

Aesys S.p.A
Code of Conduct for Suppliers

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1 Purpose and scope of the Code

Aesys S.p.A. (hereinafter "Aesys") is a company operating in compliance with its own Codes of Conduct such as the Ethical Code, the Commercial Code of Conduct, the Anti-Corruption Code of Conduct, as well as the Organization, Management and Control Model which prescribes principles and values, as integral parts of the company.

The procurement process along Aesys supply chain is based not only on the quality and competitiveness of products and services, but also on adherence to ethical values. Moreover, it aims at promoting actions and practices of social and environmental responsibility carried out by its suppliers, in order to favour the sustainability of the business processes characterizing the related sectors.

This Supplier Code of Conduct applies to all Aesys suppliers (hereinafter "Suppliers" or "Recipients") entering into a contract for the supply of goods or services to Aesys. The Recipients, in turn, are encouraged to share it and favour its application by their suppliers, favouring the overall sustainability of their supply chain. Our expectation is that Aesys Suppliers will support Aesys commitment to generate long-term economic, social and environmental value for all stakeholders involved.

2 Legal context

Aesys and the Recipients of the present Code, are required to understand and identify the processes necessary to comply with the laws and standards applicable in local, national or international jurisdictions in all their activities.

Based on local practices and legislation, Aesys Suppliers may implement and introduce more detailed and restrictive rules and policies to comply with applicable local requirements.

Aesys reserves the right to conduct audits or assessments to ensure Suppliers' compliance and to terminate any relationship in the event of non-compliance with international principles, failure to correct violations or demonstration of the existence of models of non-compliance with these provisions.

3 Human rights

Within the framework of internationally recognized human rights, national and international laws and regulations in this regard, Suppliers are invited to:

- Avoid having any direct or indirect negative impact on respect for human rights;
- Prevent or mitigate any negative impacts on human rights directly related to their business activities.

All those operating within Aesys supply chain are obliged to respect human rights, regardless of size, sector, operating context, ownership of the structure, wherever they work. Without prejudice to the minimum essential responsibility not to violate the rights of others, companies are called upon to act to promote and support the improvement of the conditions of their workers. This commitment must be appropriate to the size, nature and context of the activities as well as to the seriousness of the risk of adverse human rights impacts.

3.1 RESPECT FOR HUMAN RIGHTS

The Recipients of this Code are required to respect human rights, with reference to any person who interacts with them, whether they are workers or other categories of stakeholders, such as members of the local communities in which they operate. Recipients are requested not to undertake any behaviour that limits the individual personality in all the phases that characterize the employment relationship.

3.2 HUMAN TRAFFICKING, FORCED LABOUR AND REGULAR LABOUR

Practices attributable to trafficking in human beings are in any case unacceptable, regardless of the sector and country of origin of the supplier. None of Aesys supplier may be involved in or benefit in any way from human trafficking.

Recipients are required to respect the internationally accepted principles, values and best practices regarding workers' rights, refraining from resorting to any form of forced or compulsory labour. Recipients are required to guarantee and promote respect for free work, based on fair and transparent contracts for workers and avoiding unjustified restrictions on free movement, misappropriation of documents and wages.

The recipients of this document are therefore required not to circumvent the correct application of work laws or social assistance and of the rules attributable to a regular employment relationship, through the use of employment contracts, subcontracts, or agreements of home working, or through apprenticeship programs with no real intention of imparting any training, or providing regular employment. Likewise, such obligations are not to be avoided through the excessive use of fixed-term employment contracts.

3.3 EQUAL OPPORTUNITIES, NON-DISCRIMINATION

Recipients are required to guarantee all people equal job opportunities without any discrimination based on race, age, colour, gender, language, religion, ethnic origin, disability or problems relating to health, marital status, pregnancy, orientation sexual, political and trade union opinion.

Recipients must treat their employees and workers fairly, respecting their dignity and guaranteeing equal opportunities for all, therefore they must also guarantee a workplace where no harassment, threats or any other form of physical, sexual, psychological or verbal abuse or harassment.

3.4 FREEDOM OF SPEECH AND OF WORKERS' ASSOCIATION

Recipients must guarantee the right of speech and expression to all workers, encouraging open communication regarding working conditions and without suffering any repercussions of any kind.

Similarly, Recipients must recognize the right of workers to join workers' organizations and collective negotiation in the event that they decide to join them, without fear of intimidation or reprisals.

3.5 RESPECT PRIVACY CONDITIONS

Aesys Suppliers are required to respect employees privacy right, committing themselves to the correct use of data and personal information provided in accordance with the law and national and international regulations in force and applicable, and therefore that they are not used, transferred, lost or disseminated, or misused, or unauthorized.

3.6 WORKING CONDITIONS: WORKING HOURS, WAGES

With regard to working hours, Suppliers must act in compliance with national regulations, international labour regulations and industry standards. Furthermore, Recipients are required to comply with the following rules: workers must be allowed the free days provided for by national legislation; all overtime must be voluntary.

Recipients must comply with current legislation and collective labour agreements as regards the payment of wages and benefits. Therefore, in addition to their normal salary, workers have the right to be paid for overtime according to the provisions of current regulations and collective agreements. Additionally, Suppliers must ensure that their employees receive fair, regular and adequate wages.

3.7 HEALTH & SAFETY

Aesys considers the constant commitment to improve health and safety performance as an essential objective.

Recipients are therefore required to comply with all applicable laws and regulations, with the rules relating to the health and safety of workers, occupational hygiene and the prevention of injuries at work.

Recipients are required to adopt the best technical standards for the safety of plants and production systems and to ensure a healthy working environment.

Recipients are also required to promptly inform Aesys in the event that serious or fatal accidents occur to their staff, to that of their subcontractors or to third parties during or as a result of the execution of the activities.

4 Environment

Recipients are required to comply with all environmental standards, regulations and laws in force in all the countries in which they operate, mainly by obtaining and maintaining environmental permits and approvals for carrying out regulated activities. Recipients are therefore required to integrate environmental responsibility into their strategy, adopt a precautionary approach with a view to preserving natural resources and the use of efficient technologies, aiming to reduce the environmental impact with a view to preserving natural resources.

Aesys also recommends its Suppliers to evaluate the opportunity to adopt relevant management systems according to international and European standards (including ISO 9001: 2015, ISO 14001: 2015, ISO 50001: 2018, FSC®-PEFC®, Ecolabel is the more important).

4.1 REUSE, RECYCLING, WASTE AND EMISSIONS, ENERGY CONSUMPTION

Recipients are required to use natural resources cautiously (for example water, energy sources, raw materials). Negative impact on the environment and climate must be reduced or eliminated at source or through practices such as changing manufacturing, maintenance and plant processes, as well as replacing, storing, recycling and reusing materials.

Aesys encourages an approach to the efficient use of natural resources, in search of process and product solutions that allow, on the one hand to improve the environmental performance along the entire production process, and on the other hand to propose goods and services with always lower environmental impact to the market. This means, among other things, investing in the entire life cycle of the product.

Recipients are encouraged to adopt a clear, correct and systematic approach to responsibly identify, manage, reduce, dispose or recycle waste. Recipients must have appropriate environmental permits and licenses for the activities carried out and must comply with relevant local regulations.

Recipients must also follow precise procedures aimed at increasing the division of waste, to facilitate the correct treatment and recovery of the waste itself.

Recipients, when purchasing products, equipment and services that consume energy and, therefore, have or may have an impact on energy consumption, must consider energy performance as one of the criteria to be considered in purchase decision.

Recipients must also undertake to: provide energy-efficient products and services and energy-saving materials or low greenhouse gas emissions and promote the use of renewable energy sources.

4.2 BIODIVERSITY, DEFORESTATION

Aesys Suppliers are encouraged to evaluate and monitor the effects of their activities on the biodiversity of the environment in which they are located, considering the nature of their products and production processes and the characteristics/uniqueness of the natural environment, in order to be able to resolve/limit any negative externalities of its processes and/or products.

Forests play a vital role in protecting the global environment and maintaining biodiversity; deforestation implies the long-term reduction of the earth's forest area. Business activity can have a direct or indirect impact on the deforestation of a particular territory. Recipients are encouraged to assess and monitor the impact of their activities on deforestation, to implement sustainable forest management practices.

4.3 SAFETY

Suppliers are required to set up systems for the prevention or containment of accidental spills and the release of substances into the environment.

5 Fair Business: integrity, ethics and anti-corruption

Recipients are required to adopt and apply the most rigorous standards of ethical conduct in business, operating, in all business interactions, in compliance with the most rigorous standards of integrity ensuring correct business practices.

5.1 CONFLICT OF INTEREST

Aesys ensures that every decision related to its business activities is made in the exclusive interest of the company itself, avoiding any situation of conflict of interest, even if only potential, in order to maintain the highest level of integrity in the business conduct.

In compliance with Aesys Anti-Corruption Code, Recipients are required to operate in the absence of conflicts of interest, so as to make every decision impartially and objectively, in compliance with local regulations.

Recipients must avoid any situation that could lead to conflicts of interest or that could interfere with the ability to make impartial decisions and report any situation of conflict of interest, even potential, of which they become aware, right from the negotiation phase with Aesys.

5.2 CORRUPTION, GIFTS AND GRATUITIES

In compliance with the Aesys Anti-Corruption Code, Recipients are prohibited from requesting or accepting payments for corrupt purposes both with reference to subjects belonging to the Public Administration and to private subjects.

Recipients must make use of procedures reasonably suitable for preventing and fighting corruption in all its forms; they must not facilitate or favour third parties in money laundering, terrorist financing or other financial crime activities.

Recipients are prohibited from offering or soliciting directly or indirectly gifts or benefits of any kind to Public Officials, managers, officers or employees of Aesys or other commercial counterparties.

Acts of commercial courtesy are allowed as long as they are of modest value.

5.3 CONFIDENTIALITY, INFORMATION PROTECTION, INTELLECTUAL PROPERTY

In carrying out their activities, Suppliers must comply with obligations relating to the protection, collection and correct management of confidential and personal information.

This information is treated in compliance with current legislation and current use within the reference sector, and any improper use is avoided.

The Recipients undertake to respect the intellectual property of third parties, and not to use them unless duly authorized, even once the commercial relationship with Aesys has been concluded.

5.4 FAIR COMPETITION

Recipients undertake to operate according to fair competition principles and to reject any kind of anti-competitive practice, not to abuse its position on the market in order to exclude other companies from tenders, including through pricing practices, and to report any anti-competitive behaviour, even if only suspicious.

5.5 RESPONSIBLE SOURCING

Recipients undertake to ensure that the raw materials present in the products they manufacture do not finance or favour, directly or indirectly, serious violations of human rights or entail serious and recognized negative social and/or environmental impacts.

Recipients pay particular attention in the case of minerals identified internationally as Conflict Minerals. Aesys, although not subject to a legislative obligation, in fact undertakes to supply the market with mineral-free products from conflict zones. Recipients, in turn, are required to ascertain the origin of these minerals and comply with the Policy adopted by Aesys.

5.6 DISSEMINATION OF THE CODE

The Company undertakes to ensure the maximum dissemination of this Code to all internal and external subjects interested in the corporate mission through specific communication activities.