem razkritju navedena kot oseba, ki jo prijavitelj bremeni kršitve ali je s to osebo povezana.	“Person concerned” means a natural or legal person referred to in a report or public disclosure as a person to whom the breach is attributed or with whom that person is associated.
»Posrednik ali posrednica (v nadaljnjem besedilu posrednik)« je fizična oseba, ki pomaga prijavitelju v postopku prijave v delovnem okolju in katere pomoč bi morala biti zaupna.	“Facilitator” means a natural person who assists a reporting person in the reporting process in a work-related context and whose assistance should be confidential.
»Povezane osebe« so osebe, ki so ali bi lahko utrpele povračilne ukrepe v delovnem okolju zaradi povezave s prijaviteljem, kot so sodelavci ali sorodniki prijavitelja, ter pravni subjekti, ki so v lasti prijavitelja, za katere prijavitelj dela ali so z njimi drugače povezani v delovnem okolju.	“Associated persons” means persons who have suffered or could suffer retaliation in a work-related context because of their connection with the reporting person, such as colleagues or relatives, and legal entities owned by, employing, or otherwise connected with the reporting person in a work-related context.
»Zaupnik ali zaupnica (v nadaljevanju zaupnik)« je ena ali več zaupanja vrednih oseb ali notranja organizacijska enota za prejem in obravnavo notranjih prijav.	“Confidential adviser” means one or more trusted persons or an internal organisational unit responsible for receiving and handling internal reports.

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»Nadaljnje ukrepanje« je vsak ukrep, ki ga sprejme zaupnik, uradna oseba organa za zunanjo prijavo ali Komisija za preprečevanje korupcije (v nadaljevanju: Komisija), da se ugotovi točnost navedb iz prijave in po potrebi obravnava prijavljena kršitev, vključno z ukrepi, kot so obveščanje osebe, pristojne za nadaljnje ukrepanje pri delodajalcu, notranja preiskava, inšpekcijski nadzor, naznanitev kaznivega dejanja, izterjava sredstev ali konec postopka.

»Povračilni ukrep« je vsako neposredno ali posredno dejanje ali opustitev dejanja v delovnem okolju, ki je posledica notranje ali zunanje prijave ali javnega razkritja in ki povzroči ali lahko povzroči prijavitelju neupravičeno škodo.

“Follow-up” means any action taken by the confidential adviser, an official of an external reporting authority or the Commission for the Prevention of Corruption (hereinafter: the Commission) to assess the accuracy of allegations made in a report and, where necessary, address the reported breach, including referral to the person competent for follow-up at the Employer, an internal investigation, inspection, reporting a criminal offence, recovery of funds or closure of the procedure.

“Retaliation” means any direct or indirect act or omission in a work-related context prompted by an internal or external report or by public disclosure and which causes or may cause unjustified harm to the reporting person.

III. UPORABA PRAVILNIKA

4. člen

Ta pravilnik se uporablja za prijavitelje po ZZPri ter za vse notranje in zunanje deležnike, ki vložijo ESG pritožbo. Zakonska zaščita po ZZPri se presoja po pogojih tega zakona; dostop do širšega ESG pritožbenega mehanizma pa ni omejen na fizične osebe, delovno okolje ali formalno kršitev predpisa.

Do zaščite po ZZPri je upravičen prijavitelj, ki je podal prijavo pod pogoji, določenimi z zakonom, vključno z anonimnim prijaviteljem, katerega identiteta je bila pozneje razkrita. Za ESG pritožbo družba zagotavlja zaupnost, varstvo osebnih podatkov in prepoved povračilnih ukrepov vsem prijaviteljem in njihovim predstavnikom, ki so ravnali v dobri veri oziroma so imeli razumne razloge verjeti, da so informacije resnične.

Prijavitelj ni upravičen do zaščite po tem pravilniku, če je podal prijavo dve leti ali več po prenehanju kršitve.

III. SCOPE OF APPLICATION

Article 4

These Rules apply to reporting persons under the ZZPri and to all internal and external stakeholders who submit an ESG grievance. Statutory protection under the ZZPri is assessed under the conditions of that Act; access to the broader ESG grievance mechanism is not limited to natural persons, a work-related context or a formal breach of legislation.

A reporting person who has submitted a report under the conditions laid down by the ZZPri is entitled to protection under that Act, including an anonymous reporting person whose identity is subsequently disclosed. For ESG grievances, the Company ensures confidentiality, personal-data protection and protection against retaliation for all reporting persons and their representatives who acted in good faith or had reasonable grounds to believe that the information was true.

A reporting person is not entitled to protection under these Rules if the report was submitted two years or more after the breach ceased.

Do zaščite po tem pravilniku so upravičeni tudi posredniki in povezane osebe, če je verjetno, da so bili ali bi lahko bili zaradi povezanosti s prijaviteljem zoper njih uvedeni povračilni ukrepi.

Facilitators and associated persons are also entitled to protection under these Rules where it is likely that retaliation has been or could be taken against them because of their connection with the reporting person.

Prijavitelj lahko kršitev javno razkrije pod pogoji iz ZZPri.

A reporting person may publicly disclose a breach under the conditions laid down by the ZZPri.

II. OPIS KRŠITEV, KI SO PREDMET POROČANJA OZIROMA PRIJAVE

5. člen

Predmet prijave ali pritožbe so dejanske ali možne kršitve oziroma škodljivi vplivi, povezani z dejavnostmi, proizvodi, storitvami ali poslovnimi odnosi družbe, zlasti: kršitve človekovih pravic in pravic delavcev; diskriminacija, nadlegovanje ali trpinčenje; vplivi na okolje, podnebje, varnost in zdravje; goljufije, korupcija, nasprotja interesov in druge neetične poslovne prakse; kršitve prava konkurence in pravil o državnih pomočeh; kršitve na področju varnosti in skladnosti proizvodov, finančnih storitev, preprečevanja pranja denarja in financiranja terorizma, davkov, varstva potrošnikov, zasebnosti in osebnih podatkov, informacijske varnosti ter poslovnih skrivnosti; in druge kršitve ali škodljivi vplivi, povezani z dejavnostmi ali poslovnimi odnosi družbe oziroma pomembni za družbo in njene deležnike.

II. DESCRIPTION OF BREACHES AND IMPACTS SUBJECT TO REPORTING OR GRIEVANCE

Article 5

A report or grievance may concern actual or potential breaches or adverse impacts connected with the Company's activities, products, services or business relationships, including in particular: violations of human rights and workers' rights; discrimination, harassment or bullying; impacts on the environment, climate, safety and health; fraud, corruption, conflicts of interest and other unethical business practices; breaches of competition law and State-aid rules; breaches relating to product safety and compliance, financial services, prevention of money laundering and terrorist financing, taxation, consumer protection, privacy and personal data, information security and trade secrets; and other breaches or adverse impacts connected with the Company's activities or business relationships or otherwise material to the Company and its stakeholders.

6. člen

V sklop prijav so zajete tudi kršitve zaradi nasprotja interesov, nespoštovanja pravil in kontrolnih postopkov ter kazniva ali druga nedopustna ravnanja, kot so prevara, poneverba, kraja, korupcija, pranje denarja, izsiljevanje, goljufija, ponarejanje, neustrezna obdelava osebnih podatkov, nepooblaščen dostop do informacijskih sistemov in posredovanje lažnih informacij vodstvu ali strokovnim službam.

Pritožbe iz delovnega razmerja, vključno z diskriminacijo, nadlegovanjem in trpinčenjem, se lahko vložijo tudi po tem pravilniku. Če drug notranji akt določa specializiran postopek, zaupnik ob soglasju prijavitelja zagotovi varen prenos pristojni osebi, spremlja obravnavo ter zagotovi zaupnost, prepoved povračilnih ukrepov,

Article 6

Reports also cover conflicts of interest, failure to comply with rules and control procedures, and criminal or other impermissible conduct such as fraud, embezzlement, theft, corruption, money laundering, extortion, deception, forgery, improper processing of personal data, unauthorised access to information systems and the provision of false information to management or professional functions.

Employment-related grievances, including discrimination, harassment and bullying, may also be submitted under these Rules. Where another internal act establishes a specialised procedure, the confidential adviser shall, with the reporting person's consent, arrange a secure referral to the competent person, monitor the handling and

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upoštevanje rokov in povratno informacijo. Prenos ne sme povzročiti, da bi moral prijavitelj ponovno vložiti isto pritožbo.
Kadar se zadeva nanaša na spolno ali drugo nadlegovanje oziroma trpinčenje na delovnem mestu, se vsebinska obravnava izvede tudi v skladu s Pravilnikom o ukrepih delodajalca za zaščito delavcev pred spolnim in drugim nadlegovanjem ali trpinčenjem na delovnem mestu. Zaupnik ostane enotna kontaktna točka in koordinator zaščitnih ukrepov, razen če prijavitelj izrecno izbere drug razpoložljiv kanal.
Zaupnik je enotna vstopna točka za vse prijave in pritožbe po tem pravilniku. Če je za vsebinsko obravnavo pristojna druga organizacijska enota ali drug notranji postopek, zaupnik določi vodilni postopek, koordinira sodelovanje, prepreči podvajanje razgovorov in dokazovanja ter zagotovi enotno evidenco, varovanje identitete, spremljanje rokov in skupno zaključno obvestilo.

ensure confidentiality, protection against retaliation, compliance with time limits and feedback. The referral must not require the reporting person to submit the same grievance again.
Where a case concerns sexual or other harassment or workplace bullying, the substantive review shall also be conducted in accordance with the Rules on Employer Measures to Protect Workers against Sexual and Other Harassment or Workplace Bullying. The confidential adviser remains the single point of contact and coordinator of protective measures unless the reporting person expressly chooses another available channel.
The confidential adviser is the single entry point for all reports and grievances under these Rules. Where another organisational unit or internal procedure is competent for the substantive review, the confidential adviser determines the lead procedure, coordinates cooperation, prevents duplication of interviews and evidence gathering, and ensures a single record, protection of identity, monitoring of time limits and a consolidated closing notice.

IV. PRIJAVITELJ IN POGOJI ZA ZAŠČITO

7. člen

Prijavo ali pritožbo lahko predloži vsak notranji ali zunanji deležnik, ki je seznanjen z dejansko ali možno kršitvijo oziroma škodljivim vplivom, povezanim z družbo. Mehanizem je na voljo zaposlenim in nekdanjim zaposlenim, kandidatom za zaposlitev, začasnim in agencijskim delavcem, pripravnikom, vajencem, študentom, članom organov vodenja ali nadzora, poslovnim partnerjem, neposrednim in posrednim dobaviteljem, podizvajalcem, izvajalcem storitev, kupcem, potrošnikom, predstavnikom lokalnih skupnosti, civilnodružbenim organizacijam ter drugim osebam ali organizacijam, na katere vplivajo dejavnosti ali poslovni odnosi družbe. Prijavo lahko vloži tudi pooblaščeni predstavnik upravičene osebe. Dostop do mehanizma ni

IV. REPORTING PERSON AND CONDITIONS FOR PROTECTION

Article 7

A report or grievance may be submitted by any internal or external stakeholder who is aware of an actual or potential breach or adverse impact connected with the Company. The mechanism is available to current and former employees, job applicants, temporary and agency workers, trainees, apprentices, students, members of management or supervisory bodies, business partners, direct and indirect suppliers, subcontractors, service providers, customers, consumers, representatives of local communities, civil-society organisations and other persons or organisations affected by the Company's activities or business relationships. A report may also be submitted by an authorised representative of an entitled person. Access to the mechanism is not conditional on a

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pogojen z obstojem pogodbenega ali delovnega razmerja z družbo.

Prijavitelji so ustrezno zaščiteni pred nepoštenimi, maščevalnimi in diskriminatornimi posledicami, ki lahko izvirajo zaradi prijave.

8. člen

Prijavitelj je do zaščite po tem pravilniku upravičen:

• je na podlagi utemeljenih razlogov menil, da so bile prijavljene informacije o kršitvah ob prijavi resnične, in je podal prijavo v skladu s tem pravilnikom,

• je prijavo podal pred potekom dveh let po prenehanju kršitve,

• je prijavo podal anonimno, njegova identiteta pa je bila pozneje razkrita.

9. člen

Prepoved razkritja identitete in zaupnost se v družbi zagotavljata na naslednje načine:

• Nihče ne sme brez izrecnega soglasja prijavitelja razkriti njegove identitete nikomur razen zaupniku in organu za zunanjo prijavo. To velja tudi za druge informacije, iz katerih je mogoče neposredno ali posredno sklepati o identiteti prijavitelja. Izjema velja, kadar razkritje zahteva državni tožilec in je nujno za preiskovanje kaznivih dejanj ali kadar ga zahteva sodišče zaradi sodnega postopka, vključno z varstvom pravic osebe, ki jo prijava zadeva. Pred takim razkritjem se prijavitelja pisno obvesti o nameravanem razkritju in razlogih zanj, razen če državni tožilec ali sodišče presodi, da bi obvestilo ogrozilo povezano preiskavo ali sodni postopek.

contractual or employment relationship with the Company.

Reporting persons are appropriately protected against unfair, retaliatory and discriminatory consequences arising from a report.

Article 8

A reporting person is entitled to protection under these Rules where:

• the reporting person had reasonable grounds to believe that the reported information on breaches was true at the time of reporting and submitted the report in accordance with these Rules,

• the report was submitted before two years had elapsed after the breach ceased,

• the report was submitted anonymously and the reporting person's identity was subsequently disclosed.

Article 9

The prohibition on disclosure of identity and confidentiality are ensured within the Company as follows:

• No person may disclose the reporting person's identity without the reporting person's explicit consent to anyone other than the confidential adviser and the competent external reporting authority. This also applies to any other information from which the reporting person's identity may be directly or indirectly inferred. An exception applies where disclosure is required by a public prosecutor and is necessary for the investigation of criminal offences, or by a court for judicial proceedings, including proceedings to protect the rights of the person concerned. Before such disclosure, the reporting person shall be informed in writing of the intended disclosure and the reasons for it, unless the public prosecutor or court considers that such notice would jeopardise the related investigation or judicial proceedings.

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• Ne glede na prejšnjo alinejo se identiteta prijavitelja ne sme razkriti, če bi razkritje ogrozilo življenje ali resno ogrozilo javni interes, varnost ali obrambo države.

• Notwithstanding the preceding point, the reporting person's identity must not be disclosed where disclosure would endanger life or seriously jeopardise the public interest or the security or defence of the State.

• Družba ne sme ugotavljati identitete anonimnega prijavitelja.

• The Company must not attempt to identify an anonymous reporting person.

• Če prejeta informacija vključuje poslovno skrivnost ali drugo zakonsko varovano tajnost, se sme uporabljati ali razkriti samo v okviru nadaljnjega ukrepanja.

• Where information received includes a trade secret or other legally protected confidential information, it may be used or disclosed only for the purposes of follow-up.

10. člen

Prepovedani so vsakršni povračilni ukrepi zoper prijavitelja, zlasti pa:

• odpoved delovnega razmerja,

• suspenz pogodbe o zaposlitvi,

• premestitev na nižje delovno mesto, onemogočanje ali zadrževanje napredovanja,

• prenos delovnih nalog, sprememba kraja delovnega mesta, sprememba delovnega časa, zmanjšanje delovne obveznosti, neizplačilo ali znižanje plače in drugih dodatkov, neizplačilo nagrad in odpravnin,

• onemogočanje ali zadržanje izobraževanja in strokovnega usposabljanja,

• nizka ocena delovne uspešnosti, nizka letna ocena ali negativna zaposlitvena referenca,

• šikaniranje, prisila, ustrahovanje, nadlegovanje ali izključitev in pomanjkljiva zaščita dostojanstva pred takim ravnanjem drugih oseb,

• diskriminacija, slabša ali nepravična obravnava,

• opustitev sklenitve pogodbe o zaposlitvi za določen čas pred potekom časa oziroma pred prenehanjem razloga za sklenitev te pogodbe,

• druga samovoljna ravnanja družbe, vključno z ravnanji, ki povzročajo škodo, tudi za ugled osebe, zlasti na družbenih omrežjih, finančno

Article 10

Any form of retaliation against a reporting person is prohibited, including in particular:

• termination of employment,

• suspension of the employment contract,

• demotion, withholding or delaying promotion,

• transfer of duties, change of workplace location, change of working hours, reduction of workload, non-payment or reduction of salary and other allowances, or non-payment of bonuses and severance payments,

• withholding or delaying education and professional training,

• a poor performance assessment, poor annual appraisal or negative employment reference,

• victimisation, coercion, intimidation, harassment or exclusion, and inadequate protection of dignity against such conduct by others,

• discrimination, disadvantageous or unfair treatment,

• failure to renew a fixed-term employment contract before its expiry or before the reason for which it was concluded has ceased,

• other arbitrary acts by the Company, including acts causing damage to a person's reputation,

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izgubo, vključno z izgubo posla in izgubo dohodka,

• predčasna prekinitev ali odpoved pogodbe za nabavo blaga ali storitev ali druga prekinitev poslovnega delovanja,

• razveljavitev, začasni ali trajni odvzem licence ali dovoljenja,

• samovoljno odrejanje opravljanja zdravstvenih pregledov ali pregledov zaradi ugotavljanja delovne sposobnosti,

• uvrstitev na črno listo na podlagi neformalnega ali formalnega dogovora v sektorju ali industriji, ki ima za posledico nezmožnost nove zaposlitve prijavitelja v industriji ali sektorju,

• sprožanje zlonamernih postopkov proti prijavitelju.

Kot povračilni ukrep se štejeta tudi grožnja s povračilnim ukrepom ali poskus povračilnega ukrepa.

particularly on social media, or financial loss, including loss of business and loss of income,

• early termination or cancellation of a contract for the supply of goods or services, or other interruption of business relations,

• cancellation, temporary suspension or permanent withdrawal of a licence or permit,

• arbitrarily requiring medical examinations or examinations to determine fitness for work,

• blacklisting on the basis of an informal or formal agreement within a sector or industry, resulting in the reporting person being unable to obtain future employment in that industry or sector,

• initiating malicious proceedings against the reporting person.

A threat of retaliation or an attempt at retaliation is also deemed to constitute retaliation.

11. člen

Zaščitni in podporni ukrepi, ki jih prijaviteljem zagotavlja Zakon o zaščiti prijaviteljev (v nadaljevanju: ZZPri), so ukrepi, ki se zagotavljajo prijaviteljem glede na vrsto povračilnih ukrepov, zlasti pa:

• prepoved razkritja identitete prijavitelja in zaupnosti,

• izključitev odgovornosti prijavitelja,

• sodno varstvo in začasne odredbe v primeru povračilnih ukrepov,

• brezplačna pravna pomoč,

• nadomestilo za primer brezposelnosti,

• psihološka podpora.

Komisija prijavitelju na njegovo zahtevo za namen uveljavljanja zaščitnih ukrepov izda potrdilo o upravičenosti do zaščite po ZZPri. Za

Article 11

The protective and support measures provided to reporting persons by the Whistleblower Protection Act (hereinafter: the ZZPri) are provided according to the type of retaliation involved and include in particular:

• protection of the reporting person's identity and confidentiality,

• exemption of the reporting person from liability,

• judicial protection and interim measures in cases of retaliation,

• free legal aid,

• unemployment benefit,

• psychological support.

At the reporting person's request, the Commission shall issue a certificate of entitlement to protection under the ZZPri for the purpose of asserting protective measures. For

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namen izdaje potrdila lahko pridobiva potrebne podatke od zaupnika.

the purpose of issuing the certificate, it may obtain the necessary information from the confidential adviser.

Zaupnik v nadaljnjih postopkih na podlagi prijave svetuje prijavitelju glede zaščitnih ukrepov in mu pomaga v okviru svojih pristojnosti.

In subsequent proceedings based on the report, the confidential adviser advises the reporting person on protective measures and assists within the scope of the adviser's powers.

V. IMENOVANJE ZAUPNIKA

12. člen

Družba kot zaupnika, pristojnega za sprejem in koordinirano obravnavo prijav ter ESG pritožb, določi Tadeja Pintarja, vodjo kakovosti. Uradni elektronski kontakt mehanizma je zaupnik@var.si.

Direktor s sklepom določi namestnika zaupnika ali zamenja zaupno osebo.

Zaupnik mora zagotoviti celovitost procesa. Izvaja naslednje aktivnosti:

- spremlja uporabo predpisov, ki urejajo varstvo prijaviteljev;
- spodbuja spoštovanje zakonskih rešitev in zaščito prijaviteljev;
- izvaja postopek notranjega poročanja o nepravilnostih;
- vodi evidenco prejetih prijav;
- sprejema prijave in zagotavlja zaupnost informacij ter identitete zadevane osebe in prijavitelja;
- opravi začetni preizkus in odloči o nadaljevanju preiskovalnih dejanj ali obrazloženi zavrnitvi prijave;
- pridobi rezultate preiskave, obvešča prijavitelja o poteku in zaključku, izda poročilo ter poroča poslovodstvu in Komisiji v predpisanem obsegu.

V. APPOINTMENT OF THE CONFIDENTIAL ADVISER

Article 12

The Company appoints Tadej Pintar, Quality Manager, as the confidential adviser responsible for receiving and coordinating the handling of reports and ESG grievances. The official electronic contact for the mechanism is zaupnik@var.si.

The Managing Director appoints a deputy confidential adviser or replaces the confidential adviser by written decision.

The confidential adviser must ensure the integrity of the process and performs the following activities:

- monitors the application of legislation governing the protection of reporting persons;
- promotes compliance with statutory requirements and the protection of reporting persons;
- conducts the internal reporting procedure;
- keeps a record of reports received;
- receives reports and ensures the confidentiality of information and of the identities of the person concerned and the reporting person;
- performs the initial screening and decides whether to continue with investigative actions or to reject the report with reasons;
- obtains the results of the investigation, informs the reporting person of progress and closure,

issues a report and reports to management and the Commission to the extent required by law.

Naloge zaupnika so tudi, da neanonimnemu prijavitelju zagotovi informacije o zaščiti po ZZPri, zunanjih kanalih in relevantnih nevladnih organizacijah, prijavitelju, ki je deležen povračilnih ukrepov, pa informacije in dokazila za uveljavljanje pravnega varstva. Zaupnik po potrebi sodeluje z organom za zunanjo prijavo in se lahko posvetuje s Komisijo.

The confidential adviser also provides a non-anonymous reporting person with information on protection under the ZZPri, external reporting channels and relevant non-governmental organisations, and provides a reporting person exposed to retaliation with information and evidence needed to pursue legal protection. Where necessary, the confidential adviser cooperates with the external reporting authority and may consult the Commission.

Zaupnik mora ves čas zagotavljati zaupnost identitete prijavitelja in oseb, omenjenih v prijavi. Oseba, pri kateri obstaja nasprotje interesov, se mora izločiti; direktor za konkretno zadevo imenuje nadomestno osebo.

The confidential adviser must at all times protect the identity of the reporting person and persons mentioned in the report. A person affected by a conflict of interest must withdraw, and the Managing Director appoints a substitute for the specific case.

13. člen

Article 13

Zaupnik sprejme ukrepe za ugotovitev točnosti navedb in po potrebi obravnava prijavljeno kršitev.

The confidential adviser takes measures to establish the accuracy of the allegations and, where necessary, addresses the reported breach.

Zaupnik mora biti pri sprejemu, preizkusu in obravnavi prijav nepristranski in funkcionalno neodvisen. Pri odločanju ni vezan na navodila. Ob nasprotju interesov se izloči; direktor oziroma, kadar se prijava nanaša nanj, lastnik določi neodvisno nadomestno osebo ali zunanjega izvajalca. O izločitvi se vodi sledljiva evidenca brez neupravičenega razkritja identitete prijavitelja.

The confidential adviser must be impartial and functionally independent when receiving, screening and handling reports and is not bound by instructions in individual cases. In the event of a conflict of interest, the adviser withdraws; the Managing Director or, where the report concerns the Managing Director, the owner appoints an independent substitute or external provider. A traceable record of the withdrawal is kept without unauthorised disclosure of the reporting person's identity.

Zaupnik lahko obvesti pristojno osebo v družbi, začne notranjo preiskavo, predlaga inšpekcijski nadzor ali naznanitev kaznivega dejanja, zahteva izterjavo sredstev ali postopek zaključi.

The confidential adviser may notify the competent person within the Company, initiate an internal investigation, propose an inspection or a criminal report, request recovery of funds or close the procedure.

VI. OSTALE OPERATIVNE FUNKCIJE

VI. OTHER OPERATIONAL FUNCTIONS

14. člen

Article 14

Pristojne organizacijske enote, ki jih zaupnik vključi v preiskavo ali izvedbo ukrepov, morajo z

Organisational units involved by the confidential adviser in an investigation or in implementing

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njim sodelovati tako, da družba celovito izvaja predpise o obravnavi prijav in zaščiti prijaviteljev, ter oceniti in izvesti ukrepe za ublažitev tveganj in odpravo nepravilnosti.

measures must cooperate so that the Company fully complies with the rules on handling reports and protecting reporting persons, and must assess and implement measures to mitigate risks and remedy irregularities.

VII. VLOŽITEV, EVIDENTIRANJE IN PREIZKUS PRIJAVE

15. člen

Družba zagotavlja dostopnost mehanizma prek javne spletne strani, intraneta oziroma sistema DOKU, elektronske in klasične pošte, ustne prijave ter ciljnih obvestil zaposlenim, dobaviteljem, izvajalcem in drugim relevantnim deležnikom. Zaposleni in druge relevantne osebe so periodično informirani oziroma usposobljeni o načinih prijave, zaupnosti, anonimnosti, prepovedi povračilnih ukrepov, nepristranskosti, varstvu osebnih podatkov in poteku obravnave. Skupni panožni mehanizem je lahko dopolnilni kanal, vendar ne nadomesti odgovornosti družbe.

Prijavitelj lahko poda anonimno ali neanonimno prijavo po elektronski pošti na zaupnik@var.si, do katere ima dostop le zaupnik, po klasični pošti v zaprti ovojnici z oznako »ZAUPNO – V ROKE ZAUPNIKU – NE ODPIRAJ« na naslov družbe ali ustno po dogovoru z zaupnikom.

Ustna prijava se evidentira z natančnim zapisom njene vsebine in se lahko s soglasjem prijavitelja posname. Prijavitelju se omogoči, da zapis preveri, popravi in podpiše.

16. člen

Prijava ali pritožba lahko vsebuje opis dogodka, kršitve ali vpliva, čas in kraj, udeležene osebe, pričakovano rešitev ter razpoložljive dokaze. Nepopolna prijava se ne zavrne, če vsebuje dovolj informacij za razumen začetni preizkus; zaupnik prijavitelju po potrebi pomaga pri

VII. SUBMISSION, RECORDING AND SCREENING OF REPORTS

Article 15

The Company makes the mechanism accessible through its public website, intranet or DOKU system, electronic and postal mail, oral reporting and targeted notices to employees, suppliers, contractors and other relevant stakeholders. Employees and other relevant persons are periodically informed or trained on reporting channels, confidentiality, anonymity, protection against retaliation, impartiality, personal-data protection and the handling process. A joint industry mechanism may serve as an additional channel but does not replace the Company's responsibility.

A reporting person may submit an anonymous or non-anonymous report by email to zaupnik@var.si, accessible only to the confidential adviser, by post in a sealed envelope marked "CONFIDENTIAL – FOR THE CONFIDENTIAL ADVISER – DO NOT OPEN" to the Company's address, or orally by arrangement with the confidential adviser.

An oral report is documented by an accurate record of its content and may be recorded with the reporting person's consent. The reporting person is given an opportunity to review, correct and sign the record.

Article 16

A report or grievance may include a description of the event, breach or impact, the time and place, persons involved, the expected remedy and available evidence. An incomplete report is not rejected if it contains sufficient information for a reasonable initial screening; where

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dopolnitvi. Anonimni prijavitelj ni dolžan razkriti identitete ali osebnega interesa.

necessary, the confidential adviser assists the reporting person in completing it. An anonymous reporting person is not required to disclose identity or personal interest.

17. člen

Ob prejemu prijave se uvedejo ukrepi za učinkovito varovanje identitete prijavitelja in zagotavljanje zaupnosti.

Article 17

Upon receipt of a report, measures are implemented to protect the reporting person's identity effectively and ensure confidentiality.

18. člen

Zaupnik po prejemu prijavo evidentira v skladu z 28. členom tega pravilnika.

Article 18

Upon receipt, the confidential adviser records the report in accordance with Article 28 of these Rules.

Zaupnik najprej ugotovi, ali gre za prijavo po ZZPri, širšo ESG pritožbo ali kombinacijo obeh. Pri prijavi po ZZPri preveri zakonske pogoje, vključno s statusom fizične osebe, povezavo z delovnim okoljem, očitno resničnostjo in zakonskim rokom. ESG pritožbe ne sme zavrniti zgolj zato, ker jo je vložila pravna oseba, organizacija, lokalna skupnost ali druga oseba zunaj delovnega okolja oziroma ker se ne nanaša na formalno kršitev predpisa.

The confidential adviser first determines whether the case is a report under the ZZPri, a broader ESG grievance or both. For a ZZPri report, the adviser verifies the statutory conditions, including natural-person status, connection with a work-related context, whether the information is manifestly untrue and the statutory time limit. An ESG grievance must not be rejected solely because it was submitted by a legal entity, organisation, local community or another person outside a work-related context, or because it does not concern a formal breach of legislation.

19. člen

Zaupnik zadevo obravnava po režimu, ki ustreza njeni vsebini. Neobravnavanje je dopustno le, če je zadeva očitno zunaj področja pravilnika, očitno neresnična ali tako pomanjkljiva, da je kljub ponujeni pomoči ni mogoče razumno preizkusiti. Prenehanje ali manjša posledica sama po sebi nista razlog za zavrnitev, če je obravnava pomembna zaradi preprečitve ponovitve, sanacije ali sistemskega izboljšanja.

Article 19

The confidential adviser handles the case under the regime appropriate to its substance. A case may be left unhandled only where it is manifestly outside the scope of these Rules, manifestly untrue, or so incomplete that it cannot reasonably be screened despite assistance offered. The fact that an impact has ceased or is minor is not in itself a reason for rejection where review is relevant to preventing recurrence, remediation or systemic improvement.

Zaupnik v sedmih dneh od prejema preizkusi prijavo in, če so pogoji izpolnjeni, izda potrdilo o sprejemu z datumom in časom prejema.

Within seven days of receipt, the confidential adviser screens the report and, where the conditions are met, issues an acknowledgement stating the date and time of receipt.

20. člen

Article 20

Če pogoji niso izpolnjeni, zaupnik prijavitelja v sedmih dneh seznani z razlogi za neobravnavanje. Pri anonimni prijavi se obvestilo pošlje le, če je prijavitelj navedel kontakt.

If the conditions are not met, the confidential adviser informs the reporting person within seven days of the reasons for not handling the report. For an anonymous report, notice is sent only where contact details were provided.

Zaupnik lahko kljub neizpolnjenim pogojem na lastno pobudo sprejme potrebne ukrepe zaradi teže posledic, pri čemer varuje identiteto prijavitelja.

Even where the conditions are not met, the confidential adviser may act on the adviser's own initiative where warranted by the seriousness of the consequences, while protecting the reporting person's identity.

21. člen

Article 21

Zaupnik obravnava prijave po vrstnem redu prejema; če jih prejme več hkrati, jih razvrsti glede na težo in posledice kršitve.

The confidential adviser handles reports in the order received; where several are received at the same time, they are prioritised according to the seriousness and consequences of the breach.

Postopek praviloma obsega: potrditev prejema in začetni preizkus najpozneje v sedmih dneh; zbiranje informacij, oceno tveganj, posvetovanje s prijaviteljem ali predstavnikom in potrebna preiskovalna dejanja brez nepotrebnega odlašanja; odločitev, korektivne oziroma sanacijske ukrepe in povratno informacijo praviloma najpozneje v treh mesecih. Če postopek ni končan, zaupnik poda vmesno informacijo, razloge in predvideni rok. Nujne zadeve ter nevarnosti za življenje, zdravje, okolje ali nadaljnjo resno škodo se obravnavajo prednostno.

The procedure generally comprises: acknowledgement and initial screening within seven days at the latest; information gathering, risk assessment, consultation with the reporting person or representative and necessary investigative actions without undue delay; and a decision, corrective or remedial measures and feedback, normally within three months at the latest. If the procedure is not complete, the confidential adviser provides interim feedback, reasons and an expected completion date. Urgent matters and risks to life, health, the environment or of further serious harm are prioritised.

22. člen

Article 22

Zaupnik preveri pogoje, vnese prijavo v evidenco in varen arhiv, pridobi potrebne dokaze, sprejme zaščitne ukrepe ter varuje identiteto in podatke pred nepooblaščenim razkritjem.

The confidential adviser verifies the conditions, enters the report in the register and secure archive, obtains necessary evidence, takes protective measures and safeguards identities and information against unauthorised disclosure.

Zaupnik po potrebi opravi razgovor s prijaviteljem in druga potrebna dejanja.

Where necessary, the confidential adviser interviews the reporting person and performs other required actions.

Poslovodstvo o posamezni zadevi obvesti samo v obsegu, potrebnem za zaščitne, preiskovalne ali sanacijske ukrepe, praviloma brez podatkov, ki bi

Management is informed of an individual case only to the extent necessary for protective, investigative or remedial measures, normally

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razkrili identiteto prijavitelja. Če se prijava nanaša na člana poslovodstva ali obstaja nasprotje interesov, obvesti lastnika oziroma neodvisno nadomestno osebo.

without information revealing the reporting person's identity. If the report concerns a member of management or a conflict of interest exists, the owner or an independent substitute is informed.

23. člen

Zaupnik obravnava prijavo skrbno, zaupno in samostojno ter pri posamezni zadevi ni vezan na navodila.

Od prijavitelja, prizadete osebe in osebe, na katero se prijava nanaša, pridobi informacije za oblikovanje sorazmernih ukrepov za prenehanje kršitve ali vpliva, odpravo posledic in preprečevanje ponovitve. Zagotovi nepristranskost, pravico do izjave in varstvo identitete prijavitelja.

Kadar je mogoče in primerno, zaupnik pridobi njihovo mnenje o vplivih, pričakovani rešitvi in ukrepih ter omogoči dodatne informacije in pripombe. Ukrepi morajo biti sorazmerni, pravno dopustni ter usmerjeni v prenehanje vpliva, preprečitev ponovitve in, kjer je mogoče, vzpostavitev prejšnjega stanja.

Article 23

The confidential adviser handles a report diligently, confidentially and independently and is not bound by instructions in an individual case.

The adviser obtains from the reporting person, affected person and person concerned the information needed to design proportionate measures to stop the breach or impact, remedy consequences and prevent recurrence. Impartiality, the right to be heard and protection of the reporting person's identity are ensured.

Where possible and appropriate, the adviser seeks their views on impacts, the expected remedy and proposed measures and allows additional information and comments. Measures must be proportionate, lawful and aimed at ending the impact, preventing recurrence and, where possible, restoring the previous situation.

24. člen

Zaupnik ukrene, kar je potrebno za prenehanje kršitve. Če ni pristojen, s prijavo in predlogi ukrepov seznani odgovorne osebe ali organizacijske enote.

Article 24

The confidential adviser takes the steps necessary to stop the breach. Where not competent to do so, the adviser informs the responsible persons or organisational units of the report and proposed measures.

25. člen

Vsi zaposleni morajo sodelovati z zaupnikom in pravočasno posredovati podatke, pomembne za ugotavljanje dejstev.

Zaupnik si prizadeva za celovito razjasnitev suma. Na podlagi pisnega obvestila in odobritve direktorja ima dostop do potrebnih zbirk podatkov in dokumentov; če se prijava nanaša na direktorja, dostop odobri lastnik.

Article 25

All employees must cooperate with the confidential adviser and provide information relevant to establishing the facts within the specified time.

The adviser seeks a comprehensive clarification of the suspicion. On written notice and with the Managing Director's approval, the adviser has access to necessary data collections and documents; where the report concerns the Managing Director, access is approved by the owner.

Zaupnik ravna zakonito in vestno ter ne sme zlorabiti pooblastil. Če se pokaže vpletenost tretje osebe, se lahko preiskava razširi nanjo. Po predhodnem posvetovanju z upravo lahko prijavo odstopi neodvisni zunanji tretji osebi.

The confidential adviser acts lawfully and diligently and must not abuse the adviser's powers. If a third person may be involved, the investigation may be extended to that person. Following prior consultation with management, the report may be referred to an independent external third party.

VIII. ZAKLJUČEK OBRAVNAVE, EVIDENCE IN UČINKOVITOST

VIII. CLOSURE, RECORDS AND EFFECTIVENESS

26. člen

Zaupnik konča obravnavo v treh mesecih od prejema s poročilom, v katerem ugotovi, da do kršitve ni prišlo, da je do kršitve prišlo ali da tega ni mogoče ugotoviti.

Article 26

The confidential adviser closes the review within three months of receipt by a report finding that no breach occurred, that a breach occurred, or that it cannot be determined whether a breach occurred.

27. člen

Poročilo vsebuje zlasti oceno utemeljenosti prijave, predlagane in izvedene ukrepe za prenehanje ali preprečevanje kršitve in odpravo posledic, oceno uspešnosti ukrepov ter ukrepe za zaščito prijavitelja.

Article 27

The report includes in particular an assessment of whether the report is substantiated, measures proposed and implemented to stop or prevent the breach and remedy its consequences, an assessment of their effectiveness and measures to protect the reporting person.

Anonimni prijavitelj prejme obvestilo, če je navedel kontakt.

An anonymous reporting person receives notice where contact details were provided.

Poslovodstvo se z ugotovitvami seznani le v potrebnem obsegu, praviloma anonimizirano. Če se zadeva nanaša na člana poslovodstva ali obstaja nasprotje interesov, se poročilo posreduje lastniku oziroma neodvisni nadomestni osebi.

Management is informed of the findings only to the extent necessary, normally in anonymised form. If the case concerns a member of management or a conflict of interest exists, the report is submitted to the owner or an independent substitute.

Prijavitelj, prizadeta oseba ali predstavnik lahko v 15 dneh vloži obrazloženo pritožbo. O njej odloči oseba, ki ni sodelovala pri prvotni obravnavi in ni v nasprotju interesov, oziroma neodvisna zunanja tretja oseba. Odločitev se praviloma sporoči v 30 dneh. Pritožba ne omejuje zunanje prijave ali drugih pravnih sredstev.

The reporting person, affected person or representative may lodge a reasoned appeal within 15 days. It is decided by a person who did not participate in the initial review and has no conflict of interest, or by an independent external third party. The decision is normally communicated within 30 days. An appeal does not restrict external reporting or other legal remedies.

28. člen

Article 28

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Evidenca vsebuje najmanj interno številko, datum prejema, podatke o prijavitelju, če jih je navedel, podatke o zadevani osebi in osebah, ki lahko pomagajo, kratek opis ali cenzurirano verzijo prijave, gradivo postopka, rezultat in datum obvestitve o izidu, kadar so navedeni osebni podatki prijavitelja.

The register contains at least an internal number, date of receipt, reporting-person details where provided, details of the person concerned and persons who may assist, a brief description or redacted version of the report, case materials, the outcome and the date on which the outcome was communicated where the reporting person provided personal data.

29. člen

Podatki se hranijo pet let po zaključku postopka, razen če zakon določa drugače, nato se uničijo.

Article 29

Information is retained for five years after closure, unless otherwise required by law, and is then destroyed.

30. člen

Družba obdeluje osebne podatke, vključno s posebnimi vrstami in podatki iz kazenskih zadev, le kolikor so bistveni za preiskavo, odpravo ravnanja in posledic. Podatki se lahko posredujejo zunanjim organizacijam, vključenim v preiskavo, če to zahteva zakon ali zakoniti interes družbe.

Osebni podatki prijavitelja se tretji osebi ne razkrijejo brez njegove privolitve, razen kadar zakon določa drugače.

Article 30

The Company processes personal data, including special categories and criminal-offence data, only insofar as essential to investigate and remedy the conduct and its consequences. Data may be shared with external organisations involved in the investigation where required by law or the Company's legitimate interest.

The reporting person's personal data are not disclosed to a third party without consent, except where otherwise provided by law.

31. člen

Družba do 1. marca za prejšnje leto Komisiji elektronsko poroča o številu prejetih prijav, obravnavanih povračilnih ukrepih in podatkih o zaupniku.

Najmanj vsakih 12 mesecev v okviru vodstvenega pregleda ter dodatno ob pomembni spremembi, resnem primeru ali neučinkovitosti družba dokumentirano oceni učinkovitost mehanizma. Ocena zajema število in vrste prijav, roke, dostopnost kanalov, zaključke, sanacijske ukrepe, povračilne ukrepe, pritožbe, povratne informacije in ponavljajoče se vzroke. Določijo se izboljšave, odgovorne osebe in roki ob varstvu osebnih podatkov in zaupnosti.

O izvedenih usposabljanjih, komunikaciji z zunanjimi deležniki in pregledih učinkovitosti družba hrani program oziroma gradivo, datum

Article 31

By 1 March, the Company electronically reports to the Commission for the preceding year on the number of reports received, retaliation cases handled and details of the confidential adviser.

At least every 12 months within management review, and additionally after a material change, serious case or identified ineffectiveness, the Company conducts a documented effectiveness assessment. It covers the number and types of reports, time limits, channel accessibility, outcomes, remediation measures, retaliation, appeals, user feedback and recurring root causes. Improvements, responsible persons and deadlines are defined while protecting personal data and confidentiality.

For trainings, external stakeholder communication and effectiveness reviews, the Company retains the programme or materials,

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izvedbe, ciljne skupine, evidenco udeležbe ali drugo dokazilo o komunikaciji, zapisnik pregleda, ugotovitve ter akcijski načrt izboljšav, brez nepotrebnih osebnih podatkov ali informacij o posameznih zadevah.

date, target groups, attendance or other communication evidence, review minutes, findings and improvement action plan, without unnecessary case information or personal data.

IX. ZUNANJA PRIJAVA

32. člen

Prijava se lahko poda pristojnim organom za zunanjo prijavo, če notranje prijave ne bi bilo mogoče učinkovito obravnavati ali če prijavitelj meni, da obstaja tveganje povračilnih ukrepov.

Postopek in organe za zunanjo prijavo določa ZZPri. Družba zagotavlja informacije o teh postopkih in organih.

IX. EXTERNAL REPORTING

Article 32

A report may be submitted to the competent external reporting authorities where an internal report could not be handled effectively or where the reporting person considers that there is a risk of retaliation.

The procedure and competent external reporting authorities are defined by the ZZPri. The Company provides information on those procedures and authorities.

X. PREKRŠEK PRIJAVITELJA

33. člen

Če prijavitelj naklepno prijavi ali javno razkrije neresnične informacije, se prekršek v skladu z ZZPri kaznuje z globo od 400 do 1.200 EUR.

X. OFFENCE BY A REPORTING PERSON

Article 33

Where a reporting person knowingly reports or publicly discloses false information, the offence is punishable under the ZZPri by a fine of EUR 400 to EUR 1,200.

XI. ZAČETEK VELJAVNOSTI

34. člen

Ta pravilnik začne veljati 06.10.2026.

Pravilnik je v fizični obliki dostopen pri vodji službe za pravne in kadrovske zadeve, elektronsko pa na strežniku družbe in v programu DOKU. Na javni spletni strani so najmanj v slovenskem in angleškem jeziku objavljeni namen in področje mehanizma, upravičeni deležniki, vrste pritožb, uradni kontakt zaupnik@var.si, možnost anonimne prijave, faze in okvirni roki, zaupnost, prepoved povračilnih ukrepov, pritožbeni postopek ter povezava na celotni pravilnik. Prijava je brezplačna in se lahko pošlje na zaupnik@var.si, poda ustno ali pošlje na VAR d.o.o., Panonska 23, 9250 Gornja Radgona, Slovenija, z oznako »ZAUPNO – V ROKE ZAUPNIKU – NE ODPIRAJ«. Družba po potrebi

XI. ENTRY INTO FORCE

Article 34

These Rules enter into force on 06.10.2026.

The Rules are available in hard copy from the Head of Legal and Human Resources and electronically on the Company server and in DOKU. The public website provides, at least in Slovenian and English, the purpose and scope of the mechanism, eligible stakeholders, types of grievance, the official contact zaupnik@var.si, anonymous reporting, stages and indicative time limits, confidentiality, protection against retaliation, the appeal procedure and a link to the full Rules. Reporting is free of charge and may be made to zaupnik@var.si, orally, or by post to VAR d.o.o., Panonska 23, 9250 Gornja Radgona, Slovenia, marked “CONFIDENTIAL – FOR THE CONFIDENTIAL ADVISER – DO NOT OPEN”. The

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zagotovi druge relevantne jezike in razumne prilagoditve.

Spremembe in dopolnitve pravilnika se sprejemajo po enakem postopku kot pravilnik.

VAR d.o.o.
Srečko Frumen, direktor

Company provides other relevant languages and reasonable accommodations where necessary.

Amendments and supplements to these Rules are adopted under the same procedure as the Rules.

VAR d.o.o.
Srečko Frumen, Managing Director