



## **Autoclima Group Supplier Code of Conduct.**

*The Autoclima Group consists of the single member companies Autoclima Spa and its subsidiaries, Sea and Electric Station Climatization (ESC)*

Conducting business responsibly is a top priority for The Autoclima Group. Sustainability is deeply rooted in our core values and our way of doing things, which is aimed at constant improvement. We are committed to making our activities sustainable in all aspects and stages by conforming to the highest social, ethical and environmental standards. The Autoclima Group Supplier Code of Conduct outlines the minimum requirements that apply to all business relationships between the Autoclima Group and its suppliers. In all sections, the words "shall/must" indicate mandatory requirements, while the words "should/should" indicate recommendations.

The requirements of the Autoclima Group Supplier Code of Conduct are based on the principles of the United Nations Global Compact, as well as applicable conventions of the International Labor Organization. Where local laws and/or any applicable collective bargaining agreement impose stricter requirements on Autoclima Group Suppliers and/or subcontractors than those in the Autoclima Group Suppliers Code of Conduct, those stricter laws or collective bargaining agreements will apply. In all cases where local law is less stringent than the Autoclima Group Supplier Code of Conduct, the standards described in this document will be applied.

The Autoclima Group Supplier Code of Conduct applies to all suppliers and subcontractors of goods and services. Such suppliers and subcontractors must ensure that the requirements set forth in the Autoclima group's Code of Conduct for Suppliers are also complied with by their employees, including permanent or temporary workers, temporary workers, and all other persons who directly or indirectly perform work for such suppliers and/or subcontractors. The Autoclima Group may request self-certification from suppliers at any time and reserves the right to conduct audits at any time to verify compliance with the Autoclima Group Supplier Code of Conduct. In such cases, The Autoclima Group assumes that suppliers will cooperate and transparently provide the required documents and other information.

The Autoclima Group considers compliance with the requirements set forth in this document to be an essential element in its contractual relationships. Should the supplier fail to comply with these requirements, The Autoclima group reserves the right to terminate the current contract for cause with immediate effect. The Autoclima Group is free to decide not to exercise this right and instead take alternative action if the supplier can demonstrate that it has taken immediate countermeasures, accepted by the Autoclima Group, to prevent similar violations from occurring in the future.

### **1. Labor and human rights**

The Autoclima Group affirms that all people have the fundamental right to be treated with respect and dignity. Employers have a great impact on the welfare of their workers and because of this they are obligated to them. The Autoclima group and its suppliers, wherever they operate, are responsible for absolute compliance with the highest human rights standards.

## **2. Discrimination**

Workers must be selected, hired and supported according to their qualifications and abilities. Suppliers shall not engage in any form of discrimination based on sex, age, religion or other belief, caste, social background, disability, ethnic, national or territorial origin, nationality, union membership or membership in any other legitimate organization, political affiliation or opinion, sexual orientation, gender identity or expression, family responsibilities, marital status, illness, pregnancy, or other conditions that could give rise to discrimination

## **3. Harassment**

Suppliers must strive to provide a harassment-free workplace and to promote a person-friendly social environment. Suppliers must ensure that workers are not subjected to any inhumane physical or psychological treatment, corporal punishment, threats or false promises.

## **4. Forced or compulsory labor**

Suppliers must ensure that they do not use any form of forced, bonded, compulsory labor, using human traffickers, modern slavery or not freely chosen. Suppliers are required to cooperate proactively against forced labor and to act with special care when recruiting migrant workers, whether directly or indirectly.

Workers should never be required to pay the supplier or agent any fees or prices for uniforms, personal protective equipment, or other money demanded to obtain and maintain employment. Where such payments are found to have been made, the money must be repaid immediately.

Suppliers must never withhold workers' original identity or travel documents.

Providers should present all workers with a written contract in a language they understand. The content of the contract should also be explained verbally in clear and understandable words. The contract should clearly state the voluntary nature of the employment and the procedures for leaving it. Providers should employ only personnel who have a regular work permit in the country of employment.

## **5. Child labor**

The Autoclima Group does not accept child labor. The supplier shall not directly or indirectly employ children under the age of 15, unless exceptions recognized by ILO Convention 138 on Minimum Age for Employment (Articles 6, 7) apply.

Suppliers should implement a policy on child labor and a program to combat it. If a child worker is found in the Autoclima Group's supply chain, The Autoclima Group and the suppliers involved will share responsibility for identifying measures to ensure his or her protection. It is of the utmost importance to always protect these children so that they are not forced to accept more harmful jobs such as prostitution or drug trafficking.

## **6. Young workers**

Providers must ensure that young workers who are under 18 years of age do not work overtime or night work and are protected from working conditions detrimental to their health, safety, morale and development.

## **7. Wages and benefits**

Suppliers must pay the minimum wages and benefits required by law or standard for the industry, or those stipulated in the collective bargaining agreement, whichever is higher. Wages and benefits must be paid on time, regularly and transparently.

The wage level should reflect the worker's skill level and qualifications and should refer to normal working hours. Overtime must be paid by applying the agreed-upon overtime premium rate.

Suppliers must not withhold payments, apply penalties, or make deductions from wages unless required by law or determined by a collective agreement.

## **8. Work hours**

Providers must ensure that a regular work week for workers does not exceed 48 hours, in accordance with ILO Convention 1 - Hours of Work. For shorter periods related to emergency situations, voluntary overtime hours may be requested, but not to exceed 12 hours per week per worker. Providers must allow workers to take regular daily breaks, paid annual leave and the right to at least one day off in seven, subject to exceptions defined in industry collective agreements. For the avoidance of doubt, should local laws and/or applicable collective agreements be more advantageous to workers, the treatment most advantageous to the worker will be applied.

## **9. Freedom of association and collective bargaining**

Suppliers must respect the fundamental right of workers to form and join-or not join-freely, voluntarily and without interference unions and workers' representatives of their choice to bargain collectively.

## **10. Health and safety**

The Autoclima Group believes that a healthy and safe working environment is fundamental to the well-being of workers. The Autoclima Group also believes that taking care of workers contributes to a sustainable company while also improving its quality, productivity and profitability. Workers should always have the right to refuse and report unsafe situations without being subject to any reprisals.

## **11. Health and safety risk prevention**

Suppliers must ensure that procedures are in place that identify, evaluate and prioritize the elimination of health and safety hazards. Suppliers must provide an appropriate workplace with safe equipment suitable for the purpose of the work performed.

Suppliers must ensure that workers have appropriate personal protective equipment, machinery and safety devices, and instructions on their proper use. These instructions must be communicated to and understood by the workers involved.

## **12. Emergency preparedness**

Suppliers must identify risks of incidents in order to mitigate, limit and/or prevent harm. Contingency plans must be developed and implemented for each situation. All workers must be aware of the risks associated with the operations they perform and know how to act in the various crisis situations that might occur.

Suppliers must have fully functioning firefighting equipment, escape routes, first aid supplies, emergency plans, procedures and warning signs in sufficient numbers throughout the facility.

Suppliers must ensure that trained first aid, fire safety and crisis support personnel are always present and identifiable in the workplace. The conduct to be adopted in cases of crisis must be the subject of regular trainings.

## **13. Accidents and near misses**

Suppliers must have systems in place to report, investigate and take action on all accidents, near misses and unsafe conditions. Managers and workers must know the possibility of accidents and near misses, understand the importance of preventive work and corrective actions to apply them in daily work.

## **14. Facilities**

Suppliers must provide clean and safe facilities that include areas for meals, food storage, locker rooms and break areas. Workers must always have access to potable water and toilets.

## **15. Ergonomics in the workplace**

Suppliers must indicate the ergonomic hazards associated with loads and assess workers' exposure to them. Ergonomic loading includes conditions that can affect muscles and joints due to postures assumed during work, repetitive motions, physical strain, and incorrect postures when lifting weights. Workers should be involved in designing or upgrading workstations.

## **16. Health and safety committee**

Suppliers should promote functional collaboration between workers and managers aimed at continuously improving workplace health and safety. Suppliers should form committees with worker representatives to manage health and safety issues even if this is not required by law.

## **17. Environment**

All people, and especially companies, have a responsibility to protect our planet for future generations. The Autoclima Group and its suppliers should always strive to improve the environmental sustainability of its products and services by reducing the depletion of natural resources. Suppliers should have a deep understanding of environmental challenges and should always aim to choose alternatives that have the least environmental impact.

## **18. Efficiency of resources**

Suppliers should monitor and implement actions to reduce the use of energy, water, raw materials, and materials used for packaging. Energy used in Supplier's facilities should come from non-fossil energy sources.

## **19. Emissions and waste management**

**20.** Suppliers must monitor and implement actions to reduce air emissions. Suppliers must implement systematic management of wastes piped into wastewater, both toxic and non-toxic. Oils, chemicals, batteries, and other hazardous wastes should be kept separate from other wastes and managed to prevent spread to air, water, or soil. Waste should be sorted so that it can be reused or recycled. Basically, they should be prevented from being dumped in landfills.**Chemicals**

Suppliers must implement methods, procedures and equipment to safely introduce, handle, label and store chemicals in order to minimize the impact on people and the environment. Suppliers must actively work to limit the amount of chemicals and select those that produce the least risk to health and the environment. Suppliers must always conduct risk assessments and take actions to minimize adverse impacts on people and the environment before using new chemicals. Workers handling chemicals must always have up-to-date and accessible instructions and attend training on risk management and emergency preparedness.

Suppliers must always hand over safety data sheets for all chemicals used with or related to any product when there is a risk that Autoclima group staff may be exposed to that chemical.

## **21. Ethics**

The Autoclima Group is committed to conducting business ethically and in accordance with the law and demands the same from its suppliers. Relations between The Autoclima Group and its suppliers must be based on trust and transparency.

## **22. Personal data**

The Autoclima Group requires its suppliers to protect the personal data of its workers, former workers, customers, suppliers, and other appropriate persons. Suppliers shall collect, process, use, and store personal data only when authorized by the consent of the person who owns such data, a contract, or other legal basis.

## **23. Concussione e corruzione**

The Autoclima group supports national and international commitments to protect competition from the distorting effects of corruption and does not accept corrupt practices and behavior that could harm the company. The Autoclima group assumes that its suppliers will not accept and prevent all forms of corruption, including, but not limited to, those known as so-called bribes, i.e., payments to expedite the paperwork of officials.

Suppliers must ensure that its workers, sub-contractors and its other representatives do not grant, offer or accept bribes, payments, donations or ineligible payments or provide or receive undue benefits to or from customers, officials or other business partners.

## **24. Competition and antitrust**

- 25.** The Autoclima Group requires its suppliers to comply with current and applicable competition and antitrust laws. In particular, suppliers must not enter into contracts that violate the principles of non-competition with competitors, customers and other third parties and must not abuse their own dominant position in the market.

### **Conflict of interests**

Personal interests or relationships should not influence suppliers in their decisions, which should instead be based on objectivity and factual criteria.

## **26. Gifts, hospitality and invitations**

Autoclima Group suppliers shall not offer Autoclima Group employees or other business partners inappropriate benefits, either directly or indirectly in the form of gifts, hospitality, invitations, or unduly influence them. Nor should they ask for or accept such benefits.

## **27. Money laundering**

Suppliers to the Autoclima Group must only have relationships with business partners whose integrity is established. They must ensure non-violation of legal regulations relating to money laundering and terrorist financing.

## **28. Responsible sourcing of minerals**

The trade in minerals in some parts of the world has led to conflicts that have resulted in the deaths of many people and the worst forms of human rights violations. Suppliers must act with the due diligence expressed in the relevant parts of the OECD Guide for Due Diligence or equivalent processes throughout the minerals supply chain. This includes implementing policies and measures to identify risks and taking appropriate steps to ensure that the minerals used do not directly or indirectly finance or promote through their extraction, transport, trade, management or export armed conflicts.

Information on smelters or refineries of used minerals from suppliers or subcontractors should be provided to the Autoclima Group upon request.

## **29. Management and structures**

Thoughtful, structured, competent management conducted with commitment and using effective management systems is the basis for sustainable business. Each Autoclima Group supplier has a duty to establish an organizational, administrative and accounting structure appropriate to the nature and size of the business. The values defined in this Code of Conduct must be integrated into daily operations. To ensure compliance, management must identify, determine, communicate and train staff on legal and applicable requirements.

### **30. Company statement**

All suppliers must develop a company statement, e.g., a Code of Conduct, expressing their commitment to observe the highest social, ethical and environmental standards. This statement must be posted in all company facilities in local languages for workers to understand.

### **31. Responsabilità**

Suppliers should appoint a representative for ESG activities who reports directly to senior management. The representative should develop and implement sustainability goals and corporate actions aimed at compliance with the Autoclima Group Supplier Code of Conduct and current sustainability legislation.

### **32. Training**

Suppliers must develop, implement and organize a training program for workers. The training must be appropriate for each person and serves to ensure that each worker has the skills and competencies required by his or her job. The company's statement and policies must be communicated clearly and in detail to workers.

### **33. Supply chain management**

Suppliers are responsible for ensuring compliance with the Autoclima Group Code of Conduct throughout their own supply chain. Suppliers must therefore conduct reviews of their supply chain as required by the Autoclima group and current regulations applicable to the supply chain. Any nonconformity identified in the supply chain should be evaluated and corrected within a reasonable period of time, with no expense incurred by the Autoclima group in this regard.