

# 1. Introduction

The Previero N srl Group is committed to ecologically and socially responsible corporate governance, acting in compliance with all relevant laws and regulations and the following Group-wide guidelines:

- Health and Safety Statement
- Human Rights Policy Statement
- Environment Policy

We furthermore strive to keep optimizing our business conduct and products in line with sustainability aspects, and encourage our suppliers to join us in our efforts in the interest of an integral approach.

We have defined rules of conduct, referred to as the Code of Conduct below, for our future cooperation with external partners. We expect our business partners to identify with the principles and requirements in this Code of Conduct and to take all necessary steps to fulfil them. If local laws at the company site set out specific requirements, then these requirements shall apply. The Code of Conduct shall supplement them in this case.

The Code of Conduct is based on laws, regulations and conventions such as the United Nations Universal Declaration of Human Rights, the UNICEF Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the Inter-national Labour Organization Conventions and the United Nations Global Compact, of which the Previero N srl Group is a member. We expect our suppliers to follow all relevant laws and regulations, as well as the requirements in this Code of Conduct.

# 2. Labor and Human Rights

### 2.1 Working Conditions, Times and Wages

We expect our suppliers to take responsibility for ensuring fair working conditions and to com-ply with the applicable regulations, governing working times and leave arrangements. Over-time work is subject to the respective legal framework.

The sup-plier must pay appropriate remuneration on a contractual basis, in compliance with the respective, legally guaranteed minimum wage and the national labor market.

#### 2.2 Harassment and Discrimination

The supplier must take all necessary steps to prevent harassment of any kind, such as sexual harassment, sexual abuse, corporal punishment, psychological or physical duress or verbal abuse.

All individuals and groups must be treated equally, irrespective of their personal traits, including gender, skin color, ethnic or social origin, genetic traits, language, religion or ideology, political or other views, membership of a national minority, net worth, birth status, disabilities, age or sexual orientation.

#### 2.3 Freedom of Association

We expect our suppliers to allow their employees to peacefully assemble and associate, particularly for the purpose of addressing political affairs, labor representation and civic issues. This includes the right to establish labor unions to protect their interests and to engage in collective bargaining if this is provided for by law.

#### 2.4 Forced Labor and Human Trafficking

The supplier must prevent modern slavery of any kind. Examples of this include forced over-time, retention of identification documents and human trafficking.

## 2.5 Child Labor and Young Employees

The supplier commits itself to refraining from employing children younger than the legal mini-mum age of 18 years old (pursuant to ILO Convention 138).

## 2.6 Health Protection and Occupational Safety

The supplier's health and safety measures must comply with the local statutory requirements. The supplier must ensure that all workplaces, machinery, equipment and processes under its control are safe and do not pose a risk of harm to health.

# 3. Corporate Ethics

All suppliers are expected to refrain from engaging in criminal activities.

# **PREVIERO** Supplier Code of Conduct

## 3.1 Combating Corruption

The Previero N srl Group does not tolerate corrupt practices and actively combats them. Suppliers must not engage in or tolerate corruption, bribery, extortion or embezzlement of any kind.

Any direct or indirect bribery or the acceptance of undue advantages – be it by giving, accepting payments, gifts or gratuities of any kind – beyond the scope of what is legally permissible, or normal is prohibited. We also expect our suppliers to take an active role in preventing corruption and fraud.

### 3.2 Prevention of Money Laundering and Terrorist Financing

The supplier endeavours to meet its legal obligations to prevent money laundering and terrorist financing, within the scope of the applicable le-gal regulations, and to refrain from directly or in-directly promoting these activities.

#### 3.3 Data Protection and Data Security

Personal data of employees, customers and business partners may be processed, i.e., acquired, saved, collected, used or shared, only in compliance with the applicable legal regulations.

The supplier must appropriately handle and protect all information. Data and information must be used exclusively according to their classification. The supplier ensures that the data to be protected is collected, processed, backed up and deleted properly. It additionally ensures that technical information systems are adequately protected against cyber threats by complying with the usual standards (e.g., antivirus protection, encryption, segmentation, roles and rights management

# 3.4 Fair Competition and Antitrust Laws

The supplier commits itself to fair and unfettered competition. The Previero N srl Group expects its suppliers to comply with the applicable provisions under competition and antitrust legislation. These provisions govern business practices that unlawfully restrict competition, the improper ex-change of information concerning competition, price agreements, bid rigging and fraudulent market allocation.

#### **3.5 Conflicts of Interest**

Suppliers must avoid and disclose any conflicts of interest relevant to the Previero N srl Group if these could affect the business relationship. Decisions must be made solely on an objective basis.

#### 3.6 Physical and Intellectual Property

The supplier commits itself to respecting intellectual property and protecting it throughout the supply chain. This applies equally to the Previero N srl Group's physical property, which must be protected against loss, theft or misuse.

#### **3.7 Export Control and Economic Sanctions**

The supplier must strictly follow all applicable regulations and laws governing the import and export of goods, services and information as well as payment transactions. Existing sanctions and embargoes must be observed within the framework of laws and regulations in all business activities.

## 4. Environment

#### 4.1 General

The Previero N srl Group expects its suppliers to minimize negative impacts on the environment and climate resulting from their business activities and to treat natural resources with care.

#### 4.2 Compliance with Environmental Laws

The Previero N srl Group expects its suppliers to comply with national and international environmental standards and laws.

### 4.3 Environmental Management Systems

The supplier is urged to monitor and continuously reduce its ecological footprint. Suppliers with production sites should have suitable environmental management systems in place.

#### 4.4 Consumption of Natural Resources and Air Pollution

The supplier must reduce or avoid the use and consumption of natural resources, including raw materials, water and energy. Economic solutions must be found to enhance energy efficiency and minimize energy consumption. General emissions from company operations (air and noise emissions) must be avoided whenever possible.



## 4.5 Waste, Wastewater and Hazardous Substances

The supplier should have measures in place to reduce both waste and wastewater and to treat them in compliance with all legal requirements. As much waste as possible must be recycled. The supplier ensures responsible handling of chemicals and hazardous substances with regard to environmental protection, health and safety.