



pielletalia®

pielletalia supplier code of conduct

Version n. 02
May 12th, 2023





1.0 Introduction, purpose and scope of code of conduct

1.1 pielletalia srl basis its ethics upon the following code of conduct and to the strong commitment to the UNITED NATIONS GLOBAL COMPACT, the UNIVERSAL DECLARATION OF HUMAN RIGHTS and to the INTERNATIONAL LABOUR ORGANIZATION (OIL).

1.2 pielletalia has therefore established this Code of Conduct to set out those standards, and it expects all suppliers to confirm compliance with it when they are engaged. Suppliers are responsible for ensuring that they, their staff and any sub-contractors comply with the standards set out in this document.

1.3 This Code of Conduct shall form an integral part of any contract entered into by pielletalia with Suppliers and compliance with the Code of Conduct shall be a binding obligation of each Supplier.

1.4 We consider our supplier base as a critical and necessary extension of our operations and future success, and we thank you for continuing to make compliance and integrity a top priority as you work with pielletalia. Failure to sign the pielletalia Supplier Code of Conduct and comply with it during the course of business with pielletalia may lead to your disqualification as an approved vendor and eliminate you from doing new business with pielletalia. You also commit to the obligation of reporting to pielletalia any violation of this policy, as soon as you become aware of it, by sending an e-mail to info@pielletalia.com

2.0 Laws, rule and regulations

As a Supplier, you agree to abide by the terms of this Code and acknowledge that compliance with this Code is necessary to maintain your status as a Supplier of pielletalia. You agree that all business conducted on behalf of pielletalia shall be accomplished in full compliance with applicable laws, rules, regulations, and policies.

2.1 Anticorruption Laws

Suppliers shall not make, authorize, or offer any bribes, kickbacks, or payments of money or any other value to anyone, including officials, employees, or representatives of any government or public or international organization, or to any other third party (public or private sector) for the purpose of obtaining or retaining business, or influencing any other favorable business decision, that is in any way related to pielletalia. Suppliers are required to comply with the U.S. Foreign Corrupt Practices Act and all applicable local antibribery laws.



2.2 **Antitrust and Competition Laws**

Antitrust and competition laws aim to protect consumers and competitors from unfair business practices and promote and protect healthy competition. pielleitalia is committed to complying with the applicable antitrust or competition laws of all nations or organizations, and pielleitalia also expects its Suppliers to comply with all applicable antitrust or competition laws.

3.0 **Labour**

3.1 Suppliers shall ensure that their staff are provided with:

- a safe and hygienic working environment, taking into account the prevailing knowledge of the industry and of any specific hazards. Appropriate measures shall be taken to prevent accidents and injury to health arising from, associated with, or occurring in the course of work, by minimizing, as far as reasonably practicable, the causes of hazards inherent in the work environment.
- regular and recorded health and safety training, which shall be repeated for new or reassigned workers; and
- access to clean toilet facilities and potable water, and, where appropriate, sanitary facilities for food storage shall be provided.

3.2 Suppliers shall ensure that there is no discrimination in recruitment, compensation, access to training, promotion, termination of employment or retirement on the bases of race, caste, national origin, ethnic origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Suppliers shall ensure that the recruitment and promotion processes are open, fair and transparent.

3.3 Suppliers shall promote a supportive work environment that values the diversity of its employees.

3.4 Working hours for suppliers' staff shall comply with the European Union Working Time Directive and industry standards, whichever is more protective.

3.5 Suppliers will ensure that employees receive training appropriate to their role and will help them to realize their potential and professional ambitions (subject to the financial and operational status of the employer) by providing training and development opportunities.

3.6 Child labour shall not to be used at any stage of manufacturing. The term "child" refers to any person employed under the age of 15 (or 14 if the law of the country permits), below the age for completion of compulsory education, or below the minimum age for



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employment in the country – whichever is greater. The use of legitimate apprenticeship programs in the workplace that comply with all laws and regulations is supported. Workers under the age of 18 should not perform hazardous work and may be excluded from night shifts, considering educational needs.

3.7 Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime hours at wages above the regular hourly rates. Deductions from regular contractual wages are not allowed as a disciplinary measure. The basis for workers compensation must be provided in a timely manner through payroll or similar documentation.

4.0 Health & Safety

4.1 pielleitalia expects its suppliers to comply with all relevant health and safety laws and adhere to good practice.

4.2 In particular, pielleitalia expects suppliers to:

- have a health and safety policy that complies with the law and recommended practices.
- conduct risk assessments where required and ensure that adequate safety method statements are prepared prior to the commencement of any work activities.
- implement effective structures to ensure compliance with health and safety legislation and manage health and safety issues in general.
- provide adequate training for staff in general, and see that staff assigned to carry out particular tasks or activities have received the necessary education and training and have sufficient experience
- promote awareness of good health and safety practices among staff.
- show and promote respect for the health, safety and welfare needs of staff.
- ensure that relevant information health and safety risks is provided to all those who might be affected by operations and maintain active ongoing communication with pielleitalia and all other stakeholders.
- cooperate with pielleitalia and others in ensuring that the activity does not negatively impact the work or health and safety of others.
- employ only competent subcontractors to perform the work in question and manage them effectively to ensure compliance with legislation and good practice.
- implement, maintain and supervise safe work systems and practices that meet at least minimum health and safety requirements and performance standards, taking into account the continuous occupancy of the premises and the proximity of the general public.
- provide and maintain appropriate protective equipment and ensure that employees and any subcontractors use it.
- react promptly to health and safety concerns raised and implement any required corrective action as soon as reasonably practicable; and
- comply with the law regarding any reportable accidents and incidents arising from



suppliers' activities and cooperate with pielleitalia in managing the response to such accidents or incidents.

5.0 **Probity**

Declaration of Interests

5.1 pielleitalia has established policies and procedures to ensure that its staff adhere to the highest standards of probity and expects suppliers to conform to those standards in order that pielleitalia is not discredited.

5.2 It is therefore essential that suppliers staff declare any interest that is relevant to their employer's contract with pielleitalia, or that may in any way influence or be perceived to influence that contractual relationship. It is especially important that supplier staff declare any relationship with a member of pielleitalia's staff.

5.3 Relevant interests must be declared to pielleitalia prior to entering into any contract and thereafter as soon suppliers become aware of them. pielleitalia will keep any declared interests under review and may require suppliers to verify that related persons are not involved in contracts with pielleitalia, in order to avoid any real or perceived undue influence.

Gifts and Hospitality

5.4 pielleitalia's arrangements for assuring high standards of probity include policies and procedures governing the receipt and offering of gifts and hospitality.

5.5 It is pielleitalia's policy that:

- personal gifts with a significant monetary value should not be accepted.
- staff and Governors should not accept hospitality where it could be perceived as improperly influencing pielleitalia decisions regarding a transaction or supplier, or where acceptance could have negative implications for pielleitalia's relationship with the other party;
- staff and Governors should never accept hospitality from consultants, contractors or suppliers who are bidding on work by pielleitalia; and
- hospitality should not be accepted if it is thought to imply an obligation to the person or company offering it.

Procurement

5.6 pielleitalia has established procedures to ensure compliance with the requirements of legislation and good procurement practices. pielleitalia expects its suppliers to be



similarly compliant, particularly with regard to the relationship between the two organisations.

6.0 Openness and confidentiality

Openness

6.1 Suppliers must work with pielletalia in an open, honest and transparent manner, demonstrating a commitment to these values at all times.

Confidentiality and Data Protection

6.2 To enable suppliers to do their work, confidential information may need to be shared between pielletalia and its suppliers.

6.3 At a minimum, suppliers must put in place appropriate technical and organizational measures. Suppliers must comply with these requirements with respect to all confidential information (whether it includes personal data), along with all other relevant laws and any underlying clauses that set higher standards than those defined by law.

6.4 In event of a breach of Data Protection Standards where the responsibility for said breach is due to a failure of the supplier to fulfil their responsibilities, the supplier agrees to indemnify pielletalia against any consequence thereof.

7.0 Data protection and Intellectual Property

7.1 The supplier shall adhere to applicable data protection laws, including security of personal data, e.g. GDPR, in particular with regard to personal data of customers, consumers, employees and shareholders. The supplier shall comply with all said requirements when personal data is collected, recorded, hosted, processed, transmitted, used or erased.

7.2 The supplier must respect the intellectual property of others by taking appropriate measures to safeguard and protect the confidential and proprietary information or trade secret of its business partner

7.3 The supplier must use such information only within the limits of the contractual agreements. In the case of subcontracting, the sharing of confidential information may only take place with the consent of pielletalia srl through a specific NDA



8.0 Environmental protection

- 8.1 pielletalia expects its suppliers to:
- have an effective and properly implemented environmental policy in order to minimise any negative impact their operations may have on the environment.
 - adhere to all environmental legislation and regulations to facilitate the environment protection.
 - identify a person responsible for compliance with regulatory and legal requirements and actively promote good environmental practises.
 - actively work to minimize harm and improve the environment and proactively pursue any initiatives that lead to such improvement, including those established by pielletalia.
- 8.2 pielletalia also expects its suppliers to comply with the requirements of the ISO 14001:2015 standard and the EMAS regulation where required.
- 8.3 the supplier shall comply with all applicable laws and resulting due diligence obligations with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas, which may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects

9.0 Trade regulation

- 9.1 The supplier shall comply with all applicable export control, sanctions and customs laws and regulations, including Prohibitions & Restrictions (“Trade Laws”). The supplier in particular shall ensure that the supplier, its beneficial owner(s), all its agents and any other subcontractors used by the supplier are not listed on any applicable Denied party sanctions lists.

10.0 Complaint management

- 10.1 pielletalia has a grievance policy that it will use to handle any complaints made about a supplier’s performance, unless specific arrangements have been made for handling complaints in connection with the supply or contract in question. pielletalia will inform suppliers about its procedure at the time of engagement.
- 10.2 Suppliers are expected to work together to resolve any complaint about their work, regardless of how it was presented.



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11.0 Compliance monitoring and breaches management

11.1 pielletalia will monitor compliance with this Code through customer satisfaction surveys, routine monitoring of complaints (both formal and informal) and observation of the behaviour and conduct of suppliers' staff.

11.2 Minor violations of this Code will be brought to the attention of supplier management and pielletalia expects noncompliance to be addressed quickly.

11.3 Serious breaches of this Code will be recorded in writing and formally communicated to the supplier concerned. pielletalia will assess the need for further formal action and, if necessary, invoke contractual dispute management and resolution provisions.

12.0 Further Information

12.1 Suppliers should address questions and requests for further information about this Code to pielletalia CEO's office.

We hereby agree to comply with the requirements of the Code while providing services to the Trust.

Signed by: _____

Date: _____

On behalf of: