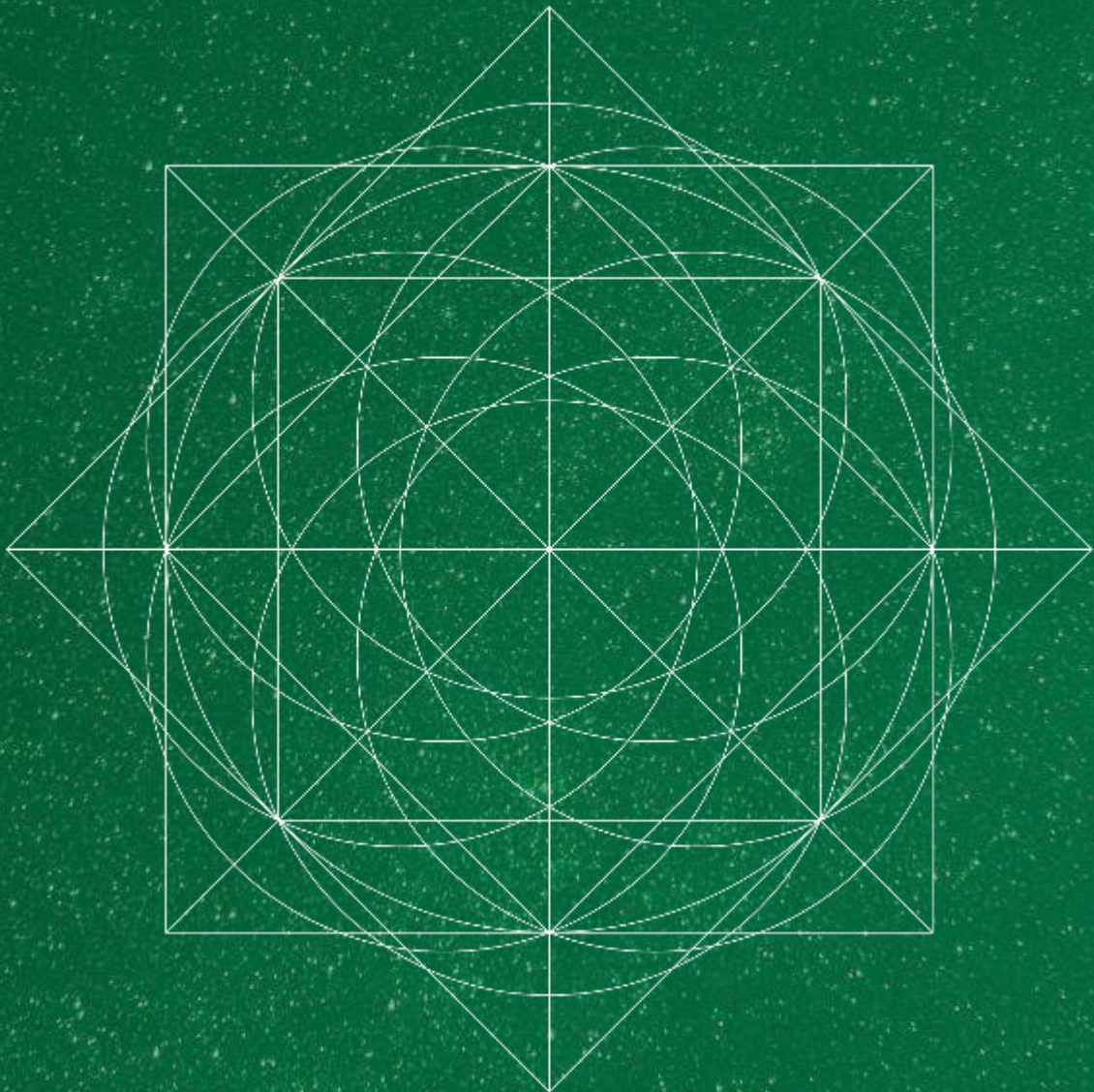


Supplier Code of Conduct



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GENERAL DISCLAIMER

Eldor Group conducts its business in accordance with the highest standards of ethical behaviour, as outlined in [Eldor's Code of Ethics](#), in compliance with all applicable laws and regulations and in the avoidance of any illegal or unethical conduct. This Supplier Code of Conduct is not intended to contrast in any way with or modify the terms and conditions of any existing contract. Unless otherwise stated in such contract, in the event of a dispute, Suppliers will adhere to their contractual terms.

In the event that local laws, regulations or rules contemplate stricter requirements than those in set out this Code, Suppliers must comply with those requirements. If local regulations are less stringent than the principles contained in the Supplier Code of Conduct, they agree to adopt, within a reasonable period of time, any measures required to comply with the principles contained in the following Code.

1. PURPOSE

As a demonstration of our strong desire to handle social and ethical aspects effectively, Eldor has drawn up a Corporate Social Responsibility (CSR) Policy to ensure that the Group acts in a responsible and sustainable manner towards its employees, customers, suppliers, the community in which it operates and the environment. In line with its CSR Policy, Eldor expects its Suppliers and their employees to act responsibly and observe the basic principles outlined in this Supplier Code of Conduct (also referred to as "SCC" or the "Code"). The purpose of the SCC is to formally communicate Eldor's requirements and expectations to its Supply Chain. Suppliers are required to communicate these principles to their own suppliers, and for them to comply accordingly.

2. HUMAN RIGHTS

Eldor's Suppliers and business partners respect and defend the regulations in force worldwide to protect human rights as a fundamental and general requirement. This also implies that Eldor's Suppliers must refrain from using any form of child or forced labour, including coerced, prison or debt-bonded labour. Suppliers must comply with the rules laid down in ILO Conventions 138 and 182 concerning the minimum age of child employment.

3. WORKING CONDITIONS

3.1 Equal Opportunities, Non-Discrimination and Respect for Local Communities

Eldor's Suppliers must ensure that none of its employees are treated less favourably on the grounds of gender, race, disability, marital status, nationality, ethnic or national origin, sexual orientation, age or religious beliefs, or on any other basis that does not relate to their performance or ability to carry out



their duties. Eldor's Suppliers must respect the rights of local communities, minorities, and indigenous people in each country in which they operate, avoiding potential adverse impacts on their health, safety, and living conditions.

Eldor's Suppliers must take immediate action in the event of an incident resulting in harassment or discrimination.

3.2 Minimum Wage

Eldor's Suppliers must pay their employees properly and adequately, at the very least the legal minimum rate of pay. Where legal or collective negotiation agreements do not exist, pay and benefits must be based on industry-specific collective agreements that apply in their location and which ensure an appropriate standard of living for the Suppliers' employees and their families.

Eldor's Suppliers must comply with legal working hours and take all necessary actions regarding overtime as set out in the applicable law, safeguarding a proper work-life balance for every employee.

3.3 Freedom of Association

Eldor's Suppliers respect their employees' freedom of association and their right to form interest groups, giving them the right to represent their interests on the basis of national legislation.

4. ENVIRONMENTAL STANDARDS

4.1 Compliance with Legal Requirements

Eldor's Suppliers must comply with all applicable legislation relating to the environment and to sustainability.

4.2 Increase in Energy and Resource Efficiency

Eldor's Suppliers should continuously improve environment and energy management systems in order to reduce consumption of natural resources, minimize waste and prevent pollution at the source.

4.3 Ecosystems Protection: Biodiversity, Land Use, Deforestation, Soil and Water Quality

Eldor's Suppliers shall protect biodiversity and natural ecosystems. They must ensure that their business activities do not contribute to or benefit from illegal deforestation and land conversion. They must check the environmental impact of discharges to prevent soil degradation and to avoid the contamination of surface water or groundwater. They shall not engage in the unlawful eviction and unlawful taking of land, forests or waters in order to preserve the natural livelihood of people.

4.4 Implementation and Application of Environmental Management Systems

Eldor Suppliers have a proactive approach to protect the environment and secure sustainability of natural resources using the best available technologies for the purpose of continuous improvement in operation management.

Eldor expects suppliers to identify and track:

- Measuring energy consumption;
- Water quality and consumption;
- Pollution;
- Responsible chemical management;
- Air quality;
- Greenhouse Gases' emission including CO₂, mitigation of environmental impacts from products end-of-life and product use;

Where applicable, implement suitable environmental management systems (e.g. in accordance with ISO 14001 or the EMAS Directive of the European Union).

5. HEALTH AND SAFETY

5.1 Product Safety

Eldor's Suppliers must comply with all applicable legal regulations and requirements concerning product safety, especially the legal requirements pertaining to safety, labelling and product packaging, as well as with respect to the use of dangerous substances and materials.

5.2 Health and Safety in the Workplace

Eldor expects its Suppliers to observe the following basic principles in particular:

- a. Comply with the relevant legal regulations for health and safety in the workplace and support the further development and improvement of working conditions.
- b. Manage plants, machinery and equipment in order to minimize risks to the health and safety of employees.
- c. Ensure that employees operate in a safe working environment and that their physical and moral integrity is protected.
- d. Introduce protective and/or preventative solutions to manage health and safety issues proactively.
- e. Support employees in a healthy lifestyle by proactively raising awareness about the prevention of diseases, by encouraging sports and a healthy diet and through anti-smoking policies.

- f. Develop and implement effective communication and training programmes in order to increase their employees' participation in activities for improving health and in safety measures.
- g. Identify, track and review KPI's for Health and Safety. Take action if necessary.

6. BUSINESS ETHICS

6.1 Integrity

Eldor Suppliers shall ensure that all their employees are committed to the highest standards of integrity, honesty and fairness in all external relations and within the Group, in accordance with national and international laws against corruption.

6.2 Domestic and International Competition

Eldor Suppliers shall ensure that activities within the organization do not prevent, restrict or distort competition within the domestic or international market.

6.3 Responsible Sourcing of Minerals

Eldor's Suppliers shall avoid sourcing minerals that had been mined under conditions of violence and armed conflict (conflict minerals regulation), source responsibly with certified conflict free smelters in order to be increasingly confident that all the parts in their products contain conflict-free minerals.

6.4 Conflicts of Interest

Eldor's Suppliers must report any significant, real or potential conflicts of interest in the conduct of their business. A conflict of interest exists when a personal interest or activity interferes or appears to interfere in the Supplier's business relationship with Eldor.

6.5 Data Protection and Intellectual Property Rights

Eldor's Suppliers must comply with all applicable legislation relating to the data protection and the intellectual property rights of third parties; they must act to protect the information and personal data of their customers.

6.6 Counterfeit Parts

Eldor's Suppliers must use audited and proven suppliers for purchases of raw materials and components,

forbidding the production or trade of counterfeit products or components. Each supplier is responsible for the authenticity of the components supplied for and used in Eldor products and has to ensure the authenticity by applying suitable processes and tests.

6.7 Responsibility and Anti-Money Laundering

Eldor's Suppliers must act responsibly in their financial business dealings, providing accurate and complete records. No Suppliers may engage or otherwise become involved in any activity involving, or which may give the appearance of, money laundering and shall strictly comply with the applicable anti-money laundering laws.

6.8 Export Controls, Customs and Economic Sanctions

Eldor's Suppliers must comply with all applicable export control laws in all the jurisdictions in which they conduct their business, ensuring to observe all applicable national and supranational sanctions and trade embargoes. We request legal compliance particularly with regard to corruption, fraud prevention as well as data protection, privacy and export controls.

7. LEGAL CONSEQUENCES OF INFRINGING ELDOR'S SUPPLIER CODE OF CONDUCT

Eldor reserves the right to send experts to inspect the business premises of its Suppliers to check for their compliance with the principles laid down in this Code of Conduct, and to terminate their business relationship in the case of non-compliance.

8. REPORTING INFRINGEMENTS

Eldor's Suppliers are encouraged to report infringements to this Code of Conduct, to [Eldor's Code of Ethics](#), to Eldor's internal control system, to any other Eldor policy and, generally, to the applicable laws. Suppliers can send their concerns to the following e-mail: compliance@eldor.it or by registered post to the following address: Compliance Committee of Eldor Corporation S.p.A., Via Don Paolo Berra 18 – 22030 Orsenigo (Co), Italy.

Eldor undertakes to protect the confidentiality and the identity of the person making such a report in good faith and / or will not carry out or undertake any action that breaches the Supplier Code of Conduct.



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