

# Code of Conduct for Suppliers



Rev.	Descrizione	Data emissione
00	Adoption of the Supplier Code of Conduct	16/06/2023
01	Approval of the Group Supplier Code of Conduct and the export compliance clauses	20/03/2026

## **1. Purpose of Document**

The commitment to Sustainability is based on the three ESG pillars, i.e. Environmental, Social and Governance, to which relationships with the territory and other stakeholders must be added.

C.O.B.O. S.p.A. and its subsidiaries and affiliates, hereinafter referred simply as COBO in this document, undertakes to define the core values specifically related to the ESG issues that must be implemented with regards to relations with all suppliers. It is expected that all suppliers with whom COBO does business establish and maintain a management system that ensures compliance with this Code of Conduct.

This Code of Conduct is inspired by the main existing regulations, guidelines and documents at national and international level on the subject of Corporate Social Responsibility, Corporate Governance, protection of human rights, safety and the environment, as enshrined in Institutions and International Conventions.

Suppliers are expected to ensure that the requirements described within this document are applied at all levels of the company, and are encouraged to assess their business operations and throughout their supply chain.

## **2. Regulatory compliance and integrity of business**

Suppliers must act in full compliance with all applicable laws and regulations in the countries in which they operate. The company must conduct business with integrity, honesty and as allowed by law, aiming at guaranteeing respect for human rights, health, safe working conditions, and environmental protection. In particular, suppliers must:

- ✓ Comply with all applicable laws and regulations in the country in which they operate, as well as the Requirements described in this Code;
- ✓ Monitor its production chain, requiring suppliers and subcontractors to ensure compliance with the legality and compliance of finished products, including in particular spare parts. They also ensure that the products marketed and supplied to COBO are not counterfeit;
- ✓ Hold valid licenses, authorisations, permits and certificates required by the law of the country of origin;
- ✓ Ensure the mandatory requirements related to compliance with ESG standards such as human rights, environmental impact, health and safety.
- ✓ Comply with the requirements of the applicable legislation at the Italian Community level on the export and import of goods and/or services, dual and commercial, subject to regulatory requirements, as well as the obligations relating to embargoes, sanctions and trade restrictions.

### **3. Labour and Human Rights**

#### **3.1. Child Labour**

As regards child labour, suppliers must:

- ✓ Comply with local legislation on the minimum age of workers;
- ✓ Not hire anyone under the age of 15 or under the minimum age for the completion of compulsory education in accordance with local legislation;
- ✓ During the recruitment stage, request documents certifying the workers' age, and keep copies, not originals, of all relevant documentation;
- ✓ Comply with all restrictions required by law on authorised young workers, including maximum overtime hours, night work, authorised duties, and mandatory medical examinations.

#### **3.2. Forced or compulsory labour**

Any form of physical and mental coercion, slavery or trafficking in human beings is strictly prohibited. As regards forced or compulsory labour, suppliers must:

- ✓ Not resort to any type of forced and/or compulsory labour and any other form of non-voluntary work;
- ✓ Not keep any employees' original identity documents or any other type of document that may limit their freedom to travel or the possibility to leave the workplace or the work;
- ✓ Not require workers to pay dues or deposits in connection with their employment.

#### **3.3. No discrimination, harassment and abuse**

All workers must enjoy equal opportunities. Suppliers must prevent any form of discrimination at the workplace, including in connection with hiring, compensation and termination of employment.

Suppliers must:

- ✓ Ensure that, at the workplace, their employees are not subjected to harassment, cruel treatment, violence, intimidation, corporal punishment, physical or psychological coercion, verbal abuse, deportations, and any other form of forced expulsion and harassment;
- ✓ Not discriminate on the grounds of colour, caste, religion, age, nationality, social or ethnic origin, race, pregnancy, sexual orientation, gender, disability, trade union membership, or political opinion.

### **3.4. Wages, benefits and working hours**

Suppliers must:

- ✓ Comply with all regulations on wages and working hours, including allowances, benefits and overtime hours;
- ✓ Remunerate the work by paying at least the minimum wage laid down by local legislation or by binding collective agreements;
- ✓ Remunerate workers on a regular basis, in accordance with legal requirements;
- ✓ Provide all the benefits provided for by law, such as paid holidays, permits, leave, etc.
- ✓ Ensure that workers have sufficient time for meals and breaks, in accordance with legal requirements;
- ✓ Keep and update a working hours record, including a listing of times worker arrive/leave work every day of work;
- ✓ Not implement any form of penalties, sanctions or disciplinary actions if workers refuse to work overtime.

## **4. Health and safety and company infrastructure**

Suppliers must:

- ✓ Promote safe, secure and healthy workplaces by implementing all necessary measures aimed at reducing the risk of accidents, injuries or exposure to harmful substances, especially when there are hazardous materials present;
- ✓ Adopt established safety procedures, preventative maintenance, and wear personal protective equipment as required by law.
- ✓ Effectively manage all workplace health and safety risks and take appropriate measures to limit and counter them;
- ✓ Duly and effectively train workers on health and safety issues and as required by national legislation;
- ✓ Equip machinery and equipment with all necessary safety devices;
- ✓ Equip all workers with adequate personal protective equipment (PPE). PPE must be free of charge, readily available, properly maintained and replaced;
- ✓ Comply with legal requirements on fire protection and emergency management; in particular, emergency exits and evacuation routes must comply with the requirements laid down by law on number, size and location; these must be visible and signalled with light devices, nothing must hinder access to them, and they should always be openable outwards.

- ✓ Commit to ensuring that all workers have access to drinking water, an adequate number of toilets and personal hygiene. The toilets must be properly cleaned and maintained. Canteens and refreshment areas must comply with the provisions of the law on sanitation and be adequately cleaned and kept in good condition. Dorms, if any, shall comply with all health and safety requirements.

## ***5. Intellectual Property and Privacy***

Suppliers must safeguard COBO's intellectual property rights, trade secrets, and proprietary information. Suppliers must protect the confidential information they come into possession of in accordance with the legislation in force in the country where they operate, concerning the protection of privacy.

## ***6. Conflicts of interest and Anti-corruption***

Suppliers must:

- ✓ Keep accurate financial records and hold a valid business licence.
- ✓ Not offer bribes, gifts, discounts, or any other illegal payments or compensation when dealing with government officials or other private sector individuals, including COBO employees or representatives, in order to influence any decision to obtain a business advantage.
- ✓ Avoid any agreements or actions that illegally restrict market exchanges and/or competition.

## **7. Responsibility towards the environment**

Suppliers must comply with all environmental laws and regulations applicable to their activities and their products and/or services. In particular, suppliers must undertake to:

- ✓ Ensure pollution levels are regularly monitored and controlled to ensure that both statutory and permit requirements are complied with;
- ✓ Ensure that chemicals and waste are stored, used, transported and disposed of in accordance with legal requirements;
- ✓ Identify and handle all chemical or other materials which, if released, could be dangerous to the environment, in order to ensure they are safely treated, handled, stored, recycled or reused and disposed of;
- ✓ Monitor environmental parameters such as energy, and the quality of the air and water used;
- ✓ Reduce waste as much as possible, including water and energy;
- ✓ Ensure that land and forests are protected;
- ✓ Reduce as much as possible emissions into the air of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated by the activities. They should be characterised, monitored, controlled and treated as required by law before being discharged.
- ✓ Implement a waste management system as laid down and in compliance with current legislation.

## **8. Reporting and Whistleblowing Mechanism**

Suppliers must encourage and provide channels of communication to their employees and subcontractors in their local languages to raise concerns or complaints, or report possible illegal activities without facing retaliation, intimidation or harassment.

Reports must be treated confidentially and, where permitted by law, may be made anonymously. In the event of a suspected violation of the criteria set out in this Document, suppliers and their employees, as well as interested parties and rights holders in general, are required to report the violations to COBO, through the dedicated whistleblowing channel. Especially in compliance with D.Lgs. 24/2023, the company has adopted a whistleblowing channel suitable for guaranteeing the confidentiality of the identity of the Whistleblower, in compliance with regulations, accessible by accessing the link <https://private.mygovernance.it/mywhistleblowing/cobo/98618>.

The confidentiality of the identity of the Whistleblower distinguishes the entire process from the moment the report is received and at every subsequent stage.

Any retaliatory conduct committed against the whistleblower or in any case aimed at violating the whistleblower's protection measures and carried out by the management bodies or by persons operating on behalf of the Company is sanctioned, based on the seriousness of the conduct.

## **9. Final Provisions**

Suppliers must observe what is described in this Code and must commit themselves to promote the principles among their stakeholders, including the supply chain. If local legislation provides for stricter requirements than those set out in this Code, suppliers must comply with the provisions applicable in the country in which they operate.

Suppliers shall promptly inform COBO of any breaches to what is outlined in this document.