

SUPPLIER CODE OF CONDUCT

GENERAL PART

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ROLFO S.p.A. Unico Socio

Società soggetta ad attività di direzione e coordinamento di Rolfo Holding S.r.l.

Capitale sociale € 3.212.500,00 i.v. - R.E.A. n. 35729 della C.C.I.A.A. di Cuneo

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1. Preamble

ROLFO S.p.A. operates according to principles of integrity, honesty, fairness and transparency, both within its own reality and towards the partners with which it relates and has commercial relationships. In line with the provisions of the Code of Ethics of the Rolfo Group and the organisational model of management and control pursuant to Legislative Decree 231/2001, ROLFO S.p.A. believes that the collaboration with the supply chain is fundamental for the achievement, not only of the highest quality standards of the product, but also for the creation of value and sustainable development of the business. To this end, ROLFO S.p.A. has adopted the Suppliers' Code of Conduct (hereinafter also the "Code") containing the ethical principles and rules of conduct already referred to in the Code of Ethics of the Rolfo Group, which are added to the legal provisions, which enrule the business relations with its partners. The Code consists of the following parts: Scope, Principles of Ethics, Monitoring and Implementation.

2. Scope of Application

This Code applies to the business partners of ROLFO S.p.A., specifically to all entities that provide goods and/or services (hereinafter also referred to as "suppliers").

Suppliers have the responsibility to ensure their own compliance with the Code, as well as to require compliance with the Code from their employees, suppliers, external collaborators and other persons who are part of the supply chain for ROLFO S.p.A.

3. Ethical Principles (Business Ethics, Labour and Human Rights, Environmental Protection)

3.1 Business Ethics

Suppliers are required to operate in compliance with the principles of transparency, loyalty, integrity, confidentiality, legality and the provisions of law and regulations applicable in the context in which they operate, as well as the commitments undertaken with ROLFO S.p.A.

This principle is also valid with reference to the national legislation of any country with which ROLFO S.p.A. operates.

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3.2 Anti-Corruption Policy

Rolfo, in accordance with the management and control organisational model pursuant to Legislative Decree 231/2001 within the adopted Anti-Corruption Policy that the supplier declares to have read and understood, does not tolerate any form of corruption and operates in full compliance with applicable anti-corruption laws and is constantly committed to ensuring that opportunities for corruption are reduced to the lowest risk level.

Suppliers are required to fully comply with the provisions contained therein, and must refrain from offering goods or services, in particular, in the form of gifts to company employees that are not of modest value and courtesy, and also prohibit their employees from offering goods or services to personnel of other companies or entities in order to obtain confidential information or direct or indirect benefits that are significant for themselves or for the company.

3.3 Conflict of Interest

ROLFO S.p.A. 's suppliers shall prevent and/or oppose any conflict of interest, real or potential, and report any circumstance that creates illegitimate favouritism.

3.4 Intellectual and Competition Protection

Suppliers shall act in full respect of ROLFO S.p.A. S industrial and intellectual property rights, as well as in compliance with the prescriptions contained in laws, regulations and conventions that protect such rights.

The technical specifications, drawings and diagrams that will be used in the manufacture of the products constitute technical and commercial know-how of considerable value to ROLFO S.p.A. and, for this reason, suppliers are required to

- A. use them exclusively for the manufacture of products;
- B. not to disclose and/or otherwise make known to third parties the Confidential Information
- C. take all necessary and appropriate security precautions and measures, in accordance with the highest professional standards, in order to keep the Information confidential, as well as to prevent unauthorized access, misappropriation and manipulation thereof
- D. cease using it immediately upon expiry of the assignment or when it is terminated for any reason.

Suppliers are also required to refrain from unfair business practices in violation of applicable fair competition and antitrust laws.

3.5 Confidentiality

The suppliers of ROLFO S.p.A. undertake to protect the information and data communicated to them, or to which they may have access, by strictly complying with current privacy and data protection regulations.

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3.6 Anti-Money Laundering

ROLFO S.p.A. conducts its business in full compliance with the current Anti-Money Laundering regulations and the provisions issued by the competent Authorities.

ROLFO S.p.A. has as its principle that of maximum transparency in commercial transactions and prepares the most appropriate tools to counter the phenomena of receiving stolen goods, money laundering and use of money, goods or utilities of illegal origin.

ROLFO S.p.A. encourages suppliers to adopt measures to regulate the management of financial flows, prohibiting any irregularity that, according to normal professional diligence, would give rise to suspicions as to the origin of the money received.

3.7 Human Rights

ROLFO S.p.A. is committed to operating with full respect for the value of the individual, human rights and workers.

ROLFO S.p.A. also recognises its responsibility to respect human rights and undertakes to adopt a proactive approach to promote respect for such rights. ROLFO S.p.A.'s suppliers are therefore, in turn, invited to operate in full respect of such values.

3.8 Child labour

The suppliers of ROLFO S.p.A. are obliged to condemn and abstain from any form of child labour, in line with what is established by the regulations in force. They are also required not to employ minors under the age of 15 years or who have not reached the age for the completion of compulsory education.

Children under 18 years of age shall not work at night and shall not be exposed to dangerous activities that may impair their physical or mental health.

3.9 Forced and compulsory labour

Suppliers are obliged to condemn and abstain from all forms and types of forced and compulsory labour and exploitative labour, as enshrined in the ILO Forced and Compulsory Labour Conventions of 1930 (No. 29).

Suppliers are obliged to refrain from any form of modern slavery such as, for example, using labour performed in an involuntary manner.

3.10 Inclusion

Suppliers are required to operate according to the principles of dignity and equality, condemning all forms of discrimination based on race, nationality, gender, age, disability, sexual orientation, political or trade union opinions, philosophical views or religious beliefs towards any person.

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3.11 Freedom of association and collective bargaining

Suppliers of ROLFO S.p.A. are required to respect the right of their employees to join trade unions and to bargain collectively, without fear of being discriminated against, intimidated or subjected to retaliation, in accordance with applicable laws and regulations.

3.12 Health and safety at work

ROLFO S.p.A. is committed to pursuing the objectives of improving the safety and health of workers as an integral part of its business and as a strategic commitment with respect to the more general aims of the Company.

Suppliers are required to comply with current health and safety legislation by guaranteeing their employees a healthy and safe working environment, in view of the sector in which they operate and the risks associated with the activities and operations they carry out.

3.13 Working Hours

Suppliers are obliged to comply with local and international regulations on working time limits, including overtime, on a daily and weekly basis, and to enforce them on their suppliers.

ROLFO S.p.A.'s suppliers are also obliged to guarantee their employees the breaks and the minimum number of rest days established by the applicable regulations, guaranteeing at least one day of rest in seven consecutive working days, except in exceptional circumstances.

3.14 Fair remuneration

Suppliers are required to offer their employees a fair level of remuneration that reflects the knowledge and skills of each individual, in accordance with applicable legal and regulatory provisions.

The pay provided to employees must be adequate to ensure the satisfaction of basic needs and living standards that respect the dignity of the individual.

3.15 Harassment-free working environment

Suppliers are obliged to protect the moral integrity of employees by guaranteeing the right to working conditions that respect personal dignity.

3.16 Regular working conditions

Suppliers are obliged to comply with the forms of employment governed by the applicable legislation, avoiding the use of any irregular methods other than the mere absence of any regularisation of a relationship, any type of use of labour services that are not deduced in a contractual and regulatory framework consistent with that of the country of reference.

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3.17 Privacy

Suppliers must act in accordance with applicable laws on privacy and the processing of personal data, and always protect the privacy of their workers and their personal data rights.

3.18 Safeguarding the environment

ROLFO S.p.A. promotes respect for the environment and intends to ensure the full compatibility of its activities with the territory and the surrounding environment.

The suppliers of ROLFO S.p.A. are therefore, in turn, invited to operate in full compliance with current legislation on environmental protection and to make an active commitment to mitigate the negative impacts on the environment and ecosystems related to their activities and operations.

3.19 Energy consumption and greenhouse gas emissions

Suppliers are encouraged to measure greenhouse gas emissions related to their business by contributing to national and international emission reduction targets through energy efficiency initiatives.

3.20 Waste Management and Water Discharges

Suppliers are obliged to comply with current regulations on the management of hazardous and non-hazardous waste, ensuring its proper treatment, transport and disposal.

In the event that suppliers use chemicals in their production processes, they are obliged to ensure compliance with the regulations in force for waste water flows.

3.21 Dangerous Substances

Suppliers are obliged to comply with national and international regulations concerning the use of hazardous substances. In particular, suppliers are obliged to prohibit the use of substances that may harm people's health, or the environment, by implementing appropriate measures for their handling, storage and transport.

4. Monitoring and Implementation

Suppliers are responsible for ensuring their compliance with the principles and rules of conduct defined in this Code of Conduct.

Suppliers are also responsible for ensuring that their employees, suppliers and external collaborators in the supply chain of ROLFO S.p.A. comply with the provisions of the Code.

In the event of an audit, suppliers undertake to share, in a transparent and cooperative manner, all information and documentation necessary for the purpose of the assessment, as well as to facilitate any access to their own facilities or those of their sub-suppliers.

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In the event of non-conformities found during audits, suppliers undertake to formalize and implement corrective actions to remedy such non-conformities.

ROLFO S.p.A. is available to support the supplier in the drafting and implementation of corrective actions.

ROLFO S.p.A. reserves the right to terminate any relationship with suppliers that do not comply with this Code of Conduct as well as the failure to implement corrective actions aimed at overcoming the non-compliance found.

In order to promote a culture based on ethics and transparency, Rolfo S.P.A. has set up an information channel to report (also anonymously) any report concerning an alleged and/or ascertained violation of this Code of Conduct or of the Organisation, Management and Control Model pursuant to Legislative Decree 231/01.

The link can be accessed by everyone at <https://www.rolfo.it/it/it/segnalazione-di-illeciti-whistleblowing>

Rolfo S.P.A. ensures the utmost safeguard, confidentiality and protection to the whistleblower from undue retaliation, unlawful conditioning, inconvenience and discrimination of any kind, for having duly reported in accordance with the European Directive EU 2019/1937 on Whistleblowing.

Any breach of the Code reported through this channel will be promptly assessed by the SB (Supervisory Board).

Suppliers undertake not to carry out any retaliatory or discriminatory action against personnel who have reported in good faith events that they consider to be unlawful.

ROLFO S.p.A. reserves the right to terminate any relationship with suppliers in the event of retaliation or discriminatory acts perpetrated by suppliers against reporting subjects.

5. Sources

This Supplier Code of Conduct is based on the following company documents:

1. Code of Ethics
2. Model 231
3. Anti-Corruption Policy
4. Whistleblowing Policy

It is also inspired by the following international sources and regulations:

1. Principles of the UN Global Compact;
2. United Nations 2030 Agenda for Sustainable Development Goals (SDGs);
3. Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organisation (ILO);
4. The Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights;
5. OECD Due Diligence Guidelines for Responsible Business Conduct