

Based on the Employment Relationships Act and on the authority of the employer, Polycom Škofja Loka d.o.o., represented by the Company Director, Miha Tušek, and following prior notification of the employees, I hereby issue the following:

**CODE OF ETHICS
AND BUSINESS CONDUCT
POLYCOM ŠKOFJA LOKA D.O.O.**

Business ethics are based on qualitative values and business objectives, reflected in care for employees, suppliers, customers, competitors, and the environment. Among the most important qualities under this Code are professionalism, awareness, confidentiality, honesty, truthfulness, and diligence.

The purpose of the Code of Ethics is to promote the development of business ethics and to establish clear value standards. The Code is intended for all employees of the Company.

The Code contains 19 principles governing four areas of relationships: the relationship with oneself, the relationship with other individuals, the relationship with society as a whole, and the relationship with nature/the environment, as well as two levels of ethics: the first defines the ethical relationship between the individual and the Company, while the second defines the relationship between the Company, the state, and society.

The Code comprehensively combines aspects of legality, meaning compliance with existing law, fairness (including where this is not defined by law), integration into the social environment, sustainable development (taking into account future generations), and responsible coexistence (meaning a holistic approach to companies and organizations).

Code of ethics principles:

1. Voluntary Employment

- 1.1 All employees enter into employment voluntarily and without coercion.
- 1.2 All employees have the right to freely leave the Company in accordance with applicable legislation.

2. Respect, Freedom of Association, and the Right to Collective Bargaining

- 2.1 The employer respects the right to organize and to collective bargaining.
- 2.2 Workers' representatives are not discriminated against and are provided with the conditions necessary to perform their representative duties.

3. Safe and Hygienic Working Conditions

- 3.1 The Company ensures a safe and hygienic working environment in accordance with the law. Appropriate measures are adopted to prevent accidents and protect health, arising from work and related to work.
- 3.2 Employees receive regular/periodic training in the field of occupational safety and health. Training is also provided to newly employed workers and to workers reassigned to new workplaces.
- 3.3 Employees have access to clean sanitary facilities and drinking water.

3.4 The areas where sanitary facilities, drinking water, and the cafeteria are located are clean, safe and meet the basic needs of employees.

3.5 A management representative is responsible for health and safety within the Company.

4. Prohibition of Child Labour

4.1 The employment and work of children under the age of 15 is prohibited.

4.2 The Company develops, cooperates in and adheres to policies and programmes that ensure the prohibition of all forms of child labour thereby preventing such children from being deprived of quality education and training.

4.3 Children and young persons under the age of 18 must not perform night work or work under hazardous conditions.

4.4 The Company's policies and work procedures comply with the provisions of ILO standards, i.e. International Labour Standards, which relate to the protection of fundamental workers' rights, increasing workers' employment security and improving employment conditions worldwide.

5. Regular Wages

5.1 Wages and other remuneration are paid in accordance with the law. No one receives a wage lower than the prescribed minimum wage.

5.2 Before employment, all workers are informed in writing about employment conditions and wages. Each month, they receive a written statement of income.

5.3 Deductions from wages that are not legally defined are not permitted without the express consent of the worker. All disciplinary measures are recorded.

6. Working Time

6.1 Working time complies with national legislation.

6.2 Workers are not required to work regular hours which, including overtime, exceed 48 hours per week. Workers have at least one day of rest in each seven-day period. Overtime work must not exceed 8 hours per week, 20 hours per month and 170 hours per year. A working day may last a maximum of 10 hours. With the worker's consent, overtime work may last longer, but not more than 230 hours per year.

7. Prohibition of Discrimination

7.1 There is no discrimination in recruitment, compensation, access to training, termination of employment or retirement on the grounds of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, trade union membership or political affiliation.

7.2 The Company ensures equal opportunities, treatment and conditions for all employees, regardless of their gender. In the Company, all employees performing work of equal or comparable value are paid equally, regardless of their gender.

7.3 The Company ensures equal opportunities, treatment and conditions for all employees, regardless of demographic, social, cultural or other diversity.

8. Ensuring Regular Employment

8.1 An employment relationship is established for all work performed, as determined by national legislation and practice.

8.2 Obligations towards employees are determined by regulations arising from regular employment. The Company strives to provide employment for an indefinite period.

9. Prohibition of Cruel and Inhuman Treatment

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, and verbal abuse, or other forms of intimidation, are prohibited.

10. Anti-Corruption Clause and Protection of Confidential Data

10.1 If anyone, in the name or on behalf of the beneficiary, promises, offers or gives any unauthorized benefit to a representative or intermediary of a body or organization in order to obtain business, conclude business under more favourable conditions, omit due supervision over the performance of contractual obligations, or perform or omit any other act by which damage is caused to the body or organization, or by which an unauthorized benefit is enabled for the representative of the body, intermediary of the body or organization, the other contractual party or its representative, agent or intermediary, the agreement shall be null and void and the act shall constitute a criminal offence. Employees who have access to confidential data of the Company, its customers and suppliers must ensure the protection of the confidentiality of such data.

11. Political Participation and Lobbying Activities

11.1 Our Company is committed to transparency and accountability in its operations. We follow high ethical standards, thereby ensuring that our activities comply with legislation.

11.2 We avoid actions that could lead to a conflict of interest arising from an individual's participation in various associations and political organizations.

12. Right of Association

12.1 The employer enables workers to participate in discussions on all matters relating to the provision of safe and healthy work and employment relationships, in accordance with the law and other rights.

12.2 Workers exercise the right referred to in the previous paragraph directly, through their representatives in the works council, in accordance with the regulations governing employee participation in management, or through a workers' representative for occupational safety and health.

12.3 The provisions governing employee participation in management apply to the election of the workers' representative referred to in the preceding paragraph of this Article.

12.4 The Company enables collective bargaining in the event that a trade union is formed.

13. Fair Competition and Antitrust Rules

13.1 The Company is committed to fair, lawful and transparent business conduct in the market. We compete on the basis of the quality of our products and services, reliability, innovation, expertise and fair business practices.

13.2 Employees must not enter into agreements or participate in practices that could restrict competition or violate antitrust legislation. Agreements with competitors concerning prices, discounts, allocation of markets or customers, limitation of production, coordinated participation in tenders, or the exchange of sensitive business information are prohibited.

13.3 When interacting with competitors, suppliers, customers and other business partners, employees must act with caution and in accordance with applicable regulations. Any suspicion of unfair competitive practices or a breach of competition protection rules must be reported immediately to the responsible person within the Company.

14. Conflict of Interest

14.1 Employees, management, and other persons acting on behalf of the Company must perform their duties impartially, responsibly and in the best interests of the Company. They must avoid circumstances in which personal, financial, family or other private interests could influence, or create the appearance of influencing, their business decisions.

14.2 A conflict of interest may arise particularly in cooperation with family members or related persons, personal financial interests in suppliers, customers or competitors, the performance of additional activities, the acceptance of gifts or benefits, and the use of Company information or assets for personal gain.

14.3 Employees are obliged to disclose any actual, potential or perceived conflict of interest in a timely manner to their superior or the responsible person. The Company will handle such cases impartially and take appropriate measures to prevent damage, unethical conduct or loss of trust.

15. Counterfeit Parts and Materials

15.1 The Company is committed to preventing the use, supply, installation or further resale of counterfeit, unsuitable, unapproved or unverified parts, materials, and components. All products, materials and components must comply with applicable technical requirements, quality standards, safety requirements and contractually agreed specifications.

15.2 Procurement is carried out from verified and approved suppliers, whereby the Company requires appropriate traceability, documentation and evidence of the origin of materials or components. Employees involved in procurement, receipt, storage, production or quality control are required to act with due care and to report any signs that could indicate counterfeit or unsuitable parts.

15.3 In the event of suspected counterfeit parts or materials, the Company must immediately take appropriate measures, including suspending their use, verifying compliance, notifying responsible persons and, where necessary, customers, suppliers or competent authorities.

16. Intellectual Property

16.1 The Company respects intellectual property rights, including patents, trademarks, copyrights, trade secrets, technical documentation, software, designs, procedures, know-how, and other protected information.

16.2 Employees are required to protect the intellectual property of the Company, customers, suppliers, and other business partners. The unauthorized use, copying, disclosure, transfer, modification or distribution of protected content, documentation, software or other confidential information is prohibited.

16.3 Data, drawings, technical documentation, specifications and other materials received from customers or business partners may be used exclusively for the agreed business purposes and in accordance with contractual obligations. The Company expects employees to respect both its own intellectual property rights and the rights of third parties.

17. Export Control and Economic Sanctions

17.1 The Company conducts its business in compliance with applicable legislation in the areas of export control, customs regulations, international trade, and economic sanctions. In business dealings with customers, suppliers, distributors and other partners, we observe restrictions relating to the export, re-export, transfer of goods, technologies, software, technical knowledge or services.

17.2 Before carrying out transactions involving international deliveries or the transfer of technology, employees must check for any possible restrictions relating to the country, end user, intended use, product or service. Particular attention is required when doing business with countries, persons, organizations or entities subject to sanctions or other legal restrictions.

17.3 The Company does not participate in transactions where there is a suspicion that they could violate regulations on export control, sanctions or prohibited end uses. Employees are obliged to report immediately to the responsible person within the Company any suspected violation, uncertainty regarding export compliance, or request for unusual business practices.

17.4 Employees are encouraged to report any irregularities, non-compliance or potential unlawful conduct they detect directly to their superiors or management. Employees will not be sanctioned, and cannot be sanctioned, for making such reports.

18. Land, Forest and Water Rights and Prohibition of Forced Evictions

18.1 The Company respects the legal rights of individuals, local communities and other stakeholders to land, forests and water resources. In its business operations, expansion of production capacities, construction projects, leases, purchases of land or other spatial interventions, the Company acts responsibly, lawfully and in accordance with the principles of respect for human rights.

18.2 The Company does not participate in the unlawful taking of land, forests or water resources and does not support or facilitate forced evictions. Any intervention that could affect the local population's access to land, natural resources, housing, livelihoods or culturally significant areas must be carried out transparently, lawfully and with appropriate involvement of the affected stakeholders.

18.3 In decisions affecting the use of land, forests or water, the Company observes the principles of fair consultation, timely information, non-discrimination and fair treatment. Particular attention is given to vulnerable groups and communities that may be disproportionately affected by the business activities of the Company or its business partners.

18.4 Employees, management, suppliers and other business partners are expected to respect these commitments and not to participate in practices that would constitute the unlawful taking of land, restriction of access to natural resources or forced eviction of individuals or communities.

19. Use of Private or Public Security Forces

19.1 The Company undertakes to act responsibly, lawfully and in accordance with respect for human rights when using private or public security services. Security services may be used exclusively for the lawful protection of people, property, production facilities and business processes, and must not be used for intimidation, violence, unlawful restriction of movement, forced eviction or violation of the rights of individuals and communities.

19.2 The Company does not tolerate private or public security forces acting in a manner that could cause physical or psychological violence, degrading treatment, discrimination, unjustified use of force or violation of the freedom of association and peaceful expression of opinions.

19.3 When selecting and cooperating with private security services, the Company verifies their competence, legality of operation, respect for human rights and compliance with applicable regulations and the Company's internal rules. Security personnel must be appropriately trained in the proportionate use of measures, respectful communication, conflict prevention and safeguarding the dignity of all persons.

19.4 The Company expects all security services and competent public authorities with which it cooperates to act in accordance with the law and the principles of proportionality, accountability and respect for human rights. Any suspicion of abuse, violence, intimidation or other inappropriate conduct by security forces must be reported immediately, investigated and appropriately sanctioned.

Director: Miha Tušek