



Code of Conduct for commercial partners

Guardini S.p.A.

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*Guardini S.p.A.
property paperwork*

➤ The objective of the Code of Conduct for commercial partners

In this *Code of Conduct* for commercial partners, *Guardini S.p.A.* has set the standards and the requests to which our commercial partners must abide by, especially regarding the respect of ethical standards, of the applicable law and of the standards in terms of moral integrity.

As for commercial partners, we take into account all the companies supplying or offering services to *Guardini S.p.A.*, for example, suppliers, consultants, trade representatives, service providers etc.

According to our commitment in terms of social responsibility, security and environmental protection, as we are convinced that the development and the sustainability of our business on a medium-long term cannot disregard the respect of the human being per se as well as an asset for our company, *Guardini S.p.A.* requires its own commercial partners to comply with the standards exposed in this *Code of Conduct*.

➤ Main standards

An economical success and a socially responsible action do not contradict each other, but they presuppose one another. A responsible action, complying with the standards of sustainability, is for us an important cornerstone of the collaboration with our commercial partners.

Therefore, we expect our commercial partners to:

- carry out their activity with integrity, namely respecting all the applicable laws as for example the standards for the safeguard of human rights (including the key standards of the International Labor Organization - ILO), the standards in terms of anti-corruption, protection of personal data, competition and antitrust as well as the standards in terms of environmental protection;
- commit in making their own commercial partners comply with the standards exposed in this *Code of Conduct*;
- be honest, responsible and loyal.

➤ Social Responsibility

We are convinced that social responsibility is an essential element for the long-term success of a company and, therefore, that this responsibility is an indispensable building block of a value-oriented company management. Consequently, we expect from our commercial partners to work in the compliance of the following standards:

- **Human rights** - Our commercial partners must respect the internationally recognized human rights.
- **Child labor** - Our commercial partners do not employ children in the production of their products or of their services and they abide by the applicable standards regarding the prohibition and the eradication of child labor (ILO Conventions 138 and 182). Child labor shall be intended as for people less than 14 years old, who cannot attend compulsory education and who cannot lead a suitable life for their age, unless it is described in a more restrictive way in each specific applicable law. Our commercial partners encourage the workers, and in particular those under 18 years old who are willing to attend school or university, helping them as much as possible in their studies by applying the designed tools in this regard described in the work contract.
- **Forced labor** - Our commercial partners must not implement conditions of slavery or servitude, forced or compulsory work, nor employ human trafficking or involuntary work, guaranteeing all employees the liberty of withdrawing from their working duties (no documents seizure, no unpaid salary and kept as bails, etc.). They ensure that their employees do not undergo humiliating and inhuman treatments, corporal punishments... (ILO Conventions 29 and 105).
- **Gender equality/diversity** - Our commercial partners encourage diversity within their organizations and do not tolerate any discrimination in the recruitment process nor in the employee's assignments (ILO Conventions 100 and 111).
- **Freedom of association** - Our commercial partners respect the freedom of assembly and the creation of groups of interests. They also ensure the protection of the employee's rights within their organizations. They respect the right of their employees to elect freely their own representatives and to negotiate collectively (ILO Conventions 87 and 98).

- **Salary** - Our commercial partners properly pay their own employees in accordance with the laws and the industrial standards in force. *Guardini S.p.A.* favors those commercial partners which ensure the wages guaranteeing the coverage of the minimum needs, as well as the access to goods and services which contribute to the improvement of their quality of life.
- **Working hours** - Our commercial partners abide by the law and industrial standards in force. Overtime work, properly paid, must not be continuous. The regular working hours must not go beyond 48 hours per week and as for overtime work, 12 hours per week. A weekly rest must be guaranteed, as it is intended in the contract in force.
- **Privacy** - Our commercial partners abide by all the laws regarding the protection of personal data in force in their own country.
- **Security and protection of work and health** - People's security is one of the core values of our commercial partners and has the utmost priority. Our commercial partners guarantee a safe and healthy work environment, they ensure training in terms of security as well as safe products and services. They reduce or even eliminate, where it is possible, all sources of risks in the work environment, applying their general knowledge in terms of security and health protection in their industrial compound.
- **Environmental protection** - Our commercial partners comply with the environmental regulations in force and endorse the standards of sustainability and environmental protection as company values. They implement efficient measures which reflect their own environmental responsibility, planning the decrease of emissions in the environment and guaranteeing a proper flow of their waste disposal. If possible, they make available the reports of the environmental performance of the company.

► Anti-corruption

Guardini S.p.A. does not tolerate any kind of corruption nor other disloyal business practices. The company deems transparency and honesty as the fundamental requirements to guarantee trust and reliability in the commercial relationships and within the partnerships.

- **Corruption** - Our commercial partners do not tolerate any kind of corruption nor any other economic crime committed by their own employees or by those of their suppliers.
- **Consultants / agents / brokers** - The fees of consultants, agents and brokers must not aim to illegally favor commercial partners, clients or any other third party. Our commercial partners thoroughly choose their own consultants, agents and other brokers on the basis of eligibility criteria.
- **Avoid conflict of interests** - Our commercial partners avoid conflict of interests which could lead to risks of corruption.
- **Invitations and donations** - Within their activity for the DB group, our commercial partners accept and return invitations only if they are appropriate, if they do not expect to be illegally returned in any way, if they do not give cause to possible aiding and abetting and if they do not infringe applicable laws (especially anti-corruption laws). The same applies for accepting and giving donations, salaries or advantages of any other kind.
- **Money donations / sponsorship** - Our commercial partners' donations are always to be done on a voluntary basis and without claiming to be returned. The sponsorship of people, groups or organizations is not used to obtain commercial advantages.
- **Money laundering and financing of terrorism** - Our commercial partners take all the necessary measures to prevent money laundering and the financing of terrorist activities.

► Competition

Guardini S.p.A. is committed in always behaving as a responsible and loyal market operator and expects its own commercial partners to behave as so.

- **Competition and antitrust laws** - Our commercial partners abide by all the relevant provisions established by the law on competition. In particular, they do not establish any arrangement or agreement that could influence prices, conditions, strategies or relationships with clients. The same applies to the exchange of delicate information in terms of competition and for any other kind of behavior which minimizes or could illegally constrain the loyal competition.

- **Export and import control** - With particular reference to the commercial activities carried out worldwide, our commercial partners abide by all the applicable laws concerning import and export of goods, services and information, as well as embargoes and penalties.

➤ Safety of goods

As AEO, *Guardini S.p.A.* asks its own commercial partners to certify that

- the goods which are produced, stocked, took over, sent or delivered:
 - are produced, stocked, prepared and loaded in safe commercial premises as well as in safe areas of loading and shipping;
 - are protected against non-authorized tampering during production, stocking, preparation, loading and shipping;
 - employ trustworthy staff for the production, stocking, preparation, loading and shipping of these goods;
- the commercial partners which act on behalf of the supplier know that they also have to guarantee the security of the supply chain mentioned above.

➤ Abiding by the Code of Conduct for commercial partners

Obligation to comply - Our commercial partners commit in respecting the standards exposed in this *Code of Conduct* and ensure the implementation of a system of management which can demonstrate this commitment.

Supply chain - Our commercial partners carefully choose their own suppliers for their activity, make them transparent towards *Guardini S.p.A.* and inform them of the standards exposed in this *Code of Conduct* for commercial partners (or equivalent standards) and they strive their suppliers to respect these standards, with a special attention to the requirements of Social Responsibility.

The company declares to have read the *Code of Conduct*, to agree with its' contents and to guarantee its' systematic application, allowing a possible audit from *Guardini S.p.A.*.

Company

Name of the authorized signatory

Qualification

Signature

Date

Stamp