SUPPLIERS CODE OF CONDUCT

We feel better under pressure

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PREMISE

The principles illustrated in this Code of Conduct are valid for all suppliers of the Vitillo Group.

PRINCIPLES OF SOCIAL SUSTAINABILITY IN THE SUPPLY CHAIN

Guide to the principles of social sustainability within the supply chain

The Vitillo Group, with a view to promoting and guaranteeing sustainable development, through:

- √ social responsibility
- ✓ environmental protection
- ✓ Health and Safety in the workplace
- ✓ product safety and quality

hopes and promotes that its entire supply chain reaches the highest standards of business integrity and social and environmental performance.

The selection and evaluation of the suppliers of the Vitillo Group is based not only on the quality and competitiveness of the products and services, but also on compliance with the requirements on the safety and health of workers, on environmental protection and on observance of ethical values.

The following guidelines clearly outline the Group's minimum expectations of business ethics, working conditions, human rights and environmental leadership.

This code of conduct for Suppliers draws reference from the Vitillo Group's internal code of ethics, inspired by the principles contained in the Universal Declaration of Human Rights of the United Nations and by the standards of the UNI EN ISO 26000 standard on social responsibility.

The Group reserves the right to verify compliance with this document by its suppliers and to take appropriate actions in cases where it recognizes failure to comply with this code of conduct.



PROFESSIONAL ETHICS

The supplier must uphold the highest standards of integrity and that they operate honestly and fairly throughout the supply chain in accordance with local laws.

Responsible Sourcing of Materials: Suppliers are expected to responsibly source the raw materials used in their products;

Anti-corruption: Companies must work against corruption in all its forms, including extortion and bribery.

Privacy: Companies must implement appropriate measures to respect privacy, to protect personal information against loss and unauthorized access or use, and to comply with laws and regulations relating to privacy and information security.

Disclosure of Information: Companies are required to disclose financial and non-financial information in accordance with applicable regulations and compliance with the signed confidentiality agreement.

Fair Competition/Antitrust: Companies must uphold fair trade standards and conduct business in compliance with all applicable antitrust or anticompetitive laws and regulations.

Conflicts of Interest: Companies must conduct business in a manner that avoids any appearance of impropriety.

Counterfeit Parts: Companies must minimize the risk of introducing counterfeit and/or deviant parts and materials.

Intellectual Property: Companies must respect valid intellectual property rights and use commercially reasonable practices to protect the transfer of confidential technology and knowhow.

Export Controls and Economic Sanctions: Companies are required to comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as applicable restrictions on trading with certain countries, regions, companies or entities and individuals.

Establishment of the employment relationship: Personnel are hired with a regular employment contract; no form of irregular work or "undeclared work" is tolerated.



ENVIRONMENT

Suppliers are expected to manage all of their activities with a proactive approach to environmental responsibility, protecting the environment, conserving natural resources and reducing the environmental footprint of production throughout the life cycle. Suppliers are required to use resources responsibly with the aim of achieving sustainable development that respects the environment and the rights of future generations.

A comprehensive approach includes, but is not limited to:

- Energy consumption and greenhouse gas emissions: Suppliers must implement a strategy that leads to the reduction of the energy used in the production cycle and to an energy optimization of the plants, introducing where possible renewable energy sources;
- Water quality and consumption: Suppliers are asked to work in the direction of the reduction, reuse and effective recycling of water with responsible treatment of waste water to protect the environment and improve overall quality some water;
- Air Quality: Suppliers are expected to regularly monitor, properly control, minimize and, as far as practicable, eliminate emissions that contribute to local air pollution;
- Natural Resource Management and Waste Reduction: Suppliers are expected to encourage and support the use of sustainable and renewable natural resources by reducing waste and increasing reuse and recycling;
- Responsible Chemical Management: Suppliers are expected to identify, minimize or eliminate the use of hazardous substances in manufacturing processes and finished products to ensure regulatory compliance.



HUMAN RIGHTS AND WORKING CONDITIONS

Suppliers are expected to respect workers' human rights and treat all people with dignity as recognized by the international community.

- Child Labor/Labor and Young Workers: Suppliers shall ensure that child labor is not tolerated in any form;
- Wages and Benefits: Suppliers must provide wages and benefits that comply with applicable local laws, including those relating to minimums, overtime compensation, and benefits. Suppliers must guarantee a minimum wage equal to at least that envisaged by the National Collective Contract for the category and, in any case, such as to satisfy the primary needs of the personnel and provide a discretionary income. Suppliers must not use in any way or form "undeclared work" or remuneration systems aimed at avoiding the fulfillment of obligations towards personnel;
- Working hours: Suppliers must use working hours in line with the provisions of the National Collective Contract for the category and, in any case, not exceeding 48 hours per week. Suppliers must enforce the regulations in force and the provisions of the National Collective Contract for the category regarding overtime work;
- Forced Labor: Suppliers shall prohibit any form of forced (bonded) or compulsory labor, including human trafficking, by not using or facilitating it in any way;
- Freedom of Association: Suppliers shall respect the rights of employees to associate freely, to join or not join unions, to bargain collectively and to join workers' councils. Companies must allow workers to communicate openly with management about working conditions and management practices without fear of retaliation, intimidation or harassment;
- Health and safety: Suppliers must provide workers with a safe and healthy work environment and adopt all preventive and protective measures to prevent potential



accidents, injuries or occupational diseases that may occur as a result, in connection with or during the performance of the work, eliminating dangers wherever possible and systematically reducing the risks to the health and safety of company workers. To this end, suppliers must make workers aware and train them so that they can carry out their duties safely for themselves and for others, planning regular and documented training and information activities for personnel. Suppliers must encourage the use of the most advanced technologies to achieve excellence in the protection of workers' health, occupational safety and environmental protection;

- **Harassment:** Suppliers must provide a workplace free from harassment against workers in any form;
- **Discipline:** Suppliers shall treat all personnel with dignity and respect and shall not engage in or tolerate disciplinary practices such as mental coercion, physical coercion, verbal abuse;
- Non-Discrimination: Suppliers shall not tolerate any form of discrimination in employment and should provide equal employment opportunity regardless of worker or applicant characteristics such as race, color, age, sex, sexual orientation, gender identity, ethnic or national origin, disability, pregnancy, religion, political affiliation, union membership, or marital status.