



**SUPPLIER
CODE OF
CONDUCT**

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PURPOSE OF THE SUPPLIER CODE OF CONDUCT

This Supplier Code of Conduct is developed by ILPEA Group (hereinafter also "ILPEA", or the "Group", or the "Company") and has been implemented throughout the Group, including its more than 30 plants in 5 continents all over the world.

A fundamental part of ILPEA's commitment is to guarantee that Human Rights are being respected in carrying out its activities and to promote the related principles also along its entire supply chain by extending this Code to all suppliers, subcontractors, business partners and in general to all those who are somehow involved in carrying out activities for ILPEA.

Procurement of materials, parts or components to be supplied to ILPEA is in no way permitted if it involves, directly or indirectly, human rights' abuses, especially in conflict or high risk areas. The selection of ILPEA's suppliers is not only based on quality and competitiveness of products and services, but also on socio-environmental performance and adherence to ethical values. These factors are a prerequisite for becoming a supplier of ILPEA and maintaining a lasting relationship of collaboration.



1. GENERAL PRINCIPLES OF THE SUPPLIER CODE OF CONDUCT



1.1 Harassment

Any form of harassment, violence, abuse, bullying in employment relationships, whether physical, sexual, psychological, verbal, or in any other form, is prohibited in ILPEA's Group and neither is it tolerated along its entire supply chain.

1.2 Discrimination, Diversity, Equity and Inclusion

ILPEA requires its suppliers and business partners to guarantee respect for the diversity of each employee and worker, as well as to set aside any kind of discrimination (by way of example only, in terms of race, ethnic origin, sex, nationality, language, disability, religion, political belief or sexual orientation). Equity and inclusion are essential values that must never be violated.

1.3 Occupational Health & Safety and Environmental Protection

The workplace must be safe and fit for work. The type of work, the load and duties must not pose a risk on health, safety and environment and must always comply with national and international standards, laws and regulations, administrative practices and national policies of the countries in which they operate.

1.4 Working Conditions and Hours

ILPEA promotes and observes decent and respectful working conditions for its employees and it also expects its suppliers to respect and guarantee this principle.

Overtime work must be considered an exception against which an increased salary is recognized.

ILPEA requires its suppliers to ensure the right balance between work and private life of their employees.

1.5 Remuneration

Local minimum wages set by law or by collective agreements, if any, must be respected.

The remuneration offered by ILPEA's suppliers and business partners to their collaborators must be commensurate and at least sufficient to guarantee a dignified life of the worker and his family.

1.6 Child Labor

ILPEA prohibits child labor within its company and it will not be tolerated in any way within along the entire value chain.

ILPEA severely condemns any form of child labor and does not tolerate the hiring of any employee under the age of 15 (unless the country's local law provides for a higher age) and requires its suppliers to apply the same principle to all their activities, as well as to their sub-suppliers.

1.7 Forced Labor and Human Traffic

Human trafficking is illegal and not tolerated. Suppliers and business partners of the Group, regardless of their origin and geographical location, must also reject any form of forced labor, exploitation, including bonded, compulsory, involuntary imprisonment and corporal punishment.

1.8 Conflict Minerals

Ilpea Group is committed to ensuring a responsible sourcing of conflict minerals, such as tin, tantalum, tungsten and gold (also known as "3TG"), refusing to finance, directly or indirectly, wars, armed groups, or to contribute to human rights' violations and ILPEA expects its suppliers to do the same.

In this regard, ILPEA has implemented Conflict Minerals Policy on Minerals and expects suppliers to read and observe it and also adopt measures to guarantee this principle throughout their supply chain.

1.9 Freedom of Association and Collective Bargaining

The right of workers to join in trade unions, freedom of association and collective bargaining, must be respected not only in ILPEA but also throughout the Group's entire supply chain. As a result, the same rights must be guaranteed to employees of ILPEA's suppliers and to those of their suppliers.

1.10 Data Protection and Privacy

ILPEA processes personal data in a lawful manner and data collected and stored are only those necessary for specific, explicit and legitimate purposes. Data are kept for a period of time not exceeding that necessary for the purposes for which they have been collected and appropriate security measures are adopted. ILPEA expects its suppliers and the entire supply chain to do the same.



2. SHARING OF THE SUPPLIER CODE OF CONDUCT

2.1 Communication and Implementation

All suppliers will be informed of this Supplier Code of Conduct as it is an integral part of any contractual relationship between ILPEA and its suppliers. ILPEA will maintain commercial relations exclusively with suppliers who respect, observe and share the principles set out herein.

Supplier Code of Conduct is also published and always available on the Group's website at www.ilpea.com, easily accessible by anyone who needs to read it.

2.2 Whistleblowing Procedure

ILPEA has set up a Whistleblowing Procedure (available on the ILPEA website www.ilpea.com), approved by the Board of Directors, to ensure that all cases of suspected violations of the values and principles set out in this Supplier Code of Conduct are reported and managed in a timely and appropriate manner.

The objective of the procedure is in fact to ensure that anyone feels supported in speaking in confidence and in reporting any matters that may involve something improper, unethical or inappropriate and that all reports are handled promptly, consistently, professionally and completely anonymously. They will be taken seriously, treated as confidential and handled without fear of retaliation.

As soon as you become aware of any wrongdoing or suspected wrongdoing, you are strongly recommended to report the situation by clicking on the link report.ilpea.com, through which reports may be made by name or anonymously if you wish. The Supervisory Body, composed of impartial professionals properly appointed by the Board of Directors, will take care of the matter.

