

TAB GROUP CODE OF CONDUCT

Expanded clean copy – revised version

September 2026

This document consolidates and further expands the existing TAB Group Code of Conduct into a single, consistent text for internal and external use.

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1. ADDRESS OF THE MANAGEMENT

The TAB Group Code of Conduct (the “Code”) sets out the principles of responsible, lawful and ethical conduct expected from all employees and persons acting on behalf of TAB Group companies. It supports integrity, respect for human rights, safe and fair working conditions, responsible business practices, environmental stewardship, sustainable development and continuous improvement throughout our operations and value chain.

The principles of this Code apply to TAB d.d., its subsidiaries and organisational units, and to all employees, managers and directors. Suppliers, contractors, customers and other business partners are expected to conduct business in a manner consistent with these principles. Tier-1 suppliers that accept this Code or are subject to equivalent contractual supplier requirements shall comply with the relevant standards as binding requirements and shall implement and cascade equivalent requirements within their own supply chains as set out in Section 8.

Compliance with this Code contributes to trust among employees, business partners, local communities and other stakeholders and supports the long-term, sustainable development of TAB Group.

2. SCOPE, RESPONSIBILITY AND COMPLIANCE WITH LAW

All employees are required to understand and comply with this Code in the performance of their duties. Managers and directors are responsible for communicating the Code, leading by example, supporting appropriate training, and establishing controls that enable compliance within their areas of responsibility.

TAB Group companies shall comply with all applicable laws and regulations in the countries in which they operate. This Code establishes minimum Group-wide expectations. Where applicable law, a collective agreement, contract or internal policy provides a higher level of protection or a stricter requirement, the stricter requirement shall apply.

Relevant records, controls and evidence of implementation shall be maintained in a proportionate and auditable manner. Employees are expected to cooperate with lawful internal reviews, audits and investigations.

3. HUMAN RIGHTS AND FAIR LABOUR PRACTICES

TAB Group respects internationally recognised human rights and expects all employees and business partners to treat people with dignity, fairness and respect. Human rights risks shall be identified and addressed in a manner appropriate to the nature, scale and context of the activity.

3.1 Modern slavery, forced and compulsory labour

TAB Group prohibits all forms of modern slavery and human trafficking, including forced, compulsory, bonded, indentured or involuntary prison labour, servitude and any work obtained through coercion, threats, abuse of vulnerability or restriction of freedom of movement.

- Employment must be freely chosen. Workers shall be free to leave employment in accordance with applicable law and agreed notice periods.
- Workers shall not be required to pay recruitment fees or deposits as a condition of employment, and personal identity or travel documents shall not be unlawfully retained.
- Employment terms shall be communicated in a language and manner reasonably understood by the worker, and no substitution of materially less favourable terms shall be permitted through deception or coercion.
- TAB Group shall take reasonable steps to identify and address modern-slavery risks in relevant supply chains and business relationships.

3.2 Child labour and young workers

TAB Group does not employ or exploit children. No person shall be employed below the minimum legal age for employment or below the age for completion of compulsory schooling, whichever provides greater protection, taking into account applicable international labour standards.

Workers under the age of 18 are considered young workers and shall not perform hazardous work, night work or other work that may jeopardise their health, safety, morals, development or education. Appropriate age-verification procedures and safeguards for lawful apprenticeships, internships and vocational training shall be maintained.

If child labour is identified, the response shall prioritise the best interests, safety, education and welfare of the affected child and shall be handled through a responsible remediation process rather than abrupt action that may cause further harm.

3.3 Wages and benefits

Employees shall receive wages, overtime compensation and legally required benefits that meet or exceed applicable legal and contractual requirements. Compensation shall be paid accurately, regularly, transparently and on time.

- Workers shall receive understandable information about wages, deductions, overtime and benefits for each pay period.
- Unlawful or disciplinary deductions from wages are prohibited.
- Equal pay principles shall be applied without discrimination, including equal pay for equal work and, where required by applicable law, work of equal value.
- TAB Group supports fair and competitive remuneration practices and periodic review of compensation and benefits.

3.4 Working hours and rest

TAB Group shall comply with applicable laws, collective agreements and internal requirements governing working time, overtime, breaks, rest periods, annual leave and public holidays. Regular working time should not exceed 40 hours per week. Total working time, including overtime, should not exceed 56 hours per week except in exceptional business circumstances permitted by law and subject to appropriate safeguards.

Overtime shall be managed responsibly and, where required by law, shall be voluntary and compensated at the applicable premium rate. Employees shall receive adequate daily and weekly rest and, as a general Group standard, at least two days off per week except where exceptional circumstances or lawful shift arrangements require otherwise.

3.5 Freedom of association and collective bargaining

TAB Group respects employees' lawful rights to form, join or not join trade unions and other worker organisations, to elect representatives, to participate in works councils and to bargain collectively. Employees and their representatives shall be able to communicate openly with management about working conditions without fear of discrimination, intimidation, harassment or retaliation.

Where freedom of association or collective bargaining is restricted by local law, TAB Group shall respect lawful alternative means of worker representation and dialogue.

3.6 Non-discrimination and harassment

Employment decisions shall be based on legitimate business needs, competence, qualifications, performance and conduct. TAB Group prohibits discrimination in recruitment, employment, assignment, training, pay, promotion, benefits, discipline, termination or any other employment condition on grounds protected by applicable law, including race, colour, ethnic or national origin, nationality, social origin, sex, gender, gender identity or expression, sexual orientation, age, disability, health status, pregnancy, maternity, marital or family status, religion or belief, political opinion, union membership or other protected status.

Harassment, bullying, intimidation, abuse and degrading treatment are prohibited, whether physical, sexual, verbal, psychological, digital or otherwise. This includes unwanted sexual conduct, threats, humiliation, repeated offensive comments, deliberate exclusion, abuse of authority and other conduct that creates an intimidating, hostile or offensive working environment.

3.7 Women's rights and gender equality

TAB Group supports the equal rights, dignity, safety, participation and professional development of women. Discrimination based on sex, pregnancy, maternity, breastfeeding, marital status or family responsibilities is prohibited.

- Women shall have equal access to recruitment, training, development, promotion, leadership opportunities, remuneration and benefits based on objective criteria.
- Pregnant and nursing employees shall receive the protections, leave and reasonable workplace accommodations required by applicable law, with appropriate attention to occupational health risks.

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- Sexual harassment, gender-based violence and retaliation against persons who raise concerns are strictly prohibited.

3.8 Diversity, equity and inclusion

TAB Group values a workforce with diverse backgrounds, experiences and perspectives and seeks to foster an inclusive workplace in which individuals are treated fairly and can contribute effectively. Employment systems and workplace practices should be designed to reduce unjustified barriers and support equal opportunity.

Reasonable accommodations shall be provided to persons with disabilities and for other protected needs where required by applicable law and where reasonably practicable. Managers are expected to promote respectful collaboration, inclusive decision-making and access to development opportunities.

3.9 Land, forest and water rights and forced eviction

TAB Group shall respect legitimate land, forest and water rights, including customary and collective rights where recognised by applicable law, and shall seek to avoid causing or contributing to the unlawful deprivation of access to land, forests, water or other natural resources on which individuals and communities depend for housing, livelihoods, food, culture or community life.

- Land acquisition, leasing, site expansion, resource access and related projects shall not involve unlawful forced eviction, intimidation, coercion or expropriation without due process and lawful compensation.
- Where activities may materially affect the land, forest or water rights of local communities or Indigenous Peoples, TAB Group shall conduct proportionate due diligence and meaningful consultation and shall respect consultation or consent requirements applicable under law and relevant project commitments.
- Project planning shall consider access to drinking water, sanitation, agricultural land, forests and other resources important to affected communities and shall seek to avoid, minimise or remedy material adverse impacts.
- Concerns relating to land, forest or water rights shall be addressed through accessible grievance and remediation processes, with appropriate attention to vulnerable or marginalised groups.

3.10 Use of private or public security forces

Where TAB Group engages private security providers or interacts with public security forces in connection with its operations, assets, personnel or projects, such arrangements shall be managed in accordance with applicable law and in a manner consistent with internationally recognised human rights.

- Private security providers shall be selected through appropriate due diligence and shall be contractually required, where practicable, to maintain suitable competence, training, supervision and standards of conduct.
- Security personnel shall use de-escalation and non-violent means wherever possible. Any use of force must be lawful, necessary and proportionate to the threat, and torture, cruel or degrading treatment, sexual violence, unlawful detention, intimidation and retaliation are prohibited.

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- Material security incidents and credible allegations of misconduct shall be reported, documented and investigated promptly, and corrective or remedial action shall be taken where appropriate.
- When public security forces are involved, TAB Group shall communicate its human-rights expectations and use the influence reasonably available to it to promote conduct consistent with these principles.

4. HEALTH AND SAFETY

TAB Group is committed to providing safe and healthy working conditions and to preventing occupational injuries and ill health. All Group companies shall comply with applicable occupational health and safety requirements and maintain risk-based systems for prevention, control, monitoring and continuous improvement.

- Identify workplace hazards and assess risks, including chemical, physical, ergonomic, electrical, mechanical, fire, process and psychosocial risks.
- Apply the hierarchy of controls, giving priority to elimination, substitution and engineering controls before relying on administrative controls or personal protective equipment.
- Provide appropriate protective equipment, safety instructions, training and supervision at no cost to employees where required.
- Maintain emergency preparedness and response arrangements, including alarms, evacuation, firefighting, first aid and incident communication.
- Record, investigate and learn from accidents, near misses and occupational illnesses, and implement corrective actions.
- Provide appropriate occupational health services, sanitation, drinking water and, where accommodation is provided, safe and hygienic living conditions.
- Employees have the right and responsibility to stop or report work where they reasonably believe there is an imminent and serious danger, without retaliation for a good-faith safety concern.

5. BUSINESS INTEGRITY AND RESPONSIBLE CONDUCT

5.1 Anti-corruption, anti-bribery and anti-money laundering

TAB Group has zero tolerance for bribery and corruption. Employees and persons acting on behalf of TAB Group shall not directly or indirectly offer, promise, give, request, accept or authorise any bribe, kickback, improper payment or other undue advantage intended to influence a business or public decision.

- Facilitation payments are prohibited except where a payment is necessary to protect an individual from an immediate threat to health or safety; any such situation must be reported and documented promptly.
- Gifts, hospitality, travel, donations, sponsorships and other benefits must be lawful, reasonable, transparent, appropriately approved and never used to obtain an improper advantage.
- Accurate books, records and supporting documentation shall be maintained. False, misleading, incomplete or off-book records are prohibited.

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- TAB Group shall not knowingly participate in money laundering, terrorist financing or concealment of criminal proceeds. Appropriate risk-based checks shall be applied to relevant transactions and business partners in accordance with applicable law and internal procedures.
- Suspicious or unusual payment arrangements, ownership structures or transactions must be escalated through the appropriate legal, finance or compliance channels.

5.2 Conflicts of interest

Employees must act in the best interests of TAB Group when performing their duties and avoid situations in which personal, family, financial or other interests improperly influence, or appear to influence, business judgment.

Actual, potential or perceived conflicts of interest must be disclosed promptly to the appropriate manager or designated function and managed transparently. Examples include significant financial interests in a supplier or competitor, outside employment that interferes with TAB duties, personal relationships affecting hiring or contracting decisions, and gifts or benefits that may compromise impartiality.

5.3 Data protection, confidentiality and data security

TAB Group respects privacy and protects personal data, confidential information, intellectual property and business information. Personal data shall be processed lawfully, fairly, transparently and only for legitimate purposes, in accordance with applicable data-protection requirements and internal policies.

- Collect and use only the data reasonably necessary for the stated purpose and retain it only for as long as required or permitted.
- Restrict access to personal and confidential information to authorised persons with a legitimate business need.
- Use appropriate technical and organisational measures to protect information against accidental or unlawful loss, destruction, alteration, unauthorised disclosure or access, including cybersecurity controls proportionate to risk.
- Report suspected data breaches, phishing, malware, loss of devices or documents, unauthorised access and other information-security incidents immediately through designated channels.
- Respect the confidentiality, intellectual property and information-security requirements of customers, suppliers, employees and other stakeholders.

5.4 Fair dealing and accurate communications

Employees shall act honestly and fairly in dealings with customers, suppliers, competitors, public authorities and other stakeholders. Fraud, theft, embezzlement, falsification of records, deceptive practices and misuse of company assets are prohibited. Public statements and business communications must be accurate, authorised where required and not knowingly misleading.

5.5 Financial responsibility and accurate records

TAB Group shall maintain complete, accurate, timely and verifiable books, records and financial information that fairly reflect transactions, assets, liabilities and business activities. Financial responsibility includes proper authorisation, documentation, accounting, safeguarding of assets, record retention and compliance with applicable tax, accounting and reporting requirements.

- Transactions shall be recorded in sufficient detail and supported by genuine, appropriate documentation. False invoices, fictitious transactions, undisclosed or off-book accounts and deliberate misclassification or concealment of payments, assets or liabilities are prohibited.
- Expense claims, purchasing records, payroll information, inventories, financial forecasts and other business records shall not be knowingly falsified, manipulated or omitted in a manner that could mislead internal or external users.
- Appropriate internal controls, segregation of duties and approval authorities shall be maintained according to risk. Employees shall cooperate with legitimate audits and shall promptly report suspected accounting or control irregularities.
- Persons responsible for budgets, payments, assets or financial reporting shall exercise reasonable care and shall not use company funds or property for unauthorised, fraudulent or improper purposes.

5.6 Fair competition and antitrust

TAB Group is committed to fair and open competition and shall comply with applicable competition and antitrust laws. Business decisions shall be made independently and competition shall be based on legitimate factors such as price, quality, service, innovation, reliability and performance.

- Agreements or understandings with competitors to fix or coordinate prices, allocate customers, suppliers or markets, limit production or capacity, rig bids or otherwise unlawfully restrict competition are prohibited.
- Employees shall not improperly exchange competitively sensitive information with competitors, including non-public information about pricing, costs, margins, capacity, customers, strategy, bids or future commercial plans.
- TAB Group shall not engage in unlawful abuse of a dominant market position or other exclusionary or discriminatory conduct prohibited by applicable competition law.

5.7 Export controls, export contracts and economic sanctions

TAB Group shall comply with applicable export-control, customs, embargo, trade-restriction and economic-sanctions requirements governing cross-border transactions. Export contracts and related transactions shall be reviewed and documented to the extent necessary to establish the lawful destination, end user, end use, classification, licensing and other relevant trade-compliance requirements.

- Relevant customers, suppliers, intermediaries, beneficial owners, destinations and transactions shall be screened or otherwise checked in accordance with applicable law and risk-based internal procedures.
- Required export, import or re-export licences, authorisations and customs documentation shall be obtained and maintained before the relevant transaction proceeds.

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- No employee or business partner acting for TAB Group may knowingly circumvent sanctions or trade controls through transshipment, false declarations, concealed end users, misleading product classifications or other evasive arrangements.
- Potentially restricted transactions, sanctioned parties, unusual routing requests or uncertainty about end use or destination must be escalated to the responsible compliance or trade-control function before commitment or shipment.

6. SPEAK-UP, WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

Employees and other eligible persons are encouraged to report suspected violations of law, this Code or other TAB Group policies as soon as possible. Reports may be made to a manager or supervisor, a Works Council or other employee representative, or the Legal Department. Reports may also be sent by regular mail to: TAB d.d., Legal Department, Polena 6, 2392 Mežica, Slovenia, or submitted through any other reporting channel established by TAB Group. Where permitted by law and supported by the relevant channel, reports may be submitted anonymously.

Reports made in good faith shall be handled as confidentially as reasonably possible and assessed promptly, impartially and fairly. TAB Group prohibits retaliation against anyone who in good faith raises a concern, seeks advice, refuses to participate in suspected misconduct, or assists with an investigation.

Retaliation includes dismissal, demotion, intimidation, threats, harassment, disadvantageous reassignment, unjustified negative treatment or any other adverse action linked to a good-faith report or participation in a review. Knowingly false or malicious allegations may themselves constitute misconduct.

Current reporting contact details and procedures shall be communicated through the official TAB Group channels and applicable internal documentation so that employees and relevant stakeholders can access the correct reporting route.

7. ENVIRONMENTAL RESPONSIBILITY

TAB Group is committed to preventing pollution, protecting the environment, using natural resources responsibly and continuously improving environmental performance. Group companies shall comply with applicable environmental laws, permits and standards and maintain environmental-management practices proportionate to their activities and impacts, including where applicable principles aligned with ISO 14001.

7.1 Energy efficiency and greenhouse-gas reduction

TAB Group shall seek to improve energy efficiency across production, buildings, logistics and supporting processes. Relevant operations should measure and monitor significant energy use, identify opportunities to reduce consumption, maintain efficient equipment and processes, and consider energy performance in investment and procurement decisions.

Where material to the activity, TAB Group shall monitor greenhouse-gas emissions and pursue technically and economically feasible measures to reduce energy-related emissions and carbon intensity.

7.2 Decarbonisation and climate transition

TAB Group shall pursue progressive decarbonisation of its operations in a manner proportionate to its emissions profile, technical options and business context. Relevant Group companies should establish suitable emissions baselines, identify significant sources of greenhouse-gas emissions and periodically review measurable reduction objectives and implementation plans.

- Decarbonisation measures should prioritise actual emissions reductions through energy efficiency, process optimisation, electrification, renewable and lower-carbon energy, logistics improvements, material efficiency and other technically and economically feasible solutions.
- Where material and reasonably practicable, direct emissions, purchased-energy emissions and significant value-chain emissions should be considered in climate-related planning and supplier engagement.
- Capital expenditure, procurement and product or process development should consider long-term energy and carbon performance where these factors are material to the decision.
- Climate and decarbonisation claims shall be supported by reasonable evidence, transparent methodologies and consistent data.

7.3 Renewable energy

TAB Group supports the responsible transition toward lower-carbon and renewable energy sources. Where technically, commercially and legally feasible, Group companies should increase the share of electricity or energy from renewable sources through on-site generation, procurement arrangements or other credible mechanisms, while ensuring reliability and business continuity.

7.4 Water quality, consumption and management

Water shall be used responsibly, with particular attention to operations in water-stressed areas and processes with significant water demand. Relevant sites shall monitor material water withdrawal and consumption, identify efficiency and reuse opportunities, and prevent unnecessary losses.

Wastewater and process water shall be managed, treated, monitored and discharged in accordance with applicable permits and legal requirements. Measures shall be taken to prevent contamination of surface water, groundwater and drinking-water resources and to respond effectively to leaks or spills.

7.5 Air quality and emissions

TAB Group shall control emissions to air in accordance with applicable permits and standards. Relevant sites shall identify significant emission sources, apply suitable prevention, capture, filtration, treatment and maintenance measures, and monitor emissions where required or appropriate.

Particular attention shall be given to particulate matter, dust, metals, acid mists, combustion pollutants, volatile organic compounds and other substances relevant to the site's processes, with the objective of protecting workers, neighbouring communities and the environment.

7.6 Responsible chemical management

TAB Group shall manage chemicals and hazardous substances throughout their lifecycle in a manner that protects employees, communities, customers and the environment and complies with applicable chemical, product-safety, transport, storage and environmental requirements.

- Relevant sites shall maintain an appropriate inventory of chemicals and access to current safety information, including safety data sheets where required, and shall ensure suitable labelling, storage, segregation, handling and transport.
- Chemical risks shall be assessed before use and controlled through the hierarchy of controls. Hazardous substances should be eliminated or substituted with safer alternatives where technically and economically feasible and where quality and regulatory requirements allow.
- Applicable restrictions on substances in products, processes and packaging shall be identified and complied with, and relevant chemical content or compliance information shall be obtained from suppliers and communicated to customers where required.
- Employees who handle chemicals shall receive appropriate training, protective measures and emergency information. Sites shall maintain spill-prevention, containment and response arrangements proportionate to the risks.
- Chemical consumption, hazardous emissions and hazardous waste should be monitored where material, with continuous efforts to reduce risk and prevent uncontrolled releases.

7.7 Waste reduction, reuse and recycling

TAB Group shall apply the waste hierarchy by preventing waste at source wherever possible and then prioritising reduction, reuse, repair, refurbishment, remanufacturing, recovery and recycling before disposal. Relevant sites should monitor significant waste streams and identify practical reduction and circularity opportunities.

- Materials, production scrap, packaging and consumables should be designed, purchased and used efficiently to reduce waste generation and unnecessary single-use materials where feasible.
- Waste shall be segregated and stored in a manner that enables safe reuse, recovery or recycling and prevents contamination of recyclable materials.
- Hazardous waste shall be identified, labelled, stored, transported and treated through appropriately authorised channels, with traceability and documentation as required by law.
- Unlawful dumping, uncontrolled burning or disposal through unauthorised channels is prohibited. Disposal to landfill or incineration without useful recovery should be reduced where reasonable alternatives are available.
- Sites and functions should cooperate with suppliers, customers and waste-management partners to increase reuse, recycling and recovery and to support closed-loop material flows where practicable.

7.8 Sustainable resource management and materials

TAB Group shall promote efficient and circular use of raw materials and other resources throughout the product and production lifecycle, with the objective of reducing material intensity, environmental impacts and dependence on virgin resources where suitable alternatives are available.

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- Use raw materials, chemicals, packaging and consumables efficiently and seek opportunities to reduce material intensity.
- Promote the responsible use of recycled and secondary materials where quality, safety, regulatory and customer requirements allow.
- Consider environmental and human-rights risks in the sourcing of significant raw materials and seek greater supply-chain transparency where relevant.
- Product, process and procurement decisions should consider durability, repairability, recoverability and material circularity where relevant to quality, safety, regulatory and customer requirements.

7.9 Biodiversity and ecosystems

TAB Group shall consider potential impacts on biodiversity and ecosystem services when planning or operating activities that may materially affect natural habitats. Impacts should be avoided where reasonably possible and otherwise minimised, restored or mitigated in accordance with applicable law and recognised good practice.

Particular care shall be taken where operations, projects or supply chains may affect protected areas, sensitive habitats or threatened species. Relevant environmental assessments and permitting requirements shall be respected.

7.10 Land use and deforestation

TAB Group shall manage land responsibly and comply with applicable land-use, planning, environmental and property-rights requirements. New developments and significant expansions should seek to avoid unnecessary conversion or degradation of high-value natural habitats and forests. TAB Group does not support illegal deforestation or illegal land conversion within its operations or supply chain. Where relevant risks are identified, the Group shall seek traceability, supplier engagement and other reasonable due-diligence measures to prevent or address such impacts.

7.11 Soil quality and contamination prevention

TAB Group shall protect soil and land from contamination arising from its activities. Sites shall implement appropriate controls for storage, transfer and handling of fuels, oils, chemicals, metals, waste and other potentially polluting substances, including secondary containment and spill-response measures where appropriate.

Suspected soil contamination shall be assessed and managed in accordance with applicable law. Where TAB Group is responsible for contamination, appropriate containment, remediation, monitoring or restoration measures shall be implemented based on risk and regulatory requirements.

8. IMPLEMENTATION, SUPPLIER STANDARDS AND CONTINUOUS IMPROVEMENT

8.1 Internal implementation and monitoring

TAB Group shall support implementation of this Code through proportionate policies, procedures, assigned responsibilities, communication, controls, risk assessments, due diligence and monitoring.

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Management shall periodically review relevant risks, compliance findings and performance indicators and shall take corrective action where deficiencies are identified.

Employees are expected occasionally to complete required training, seek guidance when uncertain and promptly raise potential concerns. Relevant records and evidence of implementation shall be maintained in a proportionate and auditable manner.

8.2 Definition and implementation of equivalent standards for tier-1 suppliers

For the purpose of this Code, a tier-1 supplier is a supplier, contractor or service provider that has a direct commercial relationship with a TAB Group company. TAB Group shall define and communicate standards for tier-1 suppliers that are equivalent in substance to the relevant requirements of this Code and proportionate to the nature, scale, location and risk of the goods or services supplied.

- Where this Code, a Supplier Code of Conduct or equivalent requirements are incorporated into contracts, purchase orders, general purchasing conditions or other binding supplier terms, compliance shall be a contractual obligation of the tier-1 supplier and not merely an aspirational expectation.
- Tier-1 suppliers shall establish and maintain their own policies, codes, procedures or management controls sufficient to implement equivalent standards in their operations, including clear management responsibility, communication, training, record keeping, risk assessment and corrective action appropriate to their risks.
- Tier-1 suppliers shall ensure that employees and relevant subcontractors understand the requirements applicable to their activities and shall maintain reasonable evidence of implementation.

8.3 Binding supply-chain cascading requirements

Tier-1 suppliers shall pass equivalent standards along the supply chain. They shall impose binding requirements on their own direct suppliers and subcontractors whose goods or services contribute to TAB Group products or operations or otherwise present material compliance, human-rights, environmental or business-integrity risks.

- Such requirements shall be established through contractual clauses, supplier terms, supplier codes or other enforceable mechanisms and shall cover the relevant principles of this Code. Informal encouragement alone is not sufficient where a binding cascading obligation applies.
- Tier-1 suppliers shall require relevant direct suppliers and subcontractors to pass equivalent requirements further down their own supply chains, proportionate to risk and with particular attention to high-risk materials, processes, countries of origin and labour arrangements.
- Tier-1 suppliers shall apply risk-based due diligence to identify material non-compliance within relevant lower-tier supply chains and shall seek prevention, mitigation and remediation, including time-bound corrective action where appropriate.
- Upon reasonable request, tier-1 suppliers shall provide evidence of how equivalent standards have been communicated and cascaded, including relevant contractual provisions, supplier acknowledgements, assessments, audit results or corrective-action records, subject to legitimate confidentiality restrictions.

8.4 Assessment, remediation and continuous improvement

TAB Group may request business partners to provide reasonable evidence of compliance, complete self-assessments, participate in risk-based reviews or audits, or implement corrective-action plans where this is proportionate to the nature and risk of the relationship. Business partners are expected to cooperate in good faith and to address identified deficiencies within reasonable timeframes.

Where non-compliance is identified, TAB Group should prioritise effective correction and prevention of recurrence where appropriate. Serious, repeated or unremedied breaches may result in suspension, non-renewal or termination of the business relationship in accordance with applicable law and contractual rights.

The Code shall be reviewed periodically and updated when significant legal, organisational, environmental, human-rights, supply-chain or business developments make revision appropriate.

9. BREACHES OF THE CODE

Violations of this Code may result in corrective or disciplinary measures in accordance with applicable law, internal rules and contractual arrangements. Measures shall be proportionate, consistent and based on a fair assessment of the facts. Serious misconduct may lead to termination of employment or business relationships and, where appropriate, referral to competent authorities.

No employee may be instructed or pressured to violate this Code in order to achieve a business objective. Questions about interpretation or application should be directed to the responsible manager, the Legal Department, Human Resources, the relevant employee representative or another designated compliance function.

10. APPROVAL AND EFFECTIVE DATE

This revised Code of Conduct becomes effective upon formal approval by the competent management bodies of TAB Group. It supersedes previous versions from the effective date stated in this document.

For approval: TAB Group Management

Effective date: 17.09.2026

Martin Rebula, CEO



The Supplier acknowledges that it has read and understood this Code of Conduct, agrees to its terms, and undertakes to comply with its provisions.

Supplier:_____

Date:_____

Signature:_____