

DALEKOVOD GROUP SUPPLIER CODE OF CONDUCT

General provisions

This Supplier Code of Conduct (hereinafter: the "Code") outlines the fundamental requirements that apply to all suppliers, contractors, and business partners (hereinafter collectively referred to as the "Suppliers") engaging with Dalekovod Group companies. The aim of this Code is to ensure compliance with Dalekovod Group's standards for ethical, sustainable, and responsible business conduct, particularly in the domains of human and labour rights, environmental sustainability, quality, and corporate ethics, as defined by internationally recognized frameworks.

Dalekovod Group requires its Suppliers to operate with integrity, maintain fair and lawful business practices, and adhere to leading standards in social responsibility, environmental stewardship, and corporate governance. The Group is committed to supporting Suppliers in enhancing their practices and performance in these areas.

This Code applies to all Suppliers engaged by Dalekovod Group companies, regardless of their geographic location, size, or sector of operation. Suppliers are further required to ensure that their subsidiaries, subcontractors, and upstream supply chain partners observe the principles and obligations outlined herein. Compliance with this Code shall be deemed a material contractual obligation. By executing an agreement with any Dalekovod Group company, the Supplier acknowledges receipt of this Code and agrees to abide by its terms in full.

Definitions

Dalekovod Group consists of Dalekovod Inc. and its subsidiaries, which include: Dalekovod – Projekt d.o.o., Dalekovod OSO d.o.o., Dalekovod EMU,d.o.o. Dalekovod EL-RA d.o.o., Dalekovod d.o.o. Ljubljana, Dalekovod Mostar d.o.o. as well as all their respective subsidiaries, and any future subsidiaries established or acquired by Dalekovod Inc. or its existing subsidiaries.

Principles of business conduct

Dalekovod Group expects all Suppliers to adhere to the highest standards of professional and ethical conduct. In performing their business activities, Suppliers should be guided by the following core principles:

- **Legal compliance and business integrity:** Suppliers must comply with all applicable laws, including labour legislation, environmental protection laws, trade and customs regulations, and sanctions regimes. Correct and timely payment of taxes and customs duties, as well as strict adherence to import/export laws and the protection of third-party rights, are mandatory. Business operations must uphold fair competition and comply with all antitrust and competition laws. This includes avoiding unlawful agreements and refraining from abusing a dominant market position.

- Respect for human and labour rights Suppliers must uphold the dignity and rights of every individual and ensure full respect for internationally recognized human rights throughout all business activities. Dalekovod Group maintains a zero-tolerance policy toward forced labour, child labour, and human trafficking - such practices are strictly prohibited and will lead to the immediate suspension of cooperation. Suppliers are also required to respect fundamental labour rights, including the right to freedom of association, the right to collective bargaining, non-discrimination in employment, and the provision of safe, healthy, and respectful working conditions with fair and adequate wages. No worker shall be subject to discrimination, harassment, or coercion in any form.
- Environmental protection and sustainability: Suppliers are expected to conduct their operations in an environmentally responsible manner and to comply with all applicable environmental laws, regulations, and standards. They should apply the precautionary principle and take proactive measures to minimize environmental harm, including the reduction of greenhouse gas and pollutant emissions, responsible waste management, efficient use of natural resources and energy, and the prevention of air, water, and soil contamination. Suppliers must also work to avoid negative environmental and social impacts on surrounding communities, such as noise pollution or ecosystem disruption. Particular attention should be given to the conservation of natural resources, including water, soil, biodiversity, and natural habitats. Suppliers are encouraged to actively support climate change mitigation efforts, for example through increased energy efficiency, decarbonization, and the use of renewable energy sources.
- Business ethics and integrity: Dalekovod Group expects its Suppliers to act with unwavering integrity and to embed ethical principles into all aspects of their operations. This includes strict compliance with international and local laws prohibiting bribery, corruption, financial misconduct, money laundering and illicit financing. Suppliers must not offer, promise, give, request, or accept any bribes or improper advantages, whether directly or indirectly, to secure or retain business or to gain any unfair advantage. Compliance with all applicable anti-corruption and anti-bribery laws is mandatory. Suppliers are obligated to avoid any circumstances that may lead to a conflict of interest. All commercial decisions must be made free from personal bias and based solely on objective, transparent, and legitimate considerations. Any actual or potential conflicts of interest must be disclosed without delay. All aspects of the business relationship with Dalekovod Group should reflect the highest standards of honesty, transparency, and professional accountability.
- Transparency and collaboration: Dalekovod Group expects Suppliers to maintain a high level of transparency in their operations. Upon request, Suppliers must provide all relevant documentation and evidence necessary to verify compliance with this Code and applicable regulations. Suppliers are also expected to cooperate fully with any due diligence activities, including audits, site visits, and third-party assessments, initiated by Dalekovod Group or its designees. Transparency and mutual cooperation are essential for ensuring responsible sourcing and maintaining an ongoing business relationship with Dalekovod Group.

Labour rights

Dalekovod Group recognises the central importance of protecting workers' rights and requires its Suppliers to ensure working conditions that reflect fairness, dignity, and legal compliance. All labour practices must conform to the highest ethical and legal standards. This obligation extends to the following provisions:

- **Prohibition of forced labour:** Suppliers shall not use any form of forced or compulsory labour, including human trafficking, slavery, or labour performed under debt-related coercion. All work must be undertaken freely and without fear of retribution. Violations will lead to the immediate cessation of cooperation with Dalekovod Group.
- **Prohibition of child labour:** Dalekovod Group maintains a zero-tolerance policy on child labour. Suppliers must employ only those who meet the legally defined minimum working age in their country of operation. Suppliers are expected to adhere to the standards outlined in ILO Convention No. 138 on Minimum Age and ILO Convention No. 182 on the Worst Forms of Child Labour. Employment of individuals under the age of 15 is not permitted under any circumstances. In jurisdictions classified as developing countries under Convention No. 138, the minimum employment age may be 14. For roles deemed hazardous, the minimum age must be 18. Breach of this provision will be deemed a material violation of this Code.
- **Equality and non-discrimination:** Suppliers must maintain a working environment that is free from any form of discrimination, harassment, or abuse. Discrimination based on gender, age, nationality, ethnic origin, race, religion or belief, language, social background, disability, sexual orientation, marital or parental status, political opinion, union membership, or any other personal characteristic is strictly prohibited. Workplace decisions regarding hiring, compensation, promotion, or termination must be based solely on objective factors such as skills, qualifications, and performance. Suppliers are expected to foster a culture of diversity, equity, and inclusion, and must provide mechanisms for reporting and addressing grievances related to discriminatory practices.
- **Freedom of association and collective bargaining:** Suppliers must respect the rights of workers to freely form, join, or refrain from joining trade unions or other lawful associations, without fear of reprisal, discrimination, or harassment. Suppliers are also required to recognise and respect the right of workers to engage in collective bargaining on employment terms and workplace conditions, in line with applicable national laws and international standards. No worker shall suffer adverse treatment due to union membership or participation in lawful collective actions. Suppliers are expected to engage openly and in good faith with legally recognised worker representatives.

- Fair working conditions: Suppliers must ensure that all workers receive wages and benefits that meet or exceed the legal minimum standards or applicable collective agreements. All remuneration shall be paid in full and on time and include all statutory entitlements. In addition to wages, workers must be granted access to all legally mandated benefits, including paid annual leave, sick leave, maternity and/or parental leave, and other forms of social security or insurance. Working hours must comply with national laws and applicable ILO standards. Overtime work must be voluntary, legal, and compensated at the prescribed rate, with full observance of rest periods and maximum working hour limitations. Suppliers must not rely on informal, undeclared, or otherwise irregular employment practices to avoid legal obligations. All employment relationships must be documented through valid written contracts or equivalent legal instruments.
- Occupational health and safety: Suppliers are required to provide all workers with a safe and healthy working environment. This includes full compliance with national occupational health and safety regulations, ensuring that all workplaces are safe, well-maintained, fit for purpose, and in proper working condition at all times, in accordance with occupational health and safety standards. Suppliers must establish and implement effective occupational health and safety systems, with a strong focus on risk prevention. This involves ensuring timely communication, training, adequate organisation, and the provision of appropriate resources and equipment across all work processes, in order to guarantee the highest possible level of worker protection. Suppliers are also obligated to continually improve workplace health and safety in line with advancements in technology, healthcare, ergonomics, and other scientific and professional disciplines. Regular inspections of work equipment and the working environment must be conducted. Furthermore, Suppliers must have documented occupational health and safety procedures that are accessible to employees at all times and must be able to demonstrate compliance with those procedures.
- Suppliers must ensure that all individuals working under their supervision or at their sites, including temporary workers, subcontractors, and agency personnel, enjoy the same working conditions and protections as permanent employees performing the same or similar tasks under similar circumstances.

Human rights

Suppliers must uphold all internationally recognised human rights and ensure that their business activities do not cause or contribute to human rights violations. This obligation extends beyond the rights of workers (as described in the previous section) to include the rights of local communities, consumers, and all other stakeholders who may be affected by the Supplier's operations. Dalekovod Group expects its Suppliers to carry out robust human rights due diligence in line with the UN Guiding Principles on Business and Human Rights. This includes the identification and assessment of actual or potential human rights impacts, followed by the implementation of effective measures to prevent, mitigate, or remedy such impacts.

Suppliers are required to actively uphold and promote respect for human rights across all tiers of their operations and supply chains. They must not engage in, support, or be complicit, whether directly or indirectly, in any form of human rights abuse. Suppliers must avoid any action that could harm the rights of Indigenous peoples or local communities in areas where they operate. The forced displacement of communities, or any unlawful seizure of land, forests, or water resources for business purposes, is strictly prohibited. Where a Supplier engages public or private security providers, they must ensure that such entities operate with full respect for human rights. Security personnel must refrain from any conduct that could endanger the safety, dignity, or well-being of individuals.

Suppliers are also expected to give particular consideration to the rights and needs of vulnerable groups and individuals, including children, minorities, the elderly, persons with disabilities, and human rights defenders. Business operations must not adversely impact these groups, whether through environmental degradation, health risks, displacement, or any other harmful effects in the communities where activities are conducted. If a Supplier's business activities have the potential to impact local communities, the Supplier is expected to engage in meaningful consultation with those communities and to take their legitimate interests and concerns into account.

In instances where a Supplier or any entity within its supply chain causes or contributes to a human rights violation, the Supplier is obligated to take prompt and appropriate remedial action. This may involve acknowledging the harm, providing compensation, facilitating rehabilitation, or implementing other forms of effective remedy. Such measures must be undertaken in coordination with affected individuals and relevant authorities, and in accordance with national legislation and international standards on access to remedy.

Environment

As part of its commitment to sustainable business practices, Dalekovod Group expects its Suppliers to demonstrate a strong and proactive commitment to environmental responsibility. Suppliers must operate in full compliance with all applicable environmental laws, regulations, and standards in the jurisdictions where they conduct business. Beyond mere legal compliance, Suppliers are encouraged to embrace a forward-looking approach to environmental management and to continuously work toward minimising the environmental footprint of their activities.

Core environmental responsibilities include:

- Securing and maintaining all required environmental permits, licenses, and authorisations necessary for lawful operation
- Establishing and implementing environmental management systems or procedures that support ongoing improvement and the effective identification, mitigation, and control of environmental risks and impacts
- Promoting and integrating environmentally sustainable technologies and practices within their operations and throughout their supply chains

- **Pollution prevention and risk management:** Suppliers are expected to apply the precautionary principle by proactively identifying potential risks to the environment and human health and implementing appropriate measures to prevent or minimise such risks. All operational processes, facilities, and production activities must, at a minimum, comply with applicable environmental regulations and standards, including those governing air emissions, wastewater discharge, hazardous substances, noise pollution, and soil contamination.
- **Resource efficiency and climate responsibility:** Suppliers are expected to manage natural resources, including energy, water, and raw materials, responsibly and efficiently. They should actively pursue the reduction of resource consumption, enhance energy efficiency across operations, and prioritise the use of renewable energy wherever practicable. Suppliers operating in manufacturing or industrial sectors are strongly encouraged to implement and maintain an energy management system (such as ISO 50001) to systematically monitor energy performance, optimise usage, and contribute to the reduction of greenhouse gas (GHG) emissions. In water-stressed regions, Suppliers must take additional care to minimise water usage and ensure wastewater is treated and discharged in full compliance with local regulations. Suppliers are further encouraged to measure and disclose their carbon footprint and to set clear, science-based targets for reducing GHG emissions in line with international climate goals.
- **Waste management and circular economy:** Suppliers are expected to manage waste responsibly in accordance with the principles of the waste hierarchy. Priority must be given to waste prevention, followed by reuse and recycling. Disposal should only be considered as a last resort when more sustainable options are not feasible. Suppliers should actively seek opportunities to minimise waste generation at the source and implement practices that support resource recovery and circularity. Hazardous waste and chemicals must be handled in full compliance with applicable laws and environmental standards. This includes accurate record-keeping, and the transfer of waste to authorised and licensed disposal or treatment providers. Suppliers must also adhere to all relevant international and regional regulations concerning restricted or banned substances, including but not limited to the Stockholm Convention on Persistent Organic Pollutants, the Minamata Convention on Mercury, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, and the EU REACH and RoHS regulations.
- Suppliers must enable Dalekovod Group or its authorised representatives to assess environmental practices and performance within their operations and broader supply chain.

Suppliers are encouraged to pursue continuous improvement in environmental performance by adopting innovative, sustainable materials, processes, and technologies. They are also invited to share relevant information with Dalekovod Group regarding their sustainability efforts, such as initiatives aimed at reducing product carbon footprints, implementing eco-design principles, advancing reforestation projects, or protecting biodiversity and natural ecosystems. Proactive engagement in environmental matters reinforces a long-term, trust-based partnership with Dalekovod Group.

Quality

Dalekovod Group is firmly committed to delivering products and services that meet the highest standards of quality and safety, in full compliance with customer requirements, applicable laws, and regulatory obligations. The same level of dedication is expected from its Suppliers throughout the supply chain.

In this regard, Suppliers are expected to:

- Collaborate openly and proactively with Dalekovod Group and its authorised representatives to support the delivery of high-quality products and services
- Provide accurate, comprehensive, and transparent information regarding their products and services, particularly in relation to technical specifications and any potential deficiencies or limitations
- Ensure that all products and services are certified in accordance with applicable quality standards and specifications
- Facilitate oversight by Dalekovod Group or its designated representatives for the purpose of evaluating quality assurance processes within their supply chains.

Ethical business conduct

Dalekovod Group is committed to the highest standards of ethical business conduct and expects its Suppliers to uphold the same values. Suppliers are required to operate with integrity, transparency, and a strong sense of accountability in all aspects of their business. Ethical conduct spans a broad range of areas, including prevention of corruption and bribery, avoidance of conflicts of interest, adherence to fair competition principles, compliance with financial and trade regulations, protection of confidential and proprietary information, and promotion of responsible and lawful corporate behaviour. To that end, Suppliers are expected to observe and apply the following principles in their operations:

- **Anti-corruption and anti-bribery:** Suppliers must operate in full compliance with all applicable anti-corruption and anti-bribery laws and regulations. They are expected to establish and maintain robust internal controls to prevent, detect, and address corruption risks across their operations. Any form of bribery or corruption is strictly prohibited. This includes offering, promising, giving, or accepting bribes, kickbacks, gifts, or other undue advantages for the purpose of obtaining or retaining business, securing favourable treatment, or influencing decision-making. These restrictions apply equally to dealings with Dalekovod Group personnel, public officials, and representatives of other organisations. Suppliers must ensure that they do not engage in corrupt activities, whether directly or indirectly through intermediaries such as agents, consultants, subcontractors, or other third parties. Under no circumstances may contracts or business relationships be used to conceal illicit payments or benefits. To uphold these standards, Suppliers are expected to implement clear anti-corruption policies, conduct regular employee training, and establish accessible and secure channels for reporting suspected violations, including anonymous reporting mechanisms where appropriate.

- **Avoidance of conflict of interest:** Suppliers must ensure that all business decisions are made independently, impartially, and in the best interest of their professional relationship with Dalekovod Group. Personal interests of individuals representing the Supplier must not influence or appear to influence any aspect of that decision-making process. A conflict of interest arises when an individual's personal, financial, or other affiliations with Dalekovod Group, or its employees, could impair, or be perceived to impair, their objectivity or integrity in business dealings. Suppliers are obligated to promptly disclose any actual, potential, or perceived conflict of interest to Dalekovod Group upon becoming aware of it. In such cases, appropriate internal measures must be taken to prevent, mitigate, or resolve the conflict in a transparent and responsible manner.
- **Fair competition:** Suppliers are required to conduct their business in full compliance with applicable competition and antitrust laws and to uphold the principles of fair, transparent, and lawful market conduct. This includes refraining from any practices that could undermine or distort fair competition. Prohibited conduct includes price fixing, bid rigging, collusive tendering, market or customer allocation, and the abuse of a dominant market position. Any agreement or coordinated activity that restricts free market dynamics is strictly forbidden. Strict prohibition applies to all breaches of antitrust legislation, including cartels, abuse of market dominance, and other forms of anti-competitive behaviour. Suppliers are strongly encouraged to provide appropriate training to relevant employees to ensure understanding and adherence to competition law obligations. Where there is any uncertainty regarding potentially anti-competitive behaviour, legal counsel should be consulted, and the activity in question avoided.
- **Prevention of money laundering:** Suppliers must operate in full compliance with all applicable laws and regulations aimed at preventing money laundering and the financing of terrorism. This includes implementing appropriate due diligence procedures to assess and monitor the integrity of their business partners, including customers, suppliers, and financial intermediaries, and to ensure that their operations are not misused for illicit financial activities. Suppliers are obliged to identify and report any suspicious transactions to the relevant authorities in accordance with legal requirements. They must avoid engaging in transactions involving cash payments that exceed regulatory limits without proper documentation, and they must not establish or maintain business relationships with individuals or entities known or reasonably suspected to be involved in unlawful financial conduct.
- **Materials from high-risk sources (conflict minerals):** Suppliers must take all necessary measures to ensure that their sourcing of raw materials and components does not contribute to armed conflicts and human rights abuses, or other serious violations in conflict-affected or high-risk areas. This includes avoiding procurement practices that may support the financing of armed groups through the trade of so-called "conflict minerals", including tin, tantalum, tungsten, and gold (3TG). Where such minerals are used in products or production processes, Suppliers must be able to provide clear, verifiable evidence that these materials have been sourced

responsibly and do not originate from regions associated with conflict. Suppliers are expected to implement due diligence measures in line with EU Regulation 2017/821 and internationally recognised frameworks such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Furthermore, Suppliers must comply with Dalekovod Group's Conflict Minerals Policy and, upon request, provide accurate and complete information regarding the origin and traceability of relevant materials.

- Confidentiality and data protection Suppliers are required to protect all confidential information and personal data acquired through their business relationship with Dalekovod Group, in full compliance with applicable data protection and privacy laws. This includes any non-public information, such as technical documentation, drawings, pricing details, business strategies, customer and supplier lists, or intellectual property, which must be treated as strictly confidential. Such information may not be disclosed to unauthorised third parties or used for any purpose other than that which is explicitly agreed with Dalekovod Group. Suppliers must also ensure compliance with applicable data privacy regulations, including the EU General Data Protection Regulation (GDPR). They must implement appropriate technical and organisational safeguards to ensure the security, integrity, and lawful processing of personal data. In cases where the Supplier processes personal data on behalf of Dalekovod Group, such processing must be limited to agreed purposes and carried out under clearly defined data processing agreements, with suitable data protection measures in place. Suppliers are further required to ensure that all employees and subcontractors with access to confidential or personal data are fully aware of their responsibilities and are adequately trained in information security and data privacy practices. Systems must be in place to detect, report, and mitigate any breaches or unauthorised access.
- Compliance with additional legal and regulatory requirements: Beyond the obligations outlined above, Suppliers must ensure full compliance with all other applicable laws and regulations relevant to their business operations. This includes import/export controls, customs regulations, trade sanctions and embargoes, product safety standards, consumer protection laws, and intellectual property rights. Suppliers are expected to actively monitor regulatory changes in all jurisdictions where they conduct business and implement timely measures to ensure ongoing compliance. In the context of cross-border trade, Suppliers must also adhere to international export control frameworks and trade compliance rules. This includes avoiding transactions involving restricted countries, entities, or individuals as defined by applicable international sanctions regimes. Failure to comply with these requirements may expose both the Supplier and Dalekovod Group to significant legal and reputational risk. As such, Suppliers are expected to maintain robust internal controls and treat regulatory compliance as a core aspect of their business operations.
- Equality, fairness, and respect for human and labour rights: Suppliers must demonstrate a clear and unwavering commitment to upholding human and labour rights, actively working to prevent all forms of modern slavery, including child labour, forced labour, and human trafficking. Respect for workers' dignity, safety,

and the right to freedom of association must be integral to their business conduct. Suppliers are expected to implement and maintain effective policies and procedures that foster a safe, inclusive, and respectful working environment, free from discrimination, harassment, exploitation, or any form of inhumane or degrading treatment.

Tax compliance and financial transparency

Dalekovod Group is committed to promoting ethical, responsible, and transparent business practices, which includes strict adherence to all tax and financial obligations. Suppliers are expected to comply with all applicable tax laws and regulations in the countries where they operate and to conduct their tax affairs in line with internationally recognised standards of good governance. This includes the timely and accurate payment of corporate taxes, social security contributions, customs duties, and other statutory charges.

Suppliers must not participate in any form of tax evasion or engage in practices intended to unlawfully reduce or conceal tax liabilities, such as falsifying financial records, operating undeclared accounts, or making use of fictitious entities or sham transactions. Suppliers are expected to operate with full transparency and maintain accurate, complete, and verifiable financial records that faithfully reflect all business transactions.

Where necessary for risk assessment within the supply chain, Dalekovod Group reserves the right to request evidence of tax compliance, such as tax clearance certificates or official statements issued by competent authorities. Suppliers that have been subject to final judicial rulings for tax evasion or other serious tax-related offences will be deemed ineligible for business cooperation with Dalekovod Group. This reflects Dalekovod's commitment to maintaining partnerships only with those who uphold the highest standards of financial integrity and accountability.

Tax compliance is more than a legal obligation - it is a clear demonstration of responsible corporate citizenship and a meaningful contribution to the social and economic systems in which a company operates. Dalekovod Group values Suppliers who embody ethical business conduct not only through the quality and competitiveness of their products and services, but also through their respect for all statutory obligations, including those related to taxation.

Grievance mechanisms and whistleblower protection

Dalekovod Group fosters a culture of integrity, transparency, and accountability by encouraging open communication and providing secure, accessible channels for reporting concerns. Suppliers, their employees, subcontractors, and any other affected parties are entitled to report actual or suspected breaches of this Code or to raise concerns about unethical or unlawful conduct related to Dalekovod Group's business operations. Reports may be submitted through multiple channels, including anonymously, to ensure the protection of whistleblowers.

Suppliers are advised to consult the official websites of individual Dalekovod Group companies for up-to-date information on available reporting mechanisms. It is the

Supplier's responsibility to inform their employees, subcontractors, and other relevant stakeholders about these channels and ensure their accessibility.

All reports will be treated with strict confidentiality. Dalekovod Group is committed to protecting the identity of the whistleblower and preventing any unauthorised access to or disclosure of the information provided. Only authorised personnel involved in managing the report will have access to the case details. Dalekovod Group operates in accordance with the applicable national Whistleblower Protection Act and other relevant legislation. Dalekovod Group strictly prohibits any form of retaliation or adverse treatment against individuals who report concerns in good faith.

Reports may concern a wide range of potential non-compliances, including allegations of corruption or bribery, violations of human, child, or labour rights, unsafe or hazardous working conditions, environmental harm or pollution, breaches of applicable laws or internal policies, or unethical conduct by Dalekovod Group employees or Suppliers within the context of their business relationship. Dalekovod Group encourages Suppliers to actively promote the use of available reporting mechanisms and to foster a culture of transparency and trust within their own organisations. This includes establishing internal procedures for handling complaints or concerns, such as secure reporting channels or the appointment of a designated, confidential contact person. This helps ensure that any issues of non-compliance are quickly recognised and effectively resolved.

Upon receiving a report, a designated confidential officer will initiate an impartial and timely investigation. The whistleblower will receive appropriate feedback, where possible and lawful. Investigations will be carried out within the legally prescribed timeframe and in full respect of the rights of all involved parties. If the report is found to be substantiated and a violation of this Code is confirmed, Dalekovod Group may require the Supplier to implement corrective measures (see next section) and/or take any other action deemed appropriate within the scope of its responsibilities. Where the identity of the whistleblower is known and communication is possible, they will be informed of the outcome in accordance with applicable confidentiality and data protection standards.

Suppliers are expected to fully cooperate during the grievance process by providing relevant information, facilitating access to appropriate personnel, and supporting the resolution of the reported concern — to the extent reasonably necessary for the investigation and follow-up.

Compliance monitoring and corrective measures

Dalekovod Group reserves the right to verify that Suppliers operate in accordance with the requirements of this Code of Conduct. Verification activities may include supplier self-assessment questionnaires, documentation reviews, on-site audits, employee interviews, and examination of relevant records and procedures. These activities will be announced in advance and carried out in coordination with the Supplier, with consideration given to minimising disruption to regular operations. Suppliers are expected to cooperate fully and in good faith with these verification processes. This includes providing timely and accurate information, allowing access to relevant data and premises, and facilitating any reasonable requests necessary to assess compliance. Failure to cooperate may constitute a violation of the Supplier's obligations under this Code.

As part of Dalekovod Group's broader sustainability risk assessment, Suppliers may be required to complete due diligence questionnaires covering key areas such as human and labour rights, environmental practices, ethical business conduct, and product quality. Responses must be truthful, complete, and supported by documentation where applicable. All data collected will be handled confidentially and used solely to strengthen the supplier relationship and improve overall compliance.

If non-compliance is identified, whether through audits, assessments, or other means, Dalekovod Group will communicate the findings to the Supplier and may request corrective actions. The Supplier is expected to respond promptly and take immediate steps to address the deficiencies. In cases involving breaches of human rights, environmental obligations, or other serious issues, corrective measures must be implemented without delay. When immediate resolution is not feasible, the Supplier is required to develop a corrective action plan. This plan must clearly outline the necessary measures, responsible parties, and realistic deadlines for implementation. Dalekovod Group may follow up to assess progress and request evidence demonstrating the effectiveness of the corrective actions taken.

Adherence to this Code of Conduct is a fundamental condition of the business relationship between Dalekovod Group and its Suppliers. Any failure to comply with the obligations set forth in this Code will be regarded as a breach of contract. Dalekovod Group aims to address non-compliance constructively and will, where appropriate, work with the Supplier to implement necessary corrective actions. However, if the Supplier does not resolve the issue within a reasonable period, or if the breach is of such gravity that it undermines the trust and integrity of the partnership, Dalekovod Group reserves the right to suspend or terminate the business relationship. In cases involving serious or unlawful violations, termination may occur with immediate effect and without prior notice, in accordance with applicable contractual and legal provisions. Beyond termination, Dalekovod Group may exercise any legal rights available, including seeking compensation for damages or losses caused by the Supplier's conduct.

Wherever possible, Dalekovod Group will prioritise dialogue and cooperation to resolve issues and restore compliance. Suppliers are expected to provide timely updates on internal corrective measures and preventive steps taken to avoid recurrence, particularly in the aftermath of any significant incident.

Any decision to terminate a business relationship due to a breach of this Code will be formally communicated to the Supplier, including a clear explanation of the grounds for such action. In cases of illegal activity, such as forced labour, trafficking, or bribery, Dalekovod Group may also report the matter to the relevant authorities.

When a breach has resulted in harm, whether to workers, communities, the environment, or to Dalekovod Group itself, the Supplier is expected to participate actively in appropriate remediation efforts. Accordingly, the Supplier is expected to take all necessary measures to reduce the impact of the violation and to offer adequate redress or assistance to those affected. These may include financial restitution (e.g. unpaid wages), environmental recovery measures, or community support initiatives where local resources have been adversely affected.

Supplier obligations

To ensure full understanding and effective implementation of this Code, Dalekovod Group expects its Suppliers to fulfil the following obligations:

1. **Acceptance and commitment to the code:** The Supplier shall formally accept this Code by signing a relevant contract or declaration. Through this confirmation, the Supplier acknowledges awareness of the Code's requirements and undertakes to embed them into its business operations. Where necessary, the Supplier shall cooperate with Dalekovod Group to resolve any uncertainties and to ensure proper implementation of the Code's provisions.
2. **Establishment of internal compliance mechanisms:** The Supplier shall develop and maintain internal policies, procedures, and controls designed to ensure adherence to the principles set out in this Code. This includes appointing individuals or teams with designated responsibility for compliance matters, conducting regular risk assessments, and keeping appropriate records of actions taken. Furthermore, the Supplier is expected to conduct regular training and awareness sessions for employees on key Code topics, including business ethics, workplace safety, anti-discrimination, harassment prevention, and anti-corruption. Special attention should be given to training those employees directly involved in delivering products or services to Dalekovod Group. Upon request, the Supplier shall provide relevant documentation regarding its compliance-related training or internal communication efforts.
3. **Completion of questionnaires and provision of information:** The Supplier commits to participating in sustainability assessments conducted by Dalekovod Group companies. This includes accurately and thoroughly completing all ESG self-assessment questionnaires, along with providing relevant supporting documentation. Additional surveys covering the areas addressed by this Code, such as working conditions, human rights, environmental protection, ethics, and governance, may also be requested. All submitted information must be truthful, complete, and current. Upon request, the Supplier shall provide further documentation or data necessary to verify compliance, such as certifications, workplace inspection records, environmental permits, internal policies, or audit reports. All information provided will be treated as confidential and handled in accordance with applicable contractual confidentiality obligations.
4. **Cooperation with audits and site assessments:** If Dalekovod Group, or an authorised independent third party, initiates an on-site audit at the Supplier's facilities, the Supplier shall grant access within a reasonable timeframe and without unnecessary delay. Such audits may include reviews of workplace conditions, access to relevant records and documents, and confidential interviews with employees to assess compliance with the principles of this Code. The Supplier must provide appropriate support during these assessments and allow auditors access to relevant operational areas. Workers must be given the opportunity to speak freely and privately, without management or supervisory presence. Under no circumstances shall employees be

penalised, intimidated, or otherwise disadvantaged for participating in the audit process or for disclosing information in good faith.

5. Extension of code obligations to subcontractors and sub-suppliers: The Supplier shall ensure that all subcontractors and sub-suppliers involved in the provision of goods or services to Dalekovod Group are adequately informed of the standards and obligations outlined in this Code and are contractually bound to uphold them. The Supplier is expected to exercise due diligence throughout its supply chain, selecting partners that meet, at a minimum, the requirements of this Code and actively monitoring their compliance. In the event that a breach of the Code is identified within the supply chain, the Supplier must take timely and appropriate remedial action (e.g. requesting corrective measures or discontinuing the relationship with the non-compliant party). Where such non-compliance directly affects Dalekovod Group, the Supplier shall inform Dalekovod without delay.
6. Incident reporting and notification of material changes: The Supplier is required to promptly notify Dalekovod Group of any major incidents or material developments that may have an impact on compliance with this Code or the Supplier's ability to fulfil its contractual obligations. This includes serious workplace injuries or fatalities occurring at the Supplier's facilities, significant environmental incidents (e.g. major chemical spills, fires, or other ecological harm), initiation of material legal proceedings against the Supplier - particularly those relating to corruption, tax violations, environmental breaches, or labour rights infringements, or any other events or conditions that may pose a risk to Dalekovod Group's reputation, legal compliance, or continuity of supply.
7. Continuous improvement: Dalekovod Group encourages its Suppliers to adopt a mindset of continuous improvement in all areas covered by this Code, including environmental responsibility, labour practices, ethical conduct, and governance. Suppliers are expected to regularly assess and refine their internal processes, for example through periodic self-evaluations, internal audits, or performance benchmarking. Proactive steps, such as improving workplace conditions, reducing ecological footprint, strengthening ethical safeguards, or enhancing transparency, are strongly encouraged. Dalekovod Group remains open to constructive engagement and collaboration with Suppliers who are committed to advancing sustainable and responsible business practices. Support may include the sharing of best practices, guidance on certifications, or joint participation in value chain improvement initiatives.
8. Declaration of compliance: To verify adherence to this Code, Dalekovod Group may request a formal written declaration of compliance from the Supplier. This declaration must be signed by an authorised representative and should confirm full alignment with the requirements of the Code. In cases where partial non-compliance exists, the Supplier must disclose the deviations and submit a corrective action plan with clear timelines for resolution. Such declarations may be required prior to the initiation of a business relationship, at regular intervals during the term of the contract, or in the context of risk assessments and compliance monitoring activities.

A strong and lasting partnership with Dalekovod Group is built on shared values and mutual commitment. Only those Suppliers who fully embrace the principles set out in this Code, including sustainability, integrity, and ethical business practices, can form the basis of long-term cooperation with Dalekovod Group. Dalekovod Group views this Code not as a mere formality, but as a practical framework for responsible conduct. It serves as a daily point of reference and a foundation for building trust, transparency, and accountability across our business relationships.

This Code takes effect on the date of its publication. Dalekovod Group reserves the right to revise the Code periodically to reflect changes in applicable laws, internal policies, or evolving industry standards and best practices. Updated versions will be shared with Suppliers or made available through official channels. Suppliers are expected to always ensure full compliance with the most current version. For any questions or clarifications regarding this Code, Suppliers may contact Dalekovod Group at: nabava.dd@dalekovod.hr

President of the Management Board



Eugen Paić-Karega

Member of the Management Board



Tvrtko Zlopaša

