

Suppliers Code of Conduct

Standards for HA Italia S.p.A. (HA) Suppliers and Contractors

Version October 2020

As a globally active, long-standing and successful family business, HA recognises its core responsibility towards society and the environment. In all of our business operations, we strive to achieve the inseparable twin goals of economic success and social responsibility. HA's core values are anchored in the guiding principles of acting responsibly and ethically towards employees, business partners, society and the environment.

HA expects its suppliers and service providers ("Suppliers") to share its commitment to these guiding principles.

You, as an HA Supplier, hereby undertake to:

- Abide by all applicable laws and regulations.
- Protect the basic rights of your employees, in particular:
 - to promote equal opportunities and the equal treatment of all employees regardless of their skin color, race, nationality, family background, disability, sexual orientation, political or religious beliefs, gender or age;
 - to respect the personal dignity, privacy and personal rights of every single employee;
 - to cultivate a working environment that is free from discrimination, bullying or harassment of any kind;
 - not to employ or force anyone to work against their will;
 - not to tolerate unacceptable treatment of employees, including psychological torment, sexual and personal harassment or discrimination (either through physical gestures or verbally);
 - to ensure adequate remuneration and to guarantee payment no lower than the applicable national minimum wage; and
 - to respect employees' freedom of association to the extent permitted by law and neither favor nor discriminate against members of workers' organizations or trade unions.
- Ensure your employees' occupational health and safety:
 - to minimize workplace hazards and provide the best possible protection against accidents and occupational illnesses;
 - to provide training and ensure that all employees are well-versed in occupational safety protocols; and
 - to implement and maintain an appropriate occupational safety management system.
- Protect the environment:
 - to ensure that environmental pollution and the consumption of natural resources is kept to a minimum, to avoid waste and to constantly strive to promote greater environmental responsibility;
 - to comply with all local and international environmental protection regulations and standards; and
 - to implement and maintain an appropriate environmental management system.

HA Italia S.p.A.

Società a socio unico soggetta ad attività di direzione e coordinamento di Hüttenes Albertus GmbH

C.F./P.I./Registro imprese di Vicenza IT00169590247 - R.E.A. n. 97738 - Capitale Sociale € 676.000,00

Sede legale, Uffici e Stabilimento: Viale della Scienza 78-80 - 36100 Vicenza - Tel: +39 0444 337444 – Fax: +39 0444 348500 -

satef@satef-ha.it - info.satef@pec.it – www.ha-group.it

Uffici e Stabilimento:

Divisione Mazzon: Via Vicenza, 72 - 36015 Schio (Vi) Tel +39.0445.678000 - Fax 678001 - info@mazzon.eu www.mazzon.eu

Stabilimento: Via Belvedere, 37 – 20862 Arcore MB - Tel: +39 039 613311 - Fax: +39 039 6014858

Stabilimento: Via Villani 20 - 27050 Silvano Pietra (PV)

IBAN: IT88C0200860350000003714971 BIC SWIFT : UNCRITM1N21 Codice Univoco SID: A4707H7

- Integrate HA's fundamental values throughout your supply chain:
 - to promote compliance with the principles of this Code of Conduct among your subcontractors and business partners with regard to the supply of goods and services; and
 - to respect the principles of non-discrimination in the selection and treatment of suppliers.
- Prohibit all forms of forced and child labor
- Prohibit all forms of corruption and bribery
- Observe all applicable antitrust laws and trading regulations

You must inform HA immediately of any violation of applicable laws or the provisions of this Code of Conduct. HA reserves the right to conduct or have audits or assessments conducted in order to ensure your compliance with this Suppliers Code of Conduct – in consultation with you as a Supplier and in accordance with applicable laws. HA reserves the right to discontinue any business relationship for non-compliance with applicable laws and/or this Code of Conduct.

We thank you for your support.

HA Italia S.p.A.

Andrea Todeschini
CEO



Confirmation of implementation by the Supplier:

We hereby confirm that we have received the HA Suppliers Code of Conduct and, in addition to our existing contractual obligations, confirm our commitment to adhering to its principles and standards.

Date, company stamp & signature