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# SUPPLIER CODE OF CONDUCT

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## 1. INTRODUCTION

Elmec Informatica S.p.A. (“ELMEC” or “the Company”) firmly believes that sustainable procurement is an effective means of promoting responsible values and practices throughout the value chain. By striving to build strong and lasting relationships and partnerships with its suppliers, the Company aims to promote responsible behavior throughout its supply chain.

ELMEC's Supplier Code of Conduct embodies the system of values that undergoes the company's ethical culture, inspiring both strategic thinking and the conduct of business activities. Suppliers must conform their behavior to the principles of loyalty, transparency, and fairness, as well as the other ethical conduct rules contained in the Code.

## 2. SCOPE

This document serves as a guideline for all individuals who interact with ELMEC in various capacities, considering the diversity of company sizes and activities. The purpose of this document is to identify shared values and principles, as well as the actions necessary for unified, progressive advancement toward conscious, productive growth. This document does not claim to regulate any situation or circumstance that may arise for individuals inside or outside the company. To this end, the Company is inspired, among other things, the provisions of the UN Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work and the Conventions issued by the International Labor Organization (ILO), as well as the Ten Principles of the Global Compact, the UN Guiding Principles for Business and the OECD Guidelines for Multinational Enterprises.

In this context, it is in ELMEC's interest to support and promote the aforementioned values and principles also in its relations with all parties with whom it interacts, among which Suppliers are particularly important as strategic partners in the development process. The Company considers Suppliers to be external collaborators and companies that, individually or as part of a chain, provide goods, services, and resources necessary for the performance of activities and the provision of services, contributing with the utmost loyalty to the achievement of objectives. This document aims to summarize in a single context the principles, values, and rules of professional ethics expressed in ELMEC's Code of Ethics and in the various Policies adopted in order to define the basic principles and behaviors adopted in specific areas, including, for example, the Responsible Procurement Policy, the Human Rights Policy, the Environmental Policy, the Anti-Corruption Policy, the Stakeholder Engagement Policy, the Lobbying Policy, the Diversity and Equal Opportunities Policy, the Health and Safety Policy, and the Whistleblowing Policy.

### **3. RIGHTS, DUTIES, AND RESPONSIBILITIES BETWEEN THE PARTIES**

This document sets out a series of rights, duties, and responsibilities of the parties involved and reflects ELMEC's commitment to complying with current regulations, as well as to the standards of fairness, integrity, and loyalty expressed in the Code of Ethics. The Company undertakes to communicate and share the principles and contents expressed herein with its suppliers and external collaborators, and requires that all internal and external parties share and commit to respecting these principles, striving in turn to promote them among their own suppliers and subcontractors.

In this context, ELMEC is committed to:

- i. developing lasting and cooperative relationships with suppliers based on communication aimed at the mutual exchange of skills and information, in order to promote and encourage the creation of shared value;

- ii. monitoring, in the forms and manner provided for by law and contracts, to preserve the health and safety of workers in companies involved in its supplies.

At ELMEC, supplier selection and qualification, as well as procurement of goods, works, and services, are based on objectivity and fairness. These processes are carried out in accordance with the Responsible Procurement Policy. Each selection is based on an evaluation of quality, cost-effectiveness, technical and professional suitability, environmental respect, and social responsibility.

The company seeks out suppliers and external collaborators who demonstrate professionalism and a commitment to the principles and contents of the Supplier Code of Conduct. All partners are required to act in accordance with the Code of Ethics' fundamental principles, which state that ELMEC's activities must comply with the law, respect human rights, and protect the environment. Under no circumstances may the pursuit of the Company's interests justify conduct that does not comply with honest and legitimate practices. Therefore, ELMEC reserves the right to not enter into or continue any type of relationship with anyone engaging in illegal activities that do not comply with the commitments set out in this document. The quality of relationships with individuals, companies, or consortia depends on each party's ethical conduct. Suppliers contribute to the image and reputation of Elmec Informatica S.p.A.; therefore, their commitment to respecting and supporting the Company's adopted principles is fundamental.

#### **4. COMMITMENTS AND PRINCIPLES APPLICABLE TO SUPPLIERS**

This list clarifies ELMEC's ethical, social, and environmental values, as outlined in the Code of Ethics and adopted policies. These values are fundamental to any business activity. The principles and values expressed below are a fundamental reference for everyone working to achieve the company's objectives. They apply to all individuals who have any kind of relationship with ELMEC, whether direct or indirect, permanent or temporary, for the pursuit of the company's results. Suppliers are required to commit to these principles

by reading the following document during the qualification and tender procedures, including the contract award and assignment phase.

#### **4.1.     LEGAL COMPLIANCE**

Suppliers must comply with all applicable national, European Union, and international laws, regulations, and standards related to their operating countries and activities. To this end, they must implement the necessary measures to stay updated on regulatory framework developments and ensure full compliance with applicable provisions.

#### **4.2.     BUSINESS ETHICS**

Suppliers are required to conduct their activities in accordance with the principles of fairness, honesty, transparency, and responsibility, ensuring ethical behavior at every stage of their operations. In managing relationships with business partners, public officials, or other third parties, they are bound to act fairly and professionally, avoiding unfair practices or situations of conflict of interest.

#### **4.3.     FRAUD AND ILLEGAL ACTS**

Suppliers are required to avoid, combat, and not tolerate any practices related to fraud, embezzlement, extortion, insolvency offenses, illegal payments, or other unlawful actions. To this end, they are required to adopt transparent behaviors and adequate control systems to prevent any risk of irregularities or abuse.

#### **4.4.     FIGHTING CORRUPTION AND EXTORTION**

Suppliers are required to prevent and reject any form of corruption or bribery, whether active or passive, direct or indirect, in whatever context or jurisdiction they operate, even in cases where such practices turn out to be tolerated or not sanctioned locally. To this end, they are required to refrain from offering, promising, giving or authorizing economic,

material or other benefits to public officials or private parties, as well as from requesting or accepting them. They are also required to comply fully with current regulations on anti-money laundering, self-money laundering and receiving stolen goods, promoting an approach based on transparency, integrity and legality in all business activities.

#### **4.5. FAIRNESS IN THE MARKETS**

Suppliers are required to operate in full compliance with national, international, regional and local laws and regulations, promoting fair and free competition. To this end, they are urged to avoid practices, agreements or understandings with competitors, suppliers, customers or other parties that may restrict or threaten competition, such as illegal price fixing, exchange of sensitive information, sharing of markets or customers, or any other improper conduct throughout the entire production and distribution chain.

#### **4.6. CONFLICTS OF INTEREST**

Suppliers are required to avoid situations that could result in improper advantage or improperly influence the ability of employees of the contracting company to make impartial and objective decisions. To this end, they are required to refrain from undue interference in qualification, contract award or subcontract authorization processes, including requests for confidential information or information obtained outside official channels. They are urged to prefer direct relations with the contracting company, reporting any conflict situations in advance and ensuring maximum transparency on corporate information, operational capabilities and bid sustainability. They are also required to promptly disclose any actual or potential circumstances that may constitute a conflict of interest, contributing to clear, fair and reliable decision-making.

#### **4.7. DATA PROTECTION**

Suppliers are required to protect the personal data of representatives, contact persons of the client company and any other individuals whose data are shared for purposes related to the collaboration, in accordance with applicable national, international, regional and local laws and regulations. To this end, they are required to implement appropriate security measures to safeguard such information and ensure responsible processing. In the event of security breaches involving loss, unauthorized disclosure, alteration, destruction, or unlawful access to data, suppliers must promptly and fully report the incident to the contracting company, working together to limit its effects and prevent future risks.

#### **4.8. PRIVACY PROTECTION**

Suppliers are required to treat confidential information in compliance with applicable privacy laws and in accordance with best practices applicable in the jurisdictions in which they operate. They must guarantee their stakeholders' right to privacy by using personal data collected only for legitimate, clear and appropriate purposes. To this end, they undertake to adopt appropriate data protection procedures, including security measures, training of personnel authorized to process and identification of roles responsible for privacy within the activities and services provided.

#### **4.9. GOVERNANCE**

Suppliers commit to an appropriate governance system, including policies, procedures, management practices, risk assessment and internal controls, to ensure transparency, accountability and compliance with applicable laws and regulations. Suppliers also commit to having whistleblowing or complaint mechanisms in place that allow for internal and external reporting, including anonymous reporting, without fear of retaliation, taking corrective action when necessary.



#### **4.10. HUMAN RIGHTS**

Suppliers are committed to respect national, regional and international minimum standards, as well as applicable local human rights regulations. They are committed to respecting the cultural, religious, economic, and social rights of local communities, minorities, indigenous peoples, and other vulnerable groups, considering the operating context and activities performed. Are required to prevent and not tolerate physical or humiliating punishment, violence or abuse of a sexual, verbal, physical or psychological nature in the workplace, taking effective measures to prevent such behavior. In the event of abuse or negative impacts, suppliers are committed to providing appropriate remedies, contributing to a safe, respectful and inclusive work environment.

#### **4.11. NON-DISCRIMINATION**

Suppliers are committed to preventing all forms of discrimination, ensuring equal opportunities for all people with whom they interact and promoting an inclusive and respectful work environment. They must ensure that no one is treated unfairly or disadvantaged because of ethnicity, religion, geographical origin, social origin, sex, gender, sexual orientation, political opinion or any other personal condition.

#### **4.12. FAIR TREATMENT**

Suppliers are committed to fair and impartial treatment of all people involved in their activities, ensuring that every stage of working life, including internships, compensation, job classification, assignment of responsibilities, training and growth paths, is based solely on skills, experience, potential and achievements. They are also committed to ensuring pay equity for equal roles and merit, promoting a work environment based on respect for and appreciation of individual contribution.

#### **4.13. HEALTH AND SAFETY**

Suppliers are required to ensure the health, safety and welfare of all workers, in compliance with local regulations and applicable national, regional and international standards. They must ensure a safe, healthy and adequately equipped working environment, providing minimum conditions of comfort such as potable water, lighting, ventilation, temperature and suitable sanitary facilities, as well as any safe company housing when provided. Suppliers are encouraged to identify and assess health and safety risks in a preventive manner, taking effective preventive and protective measures to reduce the possibility of occupational injuries or illnesses. In addition, they must ensure the implementation of safe work procedures, regular maintenance and adequate controls.

#### **4.14. FORCED LABOR AND MODERN SLAVERY**

Suppliers are required to prohibit and prevent all forms of forced, compulsory or irregular labor, including modern slavery, human trafficking and debt bondage. They must ensure that all employment relationships are established on a voluntary basis and that workers are given the right to terminate their employment after a reasonable period of notice. They are also required to ensure fair conditions of employment that respect people's dignity and promote a work environment free from coercion or abuse.

#### **4.15. ENVIRONMENTAL PROTECTION**

Suppliers are committed to operating in compliance with national and international environmental regulations and standards and to promoting responsible management of their activities. The adoption of effective environmental management systems, possibly inspired by recognized standards such as ISO 14001, EMAS or equivalent, is encouraged. Suppliers are encouraged to progressively reduce their environmental impacts and optimize the use of natural and energy resources through continuous

improvement initiatives and monitoring of their own performance. Active participation in the prevention of environmental risks and protection of ecosystems, according to the principles of precaution and prevention, is desired. Suppliers are also encouraged to share, when requested, information on their own environmental performance and to integrate sustainable practices throughout the supply chain, contributing concretely to the sustainability journey and environmental goals of the ordering company.

#### **4.16. CIRCULAR ECONOMY**

Suppliers are committed to promoting a circular economy-oriented approach, encouraging the use and development of renewable or recycled raw materials and helping to reduce the environmental impact of their processes and products. They are encouraged to design and offer solutions that optimize the use of resources, favoring materials that are reusable, recyclable or easily recovered.

#### **4.17. REDUCTION OF GHG EMISSIONS**

Suppliers are committed to measuring, monitoring and progressively reducing their greenhouse gas emissions by adopting approaches consistent with recognized international standards, such as the GHG Protocol or ISO 14064 and ISO 14067. They are encouraged to share clear and transparent data on emissions from their own activities and those of the supply chain.

### **5. IMPLEMENTATION, AUDIT AND CONSEQUENCES OF NON-COMPLIANCE**

Elmec Informatica S.p.A. reserves the right to conduct audits of its suppliers, either directly or through authorized third parties, in order to verify compliance with the principles and commitments set forth in the Supplier Code of Conduct. Such audits may be conducted either prior to the initiation of a contractual relationship or during its

execution, as required by the Company. Suppliers undertake to cooperate in good faith, allowing access to relevant information and locations and ensuring transparency in the activities being audited, while respecting each other's obligations of confidentiality and current regulations on data protection and corporate secrecy.

In the event that nonconformities of the principles and commitments set forth in this document emerge, ELMEC may propose indications or recommendations to encourage improvement in the practices adopted. The supplier agrees to work with the Company to identify the causes of any nonconformities and to define, within a reasonable time, appropriate and proportionate corrective actions. If the nonconformities are found to be significant or unresolved despite the actions taken, the Company may consider further action, including the possibility of temporarily suspending or, as a last resort, terminating the contractual relationship.

If questions or concerns arise regarding the contents of the following document, please direct them to the following e-mail address: [ESG.Elmec@elmec.it](mailto:ESG.Elmec@elmec.it).

Elmec Informatica S.p.A.