

Supplier Code Of Conduct

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Silmet S.p.A.

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1. Introduction

With this document SILMET commits to making official the values and principles, not only corporate ones, that guide its operations and that must be implemented in relationships with all suppliers.

The expectation is that the Supplier, with whom SILMET has business relations, establishes and maintains a management system capable of ensuring compliance with this Code of Conduct.

This Code of Conduct is inspired by the main regulations, guidelines, and existing documents at both national and international levels on Corporate Social Responsibility, Corporate Governance, the protection of human rights, work safety and the environment, as established by Institutions and International Conventions.

The Supplier is required to ensure that the requirements described in this document are applied at all company levels. The Supplier, in turn, must actively engage its supply chain to ensure compliance of all processes.

2. Regulatory compliance and business integrity.

The Supplier must act in full compliance with all applicable laws and regulations in the countries in which it operates. Business activities must be conducted with integrity, legality, and honesty, with the aim of ensuring respect for human rights, health, workplace safety, and environmental protection. In particular, the Supplier must:

- Comply with all applicable laws and regulations in the country in which it operates, as well as the requirements described in this Code;
- Maintain valid licenses, authorizations, permits and certificates as required by the law of the country in which it operates;
- Ensure mandatory requirements related to compliance with ESG standards, such as human rights, environmental impact and health and safety.

3. Labor and Human rights

3.1 Underage labor

Regarding underage labor, the Supplier must:

- Comply with local laws regarding the minimum age of workers;
- Not employ individuals under the age of 15 or below the age required for the completion of compulsory education, as determined by local laws;
- Request documents proving the workers' age during the hiring process, retaining all relevant documentation, but not in original form;
- Adhere to all legal restrictions imposed on authorized underage workers, including the maximum number of overtime hours, night work, authorized tasks, and mandatory medical examinations.

3.2 Forced and/or compulsory labor

Any form of physical and mental coercion, slavery, or human trafficking is strictly prohibited. Regarding forced and/or compulsory labor, the Supplier must:

- Not resort to any form of forced and/or compulsory labor or any other form of non-voluntary labor;
- Not retain employees' original identity documents, nor any other type of document that could limit their freedom to travel or their ability to leave the workplace or the job itself;
- Not require workers to pay fees or deposits in relation to their employment.

3.3 Non discrimination, harassment and abuse

All workers must enjoy equal opportunities. The Supplier must prevent any form of discrimination in the workplace including in hiring, pay, and termination of employment. The Supplier must:

- Ensure that its employees in the workplace are not subjected to harassment, cruel treatment, violence, intimidation, corporal punishment, physical or psychological coercion, verbal abuse, deportation, or any other form of forced expulsion or harassment;
- Not engage in any form of discrimination based on color, caste, religion, age, nationality, social or ethnic origin, pregnancy status, sexual orientation, gender, disability, union membership, or political opinions.

3.4 Wages, benefits and working hours

The Supplier must:

- Comply with all regulations related to wages and working hours including allowances, benefits, and overtime;
- Pay at least the minimum wage required by local laws or binding collective agreements;
- Compensate workers lawfully, in accordance with legal requirements;
- Provide all legally required benefits, such as paid vacations, leave, time off, etc.;
- Ensure that workers have sufficient time for meals and breaks, in compliance with legal requirements;
- Maintain and update a record of working hours, including the entry and exit times for each workday;
- Not impose any punishment, sanction, or disciplinary action if workers refuse to work overtime.

4. *Health, safety and corporate infrastructure*

The Supplier must:

- Promote safe, secure, and healthy work environments by implementing all necessary measures to reduce the risk of accidents, injuries, or exposure to harmful substances, especially in the presence of hazardous materials;
- Adopt established safety procedures, preventive maintenance, and use personal protective equipment (PPE) as required by law;
- Effectively manage all workplace health and safety risks and take appropriate measures to mitigate and counter them;
- Provide effective health and safety training to all workers, as required by the legislation of the home country;
- Equip machinery and equipment with the necessary safety devices;
- Provide all workers with adequate personal protective equipment (PPE). PPE must be free of charge, readily available, properly maintained and replaced when necessary;
- Comply with legal requirements regarding fire protection and emergency management; in particular, emergency exits and escape routes must meet legal requirements in terms of number, size and location and they must be visible and marked with illuminated signs;
- Ensure that all workers have access to drinking water and an adequate number of sanitary facilities including for personal hygiene. These facilities must be properly cleaned and maintained. Dining and rest areas must comply with hygiene regulations and be kept clean and in good condition. Dormitories, if present, must meet health and safety requirements.

5. *Environmental responsibility*

The Supplier must comply with all applicable environmental laws and regulations related to its activities as well as products and/or services. Specifically, the Supplier must commit to:

- Ensuring that pollution levels are regularly monitored and controlled to ensure compliance with legal and permit requirements;
- Ensuring that chemicals and waste are stored, used, transported, and disposed of in accordance with legal requirements;
- Identifying and managing all chemicals or other materials that could be harmful to the environment if released to ensure their safe handling, movement, storage, recycling/reuse and disposal;
- Monitoring environmental parameters such as energy use, air quality, and the quality of water used;

- Minimizing waste, including water and energy waste;
- Protecting land and forests;
- Minimizing atmospheric emissions of volatile organic compounds, aerosols, corrosive substances, particulates, ozone-depleting chemicals, and combustion by-products. These should be characterized, monitored, controlled, and treated as required before being discharged;
- Implementing a waste management system in compliance with current legislation.

6. *Ethical business practices*

The Supplier must refrain from any behavior or action that could be illegal. Specifically, the Supplier must:

- Operate with fair practices and avoid actions detrimental to competition, in accordance with antitrust laws.
- Provide information regarding the supply materials to ensure that no minerals or raw materials come from conflict zones (Conflict Minerals).
- Avoid involvement in fraudulent practices, money laundering, extortion or terrorism financing. The Supplier must comply with all applicable anti-corruption laws, regulations, and international conventions.
- Not offer bribes, gifts, or other illegal payments or compensation in dealings with public officials or other private sector individuals, including employees or representatives of SILMET, to influence any decision to obtain a commercial advantage.

7. *Final Provisions*

The Supplier must adhere to the provisions outlined in this Code and commit to promoting these principles among its stakeholders, including its supply chain. If local laws impose stricter requirements than those stipulated in this Code, the Supplier must comply with the applicable provisions in the country where it operates.

The President

Ghidini Pieralberto