

SUPPLIER CODE OF CONDUCT

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1. PURPOSE AND SCOPE

ALBERDINGK ITALIA S.R.L. (below the "Organisation"), fully recognises that responsible and ethical conduct in its operations is essential for the success of the business. Accordingly it has always been committed to ensuring that its operations are constantly based on a sense of responsibility. It expects the same from its stakeholders, particularly its Suppliers, namely the individuals and legal entities that provide goods and/or services to the Organisation.

The Organisation has therefore adopted this document, referred to as the "Supplier Code of Conduct" (below the "Code"), in order to establish binding minimum standards concerning the rules and requirements stipulated by the Organisation, which all Suppliers must comply with throughout the duration of their relationship with the Organisation.

It is understood that if the Supplier has independently adopted (or will adopt in the future) its own Code of Conduct (or other comparable document) that imposes (or will impose) stricter rules, which do not conflict with those in this document, the Supplier is required to comply (or will be required to comply) with those stricter rules.

2. COMMITMENTS

The principles listed below are considered by the Organisation to be fundamental and compulsory.

- Lawfulness

Suppliers commit to conducting their activities in full compliance with the applicable regulations, irrespective of the setting and the activities carried out and the places where they operate.

- Ethics and Integrity

Suppliers commit to maintaining conduct based on honesty, integrity, loyalty, good faith, reliability, clarity, transparency, and respect for the rights of their stakeholders.

Suppliers commit to providing precise, accurate, truthful, and comprehensive information with impartiality, transparency, integrity, courtesy, cooperation, helpfulness, professionalism, and timeliness in a manner that enables their counterparties to make rational and informed decisions.

Suppliers commit to refraining from any deceptive, elusive, or otherwise unfair practices.

Alberdingk Italia Srl

Registered Office: Viale Giuseppe Verdi 23/E | 31100 Treviso | Italy | Tel. +39 0422 1490326 | info@alberdingkitalia.com | www.alberdingk-boley.de

Management: Thomas Hackenberg (Deputy Chair), Mattia Stefani (Chair)

Registry Office: Treviso | REA (Economic and Administrative Index) No. TV-426991 | Vat No./Tax Identification Number and Company Register No. 05123500265 | SDI (Electronic Invoicing Code): M5UXCR1 | Share Capital €1,600,000 fully paid up

- Fair Competition

Suppliers commit to conducting their business in accordance with the principles of competition, refraining from collusive, predatory, position-abusing, and similar behaviour, in full compliance with the antitrust regulations aimed at protecting free competition and the free market.

Suppliers commit to preventing all possible conflicts of interest with the Organisation.

- Anti-Corruption

Suppliers commit to refraining from all forms of corruption, either active or passive, direct or indirect, or public or private.

Suppliers commit to instructing their representatives not to offer or grant or to accept or receive, either directly or indirectly, any form of payment, tangible or intangible benefits, advantages, gifts, or in general any form of favour (e.g., invitations, presents, free services, job offers, etc.) that may even merely create the impression of seeking or granting undue benefits or the impression of unlawfulness or immorality.

- Anti-Money Laundering

Suppliers commit to refraining from engaging in conduct or activities identifiable as handling stolen goods, money laundering, self-money laundering, or the use of illegal money, assets, or other benefits, and, therefore, to complying with the regulations concerning anti-money laundering, combating organised crime, and counteracting terrorism financing.

- Organisational and Accounting Management

Suppliers commit to ensuring the utmost transparency and integrity in the preparation of reports and financial statements that reflect their organisational, capital, operational, and financial status, and to maintaining accounting records in accordance with the criteria established by the applicable regulations, in addition to adhering to the principles of truthfulness, completeness, clarity, precision, and accuracy.

- Equal Status and Non-Discrimination

Suppliers commit to recognising and respecting the dignity and personal rights of all individuals.

Suppliers commit to refraining from any discriminatory conduct or behaviour based on age, gender, sexuality, health status, ethnic origin, nationality, political opinions, and religious beliefs. The Organisation commits to making impartial decisions based on objective and neutral criteria.

- Working Conditions

Suppliers commit to complying with worker safety regulations and to ensuring working conditions that respect the health and mental and physical well-being of workers, also by means of specific awareness-raising initiatives.

Suppliers commit to refraining from using other unlawful forms of labour (e.g., forced labour, child labour, etc.) or in conflict with labour legislation (for example the provisions regarding working hours, remuneration, freedom of association and union, etc.).

- Quality and Safety

Suppliers commit to complying with all applicable regulations concerning product, service, and process quality and safety, and to adopting a process of continuous improvement in these areas.

- Environment and Sustainability

Starting from compliance with the applicable regulatory requirements, Suppliers commit to ensuring that their activities are conducted in a manner that ensures full protection of the environment and public health.

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Suppliers commit to directing their investment and business choices while always keeping in mind environmental sustainability and the preservation of natural resources.

Suppliers commit to monitoring the environmental impacts produced by their business activities (waste, pollutants, gases, water usage, etc.) and to managing them responsibly.

- Confidentiality and Personal Data Protection

Suppliers commit to complying with the regulations on personal data protection and to implementing all reasonable organisational, physical, and digital security measures to ensure the integrity, confidentiality, and availability of the personal data processed.

- Protection of Intellectual Property

Suppliers commit to complying with the regulations on the protection of intellectual and industrial property.

3. REPORTING

Suppliers commit to promptly reporting to the Organisation concerning any issues related to this document, and in particular any breaches.

4. AUDITS AND BREACHES

This document is to be considered an integral part of all the agreements and contracts in place between the Suppliers and the Organisation.

Suppliers commit to granting the Organisation permission, including through parties appointed by it, to verify compliance with the provisions contained in this document.

In the event of a breach, the Organisation reserves the right to request corrective actions, to cancel any existing purchase orders, to suspend future orders, and even to immediately terminate the contractual relationship.

Furthermore, this does not prejudice the Organisation's right to compensation for any damage it may incur as a result of breaches by the Suppliers.

5. COMMUNICATIONS AND TRAINING

Suppliers commit to implementing appropriate communication and training measures to ensure their directors, managers, employees, and collaborators (including any subcontractors, whose conduct they remain jointly and severally responsible for towards the Organisation) have an adequate level of knowledge and understanding of the contents of this document.

6. APPROVAL AND AMENDMENTS

From the time of approval of this document, the Organisation commits to ensuring that it is binding for its Suppliers by means of specific contractual clauses.

The Organisation reserves the right to periodically review this document and Suppliers will be duly informed of any amendments.

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