



Gervasoni S.p.A. - Supplier Code of Conduct

Index

- 1. Introduction**
- 2. Recipients**
- 3. Our comments**
- 4. Business integrity**
 - 4.1 Anti-corruption
 - 4.2 intellectual and industrial property
 - 4.3 Confidentiality obligations
 - 4.4 Conflict of interest
 - 4.5 Financial records and money laundering
 - 4.6 Privacy
- 5. Labor and Human rights**
- 6. Respect for the environment**
- 7. Transparency**



1. Introduction

This Supplier Code of Conduct reflects the internal values expressed in the Gervasoni Code of Ethics and addressed to the following commitments:

- Be lawful and act with integrity on the market
- Respect for human rights and creation of a positive workplace
- Safeguarding the environment and the health of future generations
- Collaboration with the Supply Chain to achieve the highest sustainability standards

Suppliers are therefore invited to share a common commitment on the following points regarding corporate integrity, workers 'and employees' rights, respect for the environment and transparency.

2. Recipients

The recipients of this Code are all Gervasoni Spa suppliers of production and non-production items, contractors and consultants. Recipients are responsible for extending the provisions of this Code to all workers, including those hired on a fixed-term or part-time basis. It is the responsibility of the recipients to ensure that their Suppliers comply with the standards of this Code, as well as their contractors, external partners and other actors who are part of the recipient's supply chain. Recipients are required to communicate the content of this Code internally and externally and to ensure that all measures are implemented accordingly.

3. Our comments

The values we believe in can only be fully respected if shared with all our partners. This is a common goal that the Gervasoni Group wishes to make Suppliers fully aware, asking you to act in accordance with its provisions.

All Suppliers must act in compliance with the Code and ensure that their subcontractors (if any) as well as any other third parties working on their behalf (hereinafter, together with Gervasoni Suppliers collectively referred to as "Suppliers") act in full compliance with this Code.

The Supplier Code of Conduct corresponds to the Gervasoni Code of Ethics, to internationally recognized standards, such as the United Nations "Universal Declaration of Human Rights" and the "International Labor Standards" of the ILO.

Gervasoni considers collaboration with its supply chain an integral part of its success and, therefore, strives to operate as an integrated team with its suppliers. The selection of the Company's Suppliers is based not only on the quality and competitiveness of their products and services, but also on their adherence to acceptable social, ethical and environmental principles which is a prerequisite for becoming a Supplier and developing a lasting business relationship with the Company. . Any violation of this Supplier's Code of Conduct may jeopardize the Supplier's business relationship with Gervasoni up to the termination of this relationship.

All Suppliers must comply with all applicable laws (including, by way of example, anti-corruption and competition laws), as well as the principles established in the Gervasoni Code of Ethics and in this Supplier Code of Conduct. In addition, all Suppliers are required to provide information applicable to the Company or to take other actions necessary to enable the Company to comply with its reporting, disclosure and other legal obligations.

Gervasoni believes that operating in a socially responsible and ethical manner and in compliance with the laws of the countries in which we operate is fundamental for our long-term success. This means, among other things, that the Company adopts fair working practices, protects workplace safety, supports and encourages environmental awareness and fully complies with applicable laws.

The Company expects its interests and those of its Suppliers to be fully aligned in these fundamental aspects.



At Gervasoni, we believe that the way we do business is no less important than the results we obtain, in no case does the achievement of company objectives prevail over legal or ethical standards.

For this reason, as formally stated in our Code of Ethics, all our counterparties can always expect from us:

- maximum respect for people, nature and the environment;
- commitment to always operate to the best of our knowledge;
- righteousness and moral integrity;
- transparency and impartiality.

4. Business integrity

4.1 Anti Corruption

The supplier is committed to adhering to the highest standards of integrity, honesty and fairness in all internal and external affairs. The Supplier also undertakes to fully comply with all national and international anti-corruption laws. Commercial courtesy, such as small gifts or forms of hospitality, is permitted only when its value is small and does not compromise the integrity and reputation of either party and cannot be interpreted by an impartial observer as aimed at obtaining undue advantages.

It is forbidden to accept money from natural or legal persons who have or intend to have business relations with the Supplier

4.2 Industrial and intellectual property

The supplier promotes the protection of industrial and intellectual property at all levels of the value chain. The Supplier recognizes the importance of a competitive market and undertakes to fully comply with all antitrust and consumer laws in force in all countries in which it operates

4.3 Confidentiality obligations

The Supplier promotes the confidentiality of information in the management of operations and commercial activities. The know-how and intellectual property developed by the Supplier are a fundamental and valuable resource that all the managers and employees of the Supplier are called upon to protect.

4.4 Conflict of interest

The Supplier works to avoid situations of conflict of interest by following rules of fairness and impartiality. The Supplier's management and employees must avoid any possible conflict of interest, particularly with regard to personal, financial or family considerations.

All Suppliers must disclose any actual or potential conflict of interest and discuss them with Gervasoni's management. Any approved activity, despite an actual or apparent conflict, must be documented.

4.5 Financial records and money laundering

No Supplier may engage in or be otherwise involved in any activity that involves or may give rise to the appearance of money laundering and must strictly comply with anti-money laundering laws.

applicable. The transparency, accuracy and completeness of financial records are of considerable importance.

4.6 Privacy

In carrying out its normal business operations, the Supplier collects a significant amount of personal data and proprietary information and undertakes to process such data and information in accordance with all existing privacy laws in any jurisdiction in which it operates.



5. Labor and Human rights

Nessun fornitore può impiegare lavoro minorile. Nessun fornitore può impiegare lavoro forzato. Il lavoro deve essere scelto volontariamente e liberamente.

Tutti i Fornitori devono trattare i propri lavoratori in modo equo e non discriminatorio con la garanzia di pari opportunità e l'assenza di qualsiasi politica volta o indirettamente discriminatoria nei loro confronti di qualsiasi tipo, inclusi ma non limitati a razza, genere, orientamento sessuale, e posizione personale, condizione di salute, disabilità, età, nazionalità, religione, convinzioni politiche o personali (in conformità con le leggi applicabili).

Tutti i fornitori devono garantire che tutti i loro lavoratori ricevano almeno i salari e i benefici minimi previsti dalla legge. Le condizioni di lavoro, l'orario di lavoro e la retribuzione devono essere equi e conformi alle leggi, agli standard e alle pratiche applicabili nei paesi in cui opera il Fornitore.

6. Respect for the environment

Gervasoni considers the environment as a fundamental common resource to be preserved for the current society and for future generations to be favored in the global approach to business through the entire value chain. Our Suppliers must comply with all applicable laws and regulations regarding environmental protection and crime prevention of the countries and localities in which they operate, also maintaining awareness of the evolution of environmental legislative requirements. Suppliers are also required to conform their practices to generally accepted industry standards, to obtain and maintain all applicable permits and registrations, and to operate in accordance with prescribed restrictions and requirements at all times. Suppliers must prohibit the use of restricted materials or hazardous substances subject to national or international bans. An Environmental Management System, according to international standards (such as ISO14001), is strongly recommended. Any activity that could have a negative impact on the environment must be previously managed, controlled and managed appropriately. In particular, Suppliers will prevent or reduce accidental spills and the release of contaminants into the environment. Logistics management policies must be applied to take environmental impacts into account. Suppliers also undertake to reduce the consumption of natural resources to cope with their depletion, to develop and use products that fully respect the climate and to minimize the content of raw materials where possible without negatively affecting the quality and safety standards of the product. Suppliers are required to measure, control and record the energy consumption of their operations and to prioritize, where possible, the purchase of energy from renewable sources. Suppliers must engage in energy management systems and undertake initiatives to reduce energy consumption and energy efficiency, thus reducing their own greenhouse gas emissions into the atmosphere. Metrics and goals are expected to be put in place and managed to continuously improve carbon performance.

7. Transparency

Our suppliers must continuously monitor and report compliance with this Code of Conduct and maintain the necessary documentation to demonstrate compliance with its provisions and standards, as well as with applicable legislation. Suppliers must promptly notify Gervasoni of any areas of non-compliance and the related corrective actions planned. Suppliers must never hide any critical areas or claim ignorance of any areas of non-compliance.