

Code of Conduct for Business Partners of Cavalleretti Stampaggio Srl

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We, Cavalleretti Stampaggio Srl and our affiliates (hereafter referred to as "Cavalleretti Stampaggio Srl" or "we") aim to be global leaders in the sustainable flow of goods and related services. As a fundamental part of this commitment, we strive for continuous improvement in promoting sustainable, ethical, and responsible ways of working.

Our business partners are an integral part of our supply chain. We choose such partners carefully and on the basis of objective factors, such as quality, sustainability, reliability, delivery conditions, and price; we expect from them competence and constant improvements in terms of quality, sustainability, cost control, and innovation.

The actions and business practices of our partners could affect us and our reputation. We have adopted this Code of Conduct (hereinafter, "Code") for the business partners of Cavalleretti Stampaggio Srl, such as suppliers and third parties, to ensure they know what we expect from them. We require all those who do business with us to strictly adhere to the legal and ethical standards - as well as the reference systems - that we follow.

This Code outlines the minimum requirements requested from our business partners, in addition to all relevant applicable laws and regulations, while encouraging our business partners to set ambitious goals that exceed these requirements. We expect them to do their best to apply the same standards when conducting business with their suppliers and subsuppliers. Cooperation is necessary to assess and avoid any possible negative impact on people, society in the broader sense, and the environment: we and our business partners must always mitigate such impacts or remedy them if they occur.

Fundamentally, we are committed to complying with all applicable laws and regulations, and we expect our business partners to do exactly the same. This Code is based on international codes such as, for example, the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the United Nations Convention Against Corruption.

Our main customers are already signatory members of the UN Global Compact, and we are committed to respecting its Guiding Principles on Business and Human Rights, doing the same for the OECD Guidelines for Multinational Enterprises.

All business partners of Cavalleretti Stampaggio Srl must adhere to this Code and must demonstrate compliance with its standards, by formally committing to comply with it or by maintaining similar standards in their own code of conduct or corporate policies. We expect full compliance, transparency, and data accuracy from our business partners, and we may conduct auditing activities to verify our business partners' compliance with this Code.

People & Society

Human and Labour Rights

Respect for human rights, including labour rights, is an integral part of the way we operate at Cavalleretti Stampaggio Srl.

Equal Opportunities & Non-discrimination

Our business partners must treat their employees and other interested parties fairly and equally. They must maintain an inclusive working environment, without any discrimination based on gender identity, sexual orientation, race, religion, nationality, age, physical ability, or other similar characteristics.

Freely Chosen Employment

We must commit to ensuring that no form of modern slavery - including forced or compulsory labour, human trafficking, or other similar abuses - is implemented in our activities or in our supply chain. Our business partners must not engage in or support any type of exploitation or abuse, including, but not limited to, restrictions of movement, excessive recruitment fees, confiscation of identity documents, wage deductions, denial of benefits, abusive working conditions, violence, or debt bondage.

Juvenile Labour

Our business partners must avoid tolerating child labour and avoid engaging, in any circumstance or contract, with subcontractors or suppliers who use or support such type of labour. The minimum working age is that provided for the completion of compulsory education, and in no case below the age of 15. Our business partners must implement an appropriate mechanism that allows for the verification of the age of their employees. Young employees, under the age of 18, must not perform work that could put their health or safety at risk, including night shifts and overtime. The working hours of young employees must not conflict with their school hours.

Respectful Treatment & No Harassment

Our business partners must treat their employees with dignity and respect; they must also ensure that their employees can work in an environment free from harassment. Our business partners must not tolerate any type of harassment or abuse against their employees, whether direct or indirect, physical, mental, sexual, or verbal.

Working Conditions

Our business partners must ensure that their employees are paid a fair compensation, as well as comply with all applicable labour laws, including those relating to minimum wages, working hours and overtime, sufficient breaks and rest times, sick leave, maternity leave, and annual holidays, as well as those related to mandatory benefits. A working week must never exceed 60 hours, including overtime. All overtime must be on a voluntary basis. Employees must be granted at least one day off every seven days. Employees must receive a written employment contract, specifying the terms and conditions of their employment in a language they understand. Our business partners must maintain a

record documenting the working hours of their employees.

Right of assembly

Our business partners must respect the right of their employees to freedom of association and collective bargaining, in accordance with all applicable laws and regulations.

Privacy

Our business partners must collect and use personal data in accordance with applicable data protection laws. All personal data must be processed lawfully, fairly, and transparently, while ensuring that such data is relevant and used exclusively for the purpose and duration for which it is collected. Our business partners must use care and diligence and implement adequate and documented security controls, as well as adopt the necessary preventive measures to protect data from unauthorized or unlawful processing and from accidental loss, destruction, damage, alteration, or disclosure of the data itself.

Responsible Mineral Sourcing

To the extent applicable to the business partner's operations, the partner must adopt a specific policy and exercise due diligence on the sourcing and chain of custody of tantalum, tin, tungsten, and gold in the products it manufactures, to reasonably ensure that their sourcing is consistent with the guidelines established by the Organization for Economic Co-operation and Development (OECD) regarding responsible supply chains for minerals from conflict-affected and high-risk areas, or with what is established by an equivalent and recognized due diligence reference system.

Furthermore, we expect business partners to ensure that the sourcing of all minerals used in batteries (e.g., cobalt, lithium, graphite, or nickel) occurs without any violation of human rights. Business partners must exercise due diligence on the sourcing and chain of custody of such minerals, as well as make available - upon our request - the due diligence measures they have implemented.

Health & Safety

Ensuring a healthy and safe working environment for all people we interact with is part of our daily work at Cavalleretti Stampaggio Srl.

Work environment

Our business partners must ensure a healthy and safe working environment for their employees, in accordance with all applicable laws and regulations. Appropriate information on health and safety, training, and safety instructions must be prepared in a language understood by the workers; furthermore, our business partners must provide their employees with all necessary safety devices. The working environment must be healthy, including the following: appropriate drinking water, clean sanitation facilities, emergency exits, adequate levels of ventilation, lighting, and temperature, acceptable levels of noise pollution and dust, and access to first aid supplies.

Emergency Preparedness, Rest Areas and Facilities

Our business partner must have effective safety programs that, at a minimum, cover human safety, exposure to hazardous chemical and biological substances, and emergencies such as fires, liquid spills, natural disasters, or pandemics. This includes relevant emergency preparedness plans, evacuation procedures, appropriate hazard detection, training and drills, as well as adequate emergency infrastructure in the buildings.

Business partners must provide their employees with appropriate rest areas and facilities.

Employees of business partners must not be under the influence of alcohol or illegal drugs while working for - or on behalf of - Cavalleretti Stampaggio Srl.

Occupational Health and Safety

Our business partner must provide its employees with appropriate personal protective equipment and all other necessary equipment to ensure safety at work. Clear procedures must be implemented to appropriately identify, manage, prevent, record, and report occupational injuries and illnesses. Awareness of healthy and safe behaviours and best practices must be promoted among employees; employees must also be encouraged to report safety issues and concerns. Our business partners must take corrective actions to eliminate the root causes of injuries and illnesses. If hazardous substances are used, relevant supervisory controls and emergency plans must be provided. Hazardous conditions must be reported, and appropriate actions must be taken to remedy such situations and learn the due lessons.

II Environment

Greenhouse effect Gas Emissions & Environmental Permits

Cavalleretti Stampaggio Srl is committed to taking action on climate change mitigation and reducing greenhouse gas emissions throughout the entire value chain, in order to keep the increase in global warming within 1.5 degrees.

We expect our business partners - in their operations and value chain - to monitor, report, set environmental goals, and strive to reduce greenhouse gas emissions. All our business partners are encouraged to measure the environmental impact of their products and services, as well as act accordingly to mitigate negative climate impacts.

We expect our business partners to act responsibly, consider the environment when making decisions, and share our long-term environmental commitments. Our business partners must make all reasonable efforts to protect the environment and reduce the negative impact of their activities and products on the environment as much as possible. In particular, our business partners must obtain, maintain, and comply with all necessary environmental permits, licenses, and registrations for their operations, as well as internationally recognized environmental standards.

Upon request of Cavalleretti Stampaggio Srl, suppliers must make environmental performance data available as a contribution to environmental assessments, product life cycle assessments, and/or product declarations and labels.

Pollution Prevention, Air Emissions, Waste and Hazardous Substances

Our business partners must monitor, control, and appropriately treat wastewater, air emissions (particles, nitrous oxide, sulfur oxides, etc.), and solid waste generated by their operations; they must also prevent soil and groundwater pollution. Business partners must implement pollution prevention and the use of natural resources, and also strive to conserve water and reduce waste generation as much as possible. The business partner must ensure adequate controls and minimize negative environmental impacts that could result from the storage and handling of chemicals and other hazardous substances.

Our business partners must implement an adequate and systematic approach that takes environmental aspects into account; this approach must include, if applicable, the implementation of an adequate environmental management system. Our business partners must comply with all applicable environmental laws and regulations and Cargotec's requirements regarding the restriction or regulation of specific hazardous substances, including labelling for recycling and waste disposal.

III Governance

Anti-Corruption

Our business partner must comply with applicable laws and regulations regarding anticorruption and anti-bribery. The business partner must not offer, promise, or give any form of bribe or incentive - or any object of value - to anyone in order to obtain any improper advantage or to improperly influence anyone in any other way.

The business partner must establish and implement an effective, risk-based, and appropriately proportionate anti-corruption program aimed at ensuring compliance with applicable anti-corruption laws and regulations.

Gifts & Hospitality

Our business partners must not - directly or indirectly - offer, promise, or give gifts or hospitality to third parties, including any government officials, in order to obtain or retain a business or commercial advantage for Cavalleretti Stampaggio Srl.

Business partners must not offer, promise, or give gifts to employees or representatives of Cavalleretti Stampaggio Srl or anyone else, except in cases where the potential gift is permitted by local law, its value is reasonable, the context is open and transparent, and exclusively when it is customary to do so. Cash or cash equivalents must not be offered, promised, or given. Hospitality - intended as social events, meals, or entertainment occasions - may be offered where permitted by local law, if the cost is reasonable, if the context is open and transparent, and if there is a legitimate business reason for doing so. Hospitality or gifts must not be offered, promised, or given in situations of negotiations, bidding, or contract awards.

Conflict of interest

With employees of Cavalleretti Stampaggio Srl, our business partners must avoid any interaction that could conflict, or give the impression of conflicting, with the employees' duty to act in the best possible interest of Cavalleretti Stampaggio Srl.

Business partners must report if a Cavalleretti Stampaggio Srl employee - or a family member thereof - holds a material financial or other interest in their business. We expect our business partners to notify us if a Cavalleretti Stampaggio Srl employee - or a family member thereof - holds a managerial position, works, or holds a financial interest with them.

Anti-Money Laundering Rules & Financial Integrity

Our business partners must comply with applicable laws and regulations regarding money laundering and fraud and must firmly oppose all forms of money laundering and fraud.

The business partner must correctly record and report its transactions in accordance with legal obligations and good accounting practices.

The business partner must provide Cavalleretti Stampaggio Srl, accurately and honestly, with information regarding business transactions involving Cavalleretti Stampaggio Srl.

The business partner must take reasonable measures to prevent and detect any illegal form of payment and prevent its financial transactions from being used by others to launder money or finance terrorism.

Sanctions & Trade Compliance

Should the business partner - or any of its owners, directors, officers, or any affiliate or other person acting on behalf of the company - become subject to trade sanctions, they must report it to Cavalleretti Stampaggio Srl without any delay.

The business partner must report to Cavalleretti Stampaggio Srl which of the products, services, software, or technologies it provides to Cavalleretti Stampaggio Srl are subject to export controls or licensing requirements. The business partner must provide Cavalleretti Stampaggio Srl with all documentation, certifications, and information required by Cavalleretti Stampaggio Srl in relation to the production, export, and sale of products and services of Cavalleretti Stampaggio Srl.

Fair Competition

The business partner commits to competing fairly and in accordance with all applicable competition laws and regulations. The business partner must not be involved in collusive bidding, economic cartels, price discrimination, illegal market share sharing, or other unfair business practices.

Confidential Information & Intellectual Property Rights (resources)

Our business partners are required to protect confidential information from unauthorized access, disclosure, and misuse, as well as to respect the confidential information and intellectual property rights of Cavalleretti Stampaggio Srl and others.

Reporting and Grievance Mechanism

Our business partners must implement a reporting mechanism that provides their employees and other interested parties with the opportunity to raise concerns and ensure that appropriate procedures are in place for handling such cases. Our business partners must commit to correcting any eventual non-compliance with this Code.

Monitoring & Auditing

The business partner must effectively monitor compliance with this Code within its organization, as well as ensure that its personnel are aware of the standards and principles established in this Code.

The business partner must incorporate the principles and requirements of this Code into all agreements with its suppliers and business partners (hereafter referred to as "subsuppliers"). In the event that the business partner becomes aware of non-compliance by a sub-supplier, the business partner must report it to Cavalleretti Stampaggio Srl without delay. The business partner must effectively monitor the activity of its sub-suppliers regarding compliance with the principles and requirements established in this Code.

Cavalleretti Stampaggio SrI - and/or its authorized third-party representative - will have the right to monitor and evaluate the business partner's compliance with this Code by adopting measures such as, for example, carrying out self-assessments and/or on-site audits, at any time and respecting appropriate confidentiality measures. Audits may include conducting interviews with personnel selected by sample, at the business partner's premises and/or in other locations where work is performed on behalf of the business partner. The business partner must cooperate with and facilitate such monitoring, for example by promptly responding to reasonable requests for information and/or regarding access to property and/or personnel.

The business partner must provide all information requested by Cavalleretti Stampaggio Srl in relation to the partner's compliance with this Code.

Corrective Actions & Substantial Violations

The business partner must take all necessary and appropriate measures to remedy any eventual non-compliance with this Code identified during an audit. Cavalleretti Stampaggio Srl and the business partner must mutually agree on the measures to be adopted and the timeline for the corrective actions.

In the event of a substantial violation of this Code, Cavalleretti Stampaggio Srl may - if it deems it appropriate - initiate a good faith discussion with the business partner to try to identify the measures the partner must take to address such substantial violation. Notwithstanding this option, Cavalleretti Stampaggio Srl will have the right, at its sole discretion, to terminate any and/or all existing agreements between Cavalleretti Stampaggio Srl and the business partner or, if applicable, any purchase order under such agreements, upon 14 calendar days' written notice.

A substantial violation is defined as non-compliance that persists and/or non-compliance for which the business partner does not take corrective actions, despite written requests from Cavalleretti Stampaggio Srl to the partner to remedy it within a defined period of time.

Reporting Violations & Compliance Issues

Any violation of the standards or principles established in this Code must be reported promptly to Cavalleretti Stampaggio Srl. Violations can be reported to the Cavalleretti Stampaggio Srl contact.