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radiant *comfort* systems

Certified



Corporation

Supplier code of conduct

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1. INTRODUCTION

1.1 Foreword

EUROTHERM S.P.A. BC promotes and protects the ethical and social aspects of its business activities, identifying as pillars of its culture integrity, the value of people, the protection of dignity and respect for human rights, as well as the sustainability of business operations. Respect for these values and principles is considered fundamental to ensuring business sustainability, stakeholder satisfaction, the creation and distribution of shared value, and the preservation of corporate image and reputation. This commitment involves all stakeholders in the supply chain, with whom EUROTHERM S.P.A. BC establishes relationships of trust and builds solid and virtuous partnerships, promoting a fair, sustainable and transparent supply chain. In line with the ten principles of the Global Compact, this Code of Conduct aims to raise awareness and empower suppliers so that:

- Ensure fair and safe working conditions for their workers;
- Operate in an environmentally friendly manner;
- Act in accordance with legality, with integrity, transparency and fairness;
- Comply with applicable laws and regulations.

1.2 Scope of application

This Code applies to all suppliers of goods and services, including subcontractors, who have business and contractual relationships with EUROTHERM S.P.A. BC. Suppliers must disseminate the contents of this document to their collaborators and promote virtuous behavior within their supply chain to ensure compliance with this Code.

1.3 Principles and Reference Standards

The Code is based on the values and principles of the Code of Ethics, the Integrated Management System Policy, the Procurement Policy and the Organization, Management and Control Models under Legislative Decree No. 231/2001, as well as the main standards issued by international organizations such as:

- The United Nations International Bill of Human Rights.
- The United Nations Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women
- The Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO)
- The United Nations Sustainable Development Goals (SDGs) and the 10 principles of the Global Compact

2. ETHICS AND BUSINESS PRACTICES

2.1 Fair Competition

The supplier undertakes to operate in accordance with the principles of free competition, fairness and transparency, avoiding deceptive or illegal market practices and anticompetitive behavior.

2.2 Relations with the public administration, relevant authorities and control bodies

The supplier manages relations with the public administration, authorities, control bodies and other third parties with responsibility, cooperation and transparency, providing truthful statements, documents, certifications and information.

2.3 Bribery, extortion, embezzlement and money laundering

The supplier must operate in full compliance with the law, with transparency, integrity and fairness, avoiding any form of payment or acceptance of money or goods to promote or favor business, whether public or private, that violates laws or

regulations in force or that pursues personal interests to the detriment of society and the community. It must refrain from conduct aimed at obtaining advantages, contributions or financing through fraud, falsified documents or deceptive actions. In addition, it must take all necessary measures to prevent its business from being used for money laundering.

2.4 Conflict of Interest

The supplier is required to disclose the existence of a conflict of interest before, during and after the establishment and execution of a contract.

2.5 Privacy, confidentiality and privacy of data and information

The supplier must ensure the confidentiality of information learned in the course of the working relationship, while maintaining the transparency of activities and complying with information obligations imposed by laws. It must process personal data in compliance with data protection regulations, adopting effective procedures to protect information and guaranteeing the rights of data subjects by limiting data retention to the necessary time. The provider must identify privacy-related roles in its operations and train authorized personnel to process data. It must avoid the disclosure of false, biased or defamatory information and ensure that communication with stakeholders is truthful, clear and fair.

2.6 Responsible Sourcing

The supplier is committed to contributing to the economic, social and civic development of the community, giving preference to local suppliers whenever possible. It also undertakes to stipulate fair contracts with its suppliers and abide by agreed payment terms.

3. HUMAN RIGHTS AND SOCIAL PRACTICES

3.1 Occupational health and safety

The supplier shall take all necessary measures to ensure the safety and health of workers, including occupational risk prevention activities, information and training. It must put in place the necessary organization and means to adequately assess the risks associated with the company's activities in order to avoid, eliminate or mitigate them. In ensuring the effectiveness of protective measures, the supplier must take into account technical developments, replace what is hazardous with what is not or is less so, invest in prevention, give preference to collective protective measures over individual ones, and give appropriate instructions to personnel. The supplier undertakes to promote safe behavior and compliance with occupational health and safety regulations among workers.

3.2 Social security and insurance treatment

The supplier is responsible for insuring workers against occupational injury and illness, social security, and all other legal and sindical obligations. In addition, if required, he/she must take out RCO and RCT policies with an adequate limit of liability.

3.3 Equal Opportunity

The supplier is committed to ensuring equal opportunity for all employees, including temporary, temporary, seasonal and foreign workers, treating them with fairness, dignity and respect at every stage of the contractual relationship.

3.4 Education and training

The supplier is committed to promoting the development of skills and growth of employees, based on the abilities and merit of each individual, without any discrimination. It must facilitate access to educational and informational initiatives and promote field training with the support of experienced personnel.

3.5 Wages and hours of work

The supplier must ensure fair and competitive treatment of workers in terms of wages, benefits, hours of work, overtime and social security contributions, complying with applicable laws, regulations and collective bargaining agreements. This treatment must be based on objective criteria that reflect local market practices and values. All obligations of the labor relationship must be formalized through a contract that complies with applicable regulations. The supplier must avoid paying employees in cash, preferring traceable payment methods such as checks or bank transfers.

3.6 Discrimination and Harassment

The supplier agrees to condemn any form of discrimination based on sex, nationality, religion, personal and political opinions, age, health, and economic conditions, including its suppliers. It is also committed to combating inappropriate or disrespectful behavior, such as physical and verbal abuse and sexual harassment in the workplace or during workrelated events. When employing foreign workers, the supplier must ensure compliance by ensuring an inclusive and non-discriminatory selection, hiring and remuneration process and freedom of movement.

3.7 Child Labor

The supplier must comply with the principles of the International Labor Organization (ILO), for employment in any type of employment or work that may endanger the health, safety or morality of adolescents. This obligation must be extended throughout the supplier's supply chain.

3.8 Modern Slavery

The supplier shall operate in full compliance with ILO regulations, avoiding any form of illegal labor, such as forced or compulsory labor, bonded labor, modern forms of slavery and human trafficking in the value chain. It must ensure that all employees have freedom of movement and are not subjected to physical or psychological coercion. Employees must have the right to work freely, be informed in advance of working conditions, and receive regular pay. The supplier shall not seize or force workers to deposit their documents, money or deposits to perform work, or adopt practices that prevent free termination of employment.

3.9 Fight Against Corporalism

It is absolutely forbidden to employ personnel who are not free to terminate their labor contract or who work against their will. The supplier must avoid any form of labor exploitation and caporalism that may humiliate the dignity of the worker, as well as the employment of non-regular labor.

3.10 Freedom of Association and Collective Bargaining

The supplier shall guarantee its workers the right to form or join unions of their choice, the right to collective bargaining, and the right to elect their own representatives, without discrimination or prejudice.

4. ENVIRONMENTAL PROTECTION

4.1 Compliance with Environmental Regulations

The supplier must comply with all laws and regulations in environmental protection, focusing on the management of hazardous and nonhazardous waste, soil and water conservation, and the reduction of noise and air pollution. It must also take measures to improve environmental performance by using effective tools, precautions, and procedures. This commitment also extends to subcontractors, ensuring compliance monitoring throughout the supply chain. The supplier will promote sustainable and environmentally compliant behavior among its employees and suppliers.

4.2 Energy consumption optimization and emission management

The supplier undertakes to monitor and reduce energy consumption by taking all necessary measures to reduce air emissions, both diffuse and point source.

4.3 Waste Management

The supplier must ensure responsible and sustainable waste management, reducing its ecological footprint and promoting recovery and circular economy. It must manage special wastes, both hazardous and non-hazardous, in accordance with regulations, ensuring their characterization, temporary storage by homogeneous categories, compliance with the prohibition of mixing, and proper disposal. It must avoid any illegal or unauthorized practice of waste management and abandonment, both inside and outside the work areas. In addition, it must ensure accurate and transparent administrative management of waste by turning to authorized service providers for waste delivery.

4.4 Water Resources Management

The supplier is committed to minimizing the use of water resources, promoting their conservation and reducing consumption, and protecting groundwater.

4.5 Resource management and environmental impact

The supplier shall endeavor to operate while preserving the environment and enhancing the value of natural resources, complying with all local regulations. It shall use advanced technologies to reduce waste, promote reuse, reuse and recycling of natural resources. If requested, the supplier will cooperate in the calculation of the carbon footprint of EUROTHERM S.P.A. BC supply chain providing timely information necessary to reduce the environmental impact.

4.6 Use of chemicals and pesticides

The supplier agrees to use chemicals responsibly throughout the supply chain, in line with industry regulations and respecting the environment, people and animals. Prior to the use of chemicals, even on a trial basis, the supplier shall provide technical and safety data sheets that comply with applicable regulations. It must store chemicals in accordance with the laws, respecting the manufacturer's instructions and preventing environmental emergencies such as spills, pollution, bursts, fires or leaks.

4.7 Protection of Biodiversity

In the course of its activities and in the production of its services and products, the supplier is committed to protecting biodiversity, understood as the variety and variability of living organisms and their ecosystems, including genetic, species and ecosystem diversity.

4.8 Emergency Conditions

The supplier must take all necessary measures to prevent and, if necessary, manage emergency situations that may damage the environment and endanger people's health. It must have available at the workplace fire-fighting equipment, spill kits and other suitable means to prevent environmental contamination in the event of liquid product spills.

5. CONFORMITY OF PRODUCTS AND SERVICES

Suppliers are committed to satisfying customers by complying with laws and contractual agreements. Products and services must comply with national and international regulations in terms of quality, safety, and environmental protection, as well as meet the technical and sustainability requirements demanded by EUROTHERM S.P.A. BC. Suppliers are subject to an evaluation and qualification process that ends with their inclusion in the Qualified Supplier Register, providing all necessary documentation and actively participating.

6. CORPORATE INTEGRITY

6.1 Audit

During the provision of goods or services, the staff of EUROTHERM S.P.A. BC conducts audits to verify compliance with the order, compliance with specified requirements and applicable regulations, including human rights, environmental protection, and occupational health and safety under this Code of Conduct. At the end of the contractual relationship, a post-delivery evaluation is conducted. A negative outcome of these audits or evaluation may prevent future collaborations with the supplier. The supply chain is also subject to sample monitoring by internal audit departments to verify the application of the Integrated Management System and compliance with health, safety and environmental regulations, and by accredited third-party entities to maintain Integrated Management System certifications.

6.2 Reporting of violations

The supplier and its employees are required to inform EUROTHERM S.P.A. BC of any conduct that does not comply with the provisions of this Code of Conduct, of which they have become aware during their activities. Reports, which must be based on concrete and verifiable facts, will be investigated by the relevant functions of the company, ensuring the confidentiality of the reporter's identity. EUROTHERM S.P.A. BC prohibits any act of retaliation or discrimination, direct or indirect, against the reporter for reasons related to the report. Conduct contrary to this rule, as well as violation of the whistleblower's protection measures or malicious or grossly negligent reporting of unfounded information, irreparably jeopardize the relationship of trust with the supplier and may lead to termination of the contract.

6.3 Termination of contractual relationship

In the event of serious violations or failures by the fornitor to comply with the provisions of this Code of Conduct, EUROTHERM S.P.A. BC reserves the right to temporarily suspend the supplier or, if necessary, immediately terminate any contractual agreement with the defaulting supplier.

7. CODE OF ETHICS AND REPORTING

7.1 Code of Ethics

As a Benefit Company in accordance with Law No. 208/2015, in addition to the purpose of sharing the profits of the business activity, EUROTHERM S.P.A. BC pursues purposes of common benefit by operating responsibly, sustainably and transparently towards people, communities, territories and environment, cultural and social goods and activities, entities and associations and other stakeholders. In the exercise of its proprie activities, EUROTHERM S.P.A. BC intends to observe, in addition to the laws and regulations in force, the inspiring principles and high ethical standards that are collected in the company's Code of Ethics as its Constitutional Charter. The Code of Ethics can be found on the group's website <https://www.e.group.info>

7.2 Reports of violations

Any violations of the Code of Ethics by personnel of EUROTHERM S.P.A. BC may be reported by any Recipient in confidential form to the Company. The procedures for reporting and verification of violations are based on criteria of confidentiality of the identity of the whistleblower, in order both to prevent discrimination or retaliation of any kind against him or her, and to ensure an effective and truthful ascertainment of the facts, with a view to supportive and humane corporate growth. The system implemented by the Company in deference to the new EU regulations implementing the so-called. Whistleblowing of 2019, represents a system that allows the total anonymization of the report, to protect the reporter and the genuineness of the data collected, also in order to limit as much as possible any retaliatory conduct, in this way are guaranteed to the maximum degree not only the rights of the reporter and the confidentiality of the complaint but also, indirectly, the sostance of correct and included internal policies and the general orientation of the corporate structure towards correct behaviors of interaction between colleagues of all levels. The reporting channel can be reached at the following web address <https://whistleblowersoftware.com/secure/Eurotherm>.

By this signature you confirm that you have read this Supplier Code of Conduct, and the Code of Ethics of EUROTHERM S.P.A. BC.

Full name:

Job Title:

Company:

Date and place:

Stamp and signature:



Frame the QR-code to access the "Whistleblowing" platform.



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