

Suppliers Code of Conduct

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

Version November 2023

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 (according to the UN Universal Declaration of Human Rights and International Labour Organization ILO), 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;
 - to comply with legal requirements for the protection of fair working conditions, including those regulating compensation, working hours and privacy; 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 provide a healthy and safe workspace by complying with all applicable health and safety laws and standards;
 - to continuously 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.

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
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Uffici e Stabilimento:
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Stabilimento: Via Villani 20 - 27050 Silvano Pietra (PV)
IBAN: IT88C0200860350000003714971 BIC SWIFT : UNCRITM1N21 Codice Univoco SID: A4707H7

- **Protect the environment:**
 - to comply with all local and international environmental protection regulations and standards; and
 - to implement and maintain an appropriate environmental management system;
 - 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 reduce emissions into air, water, soil and formulate climate protection targets regarding the global climate neutrality;
 - to encourage and support the use of sustainable, renewable natural resources;
 - to ensure efficient water consumption and use through effective water management, and also address corresponding risks (water shortage or flooding);
 - to maintain the biodiversity and protect ecosystems.
- **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.
- **To respect the rights of indigenous peoples and act responsibly in local communities;**
- **Prohibit all forms of forced and child labor. The age of employment for young workers must meet or exceed company guidelines and local labor laws.**
- **Not support or deal with any business involved in modern slavery including forced labor and human trafficking.**
- **Not to supply conflict minerals that contribute to the direct or indirect financing or support of armed groups and /or lead to human right violations.**
- **Prohibit all forms of corruption and bribery.**
- **Observe all applicable antitrust laws and trading regulations.**

HA Italia 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.

Employees of suppliers and all other business partners who believe they are aware of a violation of applicable laws or the provisions of this Code of Conduct are encouraged to report their concern, complaint, report or inquiry to the internal anonymous reporting tool established by HA.

The reporting tool can be found at the website www.lighthouse-services.com/ha-group. In addition, you may also contact reports@lighthouse-services.com or one of the following tool-free hotlines:

Germany: 0800-183-0724

USA: 855-400-6002

All other countries: 800-603-2869

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Regardless of which reporting method you prefer, please make sure to include our company name when submitting your report. A personal meeting can also be arranged upon request for complaints submitted through the reporting tool.

Sustainable sourcing is a living process for the HA Italia, therefore our guiding principles are regularly reviewed and adapted to the latest requirements. As a supplier, you agree to accept the currently valid version of our sustainable sourcing policy. This is available at any time at: Downloads (ha-italia.com) <https://www.ha-group.com/it/en/media/downloads/>.

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

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