

# SUPPLIER CODE OF CONDUCT

## SECTION 1: ETHICS

### Introduction

As you may infer from the code of ethics, the ILTOM Group is strongly oriented towards high standards of integrity and sustainability.

Therefore, all Group suppliers are required to conform to similar standards and to carry out their business activity in an ethical manner.

The aim of this Supplier code of conduct by the ILTOM Group is to set the basic principles that shall underpin the activity of all suppliers who provide products and services to the different companies of the Group.

Therefore, this Code of Conduct is made available to all our suppliers on the corporate website and during the supplier's prequalification phase.

The ILTOM Group suppliers are required to have an ethically correct behaviour when carrying out their activities.

In particular, ethical requirements include the following:

- The supplier is required to avoid and refuse any form of corruption, extortion or misappropriation;
- Suppliers undertake neither to offer bribes or other illegal incentives nor to accept them;
- Suppliers are required to comply with antitrust laws and to carry out their activity in line with the principles of fair competition;
- Suppliers undertake to protect and use confidential information provided by the ILTOM Group in an appropriate manner;
- Suppliers are required to ensure that all products supplied to the ILTOM Group do not contain any metals extracted from minerals or their derivatives coming from the conflict zone, whose return is used to directly or indirectly finance armed groups;
- Suppliers are required to ensure that the products they supply to the ILTOM Group are compliant with requirements concerning the prohibition or restriction on the use of some substances, including dangerous ones, and therefore, that products supplied are in compliance with the requirements of all applicable regulations;
- Suppliers undertake to comply with all regulations on international trade and export control.

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## SECTION 2: WORK AND HUMAN RIGHTS

Suppliers of the ILTOM Group are required to protect the human rights of their employees, by treating them with dignity and respect and by ensuring equal conditions of employment.

In particular, requirements concerning work and human rights include the following:

- The company does not tolerate any form of child labour in the supply chain.
- The company does not tolerate slavery, hard labour and human trafficking.
- Equal treatment of employees shall be one of the basic principles of the suppliers' corporate policy. Both during hiring and employment, employees shall not be discriminated against based on their race, ethnic origin, sex, sexual orientation, religious belief, political opinion, trade union membership, age, physical aspect or disability.
- In light of the above, the supplier shall make sure their employees do not suffer any form of harassment.
- Working time of the suppliers' employees shall not exceed the maximum limit provided by the national laws in force.
- The suppliers' employee salary shall comply with all applicable regulations in force.
- Suppliers shall respect the right of their employees to freedom of association, to join a trade union, to have representatives and to join work councils, in compliance with the local legislation.

## SECTION 3: QUALITY, HEALTH, SAFETY AND ENVIRONMENT

Suppliers of the ILTOM Group are required to provide their employees with a safe and healthy work environment and to carry out their activity in an eco-friendly way. Moreover, suppliers shall integrate quality in their business activity.

In particular, they shall meet the following requirements:

- Suppliers undertake to comply with all quality, health, safety and environment regulations and to obtain all the necessary authorizations, permissions and registrations.
- Suppliers undertake to protect their employees against the risks associated with their activity and the equipment used. Should it be impossible to keep all risks adequately under control, using every means available (safety procedures, preventive maintenance, technical measures, etc.), suppliers undertake to provide the employees with the suitable personal protective equipment.
- Suppliers shall undertake to meet quality requirements generally accepted or contractually agreed in order to provide goods or services which meet the ILTOM Group needs.
- Suppliers shall make the safety data sheets of dangerous products available to all employees.

## **SECTION 4: PRIVACY, AUDITS and CORRECTIVE ACTIONS**

Suppliers of the ILTOM Group are required to protect confidential information they receive from the ILTOM Group and to comply with all applicable privacy legislation and data protection regulations in force.

Finally, to ensure and prove compliance with the code of conduct, the supplier shall retain all relevant documents and produce them on the ILTOM Group's demand.

To check the supplier's conformity, the ILTOM Group reserves the right to carry out inspections at the supplier's premises, upon reasonable notice.

Should the inspection reveal any abnormalities, the supplier shall implement the suitable corrective action to solve any non-conformance.

Should the supplier fail to solve the non-conformance to this code of conduct, the ILTOM Group shall have the right to take appropriate actions against the Supplier, including the temporary suspension or termination of the commercial relationship with them.

In turn, should the supplier deem that the ILTOM Group is not acting in compliance with their code of conduct, they are encouraged to express their doubts. The ILTOM Group ensures that this information shall be kept confidential.