

## **Code of conduct for UNITEAM TECH SRL suppliers**

### **Introduction**

Long-term cooperation, mutual commitment, sustainability and social responsibility are important principles for our company. Therefore, these principles are of particular importance in the procurement of raw materials, semi-finished and finished products, equipment, and services. We therefore expect our suppliers to also adhere to these principles.

This code applies to all suppliers of UNITEAM TECH SRL worldwide. The requirements of this code also extend to all employees of our suppliers, regardless of their role or relationship with the supplier. The code therefore also applies to workers employed informally, on short-term or part-time contracts or as consultants.

To the extent that this is reasonable and possible, suppliers will actively encourage their sub-suppliers or subcontractors to comply with the guidelines of this Code. It is therefore understood that UNITEAM TECH SRL may explicitly request suppliers to extend this code also to selected sub-suppliers.

Compliance with this code is a mandatory component of any type of commercial relationship between UNITEAM TECH SRL and its suppliers.

This code is based on guidelines and standards such as:

- the United Nations Universal Declaration of Human Rights
- the United Nations Convention on the Rights of Children and Adolescents
- the ILO (International Labor Organisation) Declaration on fundamental principles and rights at work
- the principles of the United Nations Global Compact

## Commitments of UNITEAM TECH SRL and its suppliers

UNITEAM TECH SRL is committed to ethical business practices and its suppliers are held to the same high standards. The company policy aims to comply with all laws and regulations in force in the countries and regions in which it operates and to conduct its business activities in an honest and ethical manner. In compliance with this Code of Conduct UNITEAM TECH SRL expects its suppliers to support the policies that it will prepare in compliance with all applicable laws, for the respect of human rights, for the conservation of the environment and for the safety of products and of services. The Code is kept updated to reflect UNITEAM TECH SRL standards and supplier operations.

UNITEAM TECH SRL requires its suppliers to comply with this Code of Conduct and suppliers must therefore ensure its application through appropriate disciplinary measures. Suppliers are also required to sign appropriate or similar agreements to ensure that all their subcontractors also comply with the standards and rules established in this Code.

Suppliers have a duty to report all suspected or actual violations of the Code or any applicable laws and regulations. Suppliers must make all reports to UNITEAM TECH SRL through the reporting channels provided for in the Procedure for the reporting of offences and the protection of whistleblowers, which can be found on the company's website <https://www.uniteam-italia.com> in the Download – Whistleblowing / Reports section.

Any supplier who violates this Code, or any other COMPANY policy or applicable laws, will be subject to sanctions up to and including suspension or termination of the business relationship. UNITEAM TECH SRL may also initiate civil action in response to such violations to enforce its legal and equitable rights and/or to obtain refunds, contributions and/or damages. This Code of Conduct is subject to Italian law and the competent court in the event of disputes is that of Venice.

UNITEAM TECH SRL may revise or integrate this Code at any time and in this case it will promptly distribute the new version that the Supplier will be required to sign to reiterate its consent to adhere to the latest, most updated version of the Code itself.

## Work practices and standards

**Principle 1 of the United Nations Global Compact:** Businesses must support and respect the protection of internationally proclaimed human rights.

**UN Global Compact Principle 2:** Companies must ensure they are not complicit in human rights abuses.

### **Working hours**

The duration of work, including overtime, together with scheduled breaks and days off, must comply with relevant laws, regulations, local rules, collective bargaining agreements and international conventions. Overtime work should be voluntary and paid accordingly. No worker should be forced to work or serve outside regular hours under threat of sanctions because of their vulnerable position.

### **Salaries and benefits**

Suppliers are required to comply with all applicable wage laws and regulations, including such matters as minimum wage, overtime regulations, and legally mandated benefits. In accordance with local laws, workers must be compensated for overtime at a rate above their normal hourly rate. Workers must receive fair and timely pay and the payment methods must be communicated to them in a transparent manner.

### **Equal treatment and non-discrimination**

Suppliers are prohibited from discriminating against any worker on the basis of race, color, age, sex, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, origin, social status or marital status. This applies to all aspects of hiring and employment practices, including but not limited to job applications, promotions, awards, training opportunities, job assignments, compensation, benefits, disciplinary actions, termination and retirement.

### **Health and Safety at work**

Suppliers must minimize, to the extent practically possible, risks to the health and safety of workers, employees, subcontractors and the public arising from their activities. Operations should be in line with relevant regulations, approved codes of practice, industry standards and should not endanger anyone with the risk of injury or health problems. Therefore, contractors or suppliers selected by the Suppliers must demonstrate a strong dedication to health and safety management and maintain robust policies and procedures accordingly.

Suppliers are committed to monitoring their health and safety indicators and embracing a continuous improvement strategy based on the collection and analysis of data on accidents and injuries at work, as well as feedback. Additionally, Suppliers will respect workers' rights to participate in these health and safety efforts and decisions.

Suppliers will conduct training for their employees and people affected by their activities. This training will cover various aspects such as equipment operation, manual handling, risk

assessment, fire safety, emergency preparedness, first aid and appropriate use of personal protective equipment. Additionally, specific training will address health and safety risks relevant to or caused by the organization's activities.

Suppliers will ensure the supply and maintenance of protective equipment, at no cost to workers.

### **Emergency preparedness**

Potential emergency situations and events must be identified and assessed and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, adequate fire detection and suppression equipment, adequate egress facilities and recovery plans.

### **Accidents and occupational diseases**

Procedures and systems must be in place to prevent, manage, monitor and report occupational injuries and illnesses, including provisions to: a) encourage worker reporting; b) classify and record accident and illness cases; c) provide necessary medical care; d) investigate cases and implement corrective actions to eliminate the causes; and d) facilitate the return of workers to work.

**United Nations Global Compact Principle 3:** Businesses must support freedom of association and the effective recognition of the right to collective bargaining.

Open communication and direct engagement between workers and management is the most effective way to resolve workplace and compensation issues. Suppliers must ensure that workers' rights to freely associate, to join or not to join trade unions, to seek representation and to sit on workers' councils, as well as the right to collective bargaining in accordance with local laws are respected. Workers must be able to communicate openly and share their suggestions with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

**Principle 4 of the United Nations Global Compact:** Elimination of all forms of forced and compulsory labor.

Suppliers are strictly prohibited from using any form of forced or compulsory labor. Forced labor includes work or services imposed on individuals under threat of punishment, against their will. This includes practices such as restricting movement, withholding wages or identity documents to force them to continue working, trapping individuals in unmanageable debt or

salary deductions, encouraging dependency through payments in kind, depriving them of basic necessities such as food or shelter, impose mandatory overtime or cause a loss of social status.

Suppliers will take steps to ensure that workers understand their rights regarding payment of wages, overtime compensation, preservation of personal identity and other related rights.

Recognizing that some groups, such as migrant workers, historically marginalized groups, youth, unskilled or illiterate workers, and women, may not be fully aware of their legal rights, Suppliers will ensure fair treatment and defend their rights.

Where workers are recruited through third-party entities, Suppliers will ensure diligent monitoring to ensure that these principles are consistently adhered to.

**Principle 5 of the United Nations Global Compact:** the effective abolition of child labor.

Suppliers are prohibited from employing children in violation of International Labor Organization conventions (ILO Convention Nos. 138 and 182). The minimum age for employment will align with the legal minimum age in the respective country or the age for completing compulsory education, whichever is higher. Under no circumstances should Suppliers employ children under the age of 16. Additionally, Suppliers must comply with ILO provisions relating to moral, health and safety standards for individuals aged 15 to 18. For example, but not only, Suppliers must ensure that workers under the age of 18 do not exceed the working hours required by the regulations of the countries in which they operate and do not carry out work that could put the health or safety of workers at risk. young workers.

### **Respect for the environment**

**United Nations Global Compact Principle 7:** Businesses must support a precautionary approach to environmental challenges.

**United Nations Global Compact Principle 8:** Businesses must take steps to promote greater environmental responsibility.

**United Nations Global Compact Principle 9:** Businesses should encourage the development and diffusion of environmentally friendly technologies.

### **Environmental authorizations and reports**

All environmental permits (e.g., discharge monitoring), approvals and registrations must be obtained, maintained and updated, and related operational and reporting requirements must be met.

### **Reduction of resource consumption**

Suppliers are committed to reducing consumption of raw materials and resources, while eliminating waste across their operations. This goal drives improvements in manufacturing, maintenance and cleaning methods, storage and transportation methods, and strategies such as material substitution, reusability, recycling, design changes, process innovations and more .

### **Pollution prevention**

Suppliers are committed to reducing the production of waste of all types, through practices such as recycling, modifying production processes, reusing materials and conservation.

Suppliers must implement a systematic approach to identify, manage, reduce and responsibly dispose or recycle solid (non-hazardous) waste.

### **Dangerous substances**

Chemicals and other materials that pose a risk if released into the environment must be identified and managed to ensure their safe handling, handling, storage, use, recycling or reuse and disposal.

Suppliers are responsible for ensuring that their products comply with all relevant laws and regulations in the respective countries where the product will be supplied. Suppliers must adhere to European REACH protocols or their national/international counterparts, such as the American Toxic Substance Control Act (TSCA).

Suppliers may receive requests to disclose information regarding the use and origin of specific substances and materials to comply with laws and regulations. They are obliged to align with the OECD Guidance on Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including Annex II, and to adhere to US legislation on conflict minerals. This involves disclosing whether the products they produce or commission contain “conflict minerals”, referring to minerals that finance or benefit armed groups in particular countries, directly or indirectly.

In particular, suppliers must adopt a policy that reasonably ensures that all minerals, including, but not limited to, tantalum, tin, tungsten and gold contained in the products they manufacture, do not directly or indirectly finance or promote , armed groups committing serious human rights abuses in any country, including the Democratic Republic of Congo or a neighboring country. Suppliers must exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available upon request.

### **Waste water**

Suppliers must implement a systematic approach to manage wastewater generated by operations, industrial processes and healthcare facilities. Wastewater shall be characterized, monitored, controlled and treated as required prior to discharge or disposal. Furthermore, measures must be implemented to reduce wastewater generation. Suppliers must routinely monitor the performance of their wastewater treatment systems.

### **Emissions into the air**

Suppliers must implement a systematic approach to manage air emissions of polluting gases, volatile organic and chemical substances, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated by operations must be characterised, monitored routine, checked and treated as required before unloading. Suppliers must routinely monitor the performance of their air emission control systems.

### **Ethical practices**

**UN Global Compact Principle 10:** Businesses must work against corruption in all its forms, including extortion and bribery.

To meet social responsibilities and achieve success in the marketplace, Suppliers and their agents are expected to uphold the highest ethical standards, including:

#### **Corporate integrity**

The highest standards of integrity must be maintained in all business dealings. Suppliers must adopt a zero-tolerance policy to prohibit any form of bribery, extortion and embezzlement (which includes promising, offering, giving or accepting bribes and kickbacks). All business transactions must be conducted transparently and accurately reported in the books and records of the Suppliers.

Suppliers must not, directly or indirectly, offer, promise, give, request or accept bribes or other undue advantages to employees of the UNITEAM TECH SRL group, public or private officials, with the intention of obtaining or retaining business or any other advantage.

To prevent and uncover corruption, suppliers must establish and implement effective internal controls, ethical guidelines and compliance programs. These measures may involve raising employee awareness of the company's anti-corruption policies and establishing company procedures that ensure the maintenance of fair, transparent and accurate accounts.

Monitoring procedures will need to be implemented to ensure compliance with anti-corruption laws.

### **Fair competition**

Suppliers are expected to adhere to fair business practices, ensuring strict compliance with all relevant laws and regulations relating to fair competition.

This objective involves the implementation of every precautionary measure aimed at avoiding any anti-competitive practices such as price-fixing cartels, agreements on quotas, production or sales and, more generally, any unfair practices that hinder free competition, in particular those aimed at excluding a competitor from the market.

### **Identity protection**

Programs must be maintained that ensure the confidentiality and protection of supplier and employee complaints.

### **Privacy**

Suppliers are committed to protecting the reasonable expectations of personal information privacy of everyone with whom they do business, including suppliers, customers, consumers and employees. Providers must comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.