PIVKA DELAMARIS

Kodeks poslovnega ravnanja dobaviteljev

Za odgovorno, varno in trajnostno oskrbovalno verigo

Supplier Code of Conduct

For a Responsible, Safe and Sustainable Food Supply Chain

Oktober | October 2026

CILJ IN NAMEN KODEKSA

Pivka Delamaris si aktivno prizadeva za korporativno družbeno odgovorno delovanje. To zajema odgovornost za ustvarjanje prihodkov, ki je temelj za ostale dimenzije družbene odgovornosti. Pri tem upošteva zakone in mednarodne norme obnašanja. V svoje poslovanje integrira etično in filantropsko odgovornost.
Ostajamo osredotočeni na pridobivanje in zagotavljanje najboljšega možnega izdelka in storitve, sočasno si prizadevamo za izboljšanje upravljanja, spoštovanje človekovih pravic, udejanjanje poštene delovne prakse ter izboljševanje skrbi za okolje v celotni verigi vrednosti.

Kodeks poslovnega ravnanja dobaviteljev (Kodeks) opredeljuje kriterije, ki jim želimo slediti tudi pri sodelovanju z našimi dobavitelji. Kriteriji so pripravljeni v skladu z vrednostmi skupine Pivka – Delamaris ter kriteriji naših kupcev, po katerih smo tudi presojani.

Pivka Delamaris pričakuje in spodbuja svoje dobavitelje in njihove podizvajalce ter druge pogodbene partnerje, da razvijejo in uvedejo ustrezne sisteme poslovanja, da bi zagotovili skladnost s pričakovanji tega Kodeksa. Od vseh udeležencev v dobavni verigi se pričakuje, da se bodo zavezali k spoštovanju načel odgovornega poslovanja tega Kodeksa. To spoštovanje dobavitelji potrdijo s podpisom. Skupina Pivka Delamaris presoja skladnost na podlagi revizij, pregledov dokumentacije in ocen.

PURPOSE AND INTENT OF THE CODE OF CONDUCT

Pivka Delamaris is actively committed to responsible corporate conduct. This includes responsibility for generating revenue, which is the basis for all other aspects of social responsibility. We comply with laws and internationally recognized standards of conduct. We integrate ethical and philanthropic responsibility into our business activities.

We remain focused on sourcing and delivering the best possible products and services, while also working to improve governance, respect human rights, promote fair labor practices, and enhance environmental care throughout the value chain.

This Supplier Code of Conduct (the Code) defines the standards we seek to follow in our cooperation with suppliers. These standards are based on the values of Pivka-Delamaris Group and on the requirements of our customers, against which we are also evaluated.

Pivka Delamaris expects and encourages its suppliers, subcontractors, and other business partners to develop and implement appropriate management systems to ensure compliance with the expectations of this Code. All participants in the supply chain are expected to commit to the principles of responsible business conduct described in this Code. Suppliers confirm this commitment by signing the Code. Pivka Delamaris evaluates compliance through audits, document reviews, and assessments.

Pivka Delamaris je predana zagotavljanju varnih, visokokakovostnih izdelkov, enako zavezo pa pričakuje v celotni verigi vrednosti. S tem prispevamo k trajnostnemu razvoju v celotni vrednostni verigi do končnega potrošnika.

Pivka Delamaris evaluates compliance through audits, document reviews, and assessments.
Pivka Delamaris is committed to providing safe, high-quality products and expects the same commitment throughout the value chain. In this way, we contribute to sustainable development across the entire value chain up to the final consumer.

1. Poslovna etika

Dobavitelj deluje v skladu z visokimi etičnimi standardi in spoštuje določila Etičnega kodeksa objavljenega na spletni strani www.pivkadelamaris.si.

Obveznosti izpolnjuje z visoko stopnjo integritete ter se izogiba vsem oblikam korupcije, izsiljevanja in podkupovanja. Deluje v skladu z veljavno zakonodajo, direktivami in predpisi na trgih, kjer deluje. Dobavitelj ne uporablja plačil za pospeševanje postopkov in spodbuja transparentne poslovne prakse. Dobavitelj spoštuje načela poštene konkurence. Pravočasno razkriva morebitna dejanska ali potencialna navzkrižja interesov. Zagotavlja ustrezno varstvo podatkov, zaupnost informacij in varnost poslovnih podatkov. Dobavitelj aktivno preprečuje pranje denarja, financiranje terorizma in druge oblike gospodarskih zlorab. Spoštuje pravice intelektualne lastnine ter zagotavlja odgovorno ravnanje pri prenosu tehnologije in znanja.

1. Business Ethics

The supplier operates according to high ethical standards and complies with the Code of Ethics published on www.pivkadelamaris.si.

The supplier fulfills its obligations with a high level of integrity and avoids all forms of corruption, extortion, and bribery. The supplier acts in accordance with applicable laws, directives, and regulations in the markets where it operates. The supplier does not use facilitation payments and promotes transparent business practices. The supplier respects the principles of fair competition. Any actual or potential conflicts of interest are disclosed in a timely manner. The supplier ensures proper data protection, confidentiality of information, and security of business data. The supplier actively prevents money laundering, terrorist financing, and other forms of economic abuse. The supplier respects intellectual property rights and ensures responsible handling of technology and knowledge transfer.

2. Delovni pogoji in človekove pravice

Dobavitelji spoštujejo človekove in delovne pravice zaposlenih, študentov ter drugih sodelavcev in deležnikov. Zagotavljajo varno, zdravo, vključujoče in odgovorno delovno okolje. Zaposlene spodbujajo k razvoju na osebnem kot poklicnem področju. Omogočajo usklajevanje delovnih in osebnih okoliščin.

Dobavitelj zagotavlja preprečevanje diskriminacije, nadlegovanja ter druge oblike neetičnega ravnanja. Ne dopušča prisilnega ali neprostovoljnega dela ali drugih oblik izkoriščanja ter si prizadeva za preprečevanje takšnih praks v celotni dobavni verigi. Dobavitelj ne zaposluje otrok ali mladoletnih oseb v nasprotju z zakonodajo. Dobavitelj zagotavlja zakonite in pravične delovne pogoje, ustrezno plačilo, spoštovanje delovnega časa, odmorov, dopustov ter drugih pravic zaposlenih. Spoštuje pravico zaposlenih do svobodnega združevanja, sindikalnega orga-

2. Working Conditions and Human Rights

Suppliers respect the human and labor rights of employees, students, contractors, and other stakeholders. They provide a safe, healthy, inclusive, and responsible work environment. Employees are encouraged to develop both personally and professionally. Work-life balance is supported.

The supplier prevents discrimination, harassment, and other forms of unethical behavior. Forced labor, involuntary labor, and any form of exploitation are not tolerated, and the supplier works to prevent such practices throughout its supply chain. The supplier does not employ children or underage workers in violation of applicable laws. The supplier provides lawful and fair working conditions, fair compensation, compliance with working hours, breaks, leave, and other employee rights. The supplier respects employees' rights to freedom of association, union

niziranja in kolektivnih pogajanj ter omogoča ustrezne postopke za prijavo in reševanje pritožb.

Dobavitelj izvaja ustrezno skrbnost (Human Rights Due Diligence) za prepoznavanje, preprečevanje in zmanjševanje tveganj kršitev človekovih pravic v lastnem poslovanju ter v svoji dobavni verigi. Dobavitelj spodbuja kulturo varnosti, enakih možnosti, spoštovanja, raznolikosti in vključevanja.

3. Odgovoren odnos do okolja

Dobavitelj Pivka Delamaris potrjuje, da ima vsa potrebna dovoljenja na področju varovanja okolja in spoštuje vse zakonske predpise na področju varovanja okolja.

Skrbi za zmanjšanje negativnih vplivov svoje dejavnosti na okolje ter varčevanje z naravnimi viri, gospodarno ravnanje z energijo in uvajanje sodobne varčne in zelene tehnologije. Prav tako si prizadeva za učinkovito rabo vode, zmanjševanje emisij toplogrednih plinov, preprečevanje onesnaževanja ter zmanjševanje nastajanja odpadkov in spodbuja načela krožnega gospodarstva.

4. Varnost in kakovost surovin, materialov, izdelkov ter informacij

Dobavitelji delujejo na način, ki omogoča zagotavljanje varnih in kakovosti izdelkov storitev – surovin in materialov za skupino Pivka- Delamaris. Zagotavljajo transparentnost in popolne, resnične in nedvoumne informacije o svojih izdelkih in storitvah, kot npr. o poreklu surovin, specifikacijah, količinah in drugo.

Dobavitelji imajo vzpostavljene ustrezne postopke za zagotovitev, da so vse zaupne informacije Pivka Delamaris, ne glede na to, ali se nanašajo na poslovanje ali ljudi, zaupne in varne z omejenimi pravicami dostopa ter da se upoštevajo vsi veljavni zakoni o zasebnosti podatkov, zlasti Splošna uredba o varstvu podatkov (GDPR).

Dobavitelj mora imeti vzpostavljen sistem za zagotavljanje varnosti živil, ki temelji na načelih HACCP. Kadar je glede na vrsto dejavnosti primerno, mora biti certificiran po priznanem standardu varnosti hrane (IFS Food, BRCGS Food, FSSC 22000 ali drugem enakovrednem standardu).

representation, and collective bargaining, and provides suitable processes for reporting and resolving grievances.

The supplier carries out appropriate Human Rights Due Diligence to identify, prevent, and reduce risks of human rights violations within its own operations and throughout its supply chain. The supplier promotes a culture of safety, equal opportunity, respect, diversity, and inclusion.

3. Working Conditions and Human Rights

Suppliers of Pivka Delamaris confirm that they hold all required environmental permits and comply with all applicable environmental laws and regulations.

Suppliers work to reduce the environmental impact of their activities and promote the efficient use of natural resources, responsible energy management, and the introduction of modern, efficient, and environmentally friendly technologies. They also strive for efficient water use, reduction of greenhouse gas emissions, pollution prevention, waste reduction, and support the principles of a circular economy.

4. Safety and Quality of Raw Materials, Products, and Information

Suppliers operate in a way that supports the delivery of safe and high-quality products, services, raw materials, and materials to Pivka Delamaris Group.
Suppliers provide transparency and complete, accurate, and clear information about their products and services, including information such as raw material origin, specifications, quantities, and other relevant details.

Suppliers maintain appropriate procedures to ensure that all confidential information of Pivka-Delamaris Group, whether related to business operations or individuals, remains confidential and secure with restricted access rights. All applicable data privacy laws, especially the General Data Protection Regulation (GDPR), must be followed.

Suppliers must have a food safety management system based on HACCP principles. Where appropriate to the nature of the business, suppliers must be certified to a recognized food safety standard such as IFS Food, BRCGS Food, FSSC

Dobavitelj izvaja ustrezne ukrepe za preprečevanje goljufij pri živilih (Food Fraud) ter zagotavlja avtentičnost surovin, materialov in informacij, ki jih posreduje Pivka Delamaris.
Dobavitelj zagotavlja popolno sledljivost surovin, materialov in izdelkov ter omogoča hitro identifikacijo izvora in nadaljnje distribucije izdelkov v skladu z veljavno zakonodajo in pogodbenimi zahtevami. Dobavitelj ne sme spreminjati sestave izdelkov, specifikacij, proizvodnega procesa, izvora surovin, embalaže ali lokacije proizvodnje brez predhodnega pisnega obvestila Pivka Delamaris in njene odobritve, kadar bi taka sprememba lahko vplivala na kakovost, varnost, zakonitost ali avtentičnost izdelka.

5. Dobrobit živali

Dobavitelji živih živali zagotavljajo spoštovanje načel dobrobiti živali v skladu z veljavno zakonodajo ter priznanimi standardi dobrih praks.

6. Ravnanje v skladu s kodeksom

Pivka Delamaris meni, da je skladnost s Kodeksom bistvena za njene poslovne odnose. Pridržuje si pravico, da preveri skladnost z zahtevami Kodeksa. Od dobaviteljev lahko zahteva sodelovanje v postopku samoocenjevanja ali ocenjevanja, v katerem se dobavitelj zaveže, da bo sodeloval in zagotovil popolno preglednost. Poleg tega lahko spremljanje vključuje napotitev strokovnjakov na teren.
V skladu s svojo oceno tveganja bo Pivka Delamaris vsakokrat določila dobavitelje, ki bodo podvrženi reviziji, ki jo bo izvedla neodvisna strokovna organizacija, ali notranjo revizija Pivka Delamaris.
Dobavitelj izvaja ustrezno skrbnost (Human Rights Due Diligence) za prepoznavanje, preprečevanje in zmanjševanje tveganj kršitev človekovih pravic v lastnem poslovanju ter v svoji dobavni verigi. Vsak primer kršitve Kodeksa ali nezadostnega izvajanja Kodeksa bo ocenjen individualno z ustreznim rokom za njegovo odpravo/uveljavitev. Kršitev kodeksa predstavlja bistveno kršitev dobrih poslovnih odnosov.

22000, or another equivalent standard.
Suppliers implement appropriate measures to prevent Food Fraud and ensure the authenticity of the raw materials, materials, and information provided to Pivka Delamaris.
Suppliers ensure full traceability of raw materials, materials, and products and enable rapid identification of product origin and further distribution in accordance with applicable laws and contractual requirements. Suppliers may not change product composition, specifications, manufacturing processes, raw material origin, packaging, or production location without prior written notification to and approval from Pivka-Delamaris Group when such changes could affect product quality, safety, legality, or authenticity.

5. Animal Welfare

Suppliers of live animals ensure compliance with animal welfare principles in accordance with applicable legislation and recognized good practice standards.

6. Compliance with the Code

Pivka Delamaris considers compliance with this Code to be essential for its business relationships.
The Group reserves the right to verify compliance with the requirements of this Code. Suppliers may be asked to participate in self-assessment or evaluation processes and agree to cooperate fully and provide complete transparency. Monitoring activities may also include on-site visits by qualified experts.
Based on its risk assessment, Pivka Delamaris will determine which suppliers will be subject to audits performed either by an independent professional organization or by the internal audit function of Pivka Delamaris.
The supplier carries out appropriate Human Rights Due Diligence to identify, prevent, and reduce risks of human rights violations within its own operations and throughout its supply chain. Each case of non-compliance or insufficient implementation of this Code will be assessed individually and an appropriate period for corrective action will be provided. A violation of this Code constitutes a serious breach of good business relations.

Mag. Janez Rebec
Predsednik uprave
President of the Management Board

Aleksander Debevec
Član uprave
Member of the Management Board

Kraj in datum/ Place and date:
Kal, 1. 10. 2026

PIVKA DELAMARIS

IZJAVA DOBAVITELJA PIVKA DELAMARIS

Izjavljamo, da spoštujemo vrednote in zaveze Pivka Delamaris, ki so zapisane v Kodeksu ravnanja dobaviteljev te družbe. Ravnamo skladno s Kodeksom ravnanja za dobavitelje. Potrjujemo, da bomo spoštovanje teh načel zagotovili tudi pri svojih dobaviteljih in podizvajalcih.

SUPPLIER DECLARATION OF PIVKA DELAMARIS

We declare that we respect the values and commitments of Pivka Delamaris as set out in this Supplier Code of Conduct.

We operate in accordance with the Supplier Code of Conduct and confirm that we will ensure compliance with these principles among our own suppliers and subcontractors.

Naziv in žig dobavitelja/ Supplier Name and Stamp:

_____

Ime in priimek odgovorne osebe/ Name of Authorized Representative:

_____

Funkcija/ Position: _____

Podpis/ Signature: _____

Datum podpisa/ Date of Signature: _____