



# **SUPPLIER CODE OF CONDUCT**

**Ilpea Group**

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# PURPOSE OF THE SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is developed by Ilpea Group (hereinafter also "Ilpea", or the "Group", or the "Company") and has been implemented throughout the Group, including its more than 30 plants in 5 continents all over the world.

A fundamental part of Ilpea's commitment is to guarantee Human Rights in carrying out its activities and promotion of these principles also along its supply chain, extending to suppliers, subcontractors, business partners and to all those who are in any way involved in carrying out activities for Ilpea.

Procurement of materials in products, parts or components supplied to Ilpea is in no way permitted if it involves, directly or indirectly, the use of human rights abuses, especially in areas of conflict or high risk.

The selection of Ilpea suppliers is based not only on quality and competitiveness of products and services, but also on socio-environmental performance and adherence to ethical values, factors that are a prerequisite for becoming suppliers and developing a lasting relationship of collaboration.

## 1. GENERAL PRINCIPLES OF THE SUPPLIER CODE OF CONDUCT

### **1.1 Harassment**

Any form of harassment, violence, abuse, bullying or bullying in employment relationships, whether physical, sexual, psychological, verbal, or in any other form, is prohibited in Ilpea Group and is not even tolerated along its supply chain.

### **1.2 Discrimination, Diversity, Equity and Inclusion**

Ilpea requires its suppliers and business partners to guarantee respect for diversity of each employee and worker, as well as to abolish discrimination in all its forms and therefore, by way of example, in terms of race, ethnic origin, sex, nationality, language, disability, religion, political belief or sexual orientation. Equity and inclusion are essential values that must never be violated.

### **3.3 Occupational Health & Safety**

The workplace must be safe and dignified. The load and type of work and duties must not pose a risk to health and safety of people and must always comply with national and international standards, laws and regulations, administrative practices and national policies of countries where they operate.

### **3.2 Working conditions and hours**

Just as Ilpea promotes decent and respectful working conditions for its employees, it also expects its suppliers to respect and guarantee this principle.

Overtime work must be considered an exception against which an increased salary is recognized.

Ilpea requires its suppliers to ensure the right balance between work and private life of their employees.

### **3.3 Remuneration**

Remuneration offered to its collaborators by Ilpea's suppliers and business partners must be commensurate and at least sufficient to guarantee a dignified life of the worker and his family.

In this regard, local minimum wage set by law or by collective agreements, if any, must be respected.

### **3.4 Child labor**

Ilpea prohibits child labor within its company and it will not be tolerated in any way within the perimeter of supplier's activities and entire supply chain in which Ilpea is involved directly or indirectly.

Ilpea severely condemns any form of child labor and does not tolerate hiring of any employee under the age of 15 (unless the country's local law provides for a higher limit) and requires its suppliers to apply same principle to all activities, as well as to their sub-suppliers.

### **3.5 Forced labor and human trafficking**

Suppliers and business partners of the Group, regardless of origin and geographical location, must refuse/avoid any form of forced labor, exploitation, including bonded, compulsory, involuntary, prison labor not approved and corporal punishment. Trafficking in human beings also falls within the scope of these illegal activities.

### **3.6 Conflict Minerals**

Ilpea Group is committed to ensuring a responsible sourcing of conflict minerals, such as tin, tantalum, tungsten and gold (also known as "3TG"), refusing to finance, directly or indirectly, wars, armed groups, or to contribute to human rights violations and Ilpea expects supplier to do the same.

In this regard, Ilpea has implemented Conflict Minerals Policy on Minerals and expects suppliers to read and observe it and also adopt measures to guarantee this principle throughout supply chain.

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

The right of workers to trade union freedoms, such as freedom of association and collective bargaining, must be respected not only in Ilpea but also throughout the Group's supply chain.

As a result, employees of Ilpea's suppliers, and those of their suppliers, must be able to establish, be represented by or take part in organizations aimed at protection and promotion of their interests, provided that they comply with local laws in force on these aspects.

### **3.8 Data protection and Privacy**

Ilpea processes personal data in a lawful manner and data collected/stored are only those necessary for specific, explicit and legitimate purposes. Data are kept for a period of time not exceeding that necessary for purposes of collection and appropriate security measures are adopted. Ilpea expects the supplier to do the same and ensure that entire supply chain is involved in some way.

## 2. DISSEMINATION OF THE SUPPLIER CODE OF CONDUCT

### **2.1 Methods of communication and implementation**

This Supplier Code of Conduct is communicated to all suppliers and is an integral part of any contractual relationship between Ilpea and its suppliers. In fact, Ilpea will entertain commercial relations exclusively with suppliers who respect / observe and share the principles set out.

Supplier Code of Conduct is also published and always available on Group's website [at www.ilpea.com](http://www.ilpea.com), easily accessible by anyone who needs to read it.

### **2.2 Whistleblowing mechanisms**

In order to be able to comply with the principles set out in its Code of Ethics and in this Code of Conduct for suppliers including all attachments, Ilpea has set up a Whistleblowing Procedure (available on the Ilpea website [www.ilpea.com](http://www.ilpea.com) and on Ilpea intranet), approved by the Board of Directors (or Governing Body) of each company of Ilpea Group, to ensure that all cases of suspected violations of the values and principles introduced in the aforementioned documents are reported and managed in a timely manner and appropriate.

The objective of procedure is in fact to ensure that anyone feel supported in speaking in confidence and in reporting matters. that may involve something improper, unethical or inappropriate and to handle all reports promptly, consistently and professionally.

All reports will be taken seriously, treated as confidential and handled without fear of retaliation.

As soon as you become aware of any illegal or suspected illegal, you can contact the SB (Supervisory Body) via e-mail at the following address [odv@ilpea.com](mailto:odv@ilpea.com) or directly to the email address Ilpea S.p.A. (Viale Industria 887, 21023 Malgesso - Va - Italy), attention to the Supervisory Body.

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