

CODICE DI CONDOTTA FORNITORI **WAMGROUP**



WAMGROUP®

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Our commitment

Since the beginning of its history, in 1969, WAMGROUP® has considered correctness and integrity to be essential values in relations with Collaborators, Colleagues and its Suppliers.

WAMGROUP®'s commitment is based on the belief that the way of working is just as crucial as the results achieved. Under no circumstances should the achievement of corporate objectives prevail over ethical principles. In compliance with the Code of Ethics, WAMGROUP® guarantees:

- Maximum respect for people, nature and the environment;
- Commitment to always operate in the best possible way, guided by skills;
- Openness to the learning process, attention to listening and promotion of collaboration;
- Adherence to moral principles and integrity;
- Promotion of transparency and impartiality;

Success in WAMGROUP® is closely linked to the ability to establish impartial and sincere relationships with all Suppliers, based on an open dialogue aimed at mutual benefits.

The Group has experienced significant growth over the years, transforming itself into a global reality. Despite this expansion, we have consistently maintained attention and respect for the fundamental values outlined in our Code of Ethics, sharing them with all our Employees and Collaborators in every part of the world.

Our expectations

On this path of extraordinary success, WAMGROUP® has integrated the principles of integrity with a series of equally essential values.

The Group intends to share these principles with its Suppliers and asks them to pursue these principles with commitment in all daily activities. WAMGROUP® firmly believes that a fair, sustainable and transparent supply chain forms the solid foundation for continuous improvement which, without a doubt, will benefit both WAMGROUP® and all the Collaborators, as well as the Communities in which it operates.

WAMGROUP®, in carrying out its activities, firmly undertakes to carefully observe all applicable laws, regulations and international agreements, also adhering to best practices. This Supplier Code of Conduct is fully based on compliance with national laws and reflects fundamental international standards and principles, such as those of the International Labour Organization (ILO), the Universal Declaration of Human Rights and the United Nations Global Compact.

WAMGROUP® expects its Suppliers, identified according to the extended definition indicated in the “Scope of Application” section, to operate in compliance with the principles, rules, laws and everything mentioned above.

In compliance with what has been expressed, WAMGROUP® has decided to draw up this Supplier Code of Conduct (hereinafter referred to as “SCC”), providing principles and rules to which each partner must adhere when operating with any of the Group Companies (hereinafter referred to as “WAMGROUP®”).

WAMGROUP® places great value on its Suppliers, considering them essential to ensure compliance and application of the principles and rules outlined in this SCC within their respective supply chains. For this to happen, all Group partners are required to adhere to the Supplier Code of Conduct and to ensure that their subcontractors (if any), as well as any other third parties acting on their behalf, also fully adhere to the SCC when collaborating with or on behalf of WAMGROUP®.

The WAMGROUP® SCC outlines expectations relating to the procurement cycle, with the aim of ensuring that the process respects the Group’s values and is sustainable from a social, environmental and economic point of view.

This document harmoniously integrates with the General Purchasing Principles (http://supplier.WAMGROUP®.com/it-IT/supplier/General-Terms-Conditions_it) and the WAMGROUP® Code of Ethics (<https://WAMGROUP®.com/WAMGROUP®/media/WGRCodeOfEthics/Code-Of-Ethics.pdf>), with the WAMGROUP® Sustainability Report (<https://WAMGROUP®.com/en-GB/Sites/Corporate/Innovation/Sustainability>), with the WAMGROUP® Confidentiality Agreement (http://supplier.WAMGROUP®.com/it-IT/supplier/Confidentiality-Agreement_it), with the WAMGROUP® Quality Requirements (http://supplier.WAMGROUP®.com/it-IT/supplier/Quality_it), all documents that can be consulted on the WAMGROUP® website, thus strengthening the organization’s overall commitment to responsible and ethical business practices.



WAMGROUP® expects its partners to adopt socially responsible behaviour and develop action plans consistent with the sustainability principles expressed in this SCC. WAMGROUP® reserves the right to take appropriate measures against those who do not meet expectations and do not act consistently with these principles.

WAMGROUP® understands that Suppliers operate in various legal and cultural contexts, and that in some cases it may be difficult to implement certain provisions of the SCC. However, compliance with these guidelines must be assessed considering national and international laws, as well as applicable local regulations.

WAMGROUP® expects Suppliers to promptly inform and undertake even when it is possible to only partially adopt the provisions of the SCC, in order to comply with all applicable laws and regulations in the countries in which they operate.

If national legislation or other applicable regulations govern the same area covered by this SCC, the highest standards or most restrictive provisions shall apply. In situations of conflict between this SCC and the applicable law, the applicable law shall prevail. Failure to comply with this SCC could result in WAM Group reviewing the current supply relationships.

Scope of Application

This Code of Conduct applies to any person, entity, company or other body supplying goods and services to the WAM Group (the WAM Group includes the parent company WAMGROUP® S.p.A. and all companies attributable to it as they are subject to its direct and indirect control), hereinafter referred to as the “Supplier” or “Suppliers”.

The Supplier is required to share the contents of this document with its collaborators, along the entire supply chain (i.e. with its employees, agents, subcontractors, suppliers and sub-suppliers to the extent that these are involved in the supply of goods and/or services to WAMGROUP®), as well as to promote, within it, virtuous behaviours that guarantee compliance with the SCC, both by its internal organisational structure and by sub-contractors, encouraging the monitoring of compliance in all links of the chain.

Responsible procurement: the values and principles that guide our choices

WAMGROUP®'s values describe the Company and what it believes in. Values guide actions, characterise corporate commitment and direct both the behaviour of those who are part of it and of those who interact with it. Business ethics are essential to the success of any enterprise; below are the main values on which WAMGROUP®'s activity is based, as expressed in the Code of Ethics:

- Integrity, Honesty, Transparency and Responsibility
- Respect, Empathy and Impartiality
- Loyalty to the Group
- Cost Leadership
- Innovation and Development
- Enhancement of Human Resources
- Professionalism and Excellence in Results
- Team Spirit
- Confidentiality
- Sustainability

In this Supplier Code of Conduct, we wanted to pay particular attention to the last value outlined in the Code of Ethics: Sustainability.

For WAMGROUP®, the concept of sustainability is founded on three pillars, identified by: People, Planet and Product – the fundamental core of our business.

Articles of the Supplier Code of Conduct

This Supplier Code of Conduct defines the general expectations of the organisation and the rules with which it undertakes to comply, also requiring the same commitment from Suppliers.

1. PEOPLE

WAMGROUP® considers its Employees, Collaborators and Stakeholders to be the main corporate resource.

The Company is dedicated to various initiatives aimed at enhancing the well-being of its Employees, promoting their professional and personal growth. The commitment focuses on ensuring fairness, inclusion and recognition of merit. A significant fact is that over 90% of Employees are employed on a permanent basis, and salary levels are subject to annual review, taking into consideration seniority and skills acquired.

WAMGROUP® is firmly committed to promoting training as an essential tool for people's professional development, carrying out various initiatives in this sense.

Occupational health and safety are top priorities for WAMGROUP® in all its locations and factories. In addition to adopting measures that exceed legal standards, the Company is committed to ensuring a safe and healthy working environment for all Employees. This commitment translates into the management of identified risks, the implementation of preventive measures, the evaluation of the effectiveness of these measures and the investment of considerable resources and continuous attention, with the aim of undertaking continuous improvement in this area.

Values such as respect for human and worker rights, inclusiveness, solidarity and support are an integral part of the WAMGROUP® philosophy. For years, social responsibility and commitment have been reflected in philanthropic and volunteer initiatives in support of various charitable institutions.

Human rights

WAMGROUP® asks Suppliers to commit to:

- a) respect human rights and not violate them directly or indirectly;
- b) respect the rights of children (the right to education, the right to play and the right to basic needs) and adopt the measures and provisions necessary to identify, prevent and address the problems of child labour that it may cause within the framework of its commercial relations.

Fundamental rights of workers

- a) do not hire people under the age of 18 or the minimum age required by the legislation of the country in which the Supplier operates;
- b) ensure that employing people above the minimum legal age, but under 18 years of age, does not jeopardize their education, health, safety or morals;
- c) recognize employees' rights to organise themselves, be members of a union and to negotiate collectively;
- d) do not resort to any form of forced, compulsory and/or obligatory labour;

e) do not discriminate in hiring and employment practices against any employee or potential employee, for reasons of gender, race, colour, religion, sexual orientation, age, disability, political opinion, nationality, social or ethnic origins or membership of trade unions;

f) treat all employees with fairness, respect and dignity, guaranteeing equal opportunities for all;

g) adopt the measures necessary to identify, prevent and combat any violations of the provisions above, to which it may contribute or to which it may be linked in the framework of its commercial relations.

Wages and working hours

a) comply with the applicable laws (where possible apply better standards), any collective agreements and ILO Conventions regarding working hours, weekly rest hours, annual holidays and national holidays, as well as maternity leave, sick leave and any other permission;

b) grant all employees fair, dignified, adequate and regular remuneration, as established by current regulations and collective agreements.

Occupational health and safety

a) act in compliance with current national and international standards and regulations on safety and health in the workplace;

b) have its own written policy with programs and systems aimed at guaranteeing worker safety, appointing responsible figures within its organisation;

c) plan effective controls based on defined and pursued rules and procedures, providing appropriate safety information and holding training courses for all employees;

d) measure and monitor performance and any hazards to the health and safety of workers through inspections and audits in the workplace, developing adequate systems for detecting, analysing and eliminating any hazardous situation;

e) have emergency management procedures in place;

f) raise employee awareness on occupational health and safety, work to develop and enhance a sustainable safety culture through open communication, ensuring that all staff have received adequate training on this matter;

g) report and investigate incidents that have occurred.

2. PLANET

The second pillar concerns the planet: the Environment in which the Company operates.

WAMGROUP® has always integrated environmental sustainability into its business model, along the entire production chain. The Company is constantly committed to finding solutions that minimise the impact of processes on the environment, while at the same time optimising the use of energy and natural resources. The sustainability objectives include the continuous reduction of energy consumption from fossil sources, with considerable investments in the production of renewable energy, the accurate monitoring of energy withdrawals and the careful management of waste and waste materials, thus promoting the circular economy.

WAMGROUP® asks its Suppliers to commit to:

- a) satisfy all environmental requirements in accordance with applicable laws, regulations and permits, appointing managers for this matter within their organisation;
- b) act in a sustainable way, minimising environmental impacts, direct emissions, optimising the use of resources and the efficiency of plants, operating with a view to protecting natural resources and fauna, promoting an energy mix with low carbon impact, maximising the recycling of materials and ensuring the observance of environmental rights;



- c) ensure that the employees have adequate knowledge in this area, as well as the resources necessary to fulfil their environmental responsibilities;
- d) ensure the dissemination to all employees of written instructions and relevant information regarding company processes with a potential environmental impact (e.g. the storage and handling of dangerous materials, the management of waste and waste materials, the emissions of contaminants that impact on air, water and soil, prohibition or restriction in the use of specific substances);
- e) actively participate in the process of risk assessment and environmental protection, according to the principles of precaution, prevention, protection and continuous improvement, work to prevent any environmental emergencies and ensure preparation to respond adequately in such an eventuality, analysing, identifying and adopting preventive and corrective measures;
- f) systematically manage environmental violations or issues and communicate information to employees and external stakeholders, including WAMGROUP® (if involved).

3. PRODUCT

The third pillar (Product) represents the beating heart of the Group's activities: the production of technological solutions with a constant drive towards sustainability. The intrinsic quality of the products is the result of the commitment of the people involved in the design and creation thereof, as well as the processes and tools used, together with the certifications acquired, both at product and management system level.

WAMGROUP® aims to reduce the consumption of raw materials and energy, both during the production phase and in the life cycle of the products, and is constantly committed to seeking optimisation and improvements. This commitment is aimed at reducing the use of energy and virgin raw materials, while simultaneously improving the environmental impact of the products made. The ultimate goal is to make products increasingly sustainable, safe and efficient.

The sustainability of the entire supply chain is a crucial aspect. Accordingly, we ask our Suppliers to join us in this effort and adhere to the following principles:

- a) adopt sustainability criteria in all phases that lead from the design to the creation of their products/services, implementing measures that minimise the impact on people and the environment (e.g. reduction of natural resource waste, promotion of recycling and the reuse thereof);
- b) promote the use of the necessary skills, techniques and technologies for the design and production of quality and sustainable products;

c) operate with a proactive approach towards innovative solutions and technologies that are aimed at continuously offering improved products and services with less environmental impact (i.e. promoting initiatives that contribute to the continuous improvement of production processes and quality performances);

d) operate in full compliance with the quality policies and applicable contractual requirements, constantly verifying and monitoring their compliance by both its staff and its suppliers, minimising non-conformities and the consequent potential complaints deriving from direct activities and suppliers;

e) implement management systems that facilitate compliance with current laws and promote incessant improvement in relation to the expectations illustrated in this SCC;

f) carry out risk analyses also relying on third-party bodies that monitor and certify the sustainability of the products/services;

g) use and store the chemical products in accordance with the law, in compliance with the manufacturer's instructions and correctly manage the disposal of scraps and waste.

4. GOVERNANCE AND BUSINESS INTEGRITY

The Suppliers undertake to conduct their business in compliance with the principles of free competition, transparency and fairness.

They also undertake to abstain from any possible deceptive or illicit market practice.

The Suppliers undertake to build and maintain relationships with the public administration and the various supervisory bodies based on a sense of responsibility, collaboration and transparency.

Suppliers must always operate in compliance with the law, according to the principles of transparency, integrity and fairness; they must abstain from forms of disbursement or acceptance of money or goods aimed at promoting or encouraging the conclusion of business with public or private entities, in violation of current regulations or laws, or aimed at pursuing personal interests.

Suppliers must refrain from behaviour aimed at obtaining advantages through the use of false declarations, deception and fraudulent actions.

Suppliers are required to communicate without any delay the existence of conflicts of interest in which they are involved in relation to the execution of a contractual relationship.



Suppliers must ensure the confidentiality of the information they become aware of while carrying out their assigned tasks. The personal data of which they come into possession must be processed in accordance with current legislation on data protection, adopting – where necessary – procedures for the protection of information, guaranteeing the protection of the rights of the interested party and limiting them to the time strictly necessary to their use.

Suppliers undertake to fully comply with international sanctions and the various commercial restrictions that will be issued from time to time.

WAMGROUP® pays particular attention to the international fight against money laundering and terrorist financing. Suppliers must do everything possible not to become involved in or tolerate actions that violate domestic and foreign anti-money laundering regulations.

Monitoring compliance with the Supplier Code of Conduct

WAMGROUP® reserves the right to ascertain, with or without notice, compliance with the SCC by Suppliers through WAMGROUP® personnel or organizations appointed by it.

These audits may include the inspection of the Supplier's facilities and/or interviews of its workers.

In particular, WAMGROUP® may request from Suppliers information and related documentation to support compliance with what is included in this SCC (e.g. energy consumption, gas consumption, water consumption, waste produced, etc.).

WAMGROUP® requires fair and transparent collaboration from Suppliers in conducting such auditing activities, and similarly expects Suppliers to evaluate their suppliers and ensure that they also comply with the contents of this SCC.

WAMGROUP® relies on Suppliers to promptly address any deficiencies with respect to this SCC through targeted corrective measures and provisions.

If non-compliances declared by the Supplier or ascertained by WAMGROUP® emerge, the latter may request the Supplier to plan and implement the necessary corrective actions.

WAMGROUP® counts on the mutual collaboration of the Suppliers to improve themselves in order to achieve the objectives of the SCC, reserving the right to interrupt any relationship and/or terminate any contractual agreement in the event of serious violations and/or refusal by the Supplier to implement the corrective measures within a reasonable time frame.

Updates and revisions

This SCC will be updated and reviewed regularly to reflect investments made along the path of constant improvement.

The current version of the Supplier Code of Conduct is also available on our website http://supplier.WAMGROUP®.com/it-IT/supplier/CCF_it.



WAMGROUP®