

Scaglia INDEVA Supplier Code of Conduct

Supplier Sustainability Policy

Scaglia INDEVA operates in compliance with its code of conduct such as the Code of Ethics, the Code of basic working conditions, The Antibribery Code of Conduct, the Policy of Non-discrimination and diversity and the Organization, Management and control Model that defines principles and values which have fundamental role in Scaglia INDEVA business.

Scaglia INDEVA aims to design, produce, selling and distributing high quality products. At the same time Scaglia INDEVA aims at sharing behaviours in support of sustainable development, inclusion policy and a true culture of integrity.

Scaglia INDEVA requires to its suppliers, that have a fundamental role in its development, to adopt and respect the same behaviours on issues such as human rights, health and safety at work, environmental sustainability, to combat corruption and to transfer these commitments and requests to their supply chain.

Scaglia INDEVA selection of suppliers is based not only on quality and innovation capacity but also on adherence to ethical values and environmental performance.

Suppliers Code of Conduct is based on the values expressed in Scaglia INDEVA Codes of Conduct and is inspired by UN Universal Declaration of Human Rights.

Scaglia INDEVA has adopted an Organization, Management and Control Model according to legislative decree 231/2001 under Italian law (available on Scaglia INDEVA web site: www.indevagroup.com)

Regulatory Framework

Suppliers are requested to comply with current rules and standards in the countries where they operate.

If local regulations are less severe and restrictive than the principles and rules contained in the Suppliers Code of Conduct they are requested to adhere, in a reasonable period of time, to the measures of greater protection required in the Scaglia INDEVA supplier Code of Conduct.

Suppliers Code of Conduct

Labour and Human rights

Supplier will not use **child Labour**. They will never employ any person under 15, unless this is part of a government promoted and authorized program of training and apprenticeship that is clearly beneficial to the participating person

Suppliers do not use any form of **forced labour**. They will not tolerate physically abusive disciplinary measures. They will oppose any human trafficking.

Suppliers recognize, respect and fully guarantee their employees' **rights to work and to freely associate** in all their facilities. Moreover, they will constructively collaborate with any organization

that represents employees. Suppliers collectively bargain where law/welfare system require them to do so.

Suppliers will not tolerate **harassment and/or discrimination** on the basis of sex, race, religion, colour, creed, age, ethnic origin, national origin, marital/parental status, disability, pregnancy, sexual orientation or any other personal condition. Suppliers will promote diversity as a positive value.

Suppliers will provide and maintain for their employees **a healthy and safe work place** that meets all the applicable laws.

Suppliers will comply with applicable law regulating the **hours of work**

Suppliers will comply with applicable law regulating **compensation and benefits**

Suppliers will fully consider **local population and communities** among the primary stakeholders.

Ethics

- With reference to Scaglia INDEVA anti-bribery code of Conduct, suppliers must act with integrity and transparency according to the applicable anticorruption laws in all countries where they conduct their business.
- Any form of corruption, concussion, criminal solicitation, extortion against any public and private parties is strictly forbidden.
- Suppliers will not offer, promise, pay, claim money, directly or indirectly (through bribes and/or facilitation payments included) or other benefits in order to obtain advantages.
- Suppliers must operate in compliance with the competition, antitrust, and trade rules applicable in each country where they operate.
- Suppliers must report any significant, real or potential conflict of interest in the conduct of their business
- Suppliers must oppose to all forms of money laundering and take measure to ensure that each economical or business operation is duly traced and verifiable.
- Suppliers must comply with the intellectual property rights of third parties and protect all information and personal data of their customer

The adoption of a Code of Conduct and a periodic review of its application is recommended.

Environmental protection

To minimize the impact of production activities of Scaglia INDEVA and its products on the environment, Suppliers are requested to:

- Make every effort to optimize the use of natural resources and to reduce emissions
- Design, suggest /use products and processes that take in account environmental impact
- Properly manage waste treatment and disposal, in accordance with applicable laws

- Commit to source raw materials according to sustainable and ethical principles as stated in this Code of Conduct, in other Scaglia INDEVA's policies and according to international and local laws and regulations.
- Use materials and substances that comply with the laws and rules in force and in particular with the directives /regulations ROHS-REACH and CMRT
- Adopt/ optimized logistic procedures in order to minimize environmental impact

Training

Scaglia INDEVA encourages all Suppliers to promote training sessions for their employees on the principles outlined above.

Reporting violations

- Suppliers should report to Scaglia INDEVA's Supervisory Board any violation by Scaglia INDEVA employees and/or their employees of the Code of Ethics, Antibribery Code, Organization management and control model through the following email: odv@it.indevagroup.com)
- Scaglia INDEVA guarantee the confidentiality of the identity of the reporting person.

Monitoring and correcting action

- Scaglia INDEVA reserves the right to carry out audits conduct by Scaglia INDEVA staff and /or third part upon proper notice on the matters covered by this Code of Conduct.

In case of non-compliance, Scaglia INDEVA:

- Will require Suppliers to prepare and implement a non-compliance recovery plan
- Will conduct audits to ascertain the effective implementation of the non-compliance recovery plan

In the event that Supplier violates the Supplier Code of Conduct, or in event of non-compliance, Scaglia INDEVA reserve the right of suspend or resolve in advance any commercial relationship and to act for the compensation of any damage, loss, expense or other costs incurred which may result from any conduct or breach by the Supplier.

INDEVA Policies, Ethic Code and Organization Management and Control Model are available on Scaglia INDEVA web site: www.indevagroup.com

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