
	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00



ELICA GROUP SUPPLIER CODE OF CONDUCT




	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

CONTENTS

INTRODUCTION TO THE ELICA GROUP SUPPLIER CODE OF CONDUCT	3
a. Purpose, values and commitments	3
b. Scope of application	3
GENERAL CONDITIONS	4
MINIMUM STANDARDS AND PRINCIPLES OF GOOD CONDUCT	4
1. Business ethics and compliance	4
2. Environmental Protection	5
3. Health, safety and workers' rights	6
FINAL PROVISIONS	8
4 Introduction, compliance and monitoring	8
5 Contact and further information	8
6 Approval and revision	8
ACCEPTANCE FORM	9

UPDATED:	22/07/2022
PREPARED BY:	QHSE Assurance & Sustainability Manager Massimo Enrico Magi
VERIFIED BY:	Chief Quality & Consumer Service Officer Andrea Marabini
APPROVED BY:	Group CEO Giulio Cocci
Notes: this document is available on the Elica Intranet, in the section: Policies & Procedures/Group Policies/Legal Update: first version Elica S.p.A. internal document - unauthorised dissemination and reproduction, even in part, is prohibited	

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

INTRODUCTION TO THE ELICA GROUP SUPPLIER CODE OF CONDUCT

a. Purpose, values and commitments

The Mission of Elica S.p.A. and the companies directly or indirectly controlled by it (hereinafter "the Group") is: *to provide innovative products and design solutions to make the cooking experience exceptional across the world, creating lasting value through sustainable processes for all stakeholders.*

To achieve this goal, we are committed to conducting our business in an ethical and responsible manner in every country in which we operate, according to the **values** that provide the foundations for our work:

Expertise: knowledge, research and dynamism

Design orientation: aesthetics, attention to detail, distinctiveness

Openness: multiculturalism

Intuition: lateral thinking, entrepreneurship, instinct, courage, perseverance, vision, passion, a winning mentality, ambition, understanding the value of people, confidence, breaking moulds.


These core values - the principles on which we base our daily activities - are supplemented by those contained in the "**Elica Group Ethics Code**" available for public consultation on the Elica Group's website at www.elica.com.

Specifically, it is our explicit desire to ensure that every one of our employees and contractors observe ethical and sustainable practices and to encourage the adoption of these practices along the entire supply chain. This means ensuring that each of our business partners and suppliers is involved in the pursuit of these commitments to responsible business conduct at every level. In line with these provisions and in the interests of integrating social responsibility into our work, the Group considers cooperation with its business partners and suppliers to be fundamental to achieving the highest ethical standards and sustainable business development.

The Group has therefore decided to adopt the "**Elica Group Supplier Code of Conduct**" (hereinafter the "Code"), which contains the ethical principles and rules of conduct already established in the "**Elica Group Ethics Code**". These, in turn, come in addition to the legal, regulatory and procedural provisions that must be at the heart of business relations between the Group and its partners.

b. Scope of application

This Code and the principles contained in the **Elica Group Ethics Code** are designed to share with our suppliers and business partners the Group's standards and principles for responsible business conduct. We require that all of our suppliers - whether direct or indirect - and our business partners comply with all the applicable laws and regulations in the countries in which they operate, and that they adhere and commit to the principles contained in the **Elica Group Ethics Code**. This Code is designed to reinforce the existing business relationships between the Group and its suppliers, going beyond mere compliance. The addressees of this Code are the Group's suppliers of raw materials, processing services and finished products, in addition to service providers and more generally all Group employees (hereinafter the "addressees"). Addressees of this Code are responsible for ensuring their own compliance with it and for disseminating it to and requiring compliance from their employees, suppliers, external collaborators and additional parties that are part of their supply chain. To confirm their compliance, addressees are required to sign the Acceptance Form contained in this document.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

GENERAL CONDITIONS

It is the intention of our Group to reinforce the existing relationships with our suppliers to develop strong, lasting partnerships for responsible supply chain management.

The Group's suppliers, therefore:

- accept and commit to observing the minimum standards and principles of good conduct set out in this Code as a fundamental basis for a lasting business relationship with the Group;
- comply with the principles set out in the ***Elica Group Ethics Code***;
- accept that a Group company, or an appointed third party, may request additional information at any time, or may carry out assessments or audits to verify compliance with the minimum standards and principles of good conduct set out in the Code;
- commit to disseminating and monitoring compliance with these minimum standards and principles of good conduct throughout their supply chain, by suppliers and subcontractors, their employees, agents, collaborators, subcontractors and business partners insofar as they are involved in the supply of goods and/or services to the Group.

MINIMUM STANDARDS AND PRINCIPLES OF GOOD CONDUCT

1. Business ethics and compliance

Addressees are required to conduct their activities in full compliance with the highest ethical standards, taking into account applicable legal regulations and the principles and values set out in the ***Elica Group Ethics Code*** and in this Code. By way of non-exhaustive example, addressees are required to ensure:

1.1 Legal compliance:

addressees agree to comply with all applicable laws, regulations and agreements, and to understand and accept compliance with relevant national, regional or international regulations in the locations where they operate.

1.2 Fair competition


addressees are required to conduct their activities in line with the principles of fair competition and business practices, in compliance with all applicable laws and regulations on the subject, including those governing anti-competitive behaviour and monopolistic practices, and to avoid any situation that could result in a potential conflict of interest.

1.3 Anti-corruption

addressees must not directly or indirectly ask, pledge, offer, promise, pay, authorise, accept or demand money (including bribes and/or facilitating payments) or any other benefit designed to obtain an improper advantage (for example, to obtain or retain business decisions or legal judgements), whether the improper advantage is offered directly or through an intermediary, as per the ***Elica Group Ethics Code***.

1.4. Corporate integrity and transparency:

addressees are required to carry out all business arrangements and transactions transparently and to record them accurately in their books and records as per applicable laws and may not conduct or facilitate any form of money laundering or use confidential information to be involved in or facilitate insider trading.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

1.5. Privacy and intellectual property rights:

addressees are required to respect the intellectual property rights of third parties and to process personal data and information of data subjects in accordance with all applicable laws, regulations and best practices by introducing any and all technical and organisational measures necessary, appropriate and adequate to guarantee data protection, all in accordance with a risk-based approach.

1.6. Management of Conflict Minerals:

where applicable, addressees involved in goods production are required to monitor the use and provenance of materials regulated by the EU Conflict Minerals Regulation and all other applicable regulations and laws on the subject.

2. Environmental Protection

Addressees are required to minimise the environmental impact of their business operations, focusing specifically but not solely on:

2.1. Environmental compliance and performance:

Addressees are required to comply with applicable environmental laws and regulations, obtain all necessary environmental permits, measure, monitor and evaluate their environmental performance and introduce continuous improvements to minimise their environmental impact and mitigate environmental risks. The Group encourages addressees to adopt an environmental management system and introduce specific action to promote environmental responsibility within the organisation.

2.2. Energy, climate action and pollution:

Addressees are required to take active steps to curb energy consumption and improve their operational efficiency, reducing related atmospheric greenhouse gas emissions and contributing to national and international emission reduction targets.


2.3. Water resource management:

Addressees commit to taking any and all necessary measures to minimise water use and spillage and to properly manage the discharge of wastewater as required by applicable laws and regulations.

2.4. Waste management and the circular economy:

Addressees are required to comply with applicable laws and regulations on the management of hazardous and non-hazardous waste, ensuring that this is properly treated, stored, transported and disposed of. Specifically, addressees are required to request and possess information regarding the treatment, transportation and destination of waste generated at every stage of the production process.

The Group encourages addressees to introduce measures to encourage the sorting, recycling and reuse of materials.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

2.5. Product chemical compliance:

Addressees are required to comply with international, EU, national and local regulations regarding the use of hazardous or restricted substances, including the **"RoHS" Directive**, the **"REACH Directive"** and all other applicable regulations and laws on the subject. Additional specifications may be required in some cases and will be appropriately communicated where applicable.

Specifically, addressees are required to prohibit the use of substances forbidden by applicable provisions, register the substances used as and when legally required, providing evidence of this upon Group request by filling out appropriate statements and the relevant laboratory documentation where required.

The Group reserves the right to conduct chemical tests and trials on materials, unfinished and finished products. The Group encourages addressees to promote appropriate training on the subject for its employees, especially for those who come into contact with such substances.

2.6. Ecosystem and biodiversity:

Addressees are required to take appropriate measures to ensure the conservation and preservation of ecosystems and biodiversity throughout the value chain, and endeavour to use resources from renewable sources whenever possible.

3. Health, safety and workers' rights

Addressees are required to treat all employees, contractors and their respective addressees with respect for personal dignity, health, safety and basic human rights.

By way of non-exhaustive example, addressees are required to consider:

3.1. The rights of minors:


addressees are required to recognise the key importance of the human rights of minors and must not participate in and/or enable child labour practices as part of their business activities or those of their respective addressees. Addressees are also required to ensure that every one of their direct or indirect, full-time or part-time employees and contractors meets the minimum working age, as required by ILO (International Labour Organization) principles and/or applicable national laws.

3.2. Forced labour:

addressees may not use undocumented workers, forced labour or slave labour, and must ensure compliance with all laws and regulations related to the elimination of slavery and human trafficking. All workers must work freely and be paid regularly as agreed. Physically abusive disciplinary practices are not tolerated.

3.3. Diversity and inclusion, non-discrimination, and prohibition of harassment:

Addressees are required to respect cultural and individual diversity and promote inclusion at every corporate level by hiring and rewarding their employees on the basis of equal opportunity, basing their employment decisions purely on qualifications, performance, skills and potential. Addressees are required to ensure that all of their employees are treated fairly and are not subject to any kind of discriminatory treatment on the basis of race, nationality, sex, age, physical characteristics, social background, disability, union membership, religion, marital status, possible pregnancy status, political or sexual orientation, gender identity and/or expression, or any other personal characteristic. Addressees must not tolerate any form of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

3.4. Working hours, fair wages and regular contributions:

Addressees are required to comply with applicable local laws and regulations on working hours and overtime, guaranteeing that employee working hours do not exceed the maximum daily limit established by applicable laws. Addressees are also required to pay their employees fair wages for the work they carry out; a minimum wage should be considered a precondition.

Compensation and benefits must be paid in accordance with all applicable laws and regulations to promote the material welfare of employees, providing employees and contractors with a written, clearly understandable and legally binding employment contract. Likewise, addressees are required to make social security and welfare contributions in accordance with applicable legislation.

3.5. Freedom of association and collective bargaining:

addressees are required to ensure respect for the legal rights of workers regarding collective bargaining and freedom of association or - where this is not applicable - are required to promote constructive dialogue with workers' representatives.


3.6. Disciplinary practices, harassing and persecutory acts:

Addressees are required to treat all employees with fairness, respect and dignity and refrain from subjecting them to abuse or threat of physical abuse, physical disciplinary measures, harassment of a sexual or other nature, verbal abuse, or other form of intimidation, in accordance with applicable regulations.

As per applicable laws and regulations, fines that are unlawfully used in place of disciplinary sanctions are also forbidden.

3.7. Health and safety:

Addressees are required to safeguard the health and safety of their staff and contractors by minimising any hazardous working conditions through the maintenance of appropriate safety systems and effective controls and training as required by applicable laws and regulations. Addressees are also required to introduce safe and healthy working practices to prevent work-related injuries and ill health, as required by ILO principles, and to introduce measures to deal with health emergencies and accidents and to ensure health assistance.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

FINAL PROVISIONS

4 Introduction, compliance and monitoring

Addressees are responsible for ensuring their own compliance with the principles and rules of conduct set out in the Group's Ethics Code and for complying with the provisions of this Code. Addressees are also required to complete and sign the **Acceptance Form** attached to this Code and return it to the Group's applicant by e-mail.

4.1 Code implementation and compliance

Implementation of and compliance with the Code by new and existing addressees are ensured and monitored by Group companies as follows:

- each new supplier must view and comply with the principles of the **Elica Group Ethics Code**, and comply with the provisions of the Code during the qualification phase to be approved as a supplier;
- existing suppliers are required to confirm their compliance with the principles of the **Elica Group Ethics Code** and comply with the provisions of the Code, according to an application plan enacted by the Group.

4.2 Monitoring

Group companies reserve the right - at their own discretion - to carry out assessments and audits of each individual supplier to verify compliance with the principles of the Group Ethics Code and the provisions of this Code, requesting and obtaining the relevant evidence.

4.3 Non-compliance

Failure to comply with the provisions of the Code constitutes a material breach by the addressee of its obligations. In the event of non-compliance with the provisions of the Code, the Group (at its sole discretion) may choose to support the supplier in identifying corrective actions to be introduced (at the supplier's expense) and set a deadline by which the non-compliance must be remedied.

However, in any event of non-compliance, the Group company maintaining the relationship shall, at its sole discretion, have the right to terminate with good cause the relationship with the supplier with immediate effect; it remains the Group's right (and not obligation) to grant a deadline to remedy the situation.

5 Contact and further information

5.1 Contacts and communications relating to the "Elica Group Supplier Code of Conduct"

To ensure that every addressee of this Code plays an active role in the reporting process, we strongly recommend and encourage our addressees - including their employees - to immediately communicate any concerns about possible violations of the minimum standards and principles set out in this Code.


Reports can be made by e-mail to the addresses elicaehs@sicurezzapostale.it and odv@elica.com, with the subject line "Communications regarding the application of the Elica Group Supplier Code of Conduct."

Requests for clarification regarding the contents of this Code or for further guidance or support to ensure compliance with the Code may be forwarded to the same e-mail addresses.

6 Approval and revision

6.1 Approval and revision of the Code

The Company periodically reviews this Code to ensure that it is adopted and enacted and to ensure that it reflects the contents of the **Elica Group Ethics Code**, regulatory developments and the application of best practices.

	Group Policy	Code	GP-40	
Legal & Corporate Affairs	Elica Group Supplier Code of Conduct	Date	22/07/2022	VER. 00

ACCEPTANCE FORM

By signing this form the addressee confirms that:

- having analysed and understood the provisions of the Group's Ethics Code;
- having received, analysed, and understood the provisions of this Code;
- it shall ensure compliance with the applicable principles and rules of conduct contained in the Group's Ethics Code and with the provisions of this Code, in addition to applicable local, regional and national laws and regulations that apply in the location where it operates, and with applicable supranational legislation;
- it shall, by all means necessary, communicate the contents of this Code to all employees, suppliers, external collaborators and additional parties that form part of its supply chain of raw materials, processing services and finished products for the Group, and ensure that they too comply with its provisions;
- it shall undertake to embrace and enact the recommendations contained in the Code, with a view to continuous improvement and sustainable development of business activities;
- it accepts the monitoring methods set out in **section 4.2** of the document;
- it commits, in the event of non-compliance and at the Group's request, to taking the necessary action to modify its activities and operations, as set out in **section 4.3** of the document;
- it shall undertake to report to the Group any alleged or verified cases of violation of this Code using the contact details set out in **section 5.1** of the document.
- acknowledges and agrees that the Group company shall have the right to terminate the relationship in the event of non-compliance, as per **Section 4.3**

Date (day/month/year): __/__/____

Place: _____

Company name (in block capitals): _____

Name and office of the legal representative (in block capitals): _____

Signature of the legal representative: _____

Date	Prepared by:	Verified by:	Approved by:
22/07/2022	QHSE Assurance & Sustainability Manager Massimo Enrico Magi	Chief Quality & Consumer Service Officer Andrea Marabini	Group CEO Giulio Cocci