



# SUPPLIER CODE OF CONDUCT

POL/04 - Rev. 0 dated 03/07/2023

## SUMMARY

1.	CODE OF CONDUCT	2
1.1.	OBJECTIVES OF THE CODE	3
1.2.	SCOPE OF APPLICATION	3
1.3.	GENERAL CONDITIONS	3
2.	VALUES	3
2.1.	ETHICS	4
2.1.1.	INTEGRITY	4
2.1.2.	ANTI-CORRUPTION AND ANTI-BRIBERY PRINCIPLES	4
2.1.3.	FAIR COMPETITION	4
2.1.4.	PRIVACY AND INTELLECTUAL PROPERTY	4
2.1.5.	REPORTING SUSPECTED NON-COMPLIANCE	4
2.2.	SOCIAL POLICIES	4
2.2.1.	UNDECLARED WORK AND CHILD LABOUR	5
2.2.2.	FREEDOM OF WORKERS - FREEDOM OF ASSOCIATION - COLLECTIVE BARGAINING	5
2.2.3.	WORKING CONDITIONS	5
2.2.4.	DIVERSITY, EQUAL OPPORTUNITIES AND VULNERABLE GROUPS	5
2.3.	QUALITY, HEALTH, SAFETY AND SUSTAINABILITY	5
2.3.1.	QUALITY,	6
2.3.2.	HEALTH AND SAFETY AT WORK	6
2.3.3.	PRODUCT AND PROCESS SAFETY	6
2.3.4.	EMERGENCY MANAGEMENT AND PREPAREDNESS	6
2.3.5.	SUSTAINABILITY	6
2.3.6.	EFFICIENT USE AND CONSERVATION OF RESOURCES - CLIMATE PROTECTION	7
2.3.7.	WASTE AND EMISSIONS	7
2.4.	CORPORATE INTEGRITY	7
2.4.1.	LEGAL AND OTHER REQUIREMENTS	7
2.4.2.	DOCUMENTATION	7
2.4.3.	TRAINING AND EXPERTISE	7
2.4.4.	CONTINUOUS IMPROVEMENT	7
3.	APPROVAL, DISSEMINATION AND MONITORING OF THE CODE	8

# I. CODE OF CONDUCT

---

Focaccia Group (hereinafter also referred to as 'the Group') considers collaboration with suppliers to be a fundamental part of its results and, consequently, values its relationship with them. Supplier selection is not only based on technical, quality and competitiveness requirements but also on compliance with social, ethical and environmental principles. The Group considers the coexistence of all these aspects essential for the development of long-term partnerships.

Therefore, to complement the Code of Ethics and the other institutional documents adopted by the Group, the Supplier Code of Conduct illustrates what the Focaccia Group expects from its suppliers and sub-suppliers. Suppliers are expected to understand the Group's approach to the themes of integrity, responsible procurement and supply chain management and act consistently with these. Focaccia Group expects its suppliers to convey similar expectations throughout their own supply chains.

## I.1. OBJECTIVES OF THE CODE

Through this Supplier Code of Conduct, Focaccia Group aims to involve its suppliers in building a socially, environmentally and economically virtuous supply cycle. The aforementioned Supplier Code of Conduct applies in conjunction with all regulations in force in the countries in which the Group operates and as a supplement to all the principles set out in the Code of Ethics I and in current company procedures.

## I.2. SCOPE OF APPLICATION

This Supplier Code of Conduct applies to all persons, entities, companies, partners and other entities supplying any activity, good or service to the Focaccia Group. For this reason, the Supplier Code of Conduct applies without restriction to suppliers in all Group product classes. In addition, suppliers are responsible for ensuring that their employees and any subcontracting parties are informed of the principles set out in this code and that they comply with them. The Group reserves the right to verify the implementation of the code.

## I.3. GENERAL CONDITIONS

Focaccia Group conducts its business activities in compliance with national and international laws, regulations in force and the principles set out in the Code of Ethics I. Our company therefore undertakes to put in place all the necessary measures to prevent and avoid corruption and conflict of interest, and to guarantee adequate ethical, working and environmental conditions. Focaccia Group requires that all its suppliers and sub-suppliers, in turn, undertake to share the principles of this code of conduct, the compliance with and approval of which constitutes an important component of the supplier evaluation. The Group expects its suppliers to adopt the principles of conduct set out in this code and apply them throughout their supply chain. Suppliers are required to read and confirm acceptance of the principles set out therein by signing the document "New Supplier Data Sheet" 2, sent by the purchasing department when coding a new supplier. Acceptance of the code of conduct is an important yardstick for our supply chain, as also stated in the General Terms and Conditions of Procurement 3. The above-mentioned documents can be found in the dedicated section of our website.

# 2. VALUES

---

## 2.1. ETHICS

---

### 2.1.1. Integrity

Suppliers are required to conduct their business in compliance with generally accepted ethical and integrity principles and make use of organisational systems consistent with the principles outlined in the Code of Ethics I adopted by the Group in order to maintain lasting, honest and transparent relations with the company.

### 2.1.2. Anti-corruption and anti-bribery principles

Suppliers shall not tolerate any form of corruption, bribery, money laundering, embezzlement, extortion or fraud, including the prohibition of giving or receiving anything of value, e.g. money, gifts or illegitimate incentives for the purpose of influencing negotiations or other dealings with the government or government officials, customers or other third parties. Suppliers shall monitor, record and implement procedures for compliance with anti-corruption laws.

### 2.1.3. Fair competition

Suppliers are obliged to conduct their business activities in compliance with the rules of fair competition in accordance with the relevant regulations.

### 2.1.4. Privacy and intellectual property

Suppliers are expected to respect the reasonable privacy expectations of those with whom they do business, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and data protection laws and regulatory requirements when collecting, storing, processing, transmitting and sharing personal data. Suppliers must respect intellectual property rights. The transfer of technology and knowledge must be carried out in a way that protects intellectual property rights. Customer and supplier information must be protected.

### 2.1.5. Reporting suspected non-compliance

Suppliers undertake to provide all interested parties with the appropriate means to report any suspected non-compliance or potentially unlawful and/or illegal activities or behaviour in the workplace. Any such report must be considered strictly confidential and treated as such by suppliers, who also undertake to protect reporting employees from any form of retaliation.

1: see the Focaccia Group Code of Ethics: POL/03 Company Code of Ethics

2: see “New Supplier Data Sheet”:Annex 04 PQ09

## 2.2.SOCIAL POLICIES

---

### 2.2.1. Undeclared work and child labour

Suppliers are obliged to ensure the utmost respect for people and comply with applicable labour laws, refraining from any form of undeclared, forced or child labour, in line with the ILO Convention no. 138 concerning Minimum Age and the ILO Convention no. 182 concerning the Elimination of the Worst Forms of Child Labour.

### 2.2.2. Freedom of workers - Freedom of association - Collective bargaining

Suppliers are obliged to guarantee their employees freedom of association and the application of the relevant collective bargaining agreements, in compliance with all applicable laws and regulations. Suppliers undertake not to use forced, bonded or forced labour in any way or form.

### 2.2.3. Working conditions

Suppliers are obliged to provide their employees with working conditions that respect human dignity, in compliance with applicable industry regulations concerning hours worked (or working hours), overtime, pay and social security contributions, leave, holidays and sickness. Working hours shall not exceed the maximum defined by local laws. Suppliers also undertake to provide training and educational opportunities for their employees and to ensure a working environment that complies with the hygiene and safety requirements imposed by the current legislation.

### 2.2.4. Diversity, equal opportunities and vulnerable groups

Suppliers must commit to protecting the rights of vulnerable groups within their companies and supply chains and, in particular, the rights of women, indigenous peoples, children and migrant workers. Suppliers must develop and adopt internal measures to ensure equal pay and opportunities across all levels of employment. Suppliers must also put in place measures to address the health and safety concerns particularly prevalent among female workers, including, but not limited to, prevention of sexual harassment and provision of physical protection. Suppliers shall not tolerate any form of discrimination, racism or xenophobia. The Group encourages suppliers to create and foster an inclusive culture where diversity is valued and celebrated and everyone is able to contribute fully and realise their full potential.

## 2.3.QUALITY, HEALTH, SAFETY AND SUSTAINABILITY

---

### 2.3.1. Quality

Suppliers are required to comply with the quality and safety standards and requirements of the applicable reference regulations, as well as to comply with contractually-agreed quality standards in order to provide products and services that adequately meet the Group's demands and needs.

### 2.3.2. Health and safety at work

Suppliers must identify, assess and limit the potential exposure of workers to health and safety hazards, including by removing hazards, replacing processes or materials, managing by proper design, and adopting technical and administrative controls, preventive maintenance and safe work practices (including insulation/signalling). Suppliers must offer continuous occupational health and safety training. Health and safety information must be clearly posted in the facility or in an identifiable location accessible to workers. Where risks cannot be adequately controlled by these methods, suppliers must provide workers with appropriate personal protective equipment (PPE) in good condition and relevant training on how or when it should be used. Suppliers must also provide their personnel with communication and training in relation to the personal dangers associated with these risks.

### 2.3.3. Product and process safety

When it comes to hazardous substances, the supplier must make available safety data sheets containing all necessary and relevant safety information. Suppliers are required to adopt safety programmes to manage and maintain all production processes in compliance with applicable safety standards and to address product-related issues and their potential impact during all stages of the production process. Suppliers are required to comply with the REACH Regulation (Regulation (EC) No. 1907/2006) and the RoHS directive (Regulation (EC) No. 2002/95/EC of 2002) with regard to the handling of chemicals and electronic components.

### 2.3.4. Emergency management and preparedness

Suppliers must engage in actively identifying and assessing potential emergency events and situations to mitigate their impact by adopting emergency plans and response procedures, including emergency reporting, employee warnings and evacuation procedures, training and drills. Suppliers must carry out emergency drills as stipulated by local laws. Suppliers must assess safety risks in production and other machinery. Where machinery creates risks of injury to workers, physical protection, safeguards and barriers must be provided and maintained in good condition.

### 2.3.5. Sustainability

Focaccia Group recognises the importance of ensuring a transparent supply cycle and regulating its social and environmental impacts to protect its stakeholders. To this end, it undertakes to select suppliers and manage relations with them according to criteria of transparency, fairness and impartiality, avoiding situations of conflict of interest in full compliance with company procedures. With this in mind, in order to ensure that the principles guiding the selection and evaluation of its suppliers are increasingly relevant, Focaccia Group has issued this Supplier Code of Conduct, the acceptance of which is required and which forms part of the periodic evaluation of suppliers, as mentioned in the previous chapter. This document reinforces the Focaccia Group commitment to the application of international standards, such as the United Nations Guiding Principles, the Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organisation (ILO).

### 2.3.6. Efficient Use and Conservation of Resources - Climate Protection

Suppliers are required to use all resources involved in the production cycle responsibly and efficiently, to use sustainable procurement sources and, where possible, to use energy from renewable sources. The negative impact on the environment and climate must be reduced as much as possible through practices such as changing production and maintenance processes, as well as the replacement, conservation, recycling and reuse of materials.

### 2.3.7. Waste and emissions

All activities that have potential harmful effects on human health and/or the environment must be properly managed, consciously monitored and treated before any substance is released into the environment. Suppliers are therefore required to monitor and control the impacts produced by their business activities on the territory and to comply with regulatory requirements for waste management, by guaranteeing, whenever possible, its recycling, recovery and/or reuse or disposal in suitable sites, and water consumption, by adopting precautionary measures in favour of conscious management. Suppliers must also undertake to set up systems to prevent or reduce greenhouse gas emissions and/or discharges of pollutants (into the air and into marine, surface and groundwater) in order to limit the environmental impact of their business activities.

## 2.4. CORPORATE INTEGRITY

---

### 2.4.1. Legal and other requirements

Suppliers undertake to comply with all applicable laws, regulations, contractual agreements and generally accepted standards. Suppliers shall not tolerate any form of corruption, bribery, money laundering, embezzlement, extortion or fraud and are prohibited from giving or receiving anything of value, e.g. money, gifts or illegitimate incentives. Suppliers must monitor, record and implement procedures for compliance with anti-corruption laws.

### 2.4.2. Documentation

Suppliers are required to prepare and collect appropriate information to demonstrate the implementation of the principles and values expressed in this Supplier Code of Conduct and to make this documentation available to the Group upon request.

### 2.4.3. Training and expertise

Suppliers must create new or ongoing programmes to train managers and workers to implement improvement policies, procedures and objectives, and to meet applicable legal and regulatory requirements, as well as to comply with this code and Group policies.

### 2.4.4. Continuous Improvement

Suppliers must take measures to improve innovation and efficiency in all their businesses and must strive to reduce their environmental impact, energy use, water use, material use, waste and other emissions. Suppliers must implement sustainable procurement procedures, and communicate expectations and levels of sustainability throughout the supply chain. Suppliers are obliged to continuously improve their performance in accordance with the principles of the Supplier Code of Conduct, implementing all appropriate measures to this end.

## 3. APPROVAL, DISSEMINATION AND MONITORING OF THE CODE

---

Focaccia Group approves this Supplier Code of Conduct by resolution of the company management and promotes its adoption by the entire Group. All companies belonging to the Group must independently adopt this document. This code is subject to periodic review when national and international regulations, which are referred to as best practice, are subject to change or interpretation in case of case law, or when the need arises. In the event of serious violations of any of the provisions contained in the articles of this code, Focaccia Group reserves the right to terminate the existing relationship. In any case, Focaccia Group may require the supplier to adopt remedies/corrective actions which, if not implemented, may lead to termination of the existing relationship.



---

Riccardo Focaccia  
FOCACCIA GROUP SRL