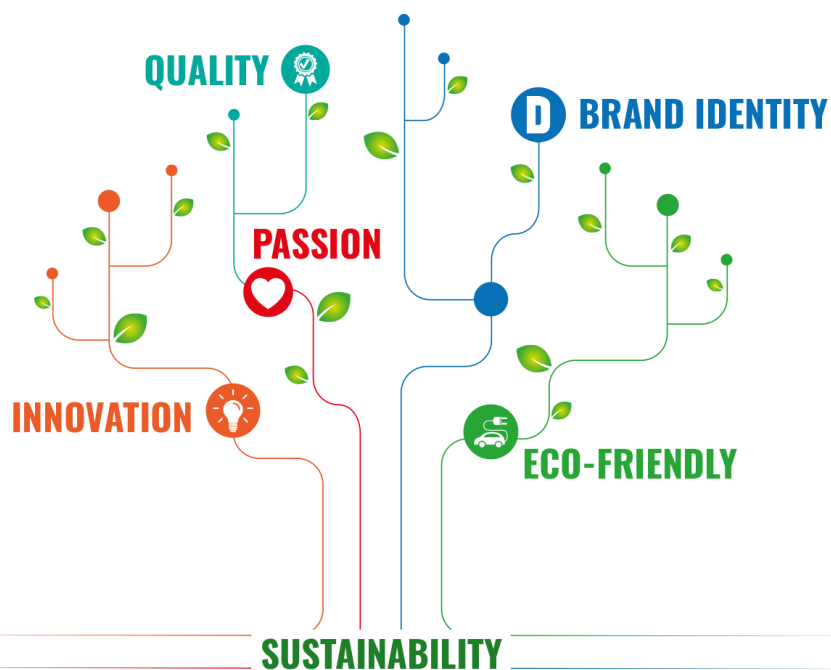


WE CREATE VALUE



DELLORTO

Code of Conduct For Suppliers

From its beginnings in 1933, as carburetors production company, Dell'Orto Spa has grown to become a successful company both on national and international level thanks to its values, high professionalism and expertise. Throughout its history, the company has been guided by the values and ethical principles of its founders. Adherence to the principle of legality, responsibly and fairly in our business dealings, have always been the cornerstone of our corporate values. Our products spark enthusiasm in the people who use them and improve their quality of life while at the same time helping to conserve natural resources. This is the reason why we place such importance on sustainability as a key element in our mission statement and our corporate strategy. Our Suppliers play a significant role in achieving these goals. We believe that the common understanding of ethical values and sustainable practices as the essential basis of such relationships. The rules and requirements stated in this Code of Conduct form an important part of every collaboration agreement between Dell'Orto Spa and its suppliers.

SUPPLIER SUSTAINABILITY POLICY

Dell'Orto Spa is a company that operates in compliance with its Codes of Conduct such as Code of Ethics and Organization Management and Control Model, (pursuant Leg. Degree n° 231/2001) that prescribe its principles and values, which are integral parts of the Company.

The primary objectives of the Company are projecting, producing and selling high quality products, sharing and spreading at the same time behaviors in support of sustainable development, encouraging the understanding and respect for diversity and spreading the culture of integrity, inside your company.

Dell'Orto Spa requires its suppliers, that are considered essential for the development of its company, to adopt the same behaviors on issues as human rights, health and safety in the workplace, environmental protection, fight against corruption and the transfer of those principles within the supply chain.

The selection of our suppliers is based not only on the quality and competitiveness of products and services, but also on environmental performance and adherence to ethical values: factors that are prerequisite for becoming a supplier of Dell'Orto Spa and for developing a lasting collaboration relationship.

This Code of Conduct for suppliers is inspired by the principles contained in the Universal Declaration of Human Rights of the United Nations, in the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration), in the Social Policy of ILO and in the guidelines for Multinational Enterprises of the OECD.

REGULATORY CONTEXT

Suppliers are required to comply with the regulations and standards in force in the countries where they operate.

If local regulations are less stringent than the principles contained in this Code of Conduct for Suppliers, they accept to adopt, within a reasonable period of time, the necessary measures to comply with the principles contained in the following Code of Conduct. In fact, suppliers are required to comply with the principles indicated below.

PRINCIPLE OF STRICT LEGALITY

Dell'Orto Spa strictly respects the principle of legality in all activities of the Company, both implicitly through its actions and explicitly in contractual agreements. These include payment of applicable taxes and customs duties, compliance with competition and antitrust laws, a strict prohibition of corruption and money laundering, application of state of-the-art technology, procurement of the required official licenses, compliance with export control laws, and respect for the legal rights of third parties.

Consequently, we expect our business partners to act according with the prevailing laws and regulations, to comply with the principles of the United Nations Global Compact and to abide by the rules of the present Code of Conduct as part of their collaboration with Dell'Orto Spa. We furthermore expect them to take steps to ensure that third parties engaged for the purpose of fulfilling contractual obligations towards Dell'Orto Spa also comply with this Code of Conduct.

LABOUR AND HUMAN RIGHTS

Our suppliers must observe the fundamental rights of their employees based on National Labor Law.

The following rules are aligned with the International Labor Organization (ILO). In particular:

- 1: suppliers must not use child labor. They must not, under any circumstances, hire personnel under the age of 15 years old, unless they are part of a professional internship, training program or apprenticeship authorized by the government and of obvious benefit to the participating person;
- 2: suppliers must not use any form of forced labor. 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;
- 3: suppliers must recognize, respect and fully guarantee the right to work and free association of their employees in all of their plants. They must collaborate constructively with their employees, or with any organization that represents them, to promote their best interests. Suppliers must apply the forms of collective bargaining in cases where regulations and/or the social system provide for them;
- 4: suppliers must not tolerate any form of harassment and /or discrimination based on gender, race, color, 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;
- 5: suppliers must ensure a safe and healthy work environment for all their employees, which meets or exceeds applicable regulations in health and safety at work;

6: suppliers must comply with the applicable rules on working hours regulation;

7: remuneration and allowances must be paid in accordance with the regulations in force, to promote the material well-being of its employees as much as possible;

8: suppliers undertake to consider local populations and communities as the main stakeholders in each type of project they plan to carry out. They undertake to openly share their projects with all those recognized as stakeholders.

ETHICS

1: With reference to the Dell'Orto Spa Code of Ethics, suppliers must 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, directly or indirectly request money or other benefits for the purpose of obtaining an undue advantage, either in cases where the undue advantage is offered directly or through an intermediary.

2: Fair competition is a fundamental prerequisite in creating business success by achieving positive financial performance and creating shareholder 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.

3: Suppliers must report any material, actual or potential conflict of interest in the performance of their business. There is a conflict of interest when an interest or a personal activity interferes or could interfere in the business relationship with Dell'Orto Spa

4: Suppliers must firmly oppose all forms of money laundering and take measures 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.

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

6: the adoption of a Code of Conduct and a periodic verification of its application is strongly recommended

WORKERS HEALTH AND SAFETY

Suppliers shall make adequate provision for the health and safety of their employees, customers, visitors, contractors, and others who may be affected by their activities. They must operate in a responsible and resource-efficient manner. This comprises the following aspects: Suppliers shall adequately protect their

employees against chemical, biological and physical hazards. In particular, the suppliers must monitoring and ensure the Air Quality levels (through checking exposure to chemical agents) sufficient to ensure the well-being of their workers and the protection of the environment. Physically demanding tasks and conditions in the workplace as well as risks associated with infrastructures used must be adequately managed to protect their employees. Suppliers shall provide appropriate controls, safe work procedures, adequate maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses.

ENVIROMENT PROTECTION

To minimize the impact of production activities and of the supply chain of Dell'Orto Spa, and related products on the environment, all suppliers should:

- 1: engage to optimize the use of natural resources: to measuring, to monitoring and to reducing emissions harmful to the environment and those of gases held responsible for the greenhouse effect;
- 2: constant measuring and monitoring of the level of use of water resources and reducing the waste of water consumption;
- 3: constant measuring of company waste, and analysis of waste reduction performance;
- 4: design, use and/or suggest products and processes that take into account the impacts on the environment;
- 5: appropriately manage, in compliance with current regulations, the treatment and disposal of waste;
- 6: engage the use of less dangerous chemicals product, to preserve the environment, the health and safety of workers and the constant analysis of the risks associated with their use;
- 7: 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);
- 8: adopt optimized logistics procedures that minimize the impact on the environment.

CONFLICT MINERALS

All suppliers must declare to Dell'Orto Spa the presence and origin of the materials regulated by the standard relating to conflict Minerals called 3TG, such as Gold, Coltan, Cassiterite, Wolframite and their derivatives such as Tantalum, Tin and Tungsten if contained in the products supplied. For this purpose, suppliers must carry out a through investigation of their supply chain in accordance with the provisions of the OECD Guidelines (www.oecd.org) which specify what is required in terms of “Due Diligence” on the subject.

TRAINING

Dell'Orto Spa encourages all suppliers to disseminate the principles set out above, also through adequate training of their employees.

REPORTING VIOLATIONS (WHISTLEBLOWING)

Suppliers have to report to Dell'Orto Spa any violations made by Dell'Orto Spa employees and/or its employees of the Code of Ethics, the Organization, Management and Control Model and, more generally, the internal control system of Dell'Orto Spa through the following email: odv@dellorto.it

Dell'Orto Spa guarantees the confidentiality of the identity of those who make the report in good faith and /or refuse to carry out or take any actions that violates this Code of Conduct of the Suppliers.

The suppliers also undertake to maintain the documentation and/or information necessary to prove the aforementioned reports. Dell'Orto Spa also reserves the right to verify such documentation if it deems it necessary.

MONITORING AND CORRECTIVE ACTIONS

Dell'Orto Spa reserves the right to carry out checks through audits conducted by its own internal staff and/or third parties, subject to appropriate communication, on the topics covered by this Code of Conduct.

In case of non-compliance, Dell'Orto Spa:

- will require suppliers to prepare and subsequently implement a non conformity recovery plan;
- will conduct document checks and/or through further Audits to ensure the effective implementation of the above recovery plans, subject to appropriate prior communication.

In the event that the supplier violated the principles of the Code of Conduct for suppliers, or, in the event that non -conformities are found and the envisaged improvement plans are not prepared and implemented, Dell'Orto Spa reserves the right to cautiously suspend and/or to terminate any commercial relationship in advance, with immediate effect as well as to take action for compensation for any loss, damage, expense or other costs arising from any breach and/or conduct by the supplier. Here there are the link for reading the “Model Principles” and the “Code of Ethics” of Dell'Orto Spa:

- <https://www.dellorto.it/en/company/quality-standard/the-4-pillars/>

Cabiate, 22/04/2021

Managing Director

Dell'Orto Spa


COMMITMENT OF THE SUPPLIER

Dell’Orto Spa requires that all suppliers who receive the aforementioned Code of Conduct for Suppliers, return this “Commitment Form” signed by their Legal Representative.

By signing this form, the supplier confirms to having read and accept all the principles, terms and conditions contained in this Code of Conduct for Supplier Rev.00 dated 26/03/2021, regarding the services and/or components of performance or supply to Dell’Orto Spa.

COMMITMENT FORM	
Business Company Name:.....	
Name of the signatory:.....	
Role of the signatory:.....	
Email of the signatory:.....	
Date: -----	Signature and Stamp -----

Please, return the signed “Commitment Form” by email to the following address: acquisti@dellorto.it