

# Third Party Code of Conduct

Version 4.0 Issued on 16<sup>th</sup> January 2024

As reflected in the Code of Conduct and in the Organizational, Management and Control Model adopted in accordance with Legislative Decree no. 231 of June 8<sup>th</sup> 2001 (hereinafter the "Model 231/01"), Arkad S.p.A. (hereinafter also the "Company") is committed to high standards of integrity and sustainability. Arkad S.p.A. has a "zero tolerance" policy when it comes to unethical business behavior, such as bribery and corruption. We expect all of our suppliers, customers, business partners, external collaborators working for or together with Arkad S.p.A. – even providing goods or services – and in general any third party interacting with Arkad S.p.A. (hereinafter the "Third Parties" and individually the "Third Party") to adhere to similar standards and to conduct their business ethically.

As a Third Party, you are required to comply with all applicable laws and regulations, with the requirements set forth in this Arkad S.p.A.'s Third Party Code of Conduct as well as in the Model 231/01 and with your contractual obligations towards us.

This Third Party Code of Conduct defines the main principles underlying your business activities as one of our business party.

## **A. Human Rights**

As a Third Party, you shall:

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will;
- prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative;
- not tolerate any form of violence, as defined in the ILO convention 190/2019 ("Violence and Harassment Convention") and as implemented in the various countries in which you operate.

## **B. Fair labor conditions and child labor**

You shall ensure fair labor conditions. In particular, you will:

- refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- respect the rights of employees to freely associate and bargain collectively;
- not to tolerate or use, at any stage of its activities, the employment of minors under the age of 15; not to employ young workers (aged between 15 and 18), except in cases expressly provided for by law; in the case of the employment of young workers, must be ensured effective conditions of learning, growth and professional development, as well as suitable health and safety conditions;
- not use any forced labor or involuntary prison labor and allow all employees the choice to leave their employment freely upon reasonable notice;
- compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist, we recommend that working hours not exceed sixty hours per week including overtime;

- ensure that employees are allowed at least one uninterrupted day off per week.

### **C. Health, safety and environmental management**

You shall provide a safe and healthy workplace for all of your employees (including security during business travels, transfers and stays in locations at risk) and shall conduct your business in an environmentally sustainable way. In particular, you will:

- formally appoint a competent person to manage health, safety and environmental programs and improvements;
- establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks;
- ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures;
- implement preventive measures to avoid or at least minimize the environmental impact (also taking into account the evolution of legislation on this subject).

### **D. Business ethics**

You shall conduct your business in an ethical manner. In particular, you will:

- refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Arkad S.p.A. employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- adhere to anti-trust and other competition laws;
- disclose to Arkad S.p.A. information regarding potential conflicts of interest relating to your activities as an Arkad S.p.A.'s business partner, including disclosure of any financial interest an Arkad S.p.A. employee may hold in your business;
- protect all confidential information provided by Arkad S.p.A. and by our respective business partners;
- respect intellectual property of others, including Arkad S.p.A.;
- adhere to international trade regulations and export control regulations.

### **E. Secure business**

You shall conduct your business in a secure manner. In particular, you will:

- implement reasonable measures for minimizing exposure of Arkad S.p.A. to security threats such as terrorism, crime, pandemics and natural disasters;
- when visiting or working at Arkad S.p.A.'s locations, abide by Arkad S.p.A.'s security procedures and report any security concerns to the appropriate Arkad S.p.A.'s channels.

### **F. Bribery**

Arkad S.p.A. does not tolerate corruption or bribery in any form. Soliciting, accepting, offering, promising, paying bribes or making other improper payments is strictly prohibited, whether directly or through any Third Party.

Third Parties shall not perform any action or behavior that can be associated to corruption, bribery or any activity (including improper payments of whatsoever nature) that may imply involvement in corruption or bribery when working for or with Arkad S.p.A., compromising Arkad S.p.A.'s reputation. This includes facilitation payments or the giving or receiving of preferential treatment that may be perceived as a bribe (even through favors, gifts and/or donations) for or on behalf of Arkad S.p.A.. Therefore you shall not accept or provide any gifts or favors to or from active or former government officials or commercial parties for or on behalf of the Company without obtaining prior approval from Arkad S.p.A..

### **G. Competing Fairly**

Third Parties shall refrain from any unfair competition. In particular, you will:

- undertake to work under applicable anti-trust and competition laws and regulations, both with other entities or individually;
- not enter into any agreement, formally or informally, to unlawfully restrict competition, set prices, compensation or benefits, or allocate clients, markets, people, or services for or on behalf of Arkad S.p.A. or otherwise in connection with any relationship with Arkad S.p.A..

### **H. Procurement by supplier**

As a supplying Third Party, you shall procure goods and services in a responsible manner. In particular, you will:

- select your own tier one suppliers providing goods or services directly or indirectly to Arkad S.p.A. based on them agreeing to adhere to standards comparable to those set forth in this Arkad S.p.A. Third Party Code of Conduct and in the Model 231/01; and
- when working at Arkad S.p.A.'s locations, only subcontract work with prior consent from Arkad S.p.A..

### **I. Inspections and corrective actions**

In order to ensure and demonstrate compliance with the Arkad S.p.A. Third Party Code of Conduct and with the Model 231/01, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request. To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without the support of a third party.

Whether in the light of results of such audit or inspection emerge any serious evidence proving any non-compliance with this Arkad S.p.A. Third Party Code of Conduct or with the Model 231/01, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this Arkad S.p.A. Third Party Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our business partners.

### **J. Access to remedy**



In the context of business relationships between Arkad S.p.A. and Third Parties, whether you or your employees reckon that another Third Party is not acting in accordance with this Third Party Code of Conduct or with the Model 231/01, or Arkad S.p.A. itself – its employees, managers, executives and in general any internal collaborators – is not acting in compliance with its Code of Conduct and/or the Model 231/01, we encourage you to raise your reserves through Arkad S.p.A.'s stakeholder Whistleblowing Channels. For more information on these reporting channels, please visit the website [www.arkadspa.com](http://www.arkadspa.com).

Best Regards,

A handwritten signature in blue ink, appearing to read "Andrea Brunetti". The signature is stylized and somewhat abstract, with several loops and flourishes.

Andrea Brunetti  
Chief Executive Officer  
Arkad S.p.A.

## Contact us

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