

## SUPPLIERS CODE OF CONDUCT

Version	Date	Notes
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## TABLE OF CONTENTS

<b>INTRODUCTION</b>	<b>3</b>
<b>PURPOSE</b>	<b>3</b>
<b>SCOPE OF APPLICATION</b>	<b>3</b>
<b>PRINCIPLES AND COMMITMENT</b>	<b>3</b>
1. <b>Human Rights and working conditions</b>	<b>4</b>
2. <b>Environment</b>	<b>5</b>
3. <b>Business ethics and responsible conduct</b>	<b>6</b>
<b>CODE IMPLEMENTATION AND MONITORING SYSTEM</b>	<b>8</b>
<b>PROVISIONS AND MEASURES IN CASE OF VIOLATION</b>	<b>9</b>
<b>REPORTING AND INVESTIGATION</b>	<b>9</b>
<b>STATUS OF THE CODE</b>	<b>9</b>
<b>ACKNOWLEDGMENT OF RECEIPT AND ACCEPTANCE</b>	<b>10</b>

## INTRODUCTION

A.A.G. STUCCHI pursues excellence in the markets in which it operates through Sustainable Development, protecting the Environment and the Safety of people, and promoting a culture of integrity and respect for Social Ethics.

A.A.G. STUCCHI is committed to maintaining transparent and responsible relationships, honouring its commitments, and investing in the development of People's skills so that products, processes, and collaborations meet the highest quality standards. Through the engagement of its Employees, Customers, Partners, and Suppliers, the company aims to generate lasting value for People and for the Community, with a view to sustainable growth.

A.A.G. STUCCHI requires its suppliers to operate in line with the principles that guide the company, including, for example, respect for human and labour rights, protection of health and safety in the workplace, environmental protection, and the prevention of corruption. Supplier qualification and the continuation of the supply relationship are therefore based not only on the quality and competitiveness of the products and services offered, but also on the Supplier's ability to adhere to the commitments and ethical values set out in this Supplier Code of Conduct. Only suppliers who demonstrate such alignment can establish and maintain a solid and long-term collaboration with A.A.G. STUCCHI.

## PURPOSE

Supplier Code of Conduct ("Code") sets out the values, principles and minimum standards of conduct required of all suppliers, subcontractors, business partners and their personnel involved in activities carried out for A.A.G. STUCCHI (hereinafter, the "Company"). The Code complements the applicable contractual clauses and technical requirements and constitutes a mandatory condition for the establishment and continuation of the supply relationship.

## SCOPE OF APPLICATION

This Code applies to all direct and indirect suppliers of goods and services, as well as subcontractors and all related personnel involved in activities carried out for the Company (hereinafter referred to as "Suppliers").

Suppliers are required to communicate internally and externally the principles and commitments described in this Code in order to ensure that its contents are understood, implemented and properly communicated to their employees and their own suppliers.

## PRINCIPLES AND COMMITMENT

A fundamental condition for collaborating with the Company is that Suppliers conduct their activities in compliance with the applicable laws of the countries in which they operate and with the obligations arising from contractual agreements and formally undertaken commitments.

## **1. Human Rights and working conditions**

A.A.G. STUCCHI requires its Suppliers to ensure working conditions that are dignified, safe and respectful of the fundamental rights of all individuals involved in their activities and supply chain. Suppliers must adopt policies and practices consistent with the Conventions of the International Labour Organization (ILO), recognizing work as an expression of human dignity.

### **1.1 Dignity and respect for the individual**

Every worker must be treated with respect, fairness and humanity. Physical, psychological or verbal abuse, threats, intimidation, corporal punishment or degrading treatment are strictly prohibited. Suppliers must promote professional relationships based on courtesy, listening and respect for human dignity, recognizing the central role of individuals in the workplace.

### **1.2 Prohibition of child labour**

Suppliers must prevent the employment of minors below the minimum working age established by law and by ILO Conventions. Where young workers of legal working age are present, appropriate measures must be adopted to protect their development, health and education, prohibiting them from performing hazardous tasks, night shifts or excessive workloads.

### **1.3 Prohibition of forced labour and human trafficking**

Any form of work performed under coercion, threat or undue economic constraint is prohibited. Suppliers must not retain personal documents, restrict freedom of movement or impose penalties for termination of employment. They must also adopt measures to prevent and combat any form of human trafficking within their supply chain.

### **1.4 Freedom of association and collective bargaining**

Workers must be free to join trade unions or workers' representatives without discrimination or retaliation. Suppliers must promote industrial relations based on transparent dialogue and guarantee the possibility of collective negotiation of working conditions and the reporting of concerns without fear.

### **1.5 Equal treatment and non-discrimination**

In all phases of employment (recruitment, training, promotion, remuneration and termination), any form of discrimination based on gender, gender identity, age, ethnicity, nationality, religion, health condition, sexual orientation, marital status or any other factor unrelated to job performance is prohibited. Suppliers must promote an inclusive work environment that values diversity as a resource.

### **1.6 Fair working conditions**

Working hours, breaks, weekly rest periods and overtime must comply with local regulations and international standards. Compensation must be fair, proportionate to the work performed and sufficient to guarantee a decent standard of living. Workers must receive clear and transparent contracts indicating their rights and applicable working conditions. The adoption of welfare measures and initiatives supporting employee well-being is encouraged.

### 1.7 Health and safety at work

Suppliers must ensure a safe working environment by implementing safety management systems, preventive risk assessments, periodic training and emergency procedures. Personal protective equipment must be provided free of charge. The prevention of accidents and occupational diseases must be a priority and an integral part of the corporate culture. Protection must extend not only to direct employees but also to contractors and temporary workers.

### 1.8 Privacy and protection of personal data

Suppliers must guarantee the confidentiality and protection of the personal data of all employees and collaborators of the Company, ensuring that information collected is processed solely for legitimate purposes and in compliance with applicable regulations. Access to data must be limited to authorized personnel who are adequately trained and protected through appropriate technical and organizational measures.

## 2. Environment

A.A.G. STUCCHI requires its Suppliers to operate with respect for the environment, using resources responsibly, preventing pollution and protecting ecosystems. Suppliers are required to commit to the continuous improvement of their environmental performance and to reducing the impacts related to their activities, products, services and supply chain.

### 2.1 Compliance with environmental regulations

Suppliers must comply with all applicable environmental laws and regulations and adhere to required permits and prescriptions. They must also adopt internal systems capable of monitoring compliance and preventing incidents or environmental damage. In case of violations or significant environmental events, corrective measures must be taken promptly and, where required, the competent authorities must be notified.

### 2.2 Pollution prevention

Suppliers must strive to reduce emissions to air, water and soil, as well as the production of hazardous substances. Production processes must be organized to minimize dispersion and contamination. Equipment must be properly maintained to prevent leaks, spills or failures.

### 2.3 Efficient use of resources and energy

Suppliers must use natural resources (raw materials, water and energy) efficiently and commit to reducing waste, consumption and greenhouse gas emissions. Where possible, more sustainable technologies should be adopted and the use of renewable energy sources should be promoted.

### 2.4 Waste management and promotion of the circular economy

Waste must be managed in compliance with regulations, prioritizing recycling and recovery. Disposal is allowed only through authorized and traceable operators. Suppliers must strive to reduce waste generation and promote the use of recycled or recyclable materials.

## 2.5 Management of hazardous substances

Hazardous chemical substances must be identified and managed safely, with proper labeling, storage, use and disposal. Measures must be adopted to prevent risks to workers' health and the environment. The use of less harmful alternative substances is encouraged.

## 2.6 Protection of biodiversity

Suppliers' activities must not compromise natural habitats or protected areas. If operating in sensitive areas, Suppliers must assess environmental impacts in advance and adopt preventive and mitigation measures. They are required to commit to preserving ecosystems and living species..

## 3. Business ethics and responsible conduct

A.A.G. STUCCHI requires its Suppliers to operate with integrity, responsibility and transparency, adopting behaviours that safeguard fair business practices, fair competition and mutual trust. Full compliance with applicable laws and the highest ethical standards is required in order to prevent conduct that could harm the integrity of the Company, the market or society.

### 3.1 Integrity and ethical conduct

Suppliers must conduct their business honestly and professionally, making decisions based on fairness and responsibility. Every business relationship must be based on transparency, cooperation and respect for commitments undertaken. Any deceptive, fraudulent or improper conduct aimed at obtaining undue advantages is prohibited.

### 3.2 Prevention of corruption and bribery

Suppliers must prevent and combat all forms of corruption, extortion or improper payments, whether direct or through third parties. It is prohibited to offer, promise or accept money, favours, gifts, benefits or any other advantage intended to improperly influence decisions or behaviour. Internal procedures must be adopted to identify, prevent and report potential risk situations.

### 3.3 Conflicts of interest

Suppliers must avoid situations where personal, family or financial interests may interfere or appear to interfere with the fairness and impartiality of activities carried out for the Company. Any actual or potential conflict of interest must be promptly disclosed and managed transparently.

### 3.4 Fair competition

Suppliers must comply with competition and antitrust laws, avoiding practices such as price fixing, market allocation, abuse of dominant position or other anti-competitive conduct. Business activities must be conducted with fairness, meritocracy and respect for the market.

### 3.5 Protection of Intellectual Property, Confidentiality and Proper Use of Company Assets

Suppliers must respect and protect the Company's intellectual and industrial property rights, including technologies, trademarks, designs, technical documentation, production processes, software and any other protected or confidential information.

Suppliers Code of Conduct – v.1 of December 19, 2025

6 / 10

Information, data and materials received from the Company must be used exclusively for purposes related to contractual activities and may not be copied, disclosed or transferred to third parties without prior authorization.

Suppliers must adopt appropriate technical and organizational measures to prevent misuse, loss, theft or unauthorized access to such information.

Where Suppliers process personal data, they must comply with applicable data protection regulations, ensuring security, integrity, confidentiality and limitation of processing purposes.

Any assets, equipment, tools or IT systems provided by the Company must be used with due care, exclusively for purposes related to the contractual relationship, and returned in appropriate condition at the end of the collaboration.

### 3.6 Responsibility in the supply chain

Suppliers are responsible for the ethical conduct of their subcontractors, agents, consultants and business partners. They must ensure that these parties comply with the principles of this Code and adopt monitoring and evaluation mechanisms to prevent violations within the supply chain.

### 3.7 Conflict minerals and high-risk areas

Suppliers must ensure that the sourcing of minerals from conflict-affected or high-risk areas does not contribute to the financing of armed conflicts, human rights violations or exploitation, in accordance with the A.A.G. STUCCHI Responsible Minerals Sourcing Policy.

### 3.8 Integrity in relations with Public Authorities and third parties

Suppliers must maintain the highest standards of transparency, fairness and integrity in their relations with public administrations, public authorities, regulatory bodies, customers, partners and any other third party involved in activities carried out for the Company. Offering, promising or accepting money, gifts, benefits or other advantages intended to influence decisions, obtain undue benefits or alter public or private decision-making processes is strictly prohibited. Suppliers must adopt internal procedures to prevent and detect corruption, fraud, extortion or undue influence, ensuring traceability of operations and proper documentation. When consultants, intermediaries or agents are involved, Suppliers must ensure that they comply with equivalent standards of legality and integrity.

### 3.9 Prevention of money laundering

Suppliers must adopt appropriate measures to prevent money laundering, illegal self-financing, terrorism financing or other criminal activities.

They must:

- not make or accept cash payments beyond the limits permitted by law,
- maintain transparent and auditable accounting systems that accurately record all transactions,

- carefully select agents, intermediaries, consultants and business partners by verifying their reputation and reliability,
- cooperate with any checks and audits requested by the Company or competent authorities.

Any suspicious transaction must be promptly reported to the Company's competent internal bodies according to the applicable reporting procedures.

### 3.10 Export control

Suppliers must comply with all applicable export control laws and regulations, trade restrictions, international sanctions and rules governing the transfer of goods, technologies and technical data. Exporting or transferring materials or information to restricted countries, entities or purposes without proper authorization is prohibited.

### 3.11 Reporting of misconduct (Whistleblowing)

Suppliers must provide their workers and collaborators with secure, confidential and accessible channels to report potential violations of this Code, fraudulent behaviour, acts of corruption, health and safety risks, human rights violations or any other improper conduct. Reports must be possible without fear of retaliation or discrimination. Suppliers must guarantee:

- confidentiality of the whistleblower's identity,
- protection against any form of retaliation,
- timely and impartial management of reports,
- documentation and traceability of corrective actions taken.

Upon request, Suppliers must inform the Company about the existence and functioning of their whistleblowing system.

## CODE IMPLEMENTATION AND MONITORING SYSTEM

Compliance with this Code is a fundamental requirement for collaborating with A.A.G. STUCCHI.

Suppliers must adopt appropriate internal control tools to ensure that their activities and those of their supply chain comply with the law, applicable regulations and the principles of this Code.

They must integrate the contents of the Code into their operations and ensure that employees, collaborators, agents and subcontractors are properly informed and trained. The Company reserves the right to verify Supplier compliance through documentation requests, self-assessment questionnaires, audits or other monitoring activities, including through third parties.

Suppliers are required to cooperate during such assessments, promptly report any risks or non-compliance and implement appropriate corrective measures.

## **PROVISIONS AND MEASURES IN CASE OF VIOLATION**

Violation of the Principles or Commitments contained in this Code undermines the relationship of trust between the Company and the Supplier and may result in operational, legal and reputational consequences.

In case of non-compliance, the Company may require the Supplier to implement a corrective action plan within defined timelines. Failure to cooperate or continued violation may lead to the temporary suspension of supplies or ongoing activities.

In more serious cases, such as human rights violations, use of child or forced labor, serious breaches of safety or environmental regulations or corrupt conduct, the Company may terminate the contract immediately and exclude the Supplier from future collaborations.

The Company also reserves the right to claim compensation for damages resulting from violations of the Code.

## **REPORTING AND INVESTIGATION**

Suppliers must report any violations of this Code committed by Company personnel or identified along the supply chain, including through the whistleblowing channel made available by the Company, according to the procedures indicated in the relevant official documentation.

Suppliers must retain documentation and information supporting such reports for at least five years. All reports will be examined by the competent bodies designated by the Company and handled in accordance with the principles of confidentiality and protection of the reporting person, who will be protected from any form of retaliation.

## **STATUS OF THE CODE**

This Supplier Code of Conduct forms an integral part of the Company's values and ethical policies and defines the minimum standards of behaviour that all Suppliers must respect in the performance of their activities.

Where laws, regulations or local requirements establish stricter standards than those contained in this Code, such requirements shall prevail and must be applied by the Supplier while ensuring consistency with the principles expressed herein.

The Company may periodically update this Code in order to ensure continuous alignment with applicable regulations, international best practices and the evolution of its ethical and sustainability objectives. The updated version of the Code is made available through the Company's official communication channels (e.g., website).

This Code, and all subsequent versions, are approved by the Board of Directors of A.A.G. STUCCHI S.r.l.

## ACKNOWLEDGMENT OF RECEIPT AND ACCEPTANCE

By signing this document, the organization expresses its intention to adhere to the principles and guidelines established in this Suppliers Code of Conduct.

This document must be returned signed and, if possible, stamped by the legal representative of the Company. For any questions regarding its content, please contact A.A.G. Stucchi Srl.

*Giuseppe Riccardi*

General Director – CEO of A.A.G. Stucchi S.r.l.



Date:

Supplier Company Name:

Supplier Company Authorised Signature: