SUPPLIERS' CODE OF CONDUCT

PURPOSE

Giellepi aims, through this Code of Conduct, to involve its suppliers in the construction of a fair, transparent and sustainable supply chain from a social, environmental and economic point of view. This Code applies in conjunction with all regulations in force in the countries in which the Company operates.

SCOPE OF APPLICATION

This Code applies to any person, entity, company, partner and other entity that supplying any activity, good or service to the Company (hereinafter "Supplier"). If new contracts are signed or existing contracts are updated, the Code must be shared and accepted by all parties involved. This Code is not intended to be an exhaustive list of all the principles and standards of ethical and business conduct with which our Suppliers must comply.

General Terms and Conditions

The Supplier shall comply with all applicable laws, regulations, contractual agreements, generally recognised technical standards and norms and be in compliance with the guidelines contained in this Code. We are aware of cultural differences, and that current processes and policies may not be in line with the principles exposed, requiring implementation efforts. Therefore, methods to meet these criteria may vary, but always showing commitment to aligning with this Code: an action plan with adequate resources can guide and support a measurable and continuous improvement process. The Supplier undertakes to implement the necessary mechanisms to identify, determine and manage the risks within its competence in relation to the subject areas described in the document. The Supplier is expected to communicate the principles outlined herein to its employees, any subcontracting parties and its entire supply chain, and to monitor and vouch for their compliance. The Supplier is encouraged to continuously improve the suitability, adequacy and effectiveness of its sustainability policies through appropriate measures. Finally, it's required to maintain appropriate documented information, keeping accurate and transparent records that demonstrate compliance with the values expressed in this Code. In agreement with the Supplier, Giellepi reserves the right to carry out audits of the implementation of the principles set out. Giellepi requires the return of the enclosed Commitment/Acceptance Form, signed by a legal representative. Giellepi encourages anyone who becomes aware of violations, concerns, or non-compliance of an ethical nature - or relating to any value, principle, or conduct, whether active or passive, by commission, omission, or attempt - covered by this Code or applicable regulations, to submit a report. Confidentiality is guaranteed for the reporting party, all individuals involved, and the content and documentation of the report. Reports may be submitted without fear of retaliation via the following email address: bd@giellepi.it

References

- The Universal Declaration of Human Rights;
- International Convention on the Elimination of All Forms of Racial Discrimination;
- Convention on the Rights of the Child;
- Ten Principles of the UN Global Compact;
- The 2030 Agenda for Sustainable Development;
- OECD Guidelines for Multinational Enterprises;
- ILO Convention No. 29 on Forced Labour;
- ILO Convention No. 105 on Abolition of Forced Labour;
- ILO Convention No. 138 on Minimum Age;
- ILO Convention No. 182 on the Elimination of the Worst Forms of Child Labour;
- ILO Convention No. 111 concerning Discrimination in Respect of Employment and Occupation;
- ILO Convention No. 190 on the Elimination of Violence and Harassment in the Workplace;
- ILO Recommendation No. 146 on Minimum Age;
- ILO Recommendation No. 116 on Reduction of Hours of Work.

Commitment/Acceptance mode

Supplier acceptance of the Code of Conduct is formalized through the signing of a specific clause included in purchase orders. This clause forms an integral part of the contractual documentation and represents the supplier's formal commitment to comply with the ethical, behavioral, and regulatory principles defined by Giellepi. Through this procedure, the Company ensures that every party involved in the supply chain is aware of the responsibilities associated with their activities and operates in accordance with the Company's values, promoting conduct based on integrity, transparency, and compliance with applicable regulations.

WORKING CONDITIONS AND HUMAN RIGHTS

Compliance with the following conditions is intended to:

- ✓ ***Ensure full and productive employment and decent work for all;***
- ✓ ***Promote diversity and inclusiveness and encourage the functioning of the social elevator;***
- ✓ ***Increase worker welfare/well-being.***

The Supplier:

- must establish recognised employment relations with its workers through legal contracts, according to their national laws and best practices. Furthermore, it must not do anything to prevent its workers from enjoying their legal and contractual rights;
- shall ensure the utmost respect for people and comply with applicable labour laws, refraining from any form of irregular work, whether forced or child labour, in line with ILO Convention [4] No. 138 on Minimum Age, ILO Convention No. 182 on the Elimination of the Worst Forms of Child Labour and the principles contained in the UN Global Compact;
- shall treat its employees and workers fairly, respecting their dignity, providing equal opportunities for all, complying with ILO Convention No. 111 on Discrimination and ILO Convention No. 190 on the Elimination of Violence and Harassment in the Workplace. The Company's hiring policy promotes inclusion and diversity;
- arranges working hours, overtime, the number of days off per week, annual leave and national holidays, as well as maternity leave, sick leave and any other leave in accordance with applicable local law;
- commits to fairly and adequately compensating its employees and ensuring the statutory minimum wage or an industry standard wage;
- ensures to its employees the compliance with all legal provisions regarding freedom of association, collective bargaining and membership in organizations permitted by law, such as trade unions or employee organizations;
- is required to ensure compliance with all the rules and regulations in force regarding health and safety at work. In addition to the requirements of the regulations, it undertakes to disseminate a solid safety culture, aimed above all at preventing risks, protecting its employees from them and from their possible consequences. It must implement appropriate controls, procedures for the safe execution of activities, preventive maintenance and technical protective and precautionary measures (e.g. emergency plans, etc.) necessary to limit risks;
- is committed to implementing a range of policies and activities aimed at creating a stimulating working environment that promotes the professional development of its employees.

ETHICS, TRANSPARENCY AND ANTI-CORRUPTION

Compliance with the following conditions is intended to:

- ✓ ***Maintain stable business relationships to foster lasting economic growth***;
- ✓ ***Share information in a transparently and collaboratively, facilitating business management***;
- ✓ ***Guarantee reliability and traceability of products to stakeholders***.

The Supplier:

- is required to conduct its business in an ethical and integral manner, in compliance with the relevant anti-corruption legislation in the countries in which it operates. All forms of active and passive corruption and/or extortion and embezzlement are prohibited;
- is required to conduct its business activities in compliance with the rules of fair and correct competition in accordance with the relevant competition, antitrust and trade regulations applicable in the countries in which it operates;
- is required to report any situation that presents a material conflict of interest, actual or potential, in the performance of its business activities. A conflict of interest exists when a personal activity interferes or could interfere with the business relationship with Giellepi;
- must respect the intellectual property rights of others and protect sensitive and private customer information that comes into its possession as a result of its business, in accordance with the laws and regulations of the country in which it operates. It must also ensure that all of its employees and collaborators comply with these guidelines;
- must comply with all applicable national and international laws on accounting, taxation and must refrain from any form of tax evasion, avoidance, money laundering or other similar illegal conduct;
- commits towards its upstream Suppliers to implement non-aggressive and non-unbalanced purchasing policies in favour of its own bargaining power, negotiating fair conditions for all counterparts;
- must provide Giellepi with all necessary and substantially complete documentation regarding the product and/or materials supplied. If it only resells products purchased from third parties, it commits to us to share documents and information accompanying the product in order to make the original source transparent;
- is willing to share with Giellepi its audit and analysis activities carried out on the product sold or on upstream counterparties.

ENVIRONMENTAL IMPACT

Compliance with the following conditions is intended to:

- ✓ ***Ensure the conservation and efficient use of natural resources;***
- ✓ ***Promote the improvement and innovation of environmentally friendly activities and processes along the supply chain;***
- ✓ ***Reduce the impact on the environment, in terms of emissions and consumption, and protect biodiversity.***

The Supplier:

- must obtain all required environmental permits by following operational and reporting requirements and comply with all applicable environmental regulations. It must therefore comply with regulatory requirements regarding water consumption, greenhouse gas emissions, management of hazardous/chemical substances, and waste disposal;
- is required to responsibly and efficiently use all the resources involved in the production cycle, and is committed to limiting the environmental impact of its activities, adopting good practices for limiting consumption and/or using alternative and renewable sources;
- includes sustainable elements among the selection criteria for the producers from whom it obtains its supplies, favouring those who, among other initiatives, demonstrate a commitment to reducing the environmental and social risks potentially arising from their economic activity;
- is invited to continually improve in the field of sustainability, monitoring impacts and setting environmental performance targets, implementing corrective actions, researching and proposing product and service solutions and technologies with a lower impact (e.g. reducing packaging, bundling of deliveries, use of hybrid means of transport);
- is invited to guarantee and promote the protection of biodiversity by monitoring the impacts that its own activities and the supply chain may have on it;
- must seek to reduce the use of animal testing and if it's not possible animals must be treated in a humane manner that minimises pain and stress.

References
[1] https://sdgs.un.org/goals
[2] https://www.unglobalcompact.org/what-is-gc/mission/principles
[3] https://www.ilo.org/rome/norme-del-lavoro-e-documenti/lang--it/index.htm