

CODE OF

CONDUCT

1.- Introduction

At Aluberg, we believe that in order to achieve our strategic objectives and fulfil our mission and noble purpose, we must do “what is right”, always act with integrity and responsibility, respect our stakeholders and of course, comply with current regulations.

Respect for the law, commitments undertaken, the quality of service and contractual good faith form the basis of relations between Aluberg and its suppliers. We seek quality, rigor, commitment and excellence in a supplier, as a source of support for our activity. Relationships with our key suppliers are considered one of Aluberg’s assets. We base our supplier relations on the principle of contractual good faith, and we demand reciprocity and transparency from the supplier in the provision of services and information on its technical and financial solvency.

Aluberg expects its suppliers to agree on the standards defined in this Aluberg Suppliers’ Code of Conduct as it is an important element in a supplier’s assessment and selection.

2.- Ethics

2.1.- *Anti-bribery . Anticorruption*

Aluberg does not tolerate the attitude, behavior or practice of corruption, bribery or influence peddling in relation to civil servants or public institutions, both national and international, or otherwise in any circumstances.

Suppliers are expected to have the same zero-tolerance approach to these behaviors and in particular, Aluberg suppliers may not, directly or indirectly, give, offer or promise bribes or other unlawful incentives to any of their stakeholders.

Suppliers are also expected not to offer to Aluberg employees gifts, even if they are complimentary gifts.

2.2.- *Privacy*

Aluberg processes the personal data of its stakeholders with the utmost respect to their privacy, and in compliance with the applicable laws on personal data protection. In particular, Aluberg processes personal data for specified, explicit and legitimate purposes only. Whenever suppliers are rendering services to Aluberg that involve processing activities on personal data, Aluberg expects them to comply with the applicable laws as well, and to apply the necessary organizational and technical safeguards to be contractually agreed with Aluberg in a data processing written agreement.

Aluberg also expects suppliers to provide appropriate training to their staff on their responsibilities in accordance with the applicable personal data protection laws.

2.3.- *Intellectual Property. Confidentiality.*

Aluberg’s intellectual property (including patents and trademarks), know-how and confidential information is the result of the collective efforts of all Aluberg employees. It belongs to Aluberg, and constitutes one of its most valuable intangible assets. Suppliers therefore, will ensure its protection and appropriate use, whenever such use is necessary for the purposes to render a particular service and always in accordance with applicable legal regulations and Aluberg’s instructions.

Aluberg’s confidential information must always be protected and suppliers must sign confidentiality undertakings to ensure that the appropriate safeguarding measures are adopted. Suppliers are also expected to communicate any confidential information to their own employees on a need-to-know basis only.

2.4.- *Trade controls*

Aluberg does not engage suppliers which are established in a target country of any sanctions program implemented by national (e.g. the United States of America) or supranational authorities (e.g. the European Union, the United Nations).

Suppliers cannot have any link or dealing, directly or indirectly, with any Specially Designated Nationals and Blocked

Persons (SDN) or countries listed under OFAC, or other designated persons who are a target of a sanctions program according to the most current lists issued by the abovementioned national or supranational authorities.

2.5.- Business Integrity. Fair Competition. Product Communication

Aluberg competes on the basis of fair play and respect for market laws. It does not tolerate deceitful, fraudulent or malicious conduct that could drive the company to obtain inappropriate advantages. The promotion and commercialization of our products is based on their intrinsic added value, innovative nature and the rigorous dissemination of scientific information available on safety, quality and the efficacy of the products.

Suppliers must conduct their business in line with fair competition and in accordance with all applicable anti-trust laws. When the supplier services imply the promotion of our products, the supplier will do so only when authorized and always in an ethical, fair and truthful way, under the instruction received and using the materials and/or information provided by Aluberg.

3.- Labour

Aluberg believes that employees are key and valuable assets of a company. In this connection, suppliers must be aligned with this principle by respecting the human rights of their own employees and treating them with integrity, dignity and respect.

3.1.- Child labour

Child labour is prohibited by the ILO Convention 138 on the Minimum Age.

Suppliers of Aluberg may not use child labour. The minimum age for employment set forth by the ILO Convention 138 is 15 years of age (or 14 in accordance with developing country exceptions in accordance with the ILO Convention no.138). If the national law of the supplier stipulates a higher age for work or mandatory schooling, the higher age will apply.

Furthermore, the work carried out by employees under 18 years old must always respect the minimum employment conditions in force in each country's regulations and in no case, can be contrary to the minimum conditions established by the ILO. In this sense, children under 18 are forbidden from doing hazardous work (dangerous, unhealthy or bad for their morals).

3.2.- Non abuse & non-harassment

Supplier is expected to provide a workplace free of any type of:

- Discrimination based on age, gender, race, religion or belief, origin, sexual orientation, political affiliation, union membership, physical ability or marital status, in line with ILO Convention No. 111 on Discrimination. In this regard and if mandatory under supplier's national law, suppliers will promote equality within their organization through the preparation and implementation of plans and programs, that observe the minimum standards set forth in the relevant labour regulations.
- Psychological, physical, sexual or verbal threat, intimidation, harassment or abuse.

3.3.- Working hours, wages and benefits

Suppliers must pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. In this regard, wage payment will take place in a timely manner according to labour regulations applicable to the supplier.

Suppliers must have working hours that are in compliance with national laws and must communicate with employee, the basis on which they are being compensated in a timely manner and/or whether overtime is required and subsequently, the wages to be paid for such overtime. In no case shall working hours and overtime exceed the maximum thresholds set forth in the applicable labour regulations.

3.4.- Minimum employment conditions. Forced labour

Supplier must respect the minimum hiring and employment conditions established by the regulations in force. Suppliers shall not use forced, bonded or indentured labour or involuntary prison labour.

3.5.- Identification of concerns

Suppliers' employees should be encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. To this effect and if mandatory under their national law, suppliers will enable reporting channels for their employees. Suppliers will investigate such reported situations and take corrective actions if needed.

3.6.- Freedom of association and collective bargaining

Suppliers shall respect the rights of employees, as set forth in local laws, to associate freely, bargain collectively, join or not join labour unions, seek representation and join employees' councils, as the case may be.

3.7.- Social Security

If required by their national law, suppliers shall comply with the social security regulations including timely payment of the relevant contributions.

4.- Occupational Health and Safety

Suppliers shall provide a safe and healthy working environment for their employees.

4.1.- Minimum standards. Employees protection

As a minimum, suppliers will provide their employees with adequate lighting and temperature, potable drinking water, ventilation, sanitation, personal protective equipment, as well as with equipped and safe workstations.

Suppliers shall protect employees from unhealthy exposure to chemical, biological, psychological and physical hazards in the workplace.

In accordance with occupational health and safety regulations, suppliers shall evaluate the risks of the work positions and will provide their employees with the necessary information and training to minimize the occupational risks accordingly.

4.2.- Process Safety

Suppliers shall operate and maintain all its facilities in the safest manner possible. Suppliers shall have programs in place through safety controls processes, to prevent significant release of chemicals.

4.3.- Emergency Preparedness and Response

Suppliers shall identify and assess emergency situations in the workplace in order to minimize their impact by implementing emergency plans and response procedures.

4.4.- Hazard Information

Safety information relating to hazardous materials shall be available to educate, train and protect suppliers' employees from hazards and will be shared with Aluberg as per its request.

5.- Environment

At Aluberg we understand environmental respect as an obligation to society, to ourselves, to the world's sustainability and for future generations. We expect our suppliers to have the same respect for the environment.

5.1.- Environmental authorizations

Suppliers must comply at all times with the current environmental legislation. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

5.2.- Pollution prevention. Resources management

Suppliers will respect the environment by using resources rationally and will implement control mechanisms in order to minimize the pollution caused by suppliers' activities.

5.3.- Waste and emissions

Suppliers will minimize the generation of waste through avoidance, reuse and/or recycling procedures.

Suppliers will measure, test, control and treat emissions and industrial wastewater before they are released into the natural environment. The hazardous substance emissions into the atmosphere must be also measured, tested and treated before they are released.

5.4.- Spills and releases

Suppliers must have systems in place to prevent or mitigate accidental spills and releases into the environment.

5.5.- Climate change

Suppliers will progressively measure their greenhouse gases emissions and will pledge to voluntarily reduce them.

6.- Quality

Aluberg's suppliers are expected to meet agreed upon product specifications and quality requirements in order to provide goods and services that consistently meet applicable international quality regulations and Aluberg' needs, perform as intended and are safe for their intended use. These product specifications and quality requirements shall be defined in a supply agreement and a quality agreement between Aluberg and the supplier.


Aluberg requests to its suppliers the commitment of fulfilling the quality standards applicable to each category of supplied product. At the same time, with the aim of overseeing and strengthening this degree of fulfilment, Aluberg defines and performs periodical audit plans to its suppliers.

7.- Management Systems

Suppliers are expected to manage their activities systematically in order to maintain business continuity, meet the standards set forth in this Aluberg Suppliers' Code of Conduct and to improve their operations continually. Such measures may include, without limitation, the following:

- Compliance with the law and with the contract in place.
- Informing subcontractors involved in the services provided to Aluberg about the contents of this Aluberg Suppliers' Code of Conduct and requiring compliance therewith.
- Allocating appropriate resources as needed and engaging in employee training.
- Maintaining the necessary documentation to track and prove compliance with these standards.
- Continually improving by setting performance objectives, executing implementation plans and taking necessary corrective actions for risks or deficiencies detected.
- Reporting promptly to Aluberg any non-compliance, breach or violation of this Aluberg Suppliers' Code of Conduct.

Version September 2021

Aluberg S.p.A.

GENERAL MANAGER