

SUPPLIER CODE OF CONDUCT

LEGAL POLICY

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POLITUBES is a company that operates in accordance with its own Codes of Conduct such as Code of Ethics, Anti- Corruption Code, Organization, Management and Control Model, and Environmental Policy. The company is oriented towards high standards of integrity and sustainability. For more information, please visit the POLITUBES Sustainability Project, <https://www.politubes.com/sustainability-challenge/>

This Code of Conduct for POLITUBES' Suppliers defines the fundamental principles that must underpin the activities of every POLITUBES' Supplier.

The Supplier shall comply with at least the following provisions:

- the UN Universal Declaration of Human Rights;
- the 10 principles of the UN Global Compact;
- the fundamental Conventions of the International Labour Organization (ILO);
- the Organization for Economic Cooperation and Development (OECD) guidelines;
- the main Conventions of the International Labour Organization (ILO);
- the rules of conduct of the International Chamber of Commerce (ICC);
- Italian anti-corruption legislation;
- the US legislation against bribery of foreign officials (US Foreign Corrupt Practices Act);
- the UK Modern Slavery Act;
- US legislation on minerals from conflict areas (US Frank-Dodd Act);
- the EU Reach regulation;
- all applicable international and/or national and local environmental regulations and laws applicable to this sector and activity in which the Supplier operates;
- all other applicable international conventions and/or national and local regulations applicable to their activity in the country or countries in which they operate.

Any policies set by Politubes that are more restrictive will be given priority.

A. Human Rights

The POLITUBES supplier is obliged to:

- Respect the dignity, privacy and rights of each individual;
- Do not force anyone to work against their will; and
- Prohibiting behavior, gestures, expressions or physical contact of a sexual or coercive nature or which may constitute threats, abuse or exploitation.

B. Fair working conditions

The supplier is obliged to ensure fair working conditions. In particular, he shall:

- Do not discriminate against job applicants on the basis of gender, age, ethnicity, nationality, religion, tradeunion membership, political affiliation or sexual orientation;
- Respect the right of employees to form associations and bargain collectively;
- Do not tolerate or even use child labour at any stage of its activities, except in cases expressly provided for by law;
- Do not use forced labour, including but not limited to involuntary labour of prisoners, victims of slavery and human trafficking, and allow any employee to leave work freely upon reasonable notice;
- Pay employees a fair wage that complies with wage legislation and/or collective labour agreements and, where these do not exist, pay employees a wage that allows for a decent living;
- Ensure that working hours include overtime, do not exceed legal limits and, where such limits do not exist, do not exceed sixty hours per week including overtime; and
- Ensure that employees have at least one full day off per week;
- Comply with company policies on human rights and the UK Modern Slavery Act;

C. Health and safety

The supplier must ensure a safe and healthy workplace for all its employees and conduct its business in an environmentally sustainable manner and in compliance with applicable regulations. In particular, it must:

- Formally appoint a person responsible for health, safety and environmental programs and progress;
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- Ensure that all workers are sufficiently informed of these risks and adequately trained to implement appropriate control measures;

D. Sustainability

Politubes asks its Suppliers that:

- Develop and offer products that help improve energy efficiency and reduce emissions;
- Assess and minimize the environmental impact of the complete life cycle of products and processes;
- Adopt and certify appropriate measures to prevent pollution and minimize the generation of solid waste, waste water and emissions to the atmosphere. Before discharging or disposing of solid waste or waste water, the supplier shall separate and treat such solid waste or waste water appropriately and in accordance with applicable laws and regulations;
- Avoid the use of prohibited substances (e.g. CMR, Carcinogenic Mutagenic and Toxic for Reproduction substances) and manage potentially hazardous substances appropriately (as defined in the regulations applicable to them);
- Adopt optimized logistics procedures that minimize impacts on the environment;
- Ensure that guidelines for reporting all mandatory environmental authorizations and registrations are obtained, maintained and implemented at all times for regulatory compliance;
- Convert to the use of environmentally friendly materials, including recycled and recyclable ones;
- They bring the use of resources such as water to the highest level of efficiency;
- strive to obtain energy from renewable and/or low-impact resources to reduce greenhouse gases;

- Respect and guarantee the rights of minorities and indigenous peoples;
- Respect land, forest and water use and forced eviction rights;
- Adopt transparent policies for the use of private or public security forces;
- Adopt financial accountability policies and are able to give documentary evidence of them;
- They ensure the use of genuine and non-counterfeit parts;
- Adopt work processes that respect animal welfare;
- They adopt work processes that respect biodiversity, sustainable land use and regulation of deforestation;
- Adopt work processes that do not affect soil quality;
- They ensure policies to control noise emissions.

Automotive suppliers must have their responsible person complete the AIAG training on supply chain sustainability.

The training is free of charge and is available at the following link:

<http://www.aiag.org/corporate-responsibility/supply-chain-sustainability>

E. Compliance of materials and conflict mineral

At POLITUBES, we are determined to comply with all legal and customer requirements regarding the prohibition or restriction of substances, including hazardous substances and conflict minerals. Therefore, Suppliers shall ensure that goods delivered to POLITUBES comply with the requirements of all relevant regulations. In particular, it shall:

- Comply with all applicable laws on minerals from conflict areas;
- Identify hazardous materials, substances and chemicals present in each link of its supply chain, ensuring their safe handling, movement, storage, recycling, reuse and disposal;
- Strictly observe all applicable laws and regulations on hazardous materials, substances and chemicals;
- Comply with material restrictions and product safety requirements imposed by applicable laws and regulations;
- Ensure that the workers in charge are aware of and trained in safety practices;
- Adopt an appropriate course of action in relation to mineral conflicts and do their best to discover their origin. To this end, Suppliers must conduct a thorough investigation of their supply chain in accordance with the OECD Guidelines (www.oecd.org), which specify what is required in terms of due diligence on the subject.
- Respond in a timely manner to POLITUBES' requests for evidence of compliance with the above requirements;
- Disclose all potential primary sources or origins (country of origin) associated with the goods and services supplied. Politubes reserves the right to require the supplier to create, at a given point in time, a complete
- mapping of the distribution chain all the way back to origin, in order to facilitate conformity assessment;
- Maintain up-to-date books and records in a transparent manner, to certify compliance with applicable state; or industry regulations for materials and services, and make them available to Politubes upon

request.

F. US Dodd-Frank Act

US customers require POLITUBES to comply with the provisions of the Dodd-Frank Act to ensure that the minerals used in its products do not directly or indirectly finance or benefit armed groups committing human rights violations. If the Supplier uses any of these minerals in their products or processes, it shall be obliged to determine whether these minerals originate from, or are processed in, the countries specified in Dodd-Frank.

The Supplier shall make every effort to trace the original sources of such minerals and provide evidence of their research. The Supplier is responsible for ensuring the disclosure of these requirements to its suppliers, and for monitoring its suppliers' compliance with these requirements.

G. Business ethics

The supplier is obliged to conduct its business in an ethical manner. In particular, it shall:

- To avoid any form of corruption, extortion and illegality and in particular to ensure that any payments, gifts or other commitments to customers (including POLITUBES employees), public officials and others are made in full compliance with current anti-corruption laws;
- Comply with anti-trust and any other competition laws;
- Inform POLITUBES of any potential conflict of interest that may relate to its activity as a POLITUBES supplier, including any financial interest that a POLITUBES employee may have in such activity;
- Protect all confidential information provided by POLITUBES and any of our business partners;
- Respect the intellectual property of third parties, including POLITUBES; and
- Comply with international trade and export control regulations.

H. Business security

The supplier is obliged to conduct its business in a safe manner. In particular, he shall:

- Take reasonable measures to minimize POLITUBES' exposure to possible threats to its security, such as terrorism, crime, pandemics and natural disasters; and
- When visiting or working at POLITUBES sites, respect POLITUBES safety regulations and report any shortcomings through the appropriate POLITUBES channels.

I. Supply

The supplier is obliged to provide goods and services in a responsible manner. In particular, he shall:

- Select its main suppliers, who directly or indirectly supply goods or services to POLITUBES, on the basis of their adherence to standards comparable with those defined in this Code of Conduct for POLITUBES Suppliers; and
- For work at POLITUBES sites, subcontract work only with the prior consent of POLITUBES.

J. Inspections and corrective actions

In order to ensure and prove compliance with the POLITUBES Code of Conduct for Suppliers, the Supplier is required to maintain all relevant documentation and to submit it to POLITUBES when requested to do so.

In order to verify the Supplier's compliance, POLITUBES reserves the right to check and inspect processes and facilities, at POLITUBES' cost and after reasonable notice, with or without the

assistance of third parties.

Should the Supplier fail to comply with the dictates of this Code of Conduct for POLITUBES Suppliers, the Supplier shall implement the necessary corrective actions requested by POLITUBES.

Should the Supplier persist in its non-compliance with the POLITUBES Supplier Code of Conduct, POLITUBES shall be entitled to take action against the Supplier, including suspension or complete termination of its activity as a POLITUBES Supplier.

K. Training

POLITUBES encourages all Suppliers to disseminate the above principles also through adequate training of employees in its supplier base.

L. Access to remedies

In the context of the business relationship between POLITUBES and the Supplier, if the Supplier or its employees believe that there is no adherence to the terms of this Code of Conduct for POLITUBES Suppliers or that POLITUBES is not acting in accordance with its Code of Conduct, we encourage the Supplier to raise its concerns through the reporting channels reserved for POLITUBES employees. For more information on these reporting channels, please visit <https://www.politubes.com/complaints/>

Revision History

Rev. letter	Date	Description	
a)	3/05/2023	Paragraph C (health and safety) amended	5
b)	3/05/2023	Modified paragraph D (sustainability), previously included in paragraph C	
d)	01/09/2023	Added policies on: <ul style="list-style-type: none"> - minority and indigenous peoples' rights; - land, forest and water rights and forced eviction; - Use of private or public security forces; - financial accountability and are able to give documentary evidence of this; - use of genuine and non-counterfeit parts; - animal welfare; - biodiversity, sustainable land use and regulation of deforestation; - soil quality; - control of noise emissions. 	