



Supplier Code of Conduct

Rev. 2 del 02/09/2023

Premessa

SAPA S.p.A. and all the companies connected to it (hereinafter for brevity "SAPA"), in order to affirm its commitment in the field of Social Responsibility also requires its suppliers to behave socially correct towards workers, in particular as regards:

Human rights and working conditions

- child and child labour
- forced and compulsory labour
- ethical recruitment
- wages and benefits
- working hours
- freedom of association and collective bargaining
- discrimination and harassment practices
- woman rights
- diversity, equality and inclusion
- rights of minorities and indigenous peoples
- land, forest and water rights and forced evictions
- use of private and public security forces

Health & Safety

Health & Safety

Business Ethics

- Anti-corruption and anti-money laundering
- privacy and data protection
- financial responsibility (accurate logs)
- disclosure of information
- fair competition and antitrust
- conflicts of interest
- counterfeit parts
- intellectual property
- export controls and economic sanctions
- whistleblowing and protection against retaliation

Environment

- Energy efficiency, renewable energy and greenhouse gas emissions
- decarbonization
- water quality and consumption
- air quality
- sustainable management of resources and waste reduction
- reuse and recycling
- biodiversity, land use and deforestation
- soil quality
- supply of raw materials

Supplier management

- Sustainability requirements for its suppliers
- Communication of sustainability criteria to the supply chain

SAPA believes it is essential to demonstrate in a concrete way the duty to respect workers' human rights in any type of process and organization, and therefore promotes it with its partners.

Code of Conduct

This Code of Conduct, drawn up in accordance with SAPA's internal procedures, aims to base operations, behaviors, ways of working and relationships both internally within the supplier company and towards of external subjects.

In summary, this document is a set of principles and rules whose observance by the Suppliers and their sub-suppliers is considered by SAPA to be a factor of absolute importance, constituting a decisive aspect for the consolidation of relations between the organization and individual suppliers.

SAPA adopts this document in order to improve the relationship with suppliers with a view to mutual benefit and considers it a formal addition to the contractual requirements with the Suppliers of goods and services, compliance with which will be a necessary condition for maintaining and strengthening supply relationships.

In particular, it will consider compliance with this code of conduct as a further evaluation criterion.

By signing this Code of Conduct, the Supplier formally undertakes, in addition to complying with the binding and current legislation, to respect the following principles:

Human rights and working conditions

1. Child and child labour

Do not accept or support the use of child labor. Children or young workers must not be exposed to situations in or outside the workplace that are dangerous or unhealthy.

2. Forced and compulsory labour

Do not accept the use of forced labour: no employer has the right to seize workers' documents. Workers must be employed in accordance with the laws and regulations of the country in which the supplier resides, laws and regulations on which the employment contract is stipulated.

3. Ethical Recruitment

Ensure compliance with the principles of equality and equal opportunities in personnel selection and recruitment activities, refusing any form of favouritism.

4. Wages and benefits

Ensure that the wages paid always correspond to at least legal or industry minimum levels and that the wages are paid at regular intervals. Overtime must be reimbursed at a premium rate and the vendor must provide its employees with all legal benefits to which they are entitled.

5. Working hours

Recomply with laws and industry standards regarding working hours and overtime. Breaks from work must follow local legislation, traditions and internationally established standards.

6. Freedom of association and right to collective bargaining

Respect the right of workers to join associations, chosen by the workers, and the presence of support operators in the exercise of workers' right to collective bargaining

7. Discrimination and Harassment Practices

Not accept any form of discrimination in hiring and in the course of the employment relationship for reasons of gender, race, color, religion, sexual orientation, age, disability, political opinion, nationality, social or ethnic origins or for membership of trade unions. Treating its employees with respect and dignity, guaranteeing them equal opportunities. Ensure that workers do not suffer any type of harassment including sexual, physical, psychological abuse.

8. Women's rights

Promote and ensure respect for equal opportunities and promote gender balance, ensuring the same working conditions for employees of both sexes and facilitating the management of the relationship between family life and professional life. Promote personal and professional training as well as support women in their careers.

9. Diversity, Equality and Inclusion

Demonstrate commitment to identifying, evaluating and improving a culture of diversity and inclusion in every aspect of workplace management.

10. Rights of minorities and indigenous peoples

Promote respect for human rights in all their forms and in all the places where it operates, preserving the rights of those who, for example, have a traditional lifestyle, or minorities with a different culture and lifestyle segments of the national population. (ILO No. 107 - Convention on Indigenous and Tribal Peoples and No. 169 - Convention on Indigenous and Tribal Peoples)

11. Land, forest and water rights and forced evictions

Respect land, forest and water rights, and not participate in any illegal forced eviction practices.

12. Use of private and public security forces

Adopt preventive and defensive measures suitable to minimize the need for an active response by public or private security forces in the face of dangers to personnel or facilities. The use of force and weapons is limited to self-defense, to prevent serious life-threatening crimes and only ever in a manner commensurate with the offense.

Health & Safety

1. Health and Safety

Ensure a healthy and safe working environment, comply with the regulations and regulatory provisions on safety and health in the workplace and take adequate measures to prevent accidents, injuries and damage to the health of workers.

Business Ethics

1. Anti-corruption and anti-money laundering

Comply with applicable laws and regulations on anti-corruption, anti-money laundering, self-laundering and receiving money, goods or other benefits.

2. Privacy and data protection

Act in accordance with applicable data protection laws. The Supplier must report the discovery of any violations of the applicable privacy legislation.

3. Financial responsibility (accurate records)

Ensuring compliance with the principles of transparency, legality and traceability of operations relating to Financial Responsibility by maintaining accurate books, records and accounts, as well as presenting accurate financial statements, in order to ensure business continuity and the detection of any fraud.

4. Disclosure of information

Protect confidential or sensitive information, including personal information, and work to prevent its inappropriate use, theft, fraud or unauthorised disclosure.

5. Fair Competition and Antitrust

Act in compliance with the rules governing fair national and international competition as well as anti-trust provisions.

6. Conflicts of Interest

Comply with conflict of interest legislation; report any material conflict of interest, actual or potential, in the performance of their activities.

7. Counterfeit parts

Implement specific measures to combat counterfeiting of products. If counterfeit parts or materials are discovered or suspected, the recipients of such counterfeit parts or materials and the appropriate authorities must be notified immediately

8. Intellectual Property

Comply with applicable national and international laws and regulations on intellectual and industrial property.

9. Export Controls and Economic Sanctions

comply with export control regulations applicable to their business and provide accurate and truthful information about customs and other authorities that require them.

10. Whistleblowing and Protection Against Retaliation

Implement in its management system a mechanism for complaints, grievances, reports of wrongdoing, commissions or omissions (apply the Sapa Group Whistleblowing policy).

11. Cultural sensitivity

Reabide by the norms and values of the culture of the countries in which it operates.

Environment

1. Environment

Recomply with all local, regional and national laws, comply with environmental regulations, actively work to minimize negative effects on the external environment.

2. Energy efficiency, renewable energy and greenhouse gas emissions

Commit to optimizing the use of natural resources, renewable energy to reduce emissions harmful to the environment and to reduce gas emissions considered responsible for the "greenhouse effect".

3. Decarbonisation

Implement a decarbonisation plan that effectively reduces CO2 emissions by using energy sources derived from renewable energy resources and in the same way reduces energy consumption.

4. Water quality and consumption

Ensuring water quality; use water resources responsibly by adopting appropriate measures to reduce water consumption.

5. Sustainable management of resources and waste reduction

Have systems in place to ensure waste handling, movement, storage, recycling and reduction.

6. Management of chemical substances and raw materials

Provide Sapa, at the time of the preliminary negotiations, with the documentation relating to the chemical substances of the products to be supplied.

7. Reuse and recycling

Promote, in the context of production processes, the reduction of waste through the reuse of resources and correct recycling.

8. Conflict Minerals

Declare to Sapa the presence and origin of the materials regulated by the standard relating to Conflict Minerals called 3TG and their derivatives such as Tantalum, Tin and Tungsten if contained in the products being supplied. The adoption of these practices must be requested from subcontractors along the entire supply chain.

9. Biodiversity, land use and deforestation

Promote the sustainable use of natural ecosystems, limit deforestation, combat desertification, halt and reverse land degradation and halt biodiversity loss.

10. Soil quality

Implement soil protection practices, its circular and sustainable use.

Supplier

1. Sustainability requirements for its suppliers

Require suppliers to comply with sustainability requirements regarding the environment, workers' rights, health and safety.

2. Communication of sustainability criteria to the supply chain

Communicate and verify the application of the principles set out in this Code of Conduct to your supply chain.

Company name:.....
Address:.....
Signatory Name:.....
Role of signatory:.....
Signatory email address:.....
Read and approved on Date:.....
Signature:.....

By signing this form, the Supplier acknowledges that he has read and accepted all the aforementioned principles, terms and conditions with regards to the services and/or components to be performed or supplied to the Sapa Group