

Introduction

Since many years the Bondioli & Pavesi Group is present on the international market in accordance with standards and regulations in force. Our aim is to introduce ourselves as a Company finding innovative and sustainable ways to fulfil its (and its Customers') goals.

Ethical principles the Bondioli & Pavesi Group refers to consist of equity and equality, protection of people and the environment, diligence, transparency, honesty, confidentiality, health protection.

Our principles and values are made explicit:

- within the document 'Code of Conduct' meant for every employee of the Group;
- within this document "Supplier Code of Conduct" being meant for all our Suppliers that have to apply it in their Companies.

The 'Supplier Code of Conduct' refers to the following:

1. Business Ethics;
2. Working conditions and Human Rights;
3. Conflict minerals Policy;
4. Environmental Standards.

1. Business Ethics

Suppliers shall professionally act with honesty and transparency in accordance with the applicable law in terms of:

Anti-corruption and anti-money laundering: Suppliers shall not promise, transfer and receive money, promise and/or give goods or other even indirect benefits to promote and favour their own interests. Moreover, Suppliers shall carry out their activity in full accordance with the anti-money laundering rules and provisions issued by the competent authorities, as well as refuse to implement procedures being not very clear from an ethical point of view.

Fair competition: we expect Suppliers to act according with Antitrust & Competition rules in force in the Countries in which they carry out their activity.

Conflict of interests: Suppliers shall refrain from carrying out activities that could result in conflict of interests between Suppliers and the Bondioli & Pavesi Group. All our staff may not receive gifts, invitations or favourable treatment being not attributable to normal courtesy relationships or not having only a symbolic importance.

Confidentiality: to have a relationship of trust with Suppliers, it is necessary to spread correct, comprehensive and truthful information, and to consider them confidential, as well. To that

end, Suppliers are required to sign the 'Non-Disclosure Agreement' being submitted to them by the Purchase Departments of each individual Group's Company, which contains the relevant confidentiality obligations.

2. Working Conditions and Human Rights

Both the health and the safety at work, as well as human rights are aspects our Group does not ignore.

Therefore, we expect our Suppliers act in such a way that:

- the work environment is safe and suitable for ensuring health of personnel according to the rules in force. Our Suppliers shall actively promote safety and health for personnel working at their premises, by implementing programmes and through practical action;
- any discrimination whatsoever is forbidden in terms of race, religion, national character, genre, gender identity, political opinion, physical and psychic disability;
- personnel has freedom of association allowed by law (for instance, trade unions, etc. ...);
- personnel is hired with a regular contract and as provided by law in terms of remuneration, working time, lack of exploitation (for instance, child labour, etc. ...).

3. Conflict mineral policy

The metals tantalum, tungsten, tin, and gold "3TG" also known as "conflict minerals" are extracted from many different locations including the Democratic Republic of the Congo and neighbouring countries (Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia).

Given that these are high-risk areas and fearing that the purchase of extracted minerals will finance the armed forces of these conflict-affected countries, causing deaths among citizens and violations of human rights, such as forced labour and the abuse of women and children. The American Government, followed by the European Union decided to establish specific laws.

The United States Congress enacted the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act"). Section 1502 of the Dodd-Frank Act ("Conflict Minerals Rule") requires US listed manufacturing companies to produce their goods with "conflict free" minerals.

The European Union has issued a specific Regulation (EU) 2017/821 of the European Parliament and of the Council which came into force on January 1st, 2021. The Regulation "establishes obligations regarding the due diligence in the supply chain for importers (including foundries and refineries) of tin, tantalum, tungsten and gold, originating in conflict-affected or "high-risk" areas.

Bondioli & Pavesi is committed to constantly operate in a socially responsible manner, embracing a

policy designed to discourage the purchase of products containing minerals extracted in conflict-affected or “high-risk” areas, and this commitment is also required of its suppliers.

4. Environmental Standards

Suppliers are required to comply with environment laws and provisions. They must guarantee their production processes in terms of quality and effectiveness and reduce their environmental impact at the same time.

That is to say, an environmental-protection oriented approach that also tends to reduce the environmental impact of processes/products including, but not limited to:

- Reduction in waste (water, energy consumption, etc. ...);
- Reduction in/satisfactory management of hazardous waste production;
- Personnel training to make it aware of its responsibilities in terms of environmental protection.

C.O.O.

(Chief Operations Officer)

