



Code of Conduct for Business Partners of Cavalleretti Stampaggio Srl

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We, Cavalleretti Stampaggio Srl and our affiliates (hereinafter referred to as "Cavalleretti Stampaggio Srl" or "we"), aim to be global leaders in sustainable load flow 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 these partners carefully based on objective factors—such as quality, sustainability, reliability, delivery terms, 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 Business Partner Code of Conduct (hereinafter, the "Code") for Cavalleretti Stampaggio Srl's partners, such as suppliers and third parties, to ensure they understand what we expect from them. We ask all those who conduct business with us to strictly respect the legal and ethical standards—as well as the reference frameworks—that we follow.

This Code outlines the minimum requirements expected of our business partners, in addition to all relevant applicable laws and regulations, and encourages 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 own suppliers and subcontractors. Cooperation is necessary to assess and avoid any possible negative impact on people, society at large, and the environment: we and our business partners must always mitigate such impacts or remedy them should 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 frameworks such as 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 signatories to the United Nations Global Compact, and we are committed to respecting their guiding principles on business and human rights, as well as the OECD Guidelines for Multinational Enterprises.

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

I People & Society

Human and Labor Rights

Respect for human rights, including labor rights, is an integral part of how we operate at Cavalleretti Stampaggio Srl.

Equal Opportunity & Non-Discrimination

Our business partners must treat their employees and other stakeholders in a fair and equal manner. They shall maintain an inclusive working environment, free from any discrimination based on gender identity, sexual orientation, race, religion, nationality, age, physical abilities, or other similar characteristics.

Freely Chosen Employment

We must commit to ensuring that no form of modern slavery — including forced or compulsory labor, human trafficking, or other similar abuses — occurs within our operations or our supply chain. Our business partners must not engage in or support any type of exploitation or abuse, including, but not limited to, restrictions on movement, excessive recruitment fees, confiscation of identity documents, withholding of wages, denial of benefits, abusive working conditions, violence, or debt bondage.

Child Labour and Young Workers

Our business partners must refrain from tolerating child labor and must avoid engaging, under any circumstance or contract, with subcontractors or suppliers who use or support such labor. The minimum working age is that required for the completion of compulsory education, and in no case shall it be less than 15 years of age. Our business partners must implement an appropriate mechanism to verify the age of their employees. Young employees, under the age of 18, must not perform work that could jeopardize their health or safety, including night shifts and overtime. The working hours of young employees must not conflict with their school hours.

Respectful Treatment & Anti-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 shall not tolerate any type of harassment or abuse toward their employees, whether direct or indirect, physical, mental, sexual, or verbal.

Working Conditions

Our business partners must ensure that their employees are paid fair compensation, as well as comply with all applicable labor laws, including those relating to minimum wages, working hours and overtime, sufficient breaks and rest periods, sick leave, maternity leave, and annual leave, as well as those relating to mandatory benefits. A work 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 compliance with applicable data protection laws. All personal data shall be processed lawfully, fairly, and transparently, while ensuring that such data is relevant and used exclusively for the purpose and duration for which it was collected. Our business partners must exercise care and diligence and implement appropriate 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.

Responsible Sourcing of Minerals

To the extent applicable to the business partner's operations, such partner shall 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, so as to reasonably ensure that their sourcing is consistent with the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, or with an equivalent and recognized reference due diligence framework.

Furthermore, we expect business partners to ensure that the sourcing of all minerals used in batteries (e.g., cobalt, lithium, graphite, or nickel) is conducted without any human rights violations. Business partners shall 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 the people we interact with is part of our daily work at Cavalleretti Stampaggio Srl.

Workplace

Our business partners must provide their employees with a healthy and safe working environment, in compliance with all applicable laws and regulations. Appropriate health and safety information, training, and safety instructions shall be provided in a language understood by the workers; furthermore, our business partners must supply their employees with all necessary safety equipment.

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 and dust pollution, and access to first-aid supplies.

Emergency readiness, rest areas and facilities

Our business partners must have effective safety programs in place that, as a minimum, cover life 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 within buildings.

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

Business partners' employees must not be intoxicated or under the influence of 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 gear to ensure safety at work. Clear procedures must be implemented to appropriately identify, manage, prevent, record, and report occupational accidents and illnesses. Awareness of healthy and safe behaviors and best practices must be promoted among employees; furthermore, employees must be encouraged to report safety issues and concerns. Our business partners shall undertake 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 from them.

II Environment

Greenhouse gas emissions & Environmental permits

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

We expect our business partners—within their operations and their value chain—to monitor, report, and set environmental targets, and to 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 to act accordingly to mitigate negative impacts on the climate.

We expect our business partners to act responsibly, take the environment into account when making decisions, and share our long-term environmental commitments. Our business partners shall make all reasonable efforts to protect the environment and to 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 environmental permits, licenses, and registrations necessary for their operations, as well as internationally recognized environmental standards.

Upon request from Cavalleretti Stampaggio Srl, suppliers shall provide environmental performance data as input for 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, atmospheric emissions (particulates, nitrous oxide, sulfur oxides, etc.), and solid waste generated by their operations; they must also prevent soil and groundwater contamination. Business partners shall implement pollution prevention and the sustainable use of natural resources, further striving to conserve water and reduce waste production as much as possible. The business partner must ensure adequate controls and minimize negative environmental impacts that could arise from the storage and handling of chemicals and other hazardous substances.

Our business partners shall implement an appropriate 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, as well as requirements regarding the restriction or regulation of specific hazardous substances, including labeling for recycling and waste disposal.

III Governance

Anti-Corruption

Our business partner must comply with all applicable laws and regulations regarding the fight against corruption and bribery. The business partner shall not offer, promise, or bestow upon anyone any form of bribe or incentive — nor any object of value — 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 anti-corruption program, based on risk and appropriately proportioned, aimed at ensuring compliance with applicable anti-corruption laws and regulations.

Gifts & Hospitality

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

Business partners must not offer, promise, or bestow gifts upon employees or representatives of Cavalleretti Stampaggio Srl or anyone else, except in cases where the gift is permitted by local law, its value is reasonable, the context is open and transparent, and only when it is customary to do so. Cash or cash equivalents must never be offered, promised, or bestowed. Hospitality — understood as social events, meals, or entertainment opportunities — 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 bestowed during situations of negotiations, bidding, or contract awards.

Conflict of Interest

With the 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 of theirs — 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 of theirs — holds a managerial position, works for, or holds a financial interest in their company.

Anti-Money Laundering (AML) regulations & Financial Integrity

Our business partners must comply with applicable laws and regulations concerning money laundering and fraud, and they 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 accurately and honestly provide Cavalleretti Stampaggio Srl 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 this to Cavalleretti Stampaggio Srl without delay.

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

Fair Competition

The business partner commits to competing fairly and in compliance with all applicable competition laws and regulations. The business partner shall not be involved in collusive bidding, economic cartels, price discrimination, illegal market 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.

Grievance and Reporting Mechanism

Our business partners must implement a reporting mechanism that provides their employees and other stakeholders 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 potential non-compliance with this Code.

Monitoring & Auditing

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

The business partner shall incorporate the principles and requirements of this Code into all agreements with its suppliers and business partners (hereinafter referred to as “sub-suppliers”). 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 shall effectively monitor the activities of its sub-suppliers regarding compliance with the principles and requirements established in this Code.

Cavalleretti Stampaggio Srl — and/or its authorized third-party representative — shall have the right to monitor and assess the business partner's compliance with this Code by taking measures such as, for example, conducting self-assessments and/or on-site audits, at any time and subject to appropriate confidentiality measures. Audits may include conducting interviews with randomly selected personnel at the business partner's premises and/or other locations where work is performed on behalf of the business partner. The business partner shall cooperate with and facilitate such monitoring, for instance by responding promptly to reasonable requests for information and/or regarding access to property and/or personnel.

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

In the event of a material breach of this Code, Cavalleretti Stampaggio Srl may — should it deem it appropriate — engage in good faith discussions with the business partner to identify the measures the partner must take to address such material breach.

Notwithstanding this option, Cavalleretti Stampaggio Srl shall have the right, at its sole discretion, to terminate any and/or all agreements in place between Cavalleretti Stampaggio Srl and the business partner or, if applicable, any purchase order under such agreements, upon 14 calendar days' written notice.

A material breach is defined as a non-compliance that persists and/or a non-compliance for which the business partner fails to take corrective action, despite written requests from Cavalleretti Stampaggio Srl to the partner to remedy it within a defined period of time.

Reporting of Violations & Compliance

Any violation of the standards or principles set forth in this Code must be reported promptly to Cavalleretti Stampaggio Srl. Violations may be reported to your primary contact at Cavalleretti Stampaggio Srl.

Respect for Fundamental Human Rights

The Company is committed to conducting its activities in full respect of internationally recognized human rights (as set forth in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights). This commitment applies to all our operations, supply chain, and business relationships.

Rights of Minorities and Indigenous Peoples

The Company recognizes the special rights of protection and self-determination of Indigenous Peoples and Ethnic, Religious, and Linguistic Minorities, as established by the relevant international regulations.

- **Consultation and Consent:** Before undertaking projects or activities that may impact their territories, resources, or lifestyles, the Company commits to consulting the affected communities in good faith and seeking their **Free, Prior, and Informed Consent (FPIC)**.
- **Cultural Valorization:** The Company respects the traditions, culture, traditional knowledge, and sites of cultural or spiritual significance to the communities.

Rights to Land, Forests, and Water

The Company recognizes that access to and use of natural resources, such as land, forests, and water, are often fundamental to the livelihood and identity of local communities and indigenous peoples.

- **Land Acquisition:** Procedures for the acquisition or use of land must be **transparent, legal, and duly documented**. They must provide for fair and prompt compensation or, where appropriate, agreed-upon non-monetary compensation mechanisms.
- **Management of Water and Forest Resources:** The Company's use of water and forest resources must not compromise the essential and sustainable access to these resources by local communities.
- **Forced Evictions:** It is strictly prohibited to take part in, or benefit from, **forced evictions** or illegal expropriations. Any relocation of individuals or communities must occur only as a last resort (*extrema ratio*), in full compliance with the law, with adequate notice and compensation, and ensuring the **safety and well-being** of the individuals involved.

Use of Security Forces (Private and Public)

Recognizing that interactions with security forces can pose a significant risk to human rights, the Company establishes the following:

- **Guiding Principles:** The Company shall adhere to the **Voluntary Principles on Security and Human Rights (VPSHR)** to guide its interaction with security forces.
- **Private Security Forces:** Private security guards employed directly or indirectly by the Company must be trained in the respect for human rights, the proportionate use of force, and the prevention of abuses. In the event of proven violations, the Company will take immediate action, including the termination of contracts.
- **Public Security Forces:** Should the Company request assistance from public security forces (police, military), it will ensure that such support is provided in accordance with the law and that mechanisms are in place to report and address any allegations of abuse by public forces in relation to our operations. The Company shall not request or accept that public security forces act in an illegal or repressive manner to protect our assets.