

## 1. Introduction

The activity carried out by Cisel srl (hereinafter Cisel) is done in accordance with its own codes of conduct such as the Code of Ethics and the Organization, Management and Control Model which prescribe the values and principles as integral parts of the company's operations.

Sharing behaviours in support of sustainable development and understanding and respect for diversity represent Cisel's commitment to sharing and disseminating the culture of integrity within its work.

Cisel requires from its suppliers to adopt similar behaviours on particularly sensitive issues such as those of human rights, health and safety in the workplace, environmental protection, the fight against corruption, business ethics, while undertaking to transfer them inside the supply chain. These factors represent a fundamental prerequisite for becoming a Cisel supplier by developing a long-lasting collaboration relationship.

Cisel requires from its suppliers, their collaborators and other parties working on their behalf, to comply with the minimum standards of conduct and fundamental practices outlined in this document. Suppliers are also required to comply with the regulations and standards in force in the countries in which they operate. If local regulations are less stringent than the principles contained in this Code of Conduct, this includes the provision that, within a reasonable time frame, the necessary measures are taken to comply with the principles contained in this document.

## 2. Labor and Human Rights

- Suppliers must not resort to child labour. Under no circumstances must they hire personnel under the age of 15, unless they are part of a professional internship, training program or apprenticeship authorized by law and useful for the professional growth of the participating person.
  - Suppliers must ensure a safe and healthy working environment for all their employees, which meets the applicable health and safety regulations in the workplace. The adoption of measures that exceed these minimum standards required by law will be considered a plus.
  - Suppliers must comply with the applicable rules on the regulation of working hours.
  - Suppliers must not use any form of forced labour. They must not tolerate the use of any disciplinary practice that involves the use of physical violence and must oppose any form of trafficking in human beings.
  - Suppliers must recognize, respect and fully guarantee the right to work and free association of their employees in all plants. Suppliers must work constructively with their employees, or with any organization that represents them, to promote their best interests. Vendors must seek to create opportunities for listening to employee issues. Suppliers must apply the forms of collective bargaining in cases where regulations and / or the social system provide for them.
  - Remuneration and allowances must be paid in accordance with current regulations to promote the material well-being of its employees as much as it is possible.
  - Suppliers must not tolerate any form of harassment and / or discrimination based on gender, race, colour, religious belief, age, ethnic origin, national origin, marital status, pregnancy, disability, sexual orientation or any other personal condition, and they must recognize and promote the positive value of diversity.
  - Suppliers must comply with the applicable rules on the regulation of working hours.
  - Suppliers undertake to consider local populations and communities as the main stakeholders in each type of project they plan to carry out. Suppliers under take to openly share their projects with all those recognized as stakeholder.
  - Suppliers must guarantee fair working conditions through the rejection of all forms of direct and indirect discrimination.
  - Suppliers must respect employees' right to form associations and bargain collectively.
  - Suppliers must give all workers a copy of the employment contract clearly specifying the conditions of employment, the voluntary nature of the work, the freedom to terminate the contract (with any procedures), and any penalties in the case there is a termination of the employment relationship.
  - Suppliers must not use bonded labour, including, but not limited to, the involuntary labour of prisoners, victims of slavery and human trafficking, and allow any employee to leave the job freely upon reasonable notice.
  - Suppliers must ensure that working hours including the overtime, do not exceed legal limits and, where such limits do not exist, do not exceed sixty hours per week including overtime.
  - Suppliers must ensure that employees can enjoy at least one full day off per week.
- Suppliers must have an open and constructive dialogue with their employees and union representatives.

- Suppliers must ensure that adequate tools are available to develop the skills and abilities of all employees.

### 3. Ethics

With reference to the anti-corruption Code of conduct, Cisel suppliers are required to operate with transparency and integrity, respecting the anti-corruption regulations in force in all the countries in which they operate. Any form of corruption, incitement to crime, extortion and embezzlement is strictly prohibited. Suppliers must not offer, promise, pay, request money directly or indirectly (including through bribes and / or facilitations payments) or other benefits for the purpose of obtaining an undue advantage, whether in cases where the undue advantage is offered directly or through an intermediary.

Suppliers must firmly oppose all forms of money laundering and take steps to ensure that each economic and financial transaction is traced. This is in order to allow the identification of the origin of the goods and / or money of each business operation and thus prevent its financial transactions from being used by third parties to launder money.

Fair competition is a fundamental prerequisite in creating business success through the achievement of positive financial performance and the creation of value. Suppliers must act in accordance with the competition, antitrust and trade laws applicable in each country in which they operate. Any form of agreement in violation of competition is strictly prohibited, as well as commercial practices in violation of antitrust laws.

Suppliers must report any material, actual or potential conflict of interest in carrying out their business. There is a conflict of interest when an interest or a personal activity interferes or could interfere in the business relationship with Cisel.

Suppliers must respect the intellectual property rights of third parties and protect the information and personal data of their customers.

The adoption of a Code of Conduct and a periodic verification of its application is strongly recommended.

### 4. Environmental Protection

To minimize the impact of the production activities of Cisel's production chain and related products on the environment, all suppliers must:

- recognize and manage the environmental impact during each stage of production or service provision, from development to delivery and disposal.
- offer compensation to those who are affected by any damage to the environment caused by their operations.
- monitor, control and reduce, through the use of the best technology, the use of resources relevant to their business, including energy, water and other resources.
- avoid, or where unavoidable, minimize or mitigate, atmospheric emissions and spills.
- treat, store, transport, use, unload or dispose of waste of any kind in a safe way.
- have emergency plans to prevent, mitigate and control serious environmental and health damage resulting from their operations.
- observe all applicable safety regulations in relation to the products and services provided and any safety requirements established contractually, including, but not limited to, generally accepted industry standards or any contractually agreed quality requirements.
- commit to optimizing the use of natural resources, reducing emissions harmful to the environment and those of gases held responsible for the "greenhouse effect".
- design, use and / or suggest products and processes that take into account the impacts on the environment.
- avoid the use of prohibited substances (for example CMR substances, Mutagenic Carcinogens and toxic for Reproduction) and adequately manage potentially dangerous substances (as defined in the applicable regulations).
- adopt optimized logistics procedures that minimize the impact on the environment.

### 5. Conflict Minerals

All suppliers must declare to Cisel the presence and origin of the materials regulated by the standard relating to Conflict Minerals called 3TG, such as Gold, Coltan, Cassiterite, Wolf Ramite and their derivatives such as Tantalum, Tin and Tungsten if contained in the products to be supplied. For this purpose, Suppliers must carry out a thorough investigation of their supply chain in accordance with the provisions of the OECD Guidelines ([www.oecd.org](http://www.oecd.org)) which specify what is required in terms of "due diligence" on the subject.

Cisel is determined to comply with all legal and customer requirements regarding the prohibition or limitation of substances, including hazardous substances and Conflict Minerals. Therefore, Cisel Suppliers must ensure that the goods delivered comply with the requirements of all relevant regulations. They will also need to adopt an appropriate course of action in relation to Conflict Minerals and do their best to discover their origin.

## 6. Gifts - Entertainment and Leisure

Suppliers are not allowed to offer Cisel employees gifts of any kind as well as payments or other types of benefits that could influence company decisions, except those of a mere symbolic value (less than 50 euros).

Suppliers cannot offer Cisel employees forms of entertainment that create the feeling of having to pay off at a later time and must implement measures to prevent anyone from having the impression of having to reciprocate from the outside.

## 7. Business Security

The supplier is required to conduct its business in a safe manner. In particular, it must take reasonable measures to minimize Cisel's exposure to any threats to its security, such as terrorism, crime, pandemics and natural disasters.

When visiting or working at Cisel production sites, the supplier must comply with the safety regulations and report any shortcomings through the appropriate channels set up by Cisel.

## 8. Supply chain

The supplier is responsible for providing goods and services responsibly. In particular, it must select its main suppliers, who directly or indirectly supply goods or services to Cisel, on the basis of their adherence to standards comparable to those defined in this Code of Conduct for Suppliers.

## 9. Monitoring, Inspection and Corrective Actions

Cisel is aware that there is not a single appropriate approach for all supply chains and each intervention must reflect the realities of the specific supply chain. Consequently, it is committed to continuous improvement in its sourcing approach and to improving the performance of its suppliers.

To ensure and prove compliance with this code of conduct, the supplier is required to keep all relevant documentation and to submit it to Cisel where requested. To verify compliance, Cisel reserves the right to control and inspect processes and structures, with costs borne by Cisel and upon reasonable notice, with or without the help of third parties.

Should the results of this control or inspection lead to the opinion that the supplier does not respect rules of this document, a solution will be sought with the supplier through dialogue. In the event of no agreement or if serious non-conformities are found, the supplier will be required to implement the necessary corrective actions requested by Cisel. If the supplier persists in its lack of compliance with the code of conduct, Cisel will have the right to undertake sanction mechanisms against the supplier, including the cancellation of the contract, the suspension or complete cessation of its activity as a supplier as well as to take action for the compensation of any loss, damage, expense or other costs arising from any breach and / or conduct by the supplier.

## 10. Professional training

Cisel encourages all suppliers to disseminate the principles set out above also through adequate training for the employees of their supplier base.

## 11. Reporting of violations

Suppliers are obliged to report to Cisel any violations by Cisel employees and / or their employees of the Code of Ethics, the Code of Conduct, the Organization, Management and Control Model, through the following email: [odv@cisel.it](mailto:odv@cisel.it).

Cisel guarantees the confidentiality of the identity of whoever makes the report in good faith and / or refuses to carry out or take actions that violate this Code of Conduct for Suppliers. The suppliers also undertake to maintain the documentation and all the information necessary to substantiate the aforementioned reports.

It is also Cisel's right to verify such documentation if it deems it necessary.

## 12. Evolution of the document

In order that this Code of Conduct can always remain an important point of reference and guarantee the adequacy and effectiveness of its contents and its application, it is periodically reviewed on the basis of regulatory and legislative developments, best practices and the inputs provided by the reference market.

Any suggestions, opinions and comments on the can be sent by e-mail to the address: [info@cisel.it](mailto:info@cisel.it).

Rev	data	Descrizione	Autore	Controllo/Approvazione
00	13/11/2020	Prima emissione		E. Fioretti (Direzione) M. Baldoni (Personale)