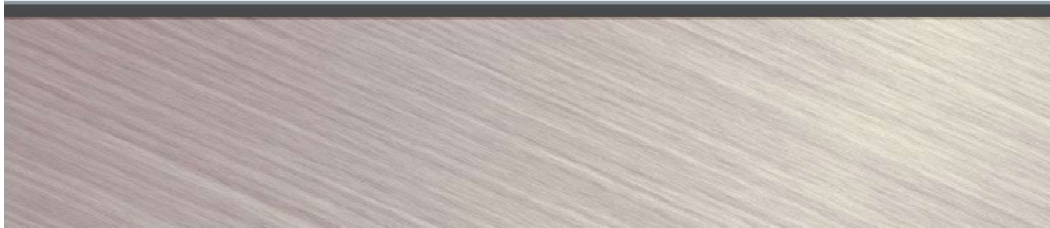




# MAKSIM GROUP SUSTAINABLE DEVELOPMENT POLICY



Maksim Group Sustainable Development Policy  
EDITION 1

Celje, APRIL 2025

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# 1. INTRODUCTION

At Maksim Group, we are aware of our responsibility towards the environment, society and future generations, and we believe that the future of our companies and society is based on the responsible decisions and actions we take and implement today. We are working to improve our performance in the areas of employee satisfaction, occupational health and safety, environmental protection and quality. We particularly support universally applicable principles in the areas of ethics, employment and labour, occupational health and safety, environmental protection and biodiversity, quality and related management and governance systems. Sustainability is not only a part of our business model, it is a core value that guides our strategic decisions and day-to-day processes.

We are committed to creating a long-term value for all our stakeholders, while reducing our environmental footprint, promoting social justice and ethical business practices. Our policy sets out the goals, principles and actions in order to contribute to a greener, more inclusive and resilient future.

Maksim Group is also striving to develop a network of suppliers that operate in line with the principles of sustainability.

The Policy was adopted by the directors of the Maksim Group's companies.

Simon Basti, Director of Maksim Group d.o.o.

Vesna Verdenik, Director of Maksim Hudinja d.o.o.

Garibaldi Ravnak, Director of Container d.o.o.

Matjaž Pečar, Director of Pocinkovalnica d.o.o.

## 2. POLICY OBJECTIVES

The Sustainable Development Policy of Maksim Group sets out the main guidelines and foundations for the management of sustainable development and social responsibility.

The main purpose of a sustainable development policy is to demonstrate that an organisation is acting in a responsible way in the long term, reducing negative impacts and contributing to positive change in society and natural environment.

We comply with the Sustainable Development Policy:

- in strategic planning,
- in operational processes,
- in the development of products and services,
- in the supply chain,
- in the field of human resources management,
- in stakeholder relations,
- and in reporting and transparency.

In short, the Sustainable Development Policy is embedded in the culture, practices and decisions of companies.

# 3. THREE PILLARS OF SUSTAINABLE DEVELOPMENT



## STABLE GROWTH, INNOVATION AND RESPONSIBLE MANAGEMENT

Maksim Group is committed to long-term economic performance based on ethical and transparent business practices. Our key highlights include:

- innovation and continuous process improvement,
- responsible risk management and regulatory compliance,
- ethical business practices and transparency; and
  - creating lasting value for all stakeholders from owners to customers, employees and wider society.



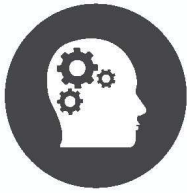
We recognise that economic success is closely linked to adaptability, digitalisation and sustainable mindset.

## PROTECTING NATURE AND REDUCING ENVIRONMENTAL IMPACT

Maksim Group strives to reduce its negative environmental impact throughout all phases of its operations. We focus on:

- energy efficiency – we reduce energy consumption and invest in renewables,
- sustainable waste management – we promote separation, recycling and the circular economy,
- responsible use of raw materials and water,
- and greenhouse gas emission reduction.

With the long-term goal of carbon neutrality. We promote environmental awareness among employees and partners.



## CARING FOR EMPLOYEES, COMMUNITIES AND SOCIETY AS A WHOLE

People are at the heart of what we do.  
We are committed to:

- ensuring a safe, inclusive and supportive working environment,
- promoting diversity, equal opportunities and the personal and professional development of employees,
- respect for human rights and work ethics throughout the value chain,
- responsible cooperation with the local communities where we operate – supporting local projects, charitable initiatives and education.



We believe that sustainable development is not possible without mutual trust, respect and cooperation.



## 1<sup>st</sup> PILLAR:



### STABLE GROWTH, INNOVATION AND RESPONSIBLE MANAGEMENT

Business among Maksim Group companies is managed in accordance with its corporate policy, intercompany agreements and relevant legislation. Prices are set in accordance with tax and other legislation managing transfer pricing.

All Maksim Group companies are obliged to conduct their business in accordance with applicable law. The payment policy is also carried out in accordance with the agreed or, in the case of state institutions, prescribed deadlines. Business decisions are taken with the aim of optimising the performance of the entire Maksim Group. More detailed business guidelines are defined in the Maksim Group Code of Ethics, which applies to all business entities, managers and employees of Maksim Group.

Due diligence also assesses the corporate sustainability and social responsibility aspects.

#### ETHICS IN BUSINESS

We follow high standards of business ethics in our work and, in line with the Maksim Group Code of Ethics, we are building a culture that encourages legal, ethical and transparent behaviour and decision-making by all employees.

All Maksim Group managers must comply with the ethical principles of business conduct. These include the following guidelines:

- conducting business in good stewardship,
- all employees are expected to have a professional attitude towards their work and the organisation,
- all activities carried out by staff comply with legislation, contracts, adopted policies and organisational rules,
- all important business decisions are made in a way that takes into account the interests of all Maksim Group stakeholders, in order to best meet their needs,
- all Maksim Group stakeholders have the right to freedom of speech and cannot be penalised if they raise concerns about perceived inappropriate activities in the organisation,
- bribery and reciprocal favours that do not comply with the law are prohibited.



- Funding of state bodies or political parties in the form of sponsorships and donations, which could reciprocally imply the seeking of favours, is also prohibited.

The main ethical principles that we at Maksim Group collectively implement and expect from all our employees are:

- **Honesty:** Always tell the truth, don't cover up information and act fairly towards others. Honesty is the cornerstone of trust in relationships with colleagues, customers and partners.
- **Integrity:** We act according to our values and ethical standards, even when no one is watching. Integrity means being consistent, credible and true to our principles.
- **Keeping promises:** We deliver what we promise – reliably and on time. This builds trust and respect in the workplace.
- **Loyalty:** We support the company's objectives and work for its benefit, while remaining loyal to our colleagues. Loyalty also means being discreet with confidential information and not acting against the company's interests.
- **Caring for others:** We respect our colleagues, help when we can and contribute to a positive working environment. Caring for others also involves understanding, empathy and a willingness to work together.
- **Responsibility:** We take responsibility for our decisions, actions and their consequences. We don't shift the blame and we strive for continuous improvement.
- **Sustainability:** Our work takes into account the impact on the environment, society and future generations. Our decisions and actions support long-term, balanced development.



## 2<sup>nd</sup> PILLAR:



### PROTECTING NATURE AND REDUCING ENVIRONMENTAL IMPACT

When designing new investment projects, we are guided by the objective of minimising adverse impacts on the environment and creating harmony with nature. To this end, we are also ISO 14001 certified.

The main environmental policies are:

- We reduce adverse environmental impacts through investment.
- All new technologies must comply with BAT (best available technology) techniques described in the BREF reference documents.
- We systematically reduce energy consumption by analysing the energy efficiency of appliances.



- Part of our electricity comes from renewable sources.
- We protect and sustain life in the waters around us.
- We minimise the consumption of hazardous substances and the resulting generation of hazardous waste.
- We reduce noise immissions.
- We reduce specific energy consumption and emissions.
- We ensure that safety measures are in place to prevent and mitigate major accidents at minor and major environmental risk facilities and that we keep the interested public adequately and transparently informed of all incidents, actions and other relevant information.

### SUPPLY CHAINS

We pass on our commitments to careful environmental management, sustainable development, social responsibility, and care for the health and safety of our employees to our suppliers of materials and services. To this end, they are assessed annually on the basis of criteria such as the quality of their operations, environmental management, employee health and safety and social responsibility. Only suppliers who certify to comply with the requirements of the standards and legislation are included in the Maksim Group's list of certified suppliers.

### USE OF CONFLICT MINERALS

Suppliers certify the origin of minerals on RMI forms. This ensures that minerals do not come from conflict areas.

### AVOIDING NEGATIVE IMPACTS

In the event of closure and decommissioning of part or all of the industrial complex, Maksim Group undertakes to ensure that all potentially hazardous substances are removed and there are no lasting negative effects on the surrounding area.

### ACTIVITIES AND INVESTMENTS

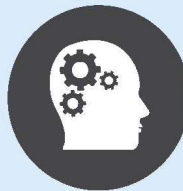
We are reducing the raw materials needed by lowering throughput factors, increasing the share of low carbon footprint purchases and the share of low carbon footprint energy use. At the same time, we are working to reduce air emissions and preserve the unspoilt nature in our vicinity.

We also include the sustainability aspect of the Maksim Group's development in feasibility studies for new investments.

At Maksim Group, we recognise climate change impact as a key factor in effectively achieving our business objectives and meeting stakeholder expectations.

## 3<sup>rd</sup> PILLAR:

### CARING FOR EMPLOYEES, COMMUNITIES AND SOCIETY AS A WHOLE



#### RESPECT FOR HUMAN RIGHTS

Respect for human rights is a fundamental guiding principle of responsible employee relations. We take into account the United Nations Guiding Principles on Business and Human Rights.

The fundamental pillars of respect for human rights are:

- prohibition of child labour and employment of persons under 18 years of age,
- prohibition of exploitation of employees, which means that any form of extortion, coercion, forced labour or other forms of slavery are prohibited,
- preventing discrimination and inequality and promoting equal opportunities,
- preventing workplace bullying,
- ensuring equal opportunities for men and women,
- protecting people with disabilities from discrimination,
- ensuring health and safety in the workplace.



# OUR WAY OF WORK

## OUR STANDARD

We also demonstrate respect for employees' rights through the following mechanisms:

- fair pay for fair work,
- rewarding employees: employees are rewarded for good operational and individual performance in an incentive-based way,
- profit-sharing: if annual targets are met, employees are entitled to a Christmas bonus,
- catering: we provide quality meals for our employees,
- working hours: employees work according to the legal working hours (40-hour work week). If overtime is ordered, an allowance is paid. All employees who work at less favourable hours (afternoons, nights, public holidays) are entitled to a bonus for working in less favourable conditions.

## ENSURING OCCUPATIONAL HEALTH AND SAFETY

One of the core objectives of Maksim Group is to prevent accidents at work. To this end, we have put in place the following effective mechanisms in the field of occupational safety and health:

- regular monitoring to identify and prevent potential accident hazards,
- periodic training of employees in occupational safety and health,
- regular checks on employees' occupational safety and health knowledge,
- carrying out ergonomics assessments of workplaces and introducing appropriate improvements,
- ensuring the provision of appropriate and good quality personal protective equipment,
- setting up a system for reporting and handling incidents,
- conducting emergency response drills,
- training managers to effectively manage health and safety in the workplace,
- regular communication activities to raise awareness on health and safety at work,
- a system of regular information transfer between managers and employee representatives,
- conducting internal and external audits in accordance with ISO 45001.

## **STAFF DEVELOPMENT AND COOPERATION**

Understanding our employees' needs is crucial to their proper development. The latter is identified through different mechanisms:

- measuring organisational climate, employee satisfaction and engagement,
- collecting useful suggestions and monitoring incidents,
- annual staff interviews,
- regular cooperation with employee representatives.

## **CAREER DEVELOPMENT**

Our commitment to our employees is also to develop their careers, and we do this through the following mechanisms:

- promotion possibilities,
- regular training sessions,
- systematic development of staff competences,
- setting up mentoring,
- involving employees in projects and promoting teamwork,
- a system for making useful suggestions,
- scholarships for promising students.

We also build employee loyalty and commitment, with the following as our core mechanisms:

- organisation of sporting and social events,
- awards for innovators.

## RESPONSIBILITY TOWARDS LOCAL COMMUNITY



Due to our involvement in the local environment, we constantly strive to maintain the harmony with the residents, contribute to the development of social activities, promote the development of perspective hobby activities, and contribute to a better quality of life.

- We sponsor clubs and other organisations, giving priority to local sports clubs and youth organisations,
- We sponsor local events that are in line with our sponsorship strategy, where our criteria are professionalism, seriousness and relevance to the development of the local environment,
- We actively report on our activities, plans and strategy and communicate this to stakeholders,
- We reduce negative impacts on the environment,
- We organise open days and give interested members of the public the opportunity to visit our premises,
- We invest in development and increasing jobs.

## SUSTAINABLE PRODUCTION AND PROCESSES



We strive to achieve operational excellence, increasing productivity, improving equipment utilisation and reducing process losses.

We focus on digitising work processes and increasing efficiency by automating production lines.

We also aim to increase energy efficiency.





# 4. ENSURING COMPLIANCE

Internal audits are carried out by internal auditors who have adequate knowledge of the content and requirements of the standard. Audits are carried out once a year.

## MANAGING RESPECT FOR HUMAN RIGHTS

	Key indicators	Risks	Conformity assessment	Reporting
Managing respect for human rights	Number of employee complaints Number of human rights complaints	Loss of reputation Lawsuits Decline in productivity	Internal audits of compliance of processes with adopted organisational rules and standards	Annual report

## MANAGING HEALTH AND SAFETY AT WORK

	Key indicators	Risks	Conformity assessment	Reporting
Managing health and safety at work	Number of work accidents, severity of work accidents, number of reported incidents	Loss of reputation Lawsuits Decline in productivity	External audit of the standard Internal audits of compliance of processes with adopted organisational rules and standards	Annual report

## MANAGING ENVIRONMENTAL PROTECTION

	Key indicators	Risks	Conformity assessment	Reporting
Managing environmental protection	Specific energy consumption, amount of hazardous waste, number of hazardous events	Loss of reputation Lawsuits Inability to expand Closure of establishments	External audit of ISO 14001 standard Internal audits of compliance of processes with adopted organisational rules and standards	Annual report

# 5. CHANGE MANAGEMENT AND CONTINUOUS IMPROVEMENT

We measure process performance, identify opportunities and make improvements to achieve higher targets.

Improvements are implemented through the following approaches:

- detecting non-compliance and implementing corrective actions,
- systematically encouraging useful suggestions,
- digitisation of processes,
- reorganising processes to increase efficiency.

# 6. COMMUNICATION

## COMMUNICATION SYSTEMS

Awareness-raising and communication are essential for the smooth functioning and development of a company. We present the Maksim Group's policy and developments within the Group to interested members of the public through various channels.

Interested members of the public	Awareness-raising and communication channels
Employees	Trainings, workshops, company colleges, Maksimko magazine, bulletin boards, displays, website, Facebook profile
Customers, suppliers	Web page
Investors, banks	Website, annual report
Owners	Website, annual report, Maksimko magazine, Facebook profile, General Assembly
Local community, media	Press releases, website, annual report, newspaper publications, Maksimko magazine, Facebook profile

## PUBLICATION OF SUSTAINABLE DEVELOPMENT POLICY

Our Sustainable Development Policy is a public document published on the website. Employees are informed about the content through the following channels:

- with publications in the in-house magazine Maksimko,
- with introductory training for new employees,
- periodic training for full-time staff.

## TAKING ACTION IN CASE OF NON-COMPLIANCE

All non-compliances are addressed in accordance with the adopted internal rules, focusing on root cause analysis. The owner of each process is responsible for verifying the implementation of the measure. Stakeholders are informed in a timely and appropriate manner about non-compliances that have a negative impact on stakeholders via established communication channels.

Employees may report reasonable suspicions of dishonest, illegal or unethical behaviour to their manager, director or the Human Resources and General Department. Furthermore, the Maksim Group companies have established ways of reporting the suspected irregularities or violations in accordance with the Act on the Protection of Reporters. The reporting procedures and email addresses where you can submit a report in case of suspected violations are published on the websites of the Maksim Group companies:

- <http://www.maksim.si/podjetje/prijava-krsitev-zascita-prijaviteljev/>
- <http://www.container.si/podjetje/prijava-krsitev-zascita-prijaviteljev/>
- <http://www.pocinkovalnica.si/podjetje/prijava-krsitev-zascita-prijaviteljev/>

In the Maksim Group, we will protect the identity of the author of the report. The employees can also report suspected inappropriate behaviour to the relevant services anonymously.



In the event of mobbing or perceived discrimination in the workplace or other misconduct, it can be reported to the person authorised to collect reports.

# REFERENCE DOCUMENTS

- Maksim Group's Code of Ethics
- Maksim Group's Rules of Procedure
- Maksim Group's Policy



