

HRASTNIK1860

CODE OF ETHICS OF STEKLARNA HRASTNIK



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ADDRESS BY THE GENERAL MANAGER

With a 160-year tradition, Steklarna Hrastnik is a renowned global business partner in the development and production of premium glass products, primarily in the special glass packaging segment. We manufacture the most technically demanding products from some of the purest glass in the world and are a subsidiary of GlobalGlass.

We produce a wide range of products, including prestigious bottles for alcoholic beverages, bottles for the perfumery and cosmetics industries. Our entire range of products is distinguished by aesthetic perfection and high standards and awards. All our products are made from exceptionally pure glass, are renowned for their perfect crystal lustre and are completely free of heavy metal impurities.

We adapt the product and production quantity to the customer's wishes. Using sophisticated decorating techniques, we tailor all products to individual preferences, achieving unique and stunning results that reflect the customer's vision. Steklarna Hrastnik offers a full range of services in one place - from ideation, design, development and delivery - while also ensuring flexibility, responsiveness and excellence in tailor-made services and solutions.

In our day-to-day operations, we are delivering on our **VISION** to be the world's most inspiring, sustainable and profitable premium glass packaging company and our **MISSION** to deliver priceless experiences through unique solutions in glass packaging. Proudly, passionately and energetically.

At Steklarna Hrastnik, we understand that ethical business must cover all areas of our operations.

The Code of Ethics, which we have drawn up to present the way we do business and operate, is also our guide and reminder to act in accordance with our values, vision and mission.

Steklarna Hrastnik's business is based on mutual relations with all stakeholders with whom we enter into relationships in different ways and each of whom in their own way represent our employees, i.e. employees, regardless of the legal basis of their employment, customers, suppliers and stakeholders of the social environment, local, national and global.



1.

PRESENTATION OF THE CODE

The purpose of the Code of Ethics of Steklarna Hrastnik (hereinafter: the Code) is to provide clear information and to inform all employees of Steklarna Hrastnik about the basic ethical and legal guidelines that we respect in the performance of our work. Some of the areas arising from the Code are further specified in internal documents, which are fully observed together with the Code.

The Code of Ethics provides a framework for the Company's commitment to legal compliance,

honesty, credibility and ethical conduct, reflects and enforces the general principles or core values of Steklarna Hrastnik and the rules of conduct in accordance with which we act in our daily work in the Company.

Steklarna Hrastnik expects and demands the same level of ethics, transparency and integrity in its operations and conduct as it itself does from all stakeholders in the business process (suppliers, customers and other business partners and associates).



2.

OUR VALUES

CLEARNESS – trust, openness, entrepreneurship

We trust our team and their knowledge at all levels and areas of work. By assuming responsibility and with a high level of authenticity we inspire trust of all our business partners.

We communicate in a clear and open manner. We encourage friendly relationships and ethic conduct of individuals and the company as a whole. We operate in a transparent way by making processes and the process flow clear.

We are proactive and goal-oriented. We are focused on the work process as well as the final goal using the latest accessible technology to achieve it.



CLEARNESS

Trust
Honesty
Entrepreneurship

PASSION – innovation, cooperation, excellence

We encourage expressing ideas and build a creative environment that enables constant encouragement and solution-seeking.

We build open and long-term partnerships inside and outside the company. We interact. We are inclusive. We highly appreciate teamwork and notice additional effort.

We consistently ensure excellence in the execution of products, processes, services and relations.



PASSION

Innovation
Cooperation
Excellence

HEARTH – respect, sustainable orientation, commitment

Respecting agreements and accepting differences between people, cultures and ideas. We respect others as we would want others to respect us.

We are oriented toward the future and give great emphasis to our environmental orientation, higher quality of life and social responsibility in all forms. For a better tomorrow of future generations.

We love what we do. And we do what we love. We constantly develop and look for better solutions.

Neprestano razvijamo in iščemo še boljše rešitve.



HEART

Respect
Sustainability
Commitment

RESPONSIBLE COMPANY-EMPLOYEE AND EMPLOYEE-COMPANY RELATIONS

INTEGRITY, DIGNITY, EMPLOYEE RIGHTS

At Steklarna Hrastnik, **we respect the integrity, dignity and rights of all our employees** who work for the company on a legally permissible basis, i.e. all temporary and permanent employees, contract workers (agency workers), students and pensioners.

TRAINING, KNOWLEDGE AND STAFF DEVELOPMENT

We tackle challenges of modern times and global competition with our capable and highly-trained workers, for this reason we are constantly **investing in the employee knowledge and development**. With planned and targeted training we ensure the competence of our employees, in the area of professional and managerial as well as personal competences. A competence model serves as the basis for human resources development, carrying out development dialogues and drawing up career plans. With development dialogues we bring strategic objectives to an operational level, we encourage transparent communication, cooperation and ensure a clear understanding of roles and expectations. We encourage our employees to realise their potentials, achieve the expected results and develop their careers together with the company.

In cooperation with educational institutions, both locally and more broadly, we pay great attention to **the development of our young people**, who are provided with practical training and scholarships. With the aim of encouraging talent development, inspiring young people to be creative in technical careers and encouraging innovation, we are involved and active in a wide range of projects and collaborations with

secondary schools, colleges and universities. A lot of our efforts are focused on employer branding by trying to present Steklarna Hrastnik through modern video communication channels – what kind of profiles do we need, what is the work in the glassworks like and why there is always room in our company for committed and capable people.

Steklarna Hrastnik has been certified **as a family-friendly company** for many years, and we are committed to better reconciling our private and professional lives.

Actions are implemented regularly and reviewed, upgraded and updated annually.



THE RIGHT TO FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of workers to form trade unions and workers' representative bodies in a free and democratic manner and, in accordance with the applicable legislation, provide and ensure the **conditions for their functioning**.

The General Manager and, where appropriate, other professional staff shall attend meetings of the executive body of the representative trade union. We also keep the representative trade union regularly informed about the Company's business and about all current issues, projects and activities that always affect employees in one way or another.

We do not discriminate against workers on the basis of their membership of trade unions or workers' representatives.

We respect workers' right to collective bargaining.

In the case of business in countries where trade union activity is illegal or where free and democratic trade union activity is not allowed, the business partner must respect this principle by allowing workers to freely elect their own representatives with whom we can engage in dialogue on issues relating to jobs and working conditions.

DIALOGUE AND COMMUNICATION WITH EMPLOYEES

Like any company, our glassworks communicates with different target groups, but the most important of all is the internal public - our employees. Sincere and open communication is given great emphasis. We find it important that employees are informed about all events and plans, since this is the only way for them to feel respected, motivated, and part of the success.

In our communication, we follow the principles of respect, honest feedback, identifying the value of each individual, encouragement, and wholesome values.

The goal of internal communication in all its forms is to increase employee satisfaction and motivation, to implement the organisational culture, which promotes regular and open communication, takes into consideration the

opinions of employees and includes them in the decision-making process, and to improve the relationships between colleagues and our successful business operation.

We are aware that communication, respecting values and raising the culture in the company is a long process. At the company level we are constantly striving toward improving communication processes and paths, and at the same time we also put emphasis on the responsibilities of each individual.

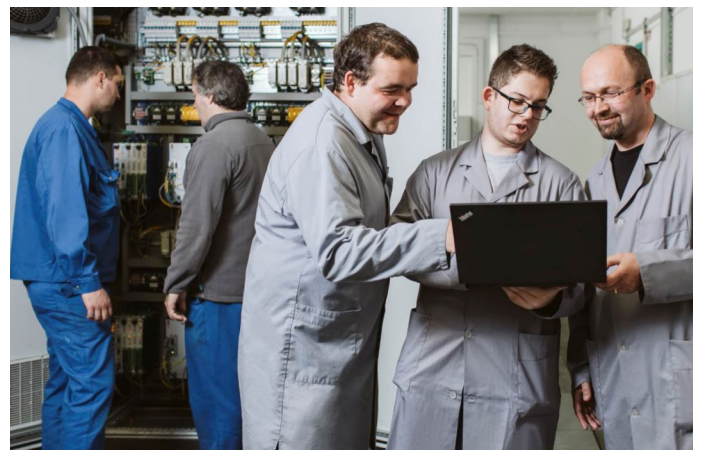
VOLUNTARY EMPLOYMENT

Employment at Steklarna Hrastnik is completely and absolutely voluntary.

We do not approve of or practise any forced labour, debt bonded labour or involuntary or prison labour at Steklarna Hrastnik.

The Company does not keep the original personal documents of employees (e.g. passport, birth certificate). No fees are charged to employees, either directly or indirectly, when they are recruited.

Employees can leave their employer after giving reasonable notice, either fixed by law or by agreement.



CHILD LABOUR AND SPECIAL PROTECTION FOR YOUNG WORKERS

At Steklarna Hrastnik, we respect the right of children to development and education, which is why we do not allow or practice child labour. We do not employ, directly or indirectly, children below the minimum age for the completion of compulsory education as defined by law, i.e. 15 years of age, except in the case of exceptions allowed by ILO or national legislation.

At Steklarna Hrastnik, we ensure that young people up to the age of 18 do not work at night and are protected from working conditions that are harmful to their health, safety, morals and development.

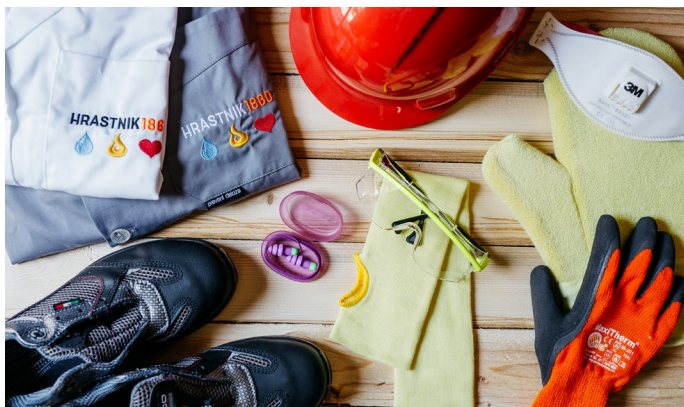
For young workers, we ensure:

- that the work they do is not harmful to their health or development,
- their working hours do not affect their attendance at school, participation in vocational training approved by the competent authority or their ability to participate in compulsory education or training programmes.

RULES OF CONDUCT

We do not tolerate behaviour in the workplace that creates a work environment that is unproductive, discouraging or offensive. Unacceptable behaviour includes disrespect for employment rights, threats, violence, possession of any weapon and use of recording devices for purposes other than those permitted. Workplace misconduct includes working under the influence of alcohol and intoxicating substances. We expect our employees to **perform their work conscientiously and responsibly**. We demand **ethical behaviour, mutual respect**, and do not tolerate **inappropriate, intolerant and offensive communication and behaviour**.

We ensure **equality of employment rights and obligations** for both workers employed by Steklarna Hrastnik and so-called **agency workers**, who work at Steklarna through employment agencies.



Company assets, such as work equipment (machines, devices, work aids, etc.), telephones, computer and IT equipment, cars, payment

cards, stamps, including small inventory and other items used by employees in the course of their work, may be used only for work for the benefit of Steklarna Hrastnik and for the purposes justified by the performance of the work. Users are obliged to treat them with due care and diligence, so that they can maintain their quality and serve their purpose for as long as possible.

We have an adequate information security management system in place to prevent misuse, intrusion and unauthorised theft of, or access to, data and trade secrets when using **information and communication technologies**. The system is based on the identification and classification of risks, continuous awareness-raising of employees about potential misuse, and the integration of state-of-the-art security systems and mechanisms in the areas of physical, system and software security, as well as clearly defined scenarios in the event of a crisis.

(Link: [Security policy](#) in [overarching information security policy](#))

WORKING ENVIRONMENT AND HEALTH AND SAFETY AT WORK

At Steklarna Hrastnik, we strive to provide, care for and maintain a **productive, safe and healthy working environment**.

Continuous technological improvements and adherence to the BAT (Best Available Techniques) principle will ensure safe working conditions, improve and facilitate work processes.

We respect the right of workers and local communities to healthy working and living conditions. Vulnerable individuals, including young workers, young mothers and pregnant workers, older workers and people with disabilities, receive special protection.

We comply with national health and safety regulations or, where national legislation is weak or insufficient, with international standards.

We ensure active cooperation between management and workers and/or their representatives, which is essential for the development and implementation of a system to ensure a safe and healthy working environment. We take effective measures to prevent accidents, injuries or illnesses arising out of, in connection with or in the course of work. The aim of these

measures is to minimise the causes of risks inherent in the working environment.

We are continuously working to improve the protection of workers in the event of an accident, including through compulsory insurance schemes and employers' liability insurance.



We provide adequate emergency medical first aid at the workplace and the necessary means of providing first aid.

We provide safe and clean working and ancillary facilities.

We organise our own meals during work to ensure that workers eat an adequate and healthy diet while at work.

We provide all workers with free prescribed personal protective equipment at all times, and free regular, periodic or, if necessary and as assessed by the medical profession, emergency medical check-ups.

We provide and facilitate free preventive education programmes for employees and raise awareness about healthy lifestyles.

In order to raise awareness of healthy lifestyles, employees have the opportunity to participate in various sports activities through the Steklarna Hrastnik Sports Association.

We do not tolerate or condone the use of alcohol, drugs or other intoxicating substances.

We take the use of alcohol, narcotics and other intoxicating substances extremely seriously. We control (random or targeted) their use that

affects or could affect the performance of work in the company and, in the event of any irregularities, conduct relevant investigations and procedures.

(Povezava: [No-smoking instructions](#))

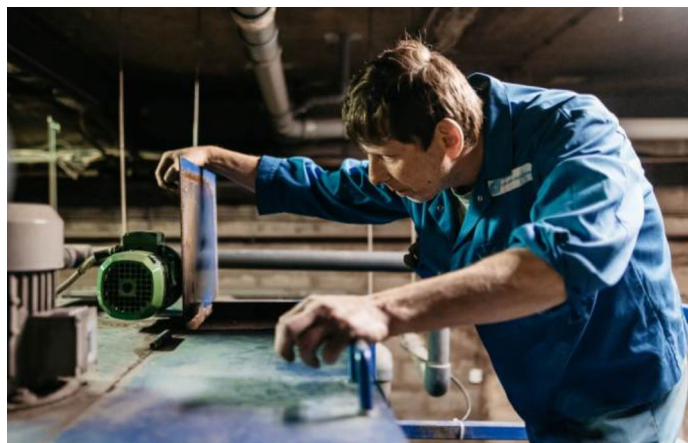
FAIR PAY AND DECENT WORKING HOURS

At Steklarna Hrastnik, we respect and guarantee the right of workers to **fair pay** sufficient for a decent living for themselves and their families, and to the social contributions or benefits required by law.

We pay the minimum wages required by national minimum wage legislation or industry standards agreed in collective agreements, whichever is more favourable.

Wages are paid on time, regularly and in full in the legal tender - money. Partial payment in the form of compensation "in kind" is acceptable in accordance with the specifications of the International Labour Organisation (hereinafter ILO). The level of pay reflects the knowledge, skills and training of workers and the contribution they make to the work they do.

Deductions are only allowed under the conditions and to the extent provided for by law or by a collective agreement.



Employees are guaranteed **full-time** work for a maximum of 40 hours per week.

In exceptional cases, as defined by the ILO and national legislation, the number of hours of work limited above may be exceeded and overtime, additional work or reassignment of working time may be allowed.

Overtime, additional work and reassignment of working time should be exceptional; ordered in

accordance with and in the cases provided for by the applicable national legislation or collective agreement; paid at a higher rate of not less than 130% of the regular rate of pay, and should not constitute a significantly increased likelihood of occupational risk.

We provide workers the right to a break during working hours, the right to rest between consecutive working days and to at least one day of rest per week, unless there are exceptions provided for by national law or collective agreements.

Applicable national laws, industry reference standards or collective agreements shall be interpreted within the international framework set by the ILO and national legislation.

PROHIBITION OF DISCRIMINATION AND VIOLENCE AT WORK (MOBBING)

Respect and tolerance in the way employees treat each other are indispensable elements of cooperation and a good working atmosphere.

At Steklarna Hrastnik, we do not discriminate against, exclude or give preference to persons on the grounds of sex, age, religion, race, caste, birth, social background, disability, ethnic or national origin, citizenship, membership of trade unions or other lawful organisations, political affiliation or identification, sexual orientation, family responsibilities, marital status, illness or any other condition likely to give rise to discrimination and, in particular, we do not harass or discipline employees for any of the above reasons.

culture, based on mutual trust and respect and the protection of the integrity and personal dignity of all participants in the work process, is the basis for a positive working climate in society and is an important prerequisite for job satisfaction and the quality of employees' working lives, and thus for the economic success of society.



Incidents of mobbing (bullying or psychological and emotional violence in the workplace) are a violation of employees' human dignity and personal rights and a disruption to the work process, and are incompatible with the desired corporate culture of society.

(Link: [Rules on the prevention of mobbing in the workplace](#))

HANDLING OF PERSONAL DATA AND CONFIDENTIAL INFORMATION

At Steklarna Hrastnik, we treat personal data relating to our employees, business partners and other stakeholders in our business process with care and respect their privacy.



We collect, store or process personal data only for specified, explicit and legally permissible purposes and to the extent strictly necessary.

We only allow access to personal data to authorised individuals and authorities, in accordance with applicable law.

We only collect and store personal data that is necessary to carry out our work and to fulfil our responsibilities and legal obligations.

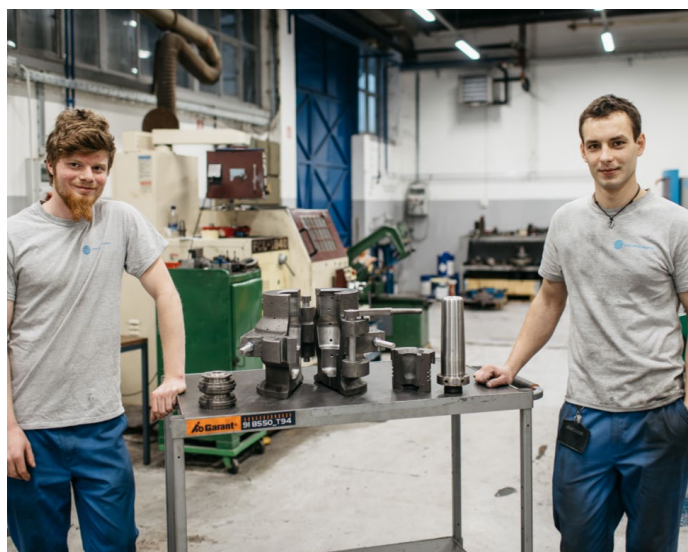
We only hold personal data for as long as is necessary to achieve the legitimate reason for processing the data.

Confidential information and trade secrets are any information, data or documents relating to the conduct of our business, regardless of the form in which they may appear, and from which it is apparent that the Company could suffer significant damage if they were to come to the knowledge of an unauthorised person (including, for example and not limited to, financial, commercial, technical data, research, projects, studies, software, quotations, or other information and data that could impair the Company's competitive position).



Steklarna Hrastnik, as a legal entity, and every employee are committed to protecting confidential information and trade secrets. When using and managing confidential information and data, we follow the principle that it should be handled only by those who need it to carry out their work.

(Link: [Regulations on the protection of personal data in the company Steklarna Hrastnik d.o.o.](#))



Such information is treated with confidentiality and care and with a high degree of sensitivity. It is forbidden to use it to pursue your own interests or to disclose them to third parties, unless required to do so by binding rules.

The same level of due diligence applies to the data, information and documents we obtain from our business partners and other stakeholders in our business process.



4.

THE COMPANY-EXTERNAL STAKEHOLDER RELATIONSHIP

RESPONSIBLE ATTITUDE TOWARDS BUSINESS PARTNERS

We are not just a factory, we are a partner. That's why it all starts with listening to the customer and understating the needs of end users. We are a reliable and responsible business partner. We work with our customers every step of the way, staying true to our pledge to deliver top quality at every level. Business relations are based on mutual trust and respect, as evidenced by long-standing and, with some business partners, traditional relationships.

PRODUCT SAFETY AND COMPLIANCE

We are proud that our glass is among the cleanest in the world.

We process it using innovative techniques and state-of-the-art automated production and control technology to ensure that our product is synonymous with excellence and quality. We are proud to have received numerous awards for our excellence and to have been a holder of the ISO 9001:2015 standard for quality management systems for many years.

We produce safe and sustainable products, proactively meeting the compliance requirements of our customers and regulatory authorities. Product safety and compliance are key elements in building trust in our Company and our products.

Our products have no hazardous properties that could harm people, property or the environment.

DEALING WITH SUPPLIERS

The basic principle of the Purchasing Department of Steklarna Hrastnik is to produce transparent and, on a solid and verifiable basis, reliable

data for decision-making on the selection of tenderers.

We build partnerships with our suppliers. We conduct the selection process impartially and in a spirit of good stewardship, whether it is for the supply of materials or the provision of a service. We ensure transparency in the selection of the most cost-effective or qualitatively appropriate or time-optimal supplier or contractor.

We offer equal opportunities to existing and potential providers, encourage healthy and free competition, and strive for efficient and quality spending.

We do not allow ourselves to be influenced by others and we avoid any relationships that could inappropriately influence our professional and independent judgement.

We have a duty to disclose biased and harmful decisions to the Company's management. We treat the information and documents we obtain from auditing and evaluating our suppliers with care and discretion to help us do business more efficiently.

We are committed to the environmentally sound management and reduction of chemicals and all waste throughout the entire life cycle.

Any violation of the legal provisions and other regulations governing procurement is unacceptable and prohibited.

We expect our suppliers and business partners to be sustainable and to operate in accordance with the principles and values to which we are committed at Steklarna Hrastnik.

We avoid suppliers and contractors who don't pay their workers or benefits, and those who discriminate against their employees.

CORRUPTION AND BRIBERY

At Steklarna Hrastnik, we have **zero tolerance to any form of corruption**. In addition to giving and receiving of bribes, corrupt acts, whatever their form, include nepotism (favouring relatives or friends), acts that abuse one's power or position, or acts by an individual who, contrary to his or her powers and responsibilities, could or would seek to obtain advantages or benefits for himself or herself or for someone else.

Offering or accepting gifts, payments or other benefits in connection with the duties or activities of Steklarna Hrastnik is prohibited.

Gifts and other benefits may be offered or accepted only if the value of the gift or hospitality does not exceed the limits set by law and if its acceptance or provision does not give rise to any concern that the gift or hospitality might influence the recipient's decision-making on work or business matters (appropriate gift or hospitality).

MONEY LAUNDERING PREVENTION

We only do business with partners who are legally active. Our actions are aimed at preventing and detecting possible illegal payment methods and, in particular, at preventing financial transactions from being used by third parties for money laundering.

Before entering into a transaction, we obtain sufficient information about the client or business partner, its business environment and the purpose of the transaction.

FREE COMPETITION

Steklarna Hrastnik operates in a global market where competition and market conditions are fierce. However, we are aware that free competition and respect for market rules are a prerequisite for the growth and sustainable development of our business. In carrying out our activities, we strictly comply with applicable legislation on the prevention of restrictions on competition, unfair competition and unfair business practices. We respect our competitors and rivals and do not take actions that could unduly damage their reputation.

AVOIDING CONFLICTS OF INTEREST

At Steklarna Hrastnik, we separate our private life from our work life. However, conflicts of interest may arise if we engage in activities or prioritise personal interests at the expense of the interests of the Company.

If an individual has interests which are different from those of Steklarna Hrastnik and which may interfere with the impartial and objective performance of his/her duties, a conflict of interest may arise. Conflicts of interest may affect our business judgement, jeopardise the reputation and performance of Steklarna Hrastnik and expose it to risks.

It is everyone's duty to avoid such situations. If a conflict of interest is unavoidable, we should inform our supervisor.

Decisions on the conclusion of contracts with business partners must be based solely on the competitiveness of the tender.

Employees must not engage in any profit-making activity that could lead to a conflict of interest with Steklarna Hrastnik.



5.

THE COMPANY-ENVIRONMENT RELATIONSHIP

Throughout its more than 160-year history, Steklarna Hrastnik has demonstrated and sustained its commitment to acting responsibly towards people, the social community and the environment.

We understand that a company first operates and influences life in its local environment. We build our connection to the local community through our daily operations and relationships. We work together on projects that present development opportunities for the Company and the local community.

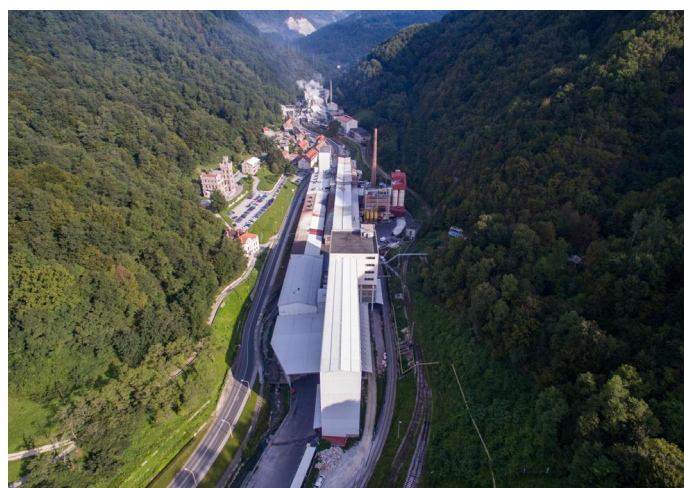
SUSTAINABILITY - A COMMITMENT FOR THE FUTURE

Responsibility for the environment is at the heart of all our processes. By continuously analysing and monitoring our products, we always invest in technological solutions that have a positive impact and drive change in the right way.

Despite our many achievements, we are not resting on our laurels, but constantly looking for even better ways. Even after the transition to Industry 4.0, we continue to increase energy efficiency and reduce our environmental footprint by implementing a number of innovative projects and improving production technologies. By continuously investing in innovative solutions, we aim to, among other things, make the best use of waste heat energy, replace fossil fuels with environmentally friendly alternatives and improve the energy efficiency and carbon footprint of factories.

Our progress and activities in the area of sustainability are reflected in our annual Sustainability Reports.

(Link: [SUSTAINABLE DEVELOPMENT | STEKLARNA HRASTNIK \(HRASTNIK1860.COM\)](https://www.steklarna-hrastnik.com/hrastnik1860))



SOCIAL RESPONSIBILITY - DOING WELL BY DOING GOOD

We are aware of our responsibility towards society and we strive to make a positive contribution to the communities in which we operate and to co-create a better environment for society as a whole. Through sponsorships and donations, we support various organisations, associations and societies in the local environment of Zasavje.

Investing in sport, culture, youth education and various philanthropic activities are key priorities for our Company. To this end, we launch an annual call for sponsorships and donations, which we allocate from our income.

We do not make donations of funds or materials to individuals, private bank accounts, political parties or organisations with close links to political parties.



6.

ATTITUDE AND RESPONSIBILITY TOWARDS THE CODE

The Code binds all employees and other persons (legal or natural) acting on behalf and for the account of Steklarna Hrastnik. It is the responsibility of each individual to familiarise themselves with the contents of the Code and to comply with it in their work. Responsibility for compliance with the Code is based on ethical principles and principles of responsibility for one's own actions and behaviour.

Failure to comply with the provisions of the Code may constitute a breach of professional obligations and may result in disciplinary, compensatory, criminal or other liability.

We are obliged to report any identified or potential violation of the Code and other internal rules, or any illegal, unethical or otherwise questionable conduct, in one of the following ways:

- directly to their manager,
- via the intranet **portal STEKLARNE HRASTNIK**
- via the email address provided for this purpose **povej@hrastnik1860.com**
- by ordinary post to STEKLARNA HRASTNIK d.o.o., Cesta 1. maja 14, 1430 Hrastnik; marked "POVEJ" (SPEAK)
- by submitting your application to the Company's mailboxes for opinions, compliments and comments

Each irregularity report will be treated with the highest level of confidentiality for the individual. In addition to confidentiality, Steklarna Hrastnik undertakes to protect all relevant interests of an individual who reports irregularities in good faith.





7.

VALIDITY/PUBLICATION OF THE CODE OF ETHICS

The Code of Ethics has been adopted by the Company's management - the Chief Executive Officer and is applicable as of 1 June 2021.

The Company's management is obliged to ensure that employees and all stakeholders related to the Company's business are familiar

with the content of the Code and that they act in accordance with its principles and rules.

The Code of Ethics is published on the Company's website [Steklarna Hrastnik | Hrastnik1860](#) and on the intranet [STEKLARNE HRASTNIK](#)

