

CODE OF CONDUCT SILICONATURE'S SUPPLIERS

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1 INTRODUCTION AND ESG COMMITMENT

Siliconature SpA (hereinafter also referred to as “Siliconature” or the “Company”) runs its own business with integrity, professionalism, diligence, transparency, correctness, loyalty, impartiality, confidentiality of information, free and loyal competitiveness, equity and respect of the dignity of others, compliant to existing laws and pursuing the highest values, moral and ethical principles and of the Company Social Responsibility.

Siliconature commits to promote the principles that inspire its own conduct even within its supply chain. For this reason, the present Code of Conduct for Suppliers (hereinafter the “Code” or the “Document”) has been drawn to design a set of values, principles and rules of conduct to be beneficial of the people and the environment to which all Siliconature’s suppliers of goods or services must comply to handle business with the Company. Siliconature is aware that, to achieve the Targets for a Sustainable Development and reach the highest ethical standards it is necessary to involve its supply chain, sharing a sustainable vision of the business, to contribute to the well-being of the society and the creation of shared values.

In the selection of suppliers, Siliconature gets inspired by the principle of the maximum competitive advantage, together with that of the highest quality, avoiding any form of discrimination and allowing each partner, owning the requested features, the possibility to take part in the definition of contract with the Company.

2 APPLICABILITY AND RECIPIENTS OF THE DOCUMENT

The provisions of the present Code are binding for all supplies, partners, external collaborators and for all who handle relations and/or commercial relations with the Company (hereinafter referred to as “Recipients” or “Suppliers”).

Siliconature reserves its right not to handle and relations with those Recipients that, in the carrying out of their activities, should adopt behaviors that do not comply with the present Code.

3 REGULATIONS

The Code is based upon the main requirements, guidelines and documents, acknowledged at both national and international level for the matter of Company Social Responsibility, Corporate Governance, protection of the Human Rights, Safety and Environment, such as:

- ✓ UN Declaration of Human Rights;
- ✓ UN International Convention upon the elimination of race discrimination;
- ✓ UN Convention upon the elimination of women discrimination;
- ✓ International ILO working regulation:
 - Convention 111 on the work discrimination;
 - Convention 29 on forced labor and 105 on the abolition of forced labor;
 - Convention 138 on the minimum working age and 182 on the prohibition of the worst forms of minors’ work;
 - Recommendation 146 on the minimum employment age;
 - Convention 98 on the right of organization and collective negotiation;
 - Convention 154 on the collective negotiation;
 - Convention 116 on the reduction of the working time;
 - Recommendation 164 on health and safety at work;

- ✓ UN Global Compact;
- ✓ UN Sustainable Development Targets;
- ✓ OCSE Guidelines.

4 ETICHS AND BUSINESS INTEGRITY

Siliconature conducts its activity with honesty, integrity and loyalty and commits to build profitable and lasting relationships with the parties belonging to its supply chain, based upon trust and acknowledgment of the mutual interests, needs and expectations.

Siliconature cannot accept, for no reason, any conducts that may prove to be non compliant to such principles, even in case the author of such conducts may call upon its justification of having acted in the interest of Siliconature.

4.1 Compliance

The Suppliers must refrain from any conducts that violate any laws and norms with regard to their activities and applicable in the countries where they operate. The principles as defined in the present Code and the commitments taken with Siliconature must always consider that it is a duty, of all parties that cooperate with Siliconature, to behave with integrity. Siliconature reserves its right not to hold any relationship with those who do not mean to operate according to the strict respect of the current legislation and/or refuse to behave in compliance with the values and principles provided for in the Code.

To such purpose, in the development of the tasks within their competence, all Recipients are bound to know all legal implications and put before the respect of the law to any other interests. In doubtful case, the Recipients are obliged to take the necessary information in order to make sure that their conduct is compliant to the law.

Nothing contained in the Code is meant to replace the norms of the Country where the Supplier operates. In case any provisions in the present Document may diverge from the law and local rules, the Recipients are bound to grant their compliance to the strictest standards, in compliance to the existing law.

4.2 Anticorruption and conflict of interest

In the context of work with or on behalf of Siliconature, Recipients are not permitted to promise, unduly offer, request or accept money, gifts, freebies, illegitimate favors, personal advantages, goods, services or other benefits (unless they have a clearly symbolic or courtesy value) which, due to their value or due to the circumstances of the specific case in which they intervene, have corrupt purposes or may even just give rise to doubts that they are aimed at distorting correct commercial practice.

The Recipients are required to refrain from exploiting their professional or commercial position to acquire personal benefits and are required to refrain from any type of relationship, act or behavior incompatible with the obligations and agreements connected to the relationship maintained with the Company.

The activities of the Suppliers must be carried out avoiding situations of conflict of interest aimed at obtaining any personal, professional or family benefit and such as to cause damage or disadvantage to the Company or to compromise the ability to make decisions in an impartial and objective manner.

Furthermore, the Recipients must refrain from conduct and behavior that could be classified as unfair competition.

4.3 Information management and intellectual property

To protect confidentiality and privacy and in accordance with the legislation in force in the country to which they belong, the Recipients are required to adopt every measure and/or caution in order to prevent the undue use of the information by third parties and to acquire, store, manage and process personal data and confidential information in their possession relating to all subjects with whom they have relationships in compliance with the

current legislation. Dissemination and communication of the aforementioned information, without prejudice to the legislative provisions established on the matter, is permitted only with express authorization.

The Recipients must protect the confidential information in their possession and maintain the confidentiality of the data they learn as part of the work carried out for the Company and must not use such information outside of carrying out the tasks entrusted to them. Siliconature's Suppliers are obliged not to use, disseminate or communicate to third parties news, data and information relating to the Company and must keep the information learned in the exercise of their activities private and confidential, even after any termination of the relationship.

Recipients must refrain from making statements regarding the Company to representatives of the press or other means of communication. Any communication of public interest relating to Siliconature is carried out exclusively by the bodies appointed for this purpose by Siliconature.

The Recipients are also required to safeguard the intellectual and industrial property rights, trade secrets and proprietary information of Siliconature and to abstain from unauthorized use of the aforementioned rights.

5 RESPECT OF HUMAN RIGHTS

5.1 Equal opportunities and non-discrimination

Suppliers are required to protect the dignity and physical, cultural and moral integrity of all the people with whom they relate and collaborate and to condemn any action that directly or indirectly prevents the recognition, enjoyment or exercise of human rights fundamental freedoms and fundamental political, civil, cultural, economic and social freedoms.

Suppliers must guarantee an environment and working conditions that respect the dignity of the person and are based on fairness, respect, dignity and the promotion of equal rights and equal opportunities for all workers. The Recipients are required to prevent their workers from suffering any form of harassment and/or discrimination at work (or their threat or retaliation in the event of a complaint and/or internal report) for reasons of sex, race, skin colour, appearance physical condition, country of origin, language, religion, political opinion, age, physical or mental disability, sexual orientation, gender identity, membership of associations and trade unions, personal conditions, social or cultural origin, marital or health status, family situation.

All procedures and decisions undertaken by the Recipients regarding human resources such as recruitment, hiring, classification, remuneration, advancement, training, promotions, termination of the employment relationship and retirement must be based on objective criteria such as professional skills and abilities, in full compliance with the principle of equal opportunities and without discrimination of any kind.

5.2 Forced and/or compulsory labor

Siliconature requires Suppliers not to use any form of forced and/or compulsory labor, nor to subject workers to working conditions that are degrading or detrimental to their dignity or to exercise any form of control over workers that may be considered harmful to the person. Employment relationships must be recognized, voluntary and freely agreed upon.

Any type of violent, threatening, intimidating, harassing or psychological abuse behavior is prohibited, as is any physical disciplinary measure, physical, psychological or verbal abuse.

Suppliers must not practice salary deductions, restrictions on mobility and withhold personal items, such as original passports and identity documents. Workers must not be subject to any rules that may limit their legitimate freedom.

5.3 Child labor

The Recipients must not use child labor and are required to observe the laws and regulations relating to the minimum age of workers. It is not permitted to hire workers under the age of 15 or in any case younger than that required by local legislation, if higher. For this purpose, the Supplier will request formal identification and the production of documents certifying the age of the workers, retaining all relevant documentation.

In the event of hiring workers under the age of 18, the Supplier undertakes not to use such workers at night or to carry out dangerous activities and not to interfere with their compulsory education. The activities and tasks carried out by young workers must not, by their nature or the circumstances in which they are carried out, expose them to risks that could compromise their health and physical, mental and emotional development, safety or moral integrity.

5.4 Freedom of association and collective bargaining

Suppliers must recognize and respect workers' right to freedom of association, organization and membership of any trade unions, the right to freedom of expression and the right to collective bargaining. Workers must be able to join workers' organizations of their choice or establish new ones, and Suppliers will not discriminate against or punish workers for exercising these rights.

5.5 Health and safety in the workplace

Suppliers are required to create and maintain a working environment that protects the physical integrity of their workers or anyone who regularly or temporarily frequents their environments, through compliance with the legislation in force in the country in which they operate regarding Health and Safety in the workplace.

In order to protect workers from the risks associated with their tasks and to prevent accidents and injuries, Suppliers are required to monitor the safety and health conditions of the workplace, carrying out the appropriate technical and organizational interventions that may become necessary. to guarantee the best working conditions. Suppliers are required to fulfill the obligations of information, education and training of workers, who must be made aware of the health and safety risks specific to individual roles, and of the actions to be taken in the event of an accident. Where applicable, the Recipients have the obligation to provide workers with adequate equipment and the necessary personal protective equipment (PPE), to ensure their continuous monitoring to guarantee their efficiency, ensuring that workers are provided with all information on the their correct use.

Where present, machinery and equipment must comply with legal requirements, must be equipped with the necessary safety and protection devices and be subjected to periodic maintenance. Dangerous substances must be stored in special places and protected with adequate measures in order to avoid risks of contact and intoxication for employees.

The Supplier is required to guarantee its workers a clean, adequately lit, heated and ventilated working environment. The Supplier must also provide drinking water and toilet facilities in an adequate number and such as to allow personal hygiene.

5.6 Contracts, wages and working hours

Suppliers must maintain working relationships based on legal collective agreements, recognized and drawn up in written and clearly understandable form, according to the legislation in force in their country. The pay provided to workers must be proportionate to the quantity and quality of the work performed and, in any case, sufficient to ensure a dignified existence.

The Recipients are required to guarantee full compliance with the legislation applicable to them regarding remuneration and minimum wage, working hours, rest periods, overtime work, night work, compulsory leave,

holidays, paid leave, various types of leave, permits for illness, compensation, benefits. The Supplier must also ensure that workers have sufficient time for breaks and meals in accordance with legal requirements.

6 ENVIRONMENTAL RESPONSIBILITY

Suppliers must comply with the laws and regulations, referring to environmental aspects, applicable to their country and their activities and must actively commit to mitigating the negative impacts on the environment and ecosystems linked to their operations.

Suppliers are encouraged to design and implement production processes, technologies, goods and services with a view to improving the environmental impact and reducing CO2 emissions and polluting substances. In this sense, the Recipients are encouraged to consider the entire life cycle of the products and to measure and monitor their impact with a view to continuous improvement.

Recipients are encouraged to make efficient, rational and responsible use of natural resources and raw materials, with particular regard to consumption in terms of electricity, gas, water and fuel.

Suppliers are also required to undertake to manage and dispose of waste responsibly, in compliance with current legislation.

Suppliers must comply with national and international regulations, as well as good manufacturing practices, regarding the quality and safety of the products and services offered and are required to refrain from marketing materials and products that may harm the health and safety of consumers or damage the environment.

7 FINAL IMPLEMENTING PROVISIONS

Siliconature promotes the dissemination and knowledge, with means suitable for the purpose, of this Code among all Recipients. Suppliers are therefore required to know, accept and respect the provisions and obligations contained in this Code and to request information from Siliconature regarding its contents in case of interpretative doubts.

Siliconature also asks the Recipients to become promoters in disseminating and making the principles contained in the Code known to their workers, external collaborators, suppliers and other subjects within their supply chain.

In the event of becoming aware of violations of the provisions of this Code, the Suppliers are required to communicate it in writing to their Siliconature contact person, who undertakes to treat every report received with confidentiality, confidentiality and without any form of retaliation.

If possible violations of this Code are reported or found, Siliconature will intervene in a timely and adequate manner, initiating appropriate checks and implementing the necessary corrective measures commensurate and proportional to the seriousness of the infringement committed. In the event of serious breaches of the Code, any commercial relationship and contractual agreement with the Supplier may be suspended or terminated.

Siliconature takes care of the periodic updating of this Code, in order to guarantee its full compliance with the changing changes in the operating context, as well as any regulatory updates.