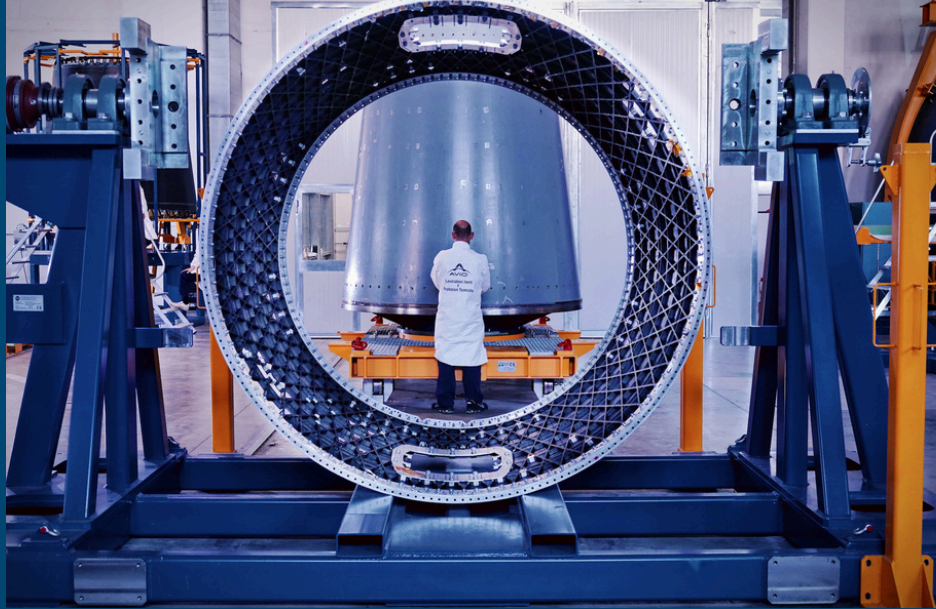




# SUPPLIER CODE OF CONDUCT

AVIO.COM





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## Introduction

This Code of Conduct outlines the behavior we expect from our suppliers: conduct in line with the values, principles, and standards upheld by our Company, from senior management to employees, including business partners. Each of the areas defined in this Supplier Code of Conduct requires the implementation of numerous ongoing initiatives. The implementation of various points will be reasonably tailored to the size and risks associated with the Supplier's activities.

## Scope of Application and Content

This Code of Conduct applies to all Suppliers, namely all sellers and traders who produce, trade, sell, lease, and/or provide goods or services that are part of AVIO's supply chain



**Diversity and Inclusion, Prohibition of Discrimination and Harassment**

Suppliers commit, in the context of their relationship with AVIO, to respect personal dignity, privacy, and the rights of each individual, and to avoid any form of discrimination based on race, color, gender, language, religion, political opinions, nationality, social background, union membership, age, health condition, or disability. Suppliers also commit to condemning any form of discrimination against workers as well as any form of harassment or inappropriate or disrespectful behavior in the workplace.

**Remuneration and Benefits**

Suppliers must ensure that their employees receive the minimum wage and benefits established by law. Working conditions and compensations must be fair and consistent with the norms and standards applicable in the countries where the supplier operates. The wages provided to employees must be sufficient to meet basic needs and standards of living that respect individual dignity.

**Working Hours**

Suppliers are required to ensure full compliance with legislation and collective labor agreements regarding working hours and overtime, including breaks, rest days, holidays, and various types of leave. In particular, recipients are required to ensure that their employees' working hours and overtime are in line with the standards set by the International Labour Organization (ILO) Conventions.

**Working Conditions**

Suppliers are required to provide their employees and collaborators with a written employment contract that is clearly understandable and legally binding. Recipients are required to record and protect information regarding contracts entered into with their employees, including contract type, working hours, remuneration, and to ensure employees' access to the information recorded about them



## **Environmental Protection**

AVIO promotes respect for the environment, understood as a common resource to be safeguarded for the benefit of society and future generations, with a view to sustainable development. Suppliers are expected to manage and improve their environmental performance, reducing the impacts associated with their products and services throughout their lifecycle, in accordance with the precautionary principle. In addition to complying with legal requirements, suppliers are required to prevent, reduce, and mitigate any form of environmental pollution.

## **Compliance with Environmental Protection Legislation**

Suppliers are required to comply with current legislation on environmental protection and the prevention of environmental offenses, and commit to adopting the precautionary principle in the management of their activities and operations. Recipients are also required to actively engage in mitigating negative impacts on the environment and ecosystems associated with their activities and operations.

## **Health and Safety at Work**

AVIO promotes and reinforces a culture of safety and health protection in the workplace through awareness-raising actions on risks and the promotion of responsible behavior. We ask our suppliers to provide a working environment that ensures respect for and protection of the health, safety, and personal dignity of every worker, in compliance with current health and safety regulations.

## **Human Rights**

Respect for human rights is among the fundamental principles of the Company. Recipients are required to respect human rights, including the rights of workers, within their activities and operations, recognizing without distinction the freedom and equality in dignity and rights of human beings, as enshrined in the International Bill of Rights and the fundamental conventions of the International Labour Organization (ILO).



I Suppliers are also required to adhere to hiring practices governed by applicable regulations, avoiding any irregular methods, including the employment of workers without proper residence permits, and to provide their employees and collaborators with social security, welfare, and insurance benefits in accordance with applicable laws and regulations as well as adopted collective agreements.

### **Anti-corruption**

AVIO is committed to combating active and passive corruption, both in the public and private sectors. Recipients are required to refrain from any direct or indirect act of offering or promising money or other benefits, including gifts or favors that exceed normal courtesy practices and that may be interpreted as intending to exert undue influence or obtain undue favoritism or improper benefits. They are also required to comply with the provisions of the AVIO Group Anti-Corruption Code as adopted and approved on March 14, 2019.

### **Legal Compliance**

Suppliers must comply with applicable international, community, national, regional, and local laws and regulations, including those related to the execution of the specific contract with AVIO, seller activities, and the goods and services provided. They must ensure accounting transparency through the use of truthful, accurate, and complete information as a basis for corresponding accounting records.

### **Whistleblowing**

AVIO, pursuant to Legislative Decree no. 24 of March 10, 2023, implementing EU Directive 2019/1937 on the protection of persons reporting breaches of Union law, encourages suppliers to report any ethical concerns, actual or potential, even anonymously and without fear of retaliation, as regulated by the new whistleblowing procedure endorsed in its first edition on July 3, 2023.





**Privacy, Confidentiality, and Data and Information Protection**

Suppliers must comply with all obligations set forth by the applicable data protection law (GDPR 679/2016), including regulations on the processing and retention of personal information. They must ensure that all personal data is deleted or anonymized when it is no longer needed for the relevant purpose for which the data was collected. Effective protocols for the security and protection of information, processed data, and email communications must be ensured through the adoption of best and latest practices. Any suspected or actual information security incidents that may affect AVIO and its stakeholders must be promptly reported as soon as possible. Confidentiality required by the circumstances for each acquired information must be ensured.

**Cybersecurity**

AVIO adopts high levels of digital information security to prevent vulnerabilities related to cyber risks. Suppliers must, also with reference to their own supply chain, take all necessary measures to ensure the highest security and protection of acquired digital information.

**Industrial and Intellectual Property**

AVIO promotes the protection of industrial and intellectual property at all levels of the value chain. Suppliers are required to act in full respect of the Group's industrial and intellectual property rights, as well as in compliance with the provisions contained in laws, regulations, and conventions protecting such rights. Suppliers are also required to refrain from engaging in unfair commercial practices in violation of applicable laws on fair competition and antitrust.

**Conflicts of Interest**

Suppliers are required to avoid situations of real or potential conflicts of interest and to report any circumstances that create, or appear to create, undue favoritism, collusive practices, or choices resulting in undue advantages.



**Business Ethics and Integrity**

AVIO promotes and upholds the principles of legality, loyalty, and fairness. Suppliers are required to respect these principles and operate with maximum transparency in compliance with applicable laws and regulations in the context of their operations, as well as the commitments made with the Company. In case the provisions of this Code diverge from those of other applicable laws, regulations, and commitments made with the Company, suppliers are required to ensure compliance with the stricter standards in accordance with the prevailing legislation and report such instances to the Company using the contact details provided in section seven of this document.

**Product Responsibility**

AVIO promotes responsible development of its products, paying utmost attention to safety and traceability of materials, components, and products used along the entire value chain. Suppliers are required to comply with applicable regulations concerning raw material procurement, production, processing, marketing, and distribution processes, considering their environmental and social impacts.





## **Final Section**

### **Updates and Revisions**

This Supplier Code of Conduct will be regularly updated and revised to reflect lessons learned from the ongoing improvement journey. The current version of the Supplier Code of Conduct is also available on our website [www.avio.com](http://www.avio.com) in the Corporate and Governance section; therefore, changes are deemed approved and acknowledged by all suppliers who subscribe to this Code of Conduct.



Sustainability is a cornerstone of Avio's values and an integral part of our business strategy.