



SUPPLIERS' CODE OF CONDUCT

COMELZ

Comelz Group

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Suppliers' Code of Conduct			
Version	Verified by	Approved by	Issue Date
1.0	Paolo Riccardi	Board of Directors	28 June 2024

1. INTRODUCTION

Comelz (hereinafter also “the Group”) is committed to integrate sustainability principles into its operations. The Group strives to ensure mutual understanding and alignment on sustainability goals with its suppliers and partners.

1.1 PURPOSE OF COMELZ SUPPLIER CODE OF CONDUCT

Given the complexity of Comelz’s business network and the effort to promote sustainable production across its supply chain, it is crucial to establish and communicate to suppliers the principles guiding the Group’s business conduct.

The objective of the Supplier Code of Conduct (hereinafter also referred to as "the Code") is to provide **guidelines** regarding ethical standards, occupational health and safety, regulatory compliance, product quality, ensuring customer satisfaction.

1.2 REFERENCE STANDARDS

For the scope of this document, Comelz has incorporated the principles of responsible business conduct as outlined in various significant international agreements, guidelines, and frameworks. These include the "Ten Principles of the United Nations Global Compact (UNGC)¹," the conventions and recommendations of the International Labor Organization (ILO)², and the OECD

¹ [United Nations Global Compact](#): the United Nations Global Compact is a non-binding corporate sustainability guideline defined in Ten principles addressing the following areas of concern: Human rights, Labor, the Environment and Anti-corruption.

² [ILO Standards](#): the International Labor Organization is a UN agency whose purpose is to promote fair, decent, free, and secure working conditions by setting international labor conventions and recommendations.

Guidelines for Multinational Enterprises³ and the Convention on Human Rights (UNCHR)⁴.

Moreover, the current document is shaped by the strategic direction of the Group and its future looking objectives, as formalized in the **ESG Action Plan**. The goals therein are inspired by the United Nations 17 Sustainable Development Goals and strive to contribute to the advancement of SDG 3,5,7,8,9,12 and 13.⁵

Regarding corporate documentation, the current Code supplements the existing body, providing additional clarity on the Group's commitments:

- Code of Ethics, adopted in 2020;
- Organizational, Management and Control model, updated in 2022, in line with the provisions of Legislative Decree n°. 231/2001 (this provision applies only to Comelz S.p.A.);
- ESG Policy, adopted in 2024.

1.3 SCOPE OF APPLICATION AND RECIPIENTS

The Code applies to all the suppliers with whom Comelz enters in business relationships with. Suppliers will make all the efforts to adhere to the Code. As confirmation of their commitment, suppliers are required to **sign the acceptance form** located in section 5.2 of this document.

2. GENERAL BUSINESS VALUES AND PRINCIPLES IN COMELZ

Being aware of its social responsibility, the Group adheres to the principles of honesty, personal integrity, transparency, professional correctness, non-discrimination, and impartiality. Comelz encourages its supply chain to comply with current national and international legislations regarding working conditions, competition, environmental protection, and **fundamental human rights**.

³ [OECD Guidelines for Multinational Enterprises](#): these international guidelines define the recommendations that multinational companies should follow to maintain a responsible business conduct.

⁴ [Universal Declaration of Human Rights](#): this declaration was adopted in 1948 by the UN General Assembly and it mentions the individual, social, political, economic, and cultural human rights which pertain to all people, based on the fundamental principles of freedom and equality.

⁵ SDG 3 “Good health and well-being”; SDG 5 “Gender equality”; SDG 7 “Affordable and clean energy”; SDG 8 “Decent work and economic growth”; SDG 9 “Industry, Innovation and Infrastructure”; SDG 12 “Responsible Production and Consumption”; SDG 13 “Climate Action”.

2.1 ETHICS & BUSINESS INTEGRITY

Comelz is committed to fostering an **ethical behavior** along its value chain. Suppliers are required to make the best efforts to **comply with laws and regulations and** the commitments contained in this Code.

Comelz promotes principles of **good faith, transparency, and impartiality**. Recipients of this Code shall not accept or give money or other benefits with the purpose of receiving an undue advantage. Moreover, the Group requires that suppliers exert their utmost effort to prevent the emergence of **conflict of interest** within their operations.

Being an international Group, Comelz is committed to complying with **international trade laws** and with the **local legislations** of both the countries where raw materials are sourced and where goods are exported. To promote **fair competition and efficient markets**, Comelz repudiates any form of favoritism within its commercial relationships and complies with the relevant competition laws to ensure equal opportunities for all market participants. Suppliers are also encouraged to make the best effort to guarantee **intellectual property protection** and **confidentiality** in business relations.

The Group encourages suppliers to ensure **data privacy and information security** by implementing robust encryption protocols, conducting regular security audits, and staying updated on emerging threats and best practices in **cybersecurity**.

Within Comelz's commitment to excellence and responsibility, **health and safety of customers** is a priority. Suppliers play a crucial role in promoting and sharing this prerogative: it is imperative that all products and services provided adhere to rigorous safety protocols and meet or exceed regulatory requirements. Suppliers must ensure that their offerings are free from any potential hazards that could compromise the well-being of Comelz's personnel. This includes providing accurate and comprehensive product information, promptly addressing any safety concerns or recalls, and implementing robust quality control measures throughout the production and distribution process.

3. HUMAN RIGHTS, WORKERS PROTECTION AND RESPECT FOR LOCAL COMMUNITIES

Comelz mandates its suppliers to respect human rights and to do the best effort to monitor any violation of the UN Conventions on Human Rights along their value chain. In particular, the Group condemns forced labor, child labor and human trafficking.

Comelz advocates for workers' rights all along its value chain. By adhering to this Code, suppliers are asked to ensure freedom of association, fair labor conditions and respect of contractual obligations. Moreover, workers must be guaranteed the right to organize and engage in collective bargaining.

The Group prioritizes the occupational **health and safety** of its workers, and extends this commitment to its suppliers, urging them to adhere to the highest health and safety standards.

Comelz upholds principles of **inclusivity and non-discrimination**, advocating for a workplace culture that fosters **equal opportunities** for all workers. Suppliers are encouraged to **monitor diversity rates** and **cases of discrimination**.

4. RESPECT FOR THE ENVIRONMENT AND BIODIVERSITY

Comelz expects that its suppliers adhere to **laws, regulations and standards** concerning **environmental preservation**.

Comelz advocates for **responsible energy consumption** as a cornerstone of its sustainability efforts. Specifically, the Group not only promotes the transition to renewable energy sources but also an **efficient energy usage**, thereby fostering a culture of sustainability within its supply chain. In addition, Comelz is deeply committed to its environmental stewardship, with a primary focus on **reducing overall greenhouse gas (GHG) emissions throughout** its operations and supply chain. Consequently, the Group encourages suppliers to adopt and implement robust emission reduction strategies and to embrace sustainable solutions that mitigate their environmental impact.

Comelz is dedicated to promoting the **preservation of natural resources and biodiversity** throughout its value chain. In line with this commitment, the Group actively encourages its suppliers to adopt responsible **water management solutions** and implement effective **waste management practices**. Special emphasis is placed on the proper handling of hazardous substances to minimize environmental impact. Moreover, Comelz pledges to diligently monitor the **origins of its materials**, ensuring adherence to environmental norms. Those who comply with this Code, upon request, are invited to provide information regarding the production **process and composition** of purchased product, in particular concerning the presence of tin, tungsten and tantalum.

5. MONITORING AND COMPLIANCE WITH THE CODE

The Group promotes the adoption of the Supplier Code of Conduct by all suppliers and its diffusion to all parties engaged in business relations with the Company. The Supplier Code of Conduct is made available on the **corporate website**. Suppliers are strongly recommended to adhere to the Code and all relevant laws to enhance their sustainability performance. Comelz is committed to monitoring their supply chain according to ESG parameters.

5.1 SUPPLIERS' ENGAGEMENT AND SELF-ASSESSMENT

Currently, suppliers are assessed by the Procurement department in consultation with the Technical Unit based on technical and economic criteria. To encourage the enhancement of suppliers' sustainability performance, Comelz intends to introduce a **Self-Assessment Questionnaire** before the start of the business relationship and periodically during the collaboration. The objective of the Questionnaire is to monitor the progress of sustainable practices along the supply chain by assessing policies and initiatives related to the environment, human rights, working conditions, product responsibility and business ethics.

5.2 ACCEPTANCE OF THE CODE

The Suppliers' Code of Conduct aims at ensuring the integrity of Comelz's operations and the respect of the Group's foundation principles. This Code was approved by the Board of Directors on the 28 June 2024. To the end of keeping the content of the Code aligned to the most recent legislative and sectorial updates, the Code will undergo periodic revisions.

By signing this Receipt Form, the Supplier:

- Acknowledges that they have received and read the Supplier's Code of Conduct;

Date (day/month/year): __ / __ / ____

Place: _____

Entity legal form (in capital letters): _____

Name and position of the Supplier Representative (in capital letters):

Signature of the Supplier Representative _____

By signing this Acceptance Form, the Supplier:

- Commits to comply with the Code and implementing its requirements of Ethics and Business Integrity; Human Rights, Workers Protection and Respect for Local Communities; and Respect for the Environment and Biodiversity
- Agrees to uphold the code of conduct by shareholders, directors, employees, and collaborators of the declaring company, ensuring mutual respect and adherence to its principles.
- Commits to encouraging compliance with the Code throughout the value chain involved in Comelz's operations.

Date (day/month/year): __/__/_____

Place: _____

Entity legal form (in capital letters): _____

Name and position of the Supplier Representative (in capital letters):

Signature of the Supplier Representative _____