

Code of Ethics AB&S AVVITO S.r.l.

AB&S AVVITO attaches great importance to the adoption of rules, practices and shared values in the areas of ethics, social responsibility and environmental protection. For this reason, AB&S AVVITO establishes and promotes exemplary relationships based on responsibility, fairness and integrity with all its partners.

For this reason, AB&S AVVITO requires its suppliers to comply with the ethical values set out in this Code of Ethical Conduct and to ensure that their respective suppliers respect those values.

AB&S AVVITO undertakes, in carrying out its activities, to respect the laws, standards and international and national regulations in force, as well as best practices, especially in matters of ethics, social responsibility and environmental protection. AB&S AVVITO expects its suppliers to respect the same rules and ethical principles in the management of their business. AB&S AVVITO requires all its suppliers, employees, production sites and their suppliers to comply fully with the aforementioned legislation. If national legislation or any applicable legislation is found to regulate a case also provided for by this Code of Ethical Conduct, the higher or more restrictive source rule will apply. If a provision of the Code of Conduct for Suppliers conflicts with the legislation in force, the latter will be applied.

AB&S AVVITO cooperates with suppliers who agree to comply with the provisions of this Code of Ethical Conduct and the values imposed by the Conventions of the International Labour Organization, the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD guidelines for multinational companies and the UN Women's Empowerment Principles. Our suppliers make warranties to AB&S AVVITO for the work done by their suppliers, and ensure that they also comply with the Code of Ethical Conduct and fulfil their obligations. In the event of a breach of this Code of Conduct for Suppliers by a supplier or supplier, AB&S AVVITO reserves the right to assess and eventually terminate the business relationship, subject to the conditions laid down by applicable law, even in the absence of a written contract formalising the relationship and without prejudice to any further rights or actions that AB&S AVVITO may bring.

1. LABOUR STANDARDS AND SOCIAL RESPONSIBILITY

AB&S AVVITO requires its suppliers to follow exemplary social responsibility practices.

- <u>Prohibition of child labour</u>: the work of children under 16 is strictly prohibited. In countries where local legislation provides for a higher age for access to employment, or where compulsory education extends beyond the age of 16, this will be the reference age.
- Prohibition of illegal, clandestine and undeclared work: our suppliers are required to comply with applicable legislation to prevent illegal, illegal and undeclared work.
- Ban on harassment and abuse: We expect our suppliers to treat their employees with respect and dignity.
- <u>Non-discrimination</u>: We expect our suppliers to treat all of their employees fairly and fairly. Our suppliers are prohibited from any form of discrimination - especially in terms of pay, recruitment, access to training, promotion, maternity protection and dismissal based on criteria relating to sex, ethnicity, religion, age, disability, sexual orientation, political opinion, union membership, nationality, gender identity or social origin.
- <u>Remuneration and contributions</u>: Our suppliers are required to pay their salaries regularly, and at least monthly, to remunerate overtime according to the percentage of increase provided by law and to comply with all regulatory provisions relating to contributions.
- Working Hours: As regards working hours, our suppliers are required to comply with applicable local laws and regulations, which may in no case exceed the maximum hours indicated by internationally recognized standards, such as the standards issued by the International Labour Organisation.
- <u>Trade union freedom:</u> Our suppliers are required to recognise and respect the right of employees to collective bargaining and the creation or affiliation to freely chosen trade union bodies.
- Ensure health and safety: our suppliers are required to provide employees with a safe and healthy working environment in order to avoid accidents or physical damage that could result from, be associated with or be a consequence of their work, also when using working tools. Suppliers are required to provide for procedures and to organise training meetings to detect, avoid and mitigate, by all possible means, any danger which may affect the health, hygiene and safety of personnel; are also required to comply with all applicable local and international laws and regulations in this area.

2. PROTECTION OF THE ENVIRONMENT

AB&S AVVITO acts concretely for the protection of the environment, which involves cooperation with its suppliers to ensure the application of good practices throughout the production chain. AB&S AVVITO expects its suppliers to share the same commitment to promote initiatives to support the reduction of the environmental impact of their activities, in particular regarding the use of ecological technologies. AB&S AVVITO requires its suppliers to comply with local and international environmental regulations and standards, obtain the required environmental permits and demonstrate effective compliance with the following requirements:

- the implementation of an environmental management system;
- the improvement of the environmental performance of their resources and production sites, especially for the proper management of waste disposal, the reduction of water and energy consumption and the adequate management of hazardous chemicals;
- the implementation of biodiversity conservation measures.
- the implementation of good practices throughout the production chain that promote respect for the environment;
- the improvement of environmental performance throughout the entire product life cycle.

3. PROFESSIONAL INTEGRITY REQUIREMENTS

AB&S requires its suppliers to follow exemplary integrity practices in their activities.

- <u>Legal requirements</u>: In carrying out their business activities, our suppliers are required to comply with applicable local, national and international regulations.
- <u>Prohibit corruption in all its forms</u>: AB&S AVVITO adopts a "zero tolerance" policy on corruption and influence trafficking. Our suppliers are required to comply in full with the applicable legislation on corruption and to take appropriate measures to prevent, detect and sanction any relevant fact, directly or indirectly, in terms of corruption or trafficking in influences in their economic sector.
- <u>Prevent conflicts of interest</u>: We require our suppliers to comply with applicable conflict of interest legislation and to commit to prevent situations arising in their cooperation with AB&S AVVITO.
- Respect competition: Our suppliers undertake to comply with the competition rules applicable in the countries in which they operate. This includes the prohibition of abuse of a dominant position, cartel practices or any unlawful agreement between competitors.
- <u>Confidentiality</u>: our suppliers are required to take all necessary measures to ensure
 the protection of professional secrecy and any other information that is not of a public
 nature and that has been communicated within the commercial relationship with
 AB&S AVVITO.
- Respect privacy: We require our suppliers to comply with applicable data protection laws and regulations.
- <u>Customs and Security:</u> We require our suppliers to comply with applicable customs regulations, including relevant regulations.

- <u>Trade restrictions and international sanctions</u>: We require our suppliers to comply with trade restrictions and international sanctions regulations, taking into account changes and additions thereto, as well as export control laws and regulations.
- <u>Gifts and invitations</u>: gifts and invitations may constitute acceptable expressions of courtesy within a commercial relationship already established if their importance and value are limited, if they are offered publicly and transparently, whether the local legislation or the customs of the country in question authorise such a practice, whether they have as their objective the expression of consideration and recognition and whether they are offered without any request being made in return. In some cases, such practices are relevant to the fight against corruption or other legal situations, the legislation of which must therefore be known and respected.
- <u>Safeguarding goods</u>: Our suppliers are required to take all necessary measures to safeguard the assets and resources of AB&S AVVITO in particular its intellectual property rights. They are committed to combating counterfeiting through prevention, cooperation and communication strategies. By way of example, the supplier shall destroy all finished products or semi-finished products bearing an AB&S AVVITO sign and which have not been ordered or have been refused, following the instructions provided by AB&S AVVITO.
- <u>Public statements</u>: Our suppliers must exercise extreme caution in public statements, especially on the Internet and social networks. They must ensure that their contribution is not attributable to AB&S AVVITO and is in accordance with the provider's commitment to privacy and professional secrecy.
- <u>Transparency of information</u>: Our suppliers are required to provide clear and accurate information about their methods and resources.

CONTROL AND AUDIT

AB&S AVVITO reserves the right to verify compliance with the values set out here and to carry out any compliance audits at the suppliers, who are required to provide all necessary information and to facilitate access for AB&S AVVITO representatives who wish to verify compliance with the requirements of this Code of Ethics. Suppliers are required to make efforts to improve or correct any deficiencies that may be detected. AB&S AVVITO can also support its suppliers in the implementation and application of good practices, in order to resolve even minor non-compliance situations.

In addition AB&S AVVITO requires:

- accuracy of records.
- suppliers to keep track of the activities carried out for compliance with this Code of Conduct for Suppliers.