

Brambati S.p.A. SUPPLIER CODE OF CONDUCT

FOREWORD

Sustainability is a key element which reflects the values of **Brambati S.p.A.** and is an integral part of the business strategy. It is a complex and ambitious purpose that **Brambati S.p.A.** wishes to pursue together with all Interested Parties concerned, with which the company shares difficulties and solutions, but also common growth and continuous improvement processes.

The relation between **Brambati S.p.A.** and its Suppliers, that is to say one of the most important Interested Parties, is based on the principles of **legality, transparency, fairness, trust and cooperation.**

The Supplier Code of Conduct aims at establishing an ever closer cooperation in order to strengthen the aforementioned principles by building together a supply chain which is attentive not only to the quality of products or services, but also to the environment and to the social and labour conditions in which the products or services to be supplied are conceived and manufactured.

Therefore, **Brambati S.p.A.** invites all its Suppliers to share and implement the principles expressed in the Code of Conduct herein, since the compliance with said Code will constitute an increasingly important criterion in the selection and evaluation of suppliers.

Should the Supplier have its own Code of Ethics or Conduct, similar to the Code herein, or a sustainability reporting system in accordance with the Global Reporting Initiative (GRI) Standards model, such documents may be accepted in place of the Supplier Code of Conduct herein, after appropriate assessment by **Brambati S.p.A.**

PURPOSE

By means of the Supplier Code of Conduct herein - hereinafter identified as the "Code" - Brambati S.p.A. intends to share with its Suppliers the path of building a Supply Chain which is sustainable from a social, environmental and economic point of view.

SCOPE OF APPLICATION

The Code herein is valid for **Brambati S.p.A.** and for all the Suppliers related to said company.

In case of signing of new supply contracts or renewal of existing contracts of **Brambati S.p.A.** , this Code will be understood as an integral and essential part of such contracts.

GENERAL CONDITIONS

Brambati S.p.A. undertakes to comply with the law wherever it performs its own business activity, according to the requirements of the ISO 20400 standard. Correspondingly, Suppliers undertake to comply with all the laws, regulations, contractual agreements in force, standards and technical regulations that are generally recognised. Furthermore, Suppliers undertake to communicate the principles set forth in the Code herein to their own supply chain.

Suppliers are encouraged to implement the mechanisms that are necessary to identify, determine and manage risks in all the areas covered by this Code and to comply with all the applicable legislative requirements.

Suppliers are encouraged to continuously improve the suitability, adequacy and effectiveness of their sustainability policies by means of appropriate measures.

Furthermore, they are encouraged to keep records of the relevant information proving the sharing and implementation of the values expressed in the Code herein. Upon prior agreement with the Supplier, **Brambati S.p.A.** reserves the right to perform audits in relation to the implementation of the principles set forth in this Code.

The Code herein can be downloaded in its updated version from the website www.brambati.it

ETHICS

Business integrity

In order to meet their social responsibilities, Suppliers are required to conduct their business ethically and to act with integrity. They are thus required not to practice nor tolerate any kind of corruption, extortion or embezzlement.

Suppliers undertake not to offer nor accept bribes or any other unlawful incentives to/from their business partners.

Suppliers are required not to offer gifts, or any other benefits that are a direct consequence of their supply relation, to the Employees of **Brambati S.p.A.**

Fair competition

1 Suppliers are required to conduct their business in line with the principles of fair competition and in compliance with all the applicable anti-trust laws.

Correspondingly, **Brambati S.p.A.** will adopt transparent and fair processes for the selection of suppliers. Suppliers will be evaluated according to the quality and prices of their products or services and will be treated fairly. Furthermore

Brambati S.p.A. will not disseminate misleading information in relation to Suppliers and to their products or services.

Intellectual property

Suppliers undertake to protect and appropriately use confidential and sensitive information (such as prices, costs, technical characteristics of products or information subject to specific confidentiality agreements) which may come into their possession and to ensure that the intellectual property rights of **Brambati S.p.A.** are protected.

Within their areas of responsibility, Suppliers are required to take all the necessary measures aimed at ensuring that **Brambati S.p.A.** products, their components or raw materials, as well as the related know-how, do not fall into the hands of counterfeiters and are not diverted from the lawful supply chain.

On the other hand, any sensitive information obtained from Suppliers will be considered, under any circumstances, absolutely confidential by **Brambati S.p.A.** and will not be shared with competitors.

LABOUR

Rejection of forced labour and child labour

Suppliers undertake not to use forced, bonded or captive labour.

Suppliers are prohibited from using any kind of child labour within their supply chain or business activities, in compliance with the founding regulations of the International Labour Organization (ILO) and with the principles of the United Nations Global Compact.

Diversity and integration

Fair treatment of all Employees must be one of the founding principles of the Supplier's corporate policy and the Supplier undertakes to repudiate any form of unequal treatment based on: race, nationality, sex, age, physical characteristics, social origin, disability and political or religious beliefs, marital status, pregnancy, sexual orientation or any other criterion which is deemed unlawful under the applicable law.

Fair treatment and working time

Suppliers undertake to provide their Employees with a workplace free of inhumane treatment;

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Suppliers undertake to ensure that employees are not subject to threats, harassment, sexual abuse, torture or corporal punishment, mental or physical constraints or abuse.

Suppliers are required to provide their Employees with fair remuneration, so as to ensure an adequate standard of living for them and their families. In any case, Suppliers are required to provide their Employees with a salary compliant with the laws in force in their respective countries.

Furthermore, **Brambati S.p.A.** encourages Suppliers to provide their Employees with appropriate training and education opportunities.

Suppliers are required to manage the employment agreements with the Employees lawfully and correctly, in compliance with the reference labour legislation.

Freedom of association

Suppliers will be committed to an open and constructive dialogue with their employees and union representatives.

In compliance with the national and/or local legislation, Suppliers will respect the right of their Employees to freely associate, join trade unions, have representatives, join workers' works councils and engage in collective bargaining.

Suppliers will not disadvantage employees who act as workers' representatives.

QUALITY, HEALTH, SAFETY AND ENVIRONMENT

Quality requirements

Suppliers undertake to meet generally recognised and contractually agreed qualitative and technical requirements in order to provide goods and services that are safe for their intended use and able to adequately meet the needs of **Brambati S.p.A.**

Safety

Suppliers undertake to comply with national regulations concerning quality, health, safety and the environment, and to obtain, keep and update all the required permits, licences and registrations.

Suppliers will apply the aforementioned good practices in terms of quality, health, safety to the whole supply chain and will assure the integrity of each shipment to **Brambati S.p.A.**, from the point of origin to the ultimate destination, including all the intermediate stages of transportation.

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Product safety

As far as all hazardous substances are concerned, Suppliers will make available the safety data sheets containing all the necessary and relevant information in terms of safety, as required by the current legislation and by the REACH Regulation.

Occupational health and safety

Suppliers undertake to protect Employees from risks associated with the working activity, from strenuous tasks at the workplace and from any risks associated with the infrastructures they use.

Suppliers will ensure to take appropriate action (controls, procedures, preventive maintenance) aimed at limiting any risks to occupational health and safety. In the event that risks cannot be properly controlled by such means, Suppliers undertake to provide Employees with appropriate personal protective equipment.

Safety information relating to hazardous materials - including compounds in intermediate products - will be available for the purposes of educating, training and protecting workers from any risks.

Safety of processes

Throughout all the stages of the production process, Suppliers are required to actively deal with all the issues relating to the safety of production processes and to products and their potential environmental impact.

Management of emergency, information and training on risks

Suppliers undertake to identify possible and potential emergency situations at the workplace and to minimise their risk of occurrence. Furthermore, Suppliers undertake to make available all the safety information on the risks identified by training employees in order to guarantee them appropriate protection.

Protection of the environment and conservation of resources

Suppliers will adopt systems aimed at ensuring that the handling, conveying, storage, recycling, reuse or management of waste and the management of air emissions and waste water are carried out safely and in compliance with the legislation in force in the reference Country.

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Furthermore, Suppliers are required to use natural resources (such as water, energy sources, raw materials) sparingly and reasonably, so as to mitigate any impact of the processes on the resources of the planet.

In addition, Suppliers undertake to develop and use products with a limited environmental impact and processes capable of reducing energy consumption and greenhouse gas emissions.

COMPANY MANAGEMENT SYSTEMS

Legal requirements

Suppliers undertake to comply with laws, regulations, contractual agreements in force and generally recognised standards.

Communication of sustainability criteria to the supply chain

Suppliers are encouraged to communicate the principles set forth in the Code herein to their own supply chain.

Risk management

Suppliers are required to implement the mechanisms that are necessary to identify and manage risks in all the areas covered by this Code, in compliance with the applicable legislative requirements.

Audit

Suppliers are encouraged to keep records of the relevant information proving the

sharing and implementation of the values expressed in the Code herein. Upon prior agreement with the Supplier, **Brambati S.p.A.** reserves the right to carry out Audits. Should the audit findings show that the Supplier does not comply with the form and substance of the Code herein, **Brambati S.p.A.** reserves the right to take appropriate improvement measures together with the Supplier.

Continuous improvement

Suppliers are encouraged to continuously improve their performance in terms of sustainability, by implementing appropriate measures.

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REPORTS FOR CORRECTIVE ACTIONS

Suppliers may report breaches of the Code herein, or any unethical conduct by collaborators of Brambati S.p.A., to the Ethics Manager of Brambati S.p.A., by writing to the dedicated e-mail address suggerimenti@brambati.it, or to the Supervisory Body by writing to odv@brambati.it, and by means of the communication channels available on the website www.brambati.it.

