



SUPPLIER CODE OF CONDUCT

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1 Purpose

In order to ensure ever greater relevance to the principles that inspire the selection and evaluation of its suppliers, **Impresa Pizzarotti & C. S.p.A.** (hereinafter "**Pizzarotti**" or the "**Company**") has issued this Supplier Code of Conduct (hereinafter also referred to as the "**Code**"), which must be accepted by suppliers in order to qualify for inclusion in the Company's Supplier Register and thus pursue business relations with the Company.

Through this Code, **Pizzarotti intends** to involve its suppliers in the implementation of a sustainable procurement cycle from a social, environmental and economic point of view.

In order to ensure that the contents of this Code are appropriate and consistent with the corporate mission, they will be reviewed at least once a year and as necessary.

This Code applies in addition to the principles set out in the Code of Ethics adopted by the Company and fully recalls the contents of the Integrated Company Policy, with express reference to the Prevention of Corruption Policy (§ 11.1) approved by the Board of Directors with the minutes of 07.03.2022, which aims at providing everyone with the rules to be followed to ensure compliance with anti-corruption laws.

The mandatory acceptance of this Code therefore implies the acceptance by all suppliers (or business partners) also of the aforementioned Integrated Company Policy.

2 Scope

This Code applies to any entity, natural or legal person supplying activities, goods or services to the Company and is issued to ensure that suppliers implement safe working conditions and employees are treated with respect. Their production processes must be responsible and environmentally friendly as well.

This Code of Conduct will be attached to the contract signed by the Supplier as well as being available on the Company's website to all interested parties.

Each Supplier shall be responsible for ensuring that its employees and subcontractors involved are informed of and comply with the principles set out in this Code.

3 Sustainability for Impresa Pizzarotti

Pizzarotti has among its primary values that of **Business Ethics, Social** and **Sustainable Development** (through instruments such as the Company Policies and the adopted Codes of Ethics), through which it conveys a message of loyalty, fairness and respect and which represents a point of reference in the social environment in which the Company operates.

In this context, **Pizzarotti** considers of particular importance the creation of transparent and lasting relations with the players in its supply chain and the sharing of the values and principles by which the Company is inspired in the performance of its activities. To this end, **Pizzarotti** has therefore decided to adopt a **Supplier Code of Conduct**, which defines the principles and rules of behaviour it requires compliance with



throughout its supply chain.

The provisions of this Supplier Code of Conduct are inspired by the principles set out in the ILO (International Labour Organization) Core Conventions and the United Nations Universal Declaration of Human Rights (and the ten principles dictated by the United Nations Global Compact). The Top Management remains responsible for assessing the periodic updating of this Code, after consultation with the Organisational Functions involved, based on future events and developments that may occur within or outside the Company.

Therefore, our **mission** is to operate in a framework of fair competition with honesty, integrity, fairness and good faith, respecting the legitimate interests of shareholders, employees, customers, partners, local communities and various stakeholders with whom we relate.

In particular, **Pizzarotti** actively promotes **Corporate Social Responsibility** and a sustainable supply chain, integrating attention to **social, environmental and ethical/governance** issues within its strategic vision.

We believe that close cooperation with our supply chain is essential to achieve high quality levels in our products, services and production activities.

The establishment of collaborations, the dissemination of this **Supplier Code of Conduct**, the **Company Policies and the adopted Code of Ethics**, as well as cooperation in various fields (technology, environment and society) are the ways in which **Pizzarotti** involves and interacts with its established suppliers.

Suppliers are strategic allies who support us in the realisation of the works under the contracts we acquire, offering our Customers/Clients the best in terms of **quality, sustainability, ethics, innovation and performance**.

In order to pursue the principles of Ethics and Sustainable Development, **Pizzarotti** imposes supply chain management methods (e.g., with contractual prescriptions) that guarantee the integration of Ethical, Environmental, Social and Sustainability criteria in the selection and involvement of suppliers.

Therefore, **Pizzarotti** invites all its Suppliers to share and implement the principles expressed in this **Supplier Code of Conduct**, compliance with which will be an increasingly important component in the assessment and selection of Suppliers.

Pizzarotti 's Procurement area is responsible for supplier management and for this purpose it works together with the various corporate Units/Functions in order to integrate the main aspects related to the environment, health and safety, energy use, ethical-social issues, sustainable development and governance (e.g. anti-corruption) into the procurement processes, thus laying the foundations for responsible and long-term success.

In particular, it is responsible for:

- ◆ disseminating this Code internally and externally, also by activating collaboration programmes with Suppliers
- ◆ reporting periodically on the results achieved in terms of Sustainable Procurement
- ◆ ensuring that procurement personnel are trained in the principles of Sustainable Procurement



- ◆ raising the awareness of all employees in relation to acting with a constant focus on Sustainable Development.

Pizzarotti's selection of suppliers and determination of purchasing conditions are based on an objective assessment of quality, price and ability to provide and guarantee services of an adequate level and to propose innovative solutions.

Ultimately, this Supplier Code of Conduct, in accordance with the adopted Company Policies and Code of Ethics, has the primary objective of communicating **Pizzarotti's** commitment to strengthening the development of solid and lasting relations with our partners, whom we ask to espouse the principles and rules that inspire us in order to pursue together a common objective of respect and protection of Environmental, Social, Ethical and Sustainable Development aspects.

Specifically, **Pizzarotti** made the following commitments:

- ◆ to protect human rights, workers' welfare and fair working conditions
- ◆ guarantee all workers a decent wage
- ◆ not to use child and/or forced labour
- ◆ make conscious use of natural resources and optimise the efficiency of the materials and natural resources used
- ◆ preserve and protect biodiversity and safeguard the functioning of the ecosystem
- ◆ make responsible use of water resources
- ◆ optimise waste management and minimise waste production
- ◆ strive to slow and mitigate climate change
- ◆ exert a positive influence on local communities
- ◆ minimise the impact on the environment
- ◆ promote sustainable procurement.

4 The Governance System adopted by the Company

Pizzarotti, in order to ensure full compliance with current legislation and with the provisions of this **Supplier Code of Conduct**, of the **Company Policies**, of the **Code of Ethics** adopted, of the **Company Integrated Management System** and of the **Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001**, as well as to pursue the continuous improvement of the *Governance System* and to ensure compliance with national and international regulations and *best practices*, has obtained conformity certification, issued by accredited Certification Bodies, in accordance with the following international reference norms/standards:

- ◆ UNI EN ISO 9001 "Quality Management System"
- ◆ UNI EN ISO 14001 "Environmental Management System"
- ◆ UNI ISO 45001 "Occupational Health and Safety Management System"
- ◆ SA 8000 "Corporate Social Responsibility"



- ◆ UNI ISO 37001 "Anti-bribery Management System"
- ◆ UNI ISO 39001 "Road Traffic Safety Management System"
- ◆ UNI ISO 30415 "Human Resource Management - Diversity and Inclusion" (in the process of being acquired)
- ◆ UNI ISO 20400 "International Standard for Sustainable Procurement"
- ◆ UNI EN ISO 14064-1: 2019 "Greenhouse gases Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals"
- ◆ European Regulation no. 1221/2009 Eco-Management and Audit Scheme (EMAS).

All this in order to provide evidence of its commitment to the pursuit of customer satisfaction, the effectiveness of the work methods adopted and its ability to continuously improve its processes and performance, as well as its commitment to pursue **Ethical, Environmental, Social** and **Sustainable Development** principles, to reduce environmental impacts, accidents at work, occupational illnesses, optimisation in the consumption of sustainable resources and to prevent offences under Legislative Decree no. 231/2001.

Pizzarotti guarantees the continuous improvement and effectiveness of its Integrated Management System, not only through the definition of corporate policies and objectives, but also through the monitoring of applicable reference regulations, the results of internal audits, data analysis and consequent corrective actions, Management Reviews, self-assessment and the direct involvement of its personnel.

The combined action of the above systems in an Integrated Management System ensures excellence in business management as it guaranteeing risk management through compliance with requirements defined by globally recognised standards.

5 Principles

5.1 Partnership and the Cornerstones of Relationships

Pizzarotti believes that selecting innovative and reliable supplier partners who are willing to build a shared success based on a high degree of value creation, commitment and flexibility is the fundamental requirement for a lasting relationship. The aim is to establish a long-term partnership characterised by transparency and collaboration.

Development, growth, and efficiency begin at the stage of selecting the Supplier with which to start the collaboration, which takes place according to a documented procedure that guarantees impartiality and equal opportunities for everyone involved.

A system of continuous performance evaluation (in which all relevant company functions participate) has also been implemented in order to guarantee the required standards over time.

Through the use of specific purchasing methods calibrated to the different product categories, **Pizzarotti** strives to obtain the best conditions in terms of performance, price, quality, ethics and sustainability throughout the entire product life cycle.



Suppliers are encouraged to implement the necessary mechanisms to identify, determine and manage Risks in all areas covered by this document and to comply with all applicable legislative requirements.

Suppliers are encouraged to continuously improve the suitability, adequacy and effectiveness of their Sustainability Policies through appropriate measures.

They are also invited to maintain appropriate documented information demonstrating the sharing and implementation of the values expressed in this document. Subject to prior agreement with the Supplier, **Pizzarotti** reserves the right to carry out audits to verify compliance with/implementation of the principles set out in this **Supplier Code of Conduct**, in the **Company Policies** and in the **Code of Ethics** adopted by **Pizzarotti**.

In addition, the supplier, as an activity/service specialist, is increasingly involved in the initial phase of Contract Management, in order to share technical and economic commitments with the Company.

General reference conditions differentiated according to the different types of supply have been implemented ("General Terms and Conditions of Product Purchase" and "General Terms and Conditions of Contract/Subcontract"), which, together with the contractual models derived from them, form the basis for supply relationships with **Pizzarotti**. In addition, suppliers entering our sites are required to provide important documentation on Contribution, Regulatory, Environmental, Occupational Health and Safety, Social Responsibility and Anti-Corruption aspects.

The guiding principle is to acquire the necessary goods/services with the best quality/price ratio to meet the objective of containing costs, ensuring quality and service levels adequate to the satisfaction of the end customer, taking due account of operational risks and complying with the general guidelines on *Quality, Environmental, Occupational Health and Safety, Social Responsibility, Anti-Corruption* and overall *Sustainability* of the choices made, in terms of Social Impact.

Pizzarotti expects suppliers and subcontractors to assume their responsibility along the entire end-to-end *supply chain*, from the producer to the supplier to the end user, to comply with regulations on Quality, Health and Safety, Environment, Ethics, Energy Efficiency and Sustainable Development, and therefore to maintain a behaviour that respects the values and principles that guide the company; for this reason, **Pizzarotti** makes sure that the different partners and suppliers are actively involved in its processes.

5.2 Ethics

5.2.1 Business Integrity

The Supplier shall carry out its business in compliance with the ethical and integrity principles set out in the **Company's Code of Ethics and Conduct**, in order to maintain long-lasting, honest and transparent relations with **Pizzarotti**.

Pizzarotti promotes a *Corporate Governance System* that integrates and promotes the Culture of **Sustainability** internally, spreads respect for the law and **Prevention of Corruption**, and is inspired by the highest standards of integrity, honesty and fairness.



Compliance with the laws, regulations and procedures in force in the areas in which the supplier operates is a prerequisite for doing business with our company.

We expect our Suppliers in their conduct of business not to tolerate any kind of corruption, extortion or embezzlement. The offer or promise of direct or indirect payment, in monetary or any other form in an attempt to obtain or retain work or for any other benefit, thereby obtaining an improper advantage over other potential Suppliers will not be tolerated.

Ultimately, we strongly believe that long-term partnership relationships should be based on mutual fairness and transparency, in a context of full respect for the rules of business and the ethical and reputational aspects of related activities.

This commitment took the form of the implementation and maintenance of a **Corruption Prevention Management System** and the consequent certification, by an Accredited Certification Body, in accordance with the UNI ISO 37001 standard.

5.2.2 *Anti-Corruption and Anti-Money Laundering*

The Supplier shall refrain from any form of active and passive corruption and/or extortion and shall not promise, offer or accept undue and/or improper benefits of any kind for corruption purposes.

The anti-corruption and anti-money laundering provisions apply to all employees, collaborators, suppliers, consultants and partners of **Pizzarotti** and are binding on all.

Pizzarotti has always paid attention to this issue through defined and applied internal procedures, starting with the adopted **Code of Ethics** and **Company Policies** with particular reference to the **Anti-Corruption Policy**, which defines the expectations for conducting business in strict compliance with the best international standards on anti-corruption legislation.

The Company has been active for several years in the fight against corruption, expressly prohibiting "*corrupt practices, illegitimate favours, collusive behaviour, solicitation, direct and/or through third parties of personal and career advantages for oneself or others (...)*". These indications are valid for all Employees/Collaborators/Suppliers/Business Partners of the Company and are expressly shared by all Suppliers at the time of acceptance of the purchase order and/or supply/subcontract agreement.

Pizzarotti 's collaborators/suppliers/subcontractors/consultants may not request, be promised or accept gifts, invitations or other favourable treatment for themselves or third parties and must also comply with the laws against money laundering, self-laundering and receiving of money, goods or other benefits.

5.2.3 *Fair competition*

The Supplier shall carry out its business in compliance with the rules of fair competition in accordance with the relevant legislation.

Collaborators/Suppliers/Subcontractors/Consultants are obliged to comply with the applicable antitrust laws and regulations and to pursue the principles of fair and transparent competition; Collaborators/Suppliers/Subcontractors/Consultants are also forbidden, in the conduct of their activities, from engaging in any practice that is restrictive or capable of unlawfully disrupting the market.



5.2.4 *Bribery and Fraud*

No funds or assets may be paid, loaned or otherwise provided as bribes, kickbacks or other payments intended to influence or compromise the conduct of an employee. A bribe can be something of value, given to another person to obtain an undue business advantage. In essence, any item, gift or service provided for the purpose of influencing a business decision can be considered a bribe.

Suppliers must refrain from any action that may cause an employee, counterparty or public official to receive anything of value in order to obtain business, as any such action violates anti-corruption laws.

5.2.5 *Conflict of Interest*

Pizzarotti 's Collaborators/Suppliers/Subcontractors/Consultants are required to behave in compliance with the principles of business **ethics** and **transparency** and are required to avoid any situation of conflict of interest that could influence their business relationship with **Pizzarotti** or could interfere with their ability to carry out their activities impartially and for the benefit of the Company, or of other third parties.

5.2.6 *Privacy*

The Supplier shall comply with applicable legislation concerning personal data protection, adopting the appropriate security tools to preserve the confidentiality of the information which it becomes aware of in the context of its business, also ensuring that all its employees and collaborators comply with these guidelines.

5.2.7 *Intellectual Property Protection and Confidentiality in the Conduct of Business*

Collaborators/Suppliers/Subcontractors/Consultants are required to respect the intellectual property of **Pizzarotti** and third parties and are to be held liable for the use or infringement of patents and/or trademarks and/or other intellectual property rights relating to the use of materials, machinery or working methods used in the performance of their activities.

Collaborators/Suppliers/Subcontractors/Consultants are also requested, in compliance with the applicable laws and regulations, not to disclose to third parties and in any way for reasons not strictly related to the execution of the contract, the technical information and all confidential information (e.g. drawings, specifications and any other technical and non-technical documents that **Pizzarotti** makes available to Collaborators/Suppliers/Subcontractors/Consultants and which remain the property of **Pizzarotti** and may be used solely and exclusively for the performance of the contractual relationship) and strategic information made available by **Pizzarotti**.

5.2.8 *Community Involvement*

Pizzarotti pays attention to the social and economic development of the Local Communities in which it operates and requires its Collaborators/Suppliers/Consultants to carry out their activities participating in the growth and enhancement of the territory, establishing relations of dialogue and constructive cooperation with all its interlocutors, marked by maximum transparency and trust.

5.2.9 *Reporting suspected non-compliance*

The Supplier undertakes to provide its employees with suitable means and tools, including computer ones, to report any suspected non-compliance or potentially illegal activities or behaviour in the workplace. Any



such report shall be considered strictly confidential and treated as such by the Supplier, which also undertakes to protect the reporting parties from any form of retaliation.

5.3 Labour

5.3.1 *Social Responsibility-Respect for Human Rights and Employee Rights in the Workplace*

Social Responsibility is an inalienable value for *Pizzarotti* and constitute a priority in the choices introduced by the Company, in order to guarantee:

- ◆ its workers the protection of their rights and respect for their human dignity and freedom
- ◆ the Company to comply with all national laws and international regulations on labour law, human rights, protection against the exploitation of minors, safety and health in the workplace
- ◆ a commitment to the dissemination of these rights throughout the supply chain of suppliers and subcontractors, extending these principles towards a broadening of the Social Responsibility culture.

Suppliers are encouraged to continuously improve the suitability, adequacy and effectiveness of their *Social Responsibility* Policies through appropriate measures.

Finally, the System, effectively implemented, ensures regulatory compliance in a number of relevant matters (labour law, human rights, offences against the individual, etc.) pursuant to Legislative Decree no. 231/2001. *Compliance with the internationally recognised Social Standards concerning human rights, working conditions and the Ministerial Decree (Environment 06 June 2021) is required.*

5.3.2 *Illegal and child labour*

The Supplier shall ensure the utmost respect for people and comply with applicable labour legislation, **refraining from any form of illegal, forced or child labour.**

5.3.3 *Freedom of workers - Freedom of association - Collective bargaining*

The Supplier shall guarantee its employees the right to freedom of association and the application of collective bargaining in the relevant sector, in accordance with all applicable laws and regulations.

5.3.4 *Working conditions*

The Supplier shall provide its employees with working conditions that respect human dignity, in compliance with the applicable industry legislation concerning hours worked (or working hours), overtime, payment and social security contributions, leave, holidays and sick leave. The Supplier also undertakes to provide training and educational opportunities for its employees and to ensure a working environment compliant with health and safety requirements provided for by the applicable legislation.

5.3.5 *Equal Opportunities, Non-Discrimination and Equal Working Conditions, Diversity and Inclusion*

Collaborators/Suppliers/Subcontractors/Consultants are required to provide equal employment opportunities



to all persons without discrimination based on race, colour, gender, language, religion, ethnic origin, disability, marital status, sexual orientation, political and trade union opinion.

For **Pizzarotti**, diversity is a strategic element for the company's competitiveness and the development of its people. **Pizzarotti** believes that teams with different skills, experiences and backgrounds enrich the working environment and stimulate creativity, fostering a more effective leadership style and nurturing an increasingly open corporate culture.

Non-discrimination, Equal Opportunities and Inclusion permeate **Pizzarotti's** values.

For these reasons, **Pizzarotti** undertakes to:

- ◆ create an inclusive working environment that ensures respect, integration, personal development and equal opportunities (e.g. training, development, career), not only for current employees, but also for potential ones
- ◆ increase employees' awareness regarding diversity and equal opportunities within **Pizzarotti**, including through the development of training programmes and special projects on diversity and inclusion
- ◆ comply with equal opportunities standards and laws, also with reference to the regulatory framework of the countries in which it operates and to observed best practices
- ◆ foster the commitment of all collaborators to act with respect and integrity in all relations with colleagues, customers, suppliers and all actors with whom they interact
- ◆ stimulate suppliers' attention regarding the respect for human dignity in the form of non-discrimination and protection of diversity.

Diversity is a value that must be protected and encouraged with concrete and pervasive actions in all organisational and management processes through the understanding, inclusion and valorisation of the differences of its people. Diversity enriches and opens up new ideas by multiplying the possibilities of generating innovative solutions: people from different cultures, social and generational backgrounds, skills, competences and experiences represent a distinctive value that enables the dialogue between multiple perspectives and makes it possible to reflect upon and anticipate the needs of customers and stakeholders.

Pizzarotti's commitment to cultivating the value of people, so that everyone feels included and can give the best of themselves, is embodied in a strategy of human resources development and management, capable of promoting an inclusive culture to enhance the uniqueness of the individuals and access to the same opportunities for professional growth regardless of the role held in the organisation.

Collaborators/Suppliers/Consultants must also ensure a workplace free from harassment, threats or any other form of physical or sexual, psychological or verbal abuse or harassment. Collaborators/Suppliers/Consultants are requested not to engage in any behaviour that restricts individual personality in all phases of the employment relationship.

In addition, the Company requires, as far as applicable, compliance with the Decree of the Presidency of the Council of Ministers, Department for Equal Opportunities, of 07/12/2021 containing "Adoption of the guidelines aimed at favouring equal gender and generational opportunities, as well as the employment inclusion of persons with disabilities in public contracts financed with PNRR and PNC resources".



5.3.6 Freedom of Association and the Right to Collective Bargaining

Collaborators/Suppliers/Subcontractors/Consultants are required to comply with all applicable laws and regulations aimed at ensuring the *freedom of association of workers* and recognising the *right to collective bargaining*.

Employees/workers should not fear intimidation or reprisals for forming or joining a trade union or participating in collective bargaining. The Supplier and its subcontractors shall guarantee the rights of workers to form, join, and organise trade unions of their choice, as well as their right to bargain collectively with the company. Should freedom of association and the right to collective bargaining be restricted by law, the company will allow its employees to freely elect their representatives. The Supplier and its subcontractors shall ensure that workers' representatives and staff engaged in the organisation of the latter are not subjected to discrimination, harassment, intimidation or retaliation. Where the right to freedom of association and collective bargaining is restricted by law, the Supplier and its subcontractors shall facilitate, and not hinder, the development of similar means of free and independent association and bargaining.

5.3.7 Discrimination

The Supplier and its subcontractors shall not practice or promote any form of discrimination (*whether in a generic sense, or direct or indirect*) or privileged treatment with regard to recruitment, remuneration, professional training, career, dismissal or retirement, nor shall they rely on criteria of race, social class or nationality, caste, family situation (including marital status and pregnancy status), origin, religion, disability, gender, sexual orientation, marital status, union membership, political opinion, age and any other condition that could give rise to discrimination. The Supplier and its subcontractors shall not engage in intimidating, offensive or exploitative behaviour or sexual harassment, including gestures, language and physical contact, either in the workplace or possibly in homes or other areas that the company makes available to workers. The Supplier and its subcontractors shall treat their employees with dignity and respect. The Supplier and its subcontractors shall not instigate or tolerate corporal punishment or mental or physical coercion or verbal abuse of employees.

5.3.8 Respect for Workers' Contractual Conditions

Collaborators/Suppliers/Subcontractors/Consultants must ensure that their daily and weekly working hours do not exceed the maximum limit set by applicable laws and regulations. Collaborators/Suppliers/Subcontractors/Consultants are obliged to compensate excess hours in accordance with legal and contractual provisions. The minimum remuneration of employees may not be lower than that established by collective agreements and applicable laws and regulations.

Employees must also be guaranteed rest periods, leave of absence and holidays as provided for in contracts and collective labour agreements and in accordance with the applicable legal and regulatory provisions.

Collaborators/Suppliers/Subcontractors/Consultants are required to respect the employee's right to privacy, committing to the correct use of the data and information provided in accordance with the law and applicable national regulations.

5.3.9 Working Hours

The Supplier and its subcontractors shall comply with the laws and industry standards on working hours,



official holidays and holidays. The normal working week, excluding overtime, will be the one established by law, but in no case will it exceed 48 hours. The working hours and regulations will be set out in writing in the contract concluded with the employee. Employees will take at least one day off after six consecutive working days. Overtime work will always be voluntary. Overtime will be used responsibly, taking into account the following factors: the duration, frequency and number of hours worked by the individual worker or the staff as a whole. Exceptions to this rule will only be allowed if all the following conditions are met: *if the working hours established by the law in force exceed the above-mentioned limit.*

5.3.10 Fair Remuneration

The Supplier and its subcontractors shall respect the rights of workers to a decent wage and must ensure that the wages paid for a normal working week correspond to legal or minimum industry standards and are sufficient to meet the basic needs of the employees, as well as to provide them with some discretionary income. Salary deductions for disciplinary purposes will not be allowed. Exceptions to this rule will only be allowed if both of the following conditions are met:

- ◆ Wage deduction for disciplinary reasons is permitted under national laws.
- ◆ An agreement resulting from collective bargaining is in force.

The Supplier and its subcontractors shall ensure that the composition of employees' wages and salaries is clearly and duly detailed in writing for each pay period. In addition, the company must ensure that the payment of wages and salaries complies with applicable laws and that payment is made in cash or by other traceable means, as deemed most convenient by the workers.

All overtime work will be remunerated with an increase in accordance with national laws. However, in countries where overtime rates are not regulated by law or collective agreements, overtime work by employees will be remunerated according to the standards prevailing in the industry, in the manner most favourable to the employee. The Supplier and its subcontractors shall not draw up contracts that provide for undeclared work or false apprenticeships for the sole purpose of avoiding the fulfilment of obligations in favour of employees laid down in the applicable workplace regulations and social security laws. The Supplier and its subcontractors shall exonerate **Pizzarotti** from any claims, complaints or disputes made by their directors, managers, employees, workers and partners whose services the Supplier uses, including those relating to their respective employment relationships or their termination, if originating in any way from the actions or omissions of the Supplier.



5.4 Quality, health, safety, environment, energy, prevention of corruption

5.4.1 Quality

The Supplier shall comply with what is defined in the special specifications and required by applicable legislation as well as comply with the Company's quality standards in order to provide products and services that adequately meet the Company's requirements.

5.4.2 Occupational Health and Safety

Occupational Health and Safety are inalienable values for **Pizzarotti** and constitute a priority in the choices made by the Company.

Ensuring a safe working environment, respecting health and safety, is a necessary condition for the present and for building the future, and a driver of growth, efficiency and quality.

The Supplier undertakes to protect its employees and collaborators from workplace hazards, taking all necessary precautionary measures to guarantee their health and safety. The Supplier shall also provide training and the necessary information so that employees and collaborators are aware of the risks associated with their work. Moreover, the Supplier shall ensure suitable controls, safety procedures, preventive maintenance and technical protection measures required to limit health and safety risks in the workplace.

Pizzarotti emphasises its commitment to Occupational Health and Safety by adopting an *Integrated Management/Sustainability System* compliant with the UNI ISO 45001 and SA 8000 standards in order to maintain and develop its performance through the definition of specific and targeted improvement objectives.

Collaborators/Suppliers/Subcontractors/Consultants are required to strive to create a working environment that is attentive to Health and Safety issues, also supported by the adoption of Management Systems certified according to recognised standards, aimed at minimising risks and removing the causes that may jeopardise the Safety and Health of their personnel and third parties.

The Supplier and its subcontractors shall ensure safe and healthy working environments and take effective measures to prevent potential accidents and not endanger the health and safety of workers in the workplace. To this end, the Supplier shall assess the specific risks present in the workplace and reduce the causes of such risks as far as reasonably possible. The Supplier and its subcontractors shall provide their personnel with specific protective equipment in the various places where the work is carried out, as required by the laws in force. The Supplier and its subcontractors shall ensure access to adequate sanitary and hygienic facilities and any accommodation made available to workers shall meet their basic needs. In addition, the Supplier and its subcontractors shall periodically train their personnel on safety aspects and on the standards and procedures to be followed, so that they become familiar with the use of safety devices and with the assessment of accident risks in order to identify their actual causes and take preventive measures; they shall also verify that health and safety standards and guidelines are consistently applied. The Supplier and its subcontractors shall appoint a management representative to provide a safe and healthy working environment for all employees.

Collaborators/Suppliers/Subcontractors/Consultants are also obliged to promptly inform **Pizzarotti** in the event of serious or fatal accidents to their own personnel, to that of their subcontractors or to third parties during or as a result of the performance of activities.

Pizzarotti is committed to playing an active role in the field of both occupational health and safety, and social responsibility, and is fully committed with all its management and Human Resources to spreading a culture of Health and Safety in the workplace at every level and in every company environment, and to safely manage the activities and tasks relating to its own employees and the employees of its suppliers/contractors.



It is the Company's will to keep its **Corporate Policies** active and effective, with the commitment to disseminate them to its employees and to the entire pool of suppliers, verifying that the regulations are complied with within the Work Sites managed by **Pizzarotti**.

5.4.3 Innovation

Innovation lies at the heart of entrepreneurial action; permanent development is the engine of a company and an integral part of **Pizzarotti**'s culture.

Continuous adaptation to new conditions and the constant search for better solutions for our Customers are the values that guide us in our daily work and which we also ask our suppliers to follow.

5.4.4 Emergency and risk management

The Supplier shall manage risks and emergencies related to its business activities by encouraging the implementation of detection systems, prevention and management practices, response procedures and suitable training, in order to limit the exposure of its employees and collaborators to any risks.

5.4.5 Road Traffic Safety Management

The Supplier is obliged to adopt a policy aimed at preventing accidents resulting from road traffic by paying attention to road accidents that have already occurred, fines imposed on its workers, drivers' licence points, proper maintenance of vehicles and the choice of the safest road routes.

5.4.6 Environmental protection

The Supplier shall use all resources involved in the production cycle responsibly and efficiently, use sustainable supply sources and, where possible, use energy from renewable sources. Negative impact on the environment and climate must be reduced or eliminated at the source through practices such as modifying production and maintenance processes, as well as replacing, conserving, recycling and reusing materials.

5.4.7 Environment - Sustainable Development - Climate Protection

Pizzarotti feels that its mission is to be a model of excellence also for the maximum protection of the Environment, which it achieves in carrying out its activities, and therefore makes the following principles of **Environmental Sustainability** its own in strategic choices and company processes at different levels in the short, medium and long term:

- ◆ preventive approach;
- ◆ reduction of environmental impacts;
- ◆ continuous improvement;
- ◆ maintaining regulatory compliance;
- ◆ responsible management of the production chain;
- ◆ awareness of human resources;
- ◆ communication.

The Supplier and its subcontractors shall comply with all Environmental Regulations related to the activities covered by the Contract. The Supplier and its subcontractors undertake to obtain and maintain all licences, authorisations, certificates and approvals required under the Environmental Regulations.

In compliance with the applicable Environmental Regulations, the Supplier and its subcontractors shall not



permit the release of any hazardous material into the environment and, in the event of a release, shall promptly carry out and implement any investigation, study, sampling, testing, cleaning, removal, remediation or any other action necessary to remove or clean up such hazardous materials in accordance with the requirements of the applicable Environmental Regulations. The Supplier and its subcontractors shall notify **Pizzarotti** of any hazardous or toxic substances present, or which **Pizzarotti** and its Collaborators may encounter, in the use or possession of the Products and shall do their best to reduce their hazardousness and toxicity. Without prejudice to the obligations of confidentiality and privacy, the Supplier shall promptly provide **Pizzarotti**, upon the latter's request, with copies of all reports on environmental matters and of all investigations carried out or received by the Supplier relating to the Supplier's compliance with the Environmental Regulations applicable to the activities covered by the Contract.

The Supplier its subcontractors shall:

- ◆ comply with all environmental protection laws, regulations and standards
- ◆ adopt the precautionary principle whenever scientific evidence on environmental challenges is lacking, and act with care and caution to minimise potential impacts
- ◆ make conscious use of natural resources and optimise the efficiency of the materials and natural resources used
- ◆ reduce energy consumption
- ◆ optimise water management, safeguard water resources, reduce water consumption and preserve water quality
- ◆ ensure that their activities are carried out in full compliance with environmental laws and regulations, and in any case be willing to implement initiatives that go beyond those strictly necessary for compliance with laws
- ◆ optimise waste management and minimise waste and waste water production
- ◆ protect biodiversity, safeguard the functioning of the ecosystem and respect wildlife protected by national and international laws by applying the strictest standards
- ◆ promote transparency and accountability on the environmental impacts of their activities
- ◆ implement policies and management systems that facilitate continuous environmental improvements with the aim of reducing the negative environmental impacts of their activities and, where possible and appropriate, seeking to offset residual negative consequences
- ◆ use cleaning products that have a low environmental impact and do not contain hazardous chemicals
- ◆ use cleaning techniques and equipment that minimise the consumption of the products used, water and electricity, the amount of waste, and that do not impair the quality of the air in the buildings
- ◆ use products and materials that do not contain potentially hazardous and readily biodegradable ingredients.

Suppliers are obliged to use natural resources (water, energy sources, raw materials) economically. Negative impacts on the environment and climate must be reduced or eliminated at the source or through practices such as modifying production/execution processes, maintaining plants, as well as replacing, conserving, recycling and reusing materials.

Suppliers undertake to develop and use climate-friendly products and processes that reduce energy consumption and greenhouse gas emissions.

All emissions must be properly and transparently managed in accordance with relevant local laws and



regulations, if more stringent.

Collaborators/suppliers/consultants are required to include **sustainability** criteria/principles as part of the procurement process, and in general:

- ◆ give preference to the purchase of RoHS-compliant electrical and electronic equipment in order to limit the presence of lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls and polybrominated diphenyl ethers in end products
- ◆ require compliance with the REACH regulation for purchased chemicals resulting in a reduction in the use of environmentally harmful substances
- ◆ prefer recyclable packaging, wood and paper, FSC-certified, ensuring that the product comes from a responsibly managed forest and supply chain
- ◆ prefer FSC-certified cellulose fibres
- ◆ give preference to the purchase of steel materials from suppliers that produce with measures for worker health and safety, energy efficiency and reduced environmental pollution
- ◆ provide for compliance with legislative requirements in terms of ethics, integrity and anti-corruption in Supply/Contracts
- ◆ reduce the impact of distribution by favouring the procurement of materials, products and services from local companies
- ◆ promote the reuse and recycling of materials and products at the end of their life cycle and, where this is not possible, ensure disposal in the most proper way
- ◆ give preference to Suppliers that implement sustainable development practices, requiring, as part of the selection process, actions aimed at social commitment also through voluntary certifications (e.g. SA8000, ISO 14001, ISO 50001, ISO 37001, ISO 45001, ISO 20400, EMAS, etc.) and participation in sustainable development programmes (e.g. UN GLOBAL COMPACT, Ecovadis, OpenES and similar).

In particular, within the framework of the provisions contained in this document, in the **Company Policies** and in the **Code of Ethics** adopted by **Pizzarotti**, collaborators/suppliers/consultants are required to commit themselves to prioritise the use of renewable sources, minimise the environmental impact of their activities, protect local ecosystems and biodiversity, promote the conscious and responsible use of all available natural resources, adopt systems to ensure that the handling, conservation, recycling, reuse or management of waste and the management of emissions into the atmosphere and waste water take place in a safe manner and in compliance with current legislation, supported also by the adoption of Certified Management Systems according to recognised standards. Collaborators/suppliers/consultants are also required to deal with any environmental emergencies in the course of their activities, using management and intervention procedures based on careful risk analysis and assessment.

This **Supplier Code of Conduct**, the **Company Policies** and the **Code of Ethics** adopted by **Pizzarotti** represent the expression of the will of the Company Management with regard to the Environment and Sustainable Development and are binding for all employees and Suppliers of the Company and for all external companies operating within the Sites managed by the **Company**.

This commitment took the form of the implementation and maintenance of an Environmental Management System, Energy Use, the preparation of a specific GHG Inventory and the consequent certifications under ISO 14001, ISO 50001 and ISO 14064, by an accredited Third-Party Body.



5.4.8 *Energy management*

At the request of the undersigned, the Supplier is obliged to communicate its energy consumption for the production unit in which it operates. Furthermore, it is informed that energy performance is one of the criteria for evaluating procurement.

5.4.9 *Waste and emissions*

All activities that may have potential harmful effects on human health and/or the environment shall be properly managed, measured, controlled and treated before any substance is released into the environment. Therefore, the Supplier shall monitor and control the impacts produced by its business activities on the territory and comply with regulatory requirements concerning both waste management, ensuring, where possible, the recycling, recovery and/or reuse or disposal in suitable sites, and water consumption, adopting measures aimed at responsible management of this resource. Moreover, the Supplier undertakes to set up systems to prevent or reduce greenhouse gas emissions and/or the discharge of pollutants (into the air and sea, surface and ground water) in order to limit the environmental impact of its business activities.

5.4.10 *Product and process safety*

The Supplier shall adopt safety programmes to manage and maintain all production processes in accordance with applicable safety standards and shall deal with the potential impact of products at all stages of the production process.

5.4.11 *Prevention of corruption*

The Supplier must refrain from corruptive conduct (relating to active and passive bribery) for itself and for all activities that may, even indirectly, affect business relations with Impresa **Pizzarotti**. It is required to adopt the company's Corruption Prevention Management System, to raise awareness and provide training on corruption prevention to its employees, in order to prevent or possibly report any suspicious situation that may constitute a violation thereof. Furthermore, it is informed that anti-corruptive conduct is one of the criteria for the evaluation of procurement.

The Supplier, also referred to as Business Partner, reads and signs for acceptance the Policy integrated with the basic principles of corruption prevention, which **Pizzarotti** has decided to adhere to and promote in order to ensure transparency in all business relations (in compliance with national and international laws on the subject).

5.5 Business Management System

5.5.1 *Documentation*

The Supplier shall prepare and keep up-to-date the documentation required by law and by the contract signed with **Pizzarotti**, in relation to its production processes and business activities.

5.5.2 *Training and expertise*

The Supplier shall implement suitable training measures to provide its managers, employees, collaborators and subcontractors involved with an adequate level of knowledge and understanding of the contents of this Code.



5.5.3 Continuous improvement

The supplier shall continuously improve its performance in terms of sustainability, taking all appropriate measures to this end.

6 Monitoring and Compliance

6.1 Audit Procedures and Control Activities

Collaborators/Suppliers/Subcontractors/Consultants, upon request, are obliged to provide **Pizzarotti** with all information necessary for a correct and complete initial assessment. If the Collaborator/Supplier/Subcontractor/Consultant is unable to comply with aspects of this **Supplier Code of Conduct**, of the **Sustainable Procurement Policy**, in part or in whole, it shall promptly notify **Pizzarotti**.

Subject to agreement with the Supplier, **Pizzarotti** reserves the right to carry out, directly or through formally appointed third parties, audits and inspections in order to verify compliance with the principles set out in this **Supplier Code of Conduct**.

6.2 Reporting Mechanism

In the event that Collaborators/Suppliers/Subcontractors/Consultants become aware of any violation of this **Supplier Code of Conduct** relating to anti-corruption aspects, they are encouraged by **Pizzarotti** to make a report that can be submitted by sending the appropriate form for reporting unlawful conduct, alternatively to the addresses specifically activated and managed autonomously by the member in charge of the Supervisory Body:

- ◆ email: whistleblower**Pizzarotti**@gmail.com;
- ◆ post office box: No. 194 - "Parma Centro" post office, via Pisacane 1, 43121 Parma.

For Social Responsibility aspects, complaints can be reported as follows:

- ◆ via the Worker's health and safety representatives (RLSA), by submitting the report and/or complaint verbally or in writing using the "SA8000 Complaint Form", (signed or anonymously)
- ◆ through the special "SA8000 Report and/or Complaint Box", placed near the company notice boards, using the "SA8000 Complaint Form", (signed or anonymously)
- ◆ to Impresa Pizzarotti, Via Anna Maria Adorni 1 - 43121 Parma - Italy Tel. (39) 0521.2021. Fax (39) 0521.20746, email: reclami@pizzarotti.it
- ◆ to the Certification Body: RINA Service Spa, via Corsica 12 - 16128 Genova, sa8000@rina.org fax 010-5351140
- ◆ to the Accreditation Body: SAAS 9 East 37th Street, 10th Floor New York, NY 10016 fax:+1 (212)-391-2106, email: saas@saasaccreditation.org.

The procedure for submitting complaints to SAAS can be found at:

<http://www.saasaccreditation.org/document-library> under the section '**SAAS Complaints /Appeals**



Any form of retaliation, discrimination or penalisation, whether direct or indirect, for reasons directly or indirectly linked to the report, is prohibited against those who have made a report. Any breach of this prohibition is subject to sanctions. At the same time, **Pizzarotti** shall ensure that the confidentiality of the identity of the whistle-blower and of the reported person is protected, without prejudice to legal obligations and the protection of the rights of **Pizzarotti** or of persons wrongly accused and/or in bad faith. Any malicious or grossly negligent reporting that turns out to be unfounded shall be subject to sanctions, where possible.

6.3 Management and Evaluation of Non-Compliance Cases

In the event of non-compliance with the provisions of this **Supplier Code of Conduct** or of the **Sustainable Procurement Policy**, **Pizzarotti** reserves the right to request the Collaborators/Suppliers/Subcontractors/Consultants to implement corrective measures. In particular, **Pizzarotti** makes itself available to discuss with its Collaborators/Suppliers/Subcontractors/Consultants in its process of identifying and adopting improvement actions with the aim of rectifying any nonconformities found.

In the event of failure to implement corrective measures, as well as of serious or systematic non-compliance with this **Supplier Code of Conduct** and the **Sustainable Procurement Policy**, **Pizzarotti** reserves the right to terminate the Contract early and exclude the Collaborator/Supplier/Subcontractor/Consultant from the **Company's** Supplier Register.

7 Sustainability Documents and Information

In order to assess the effective application of the Sustainability Principles, at **Pizzarotti** 's request the Supplier and its subcontractors shall provide:

- ◆ their environmental impacts caused by energy and water consumption, waste production, wastewater and material disposal; the list of chemicals used in work processes
- ◆ information on sustainability plans, initiatives undertaken, and progress made
- ◆ information on new Suppliers or Subcontractors used in production processes and procurement.

We therefore ask for your commitment:

- ◆ to comply with the Principles of Sustainability
- ◆ to provide, upon our request, detailed information on programmes, actions and progress on the actual implementation of the Sustainability Principles (e.g. CO2 emission data for travel to our production sites and possible adoption of hybrid and/or electric vehicles, etc.)
- ◆ to accept audits, announced and unannounced, which we reserve the right to perform and/or have performed, aimed at monitoring compliance with the principles subscribed to
- ◆ to implement the required corrective and improvement actions
- ◆ to provide updated information on any new Supplier and/or Subcontractor used in the production process and in the procurement of materials, raw materials and services
- ◆ to maintain, and make available to those carrying out the audit, appropriate records demonstrating compliance with the subscribed principles
- ◆ to have Subcontractors enter into the same commitments as you, including a willingness to receive audits and checks from us and/or our representatives.



We emphasise that compliance with the *Sustainability Principles* is an important parameter for us in evaluating a Subcontractor, and that violation of these principles and lack of cooperation in identifying and taking corrective action may constitute grounds for termination of the business relationship.

We are confident that you will join us in promoting and implementing such important values that allow us to qualify as excellent operators not only in terms of the quality of our products, but also in terms of our social, environmental and economic responsibility towards the communities in which we operate.

8 Sanctions

Any conduct by the Supplier that is not compliant with the provisions of this Code may result in the termination of the contract, pursuant to Article 1453 of the Italian Civil Code, and in a claim for damages.

9 Annexes

- ◆ Misconduct Report form
- ◆ MRC000 "SA8000 Complaint Form"



GENERAL PART ANNEX 06

Reporting illegal conduct or violation of the Organizational Model (in all its parts)

FORM FOR REPORTING ILLEGAL CONDUCT

(Whistleblower)

Employees and collaborators who intend to report illegal situations of which they have become aware in the context of their function must use this form. Please note that the law and the Company protect the employee or collaborator who reports the offense.

In particular, the Company is obliged to set up systems for protecting the confidentiality of the identity of the whistleblower, providing at least one adequate alternative reporting channel suitable for ensuring, with IT methods, the confidentiality of the whistleblower's identity.

The report may be submitted to the responsible member of the Authority, alternatively:

- 1) sending to email address Whistleblowerpizzarotti@gmail.com;
- 2) by postal service at POST OFFICE BOX n° 194 – post office "Parma Centro", via Pisacane 1, 43121 Parma

Changes in a new revision are orange (RGB red = 196; green = 89; blue = 17)

Approved by **CdA**

07.03.2022



Esteemed
Supervisory Body pursuant to Legislative Decree 231/01

Full name of the reporting person:

Job function:

Place of work:

Phone.:

E-mail:

Date / Period (when happened the fact) dd/mm/yyyy

Place and address (when happened the fact)

I believe that the omissions or actions committed or attempted are:
 criminally relevant
 implemented in violation of the Organizational Model
 subject to disciplinary sanctions
 other (to be specified)

Author (s) of the facts (identify with personal data)

Any other persons aware of the fact and/or able to report it

.....
.....
.....

Description of the fact (conduct and event)

Any attachments supporting the report
(ex: documents; photographs; etc.)

Place and date:

Signature:

**ACTION and / or REMEDIES required****METHOD FOR FORWARDING THE COMPLAINT / REPORTING:**

- ◆ through Workers Representatives to SA8000
- ◆ through the appropriate "SA8000 Reporting and / or Complaints Box"
- ◆ to the Company Pizzarotti, Via Anna Maria Adorni, 1 - 43121 Parma - Italia Tel. (39) 0521.2021. Fax (39) 0521.20746, mail: reclami@pizzarotti.it
- ◆ to the Certification Body: RINA Service Spa, via Corsica 12 – 16128 Genova, sa8000@rina.org fax 010-5351140
- ◆ to the Accreditation Body: SAAS 9 East 37th Street, 10th Floor New York, NY 10016 fax:+1 (212)-391-2106, email: saas@saasaccreditation.org

The procedure for submitting complaints to SAAS is available on the website:

<http://www.saasaccreditation.org/document-library> in the section "**SAAS Complaints/Appeals**"