



# CODE OF ETHICS AND CONDUCT FOR SUPPLIERS

Approved by the Board of Directors of SapiSelco srl

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## INTRODUCTION - ABOUT US

SapiSelco srl is an Italian company owned by the Griggio family. Since the 1950s, it has specialised in producing engineered products by injection moulding plastic materials. Its consistent growth has led to the following achievements:

- the first Quality Management System certification in 1994 according to UNI EN ISO 9002, which later became UNI EN ISO 9001
- Environmental Management System certification in accordance with UNI EN ISO 14001 in 2002
- IATF 16949 certification for quality management in the automotive sector in 2018.

All SapiSelco srl production sites are located in north-east Italy, in the province of Padua, where the following activities are carried out:

- Product and mould design
- Manufacturing of steel moulds
- Plastic moulding

The range of products manufactured by SapiSelco srl comprises cable ties, collars, expansion bolts, security seals and a range of fixing accessories for various sectors (electrical, automotive, etc. ...). The updated list of the manufactured items can be viewed on the website [www.sapiselco.com](http://www.sapiselco.com).

The development of technologies, company know-how, and the ability to customise products as a distinguishing feature within the target market has led SapiSelco srl to occupy a prominent position among the world's leading manufacturers of cable ties and fixing accessories, with a daily output of millions of pieces and a geographical presence in 65 markets worldwide.

### The mission of SapiSelco srl

*"We are a family business that has been driven by the same passion for more than three generations: to create quality products that are the result of research and technological innovation. Our production is strictly 100% Made in Italy. Our goal is to improve what is already considered excellent, and we work towards this every day to deserve the trust that our customers have placed in us for over 70 years" (Engineer S. Griggio).*

The company's organizational and production capabilities are developed in accordance with the legitimate interests of all those involved, managing relationships with employees, the rules on safety at work and compliance with the laws in a fair and correct manner; all businesses are inspired by integrity and loyalty and all conflicts between corporate and personal interests are avoided.

## PURPOSE AND RECIPIENTS OF THE CODE

Since 2015, SapiSelco srl has adopted a 'Code of Ethics', which sets out the values to which its directors and employees must adhere. This raises awareness among employees of issues related to Corporate Social Responsibility.

Through this Code of Ethics and Conduct, which incorporates and replaces the previous Code of Ethics, SapiSelco srl aims to extend its commitment to promoting a culture of ethics and sustainability to all its Suppliers.

SapiSelco srl therefore aims to work exclusively with third parties who share its commitment to integrity, sustainability, and human rights, and who have agreed to meet the requirements set out in this document. The document aims to contribute to building a supply chain that is socially, environmentally, and economically sustainable.

This Code applies alongside all regulations in force in the countries where the company operates, and provides an overview of the principles and main activities to which it refers.

SapiSelco srl and all its Suppliers undertake to:

- disseminate knowledge of the Code of Ethics and Conduct to all collaborators, Suppliers and partners;
- share the commitment transparently with all stakeholders;
- ensure that collaborators who report violations of this code are not subject to any form of retaliation.

The conviction of acting to the advantage of the company cannot be used as justification for behaviour that contradicts the Code. SapiSelco srl has therefore chosen to **refrain from conducting business** with individuals or entities who explicitly reject the principles outlined in this Code.



## RULES OF CONDUCT IN BUSINESS

### Business ethics and integrity

Suppliers of SapiSelco srl are expected to understand the mandatory requirements and be familiar with the rules that apply to SapiSelco srl and to them as Suppliers. Ignorance of the law is never an acceptable reason for non-compliance.

Suppliers must know, understand and respect the laws and regulations applicable in the regions in which they operate, through the implementation of appropriate processes, in order to adhere to internationally recognised human rights standards, as well as environmental, social and corporate governance criteria, as defined in particular in international conventions.

### Compliance with regulations

Suppliers must comply with all national, European Union and international implementing rules and regulations applicable in the countries in which they operate. They must take all necessary measures to keep themselves constantly up to date with regulatory developments.

### Conflict of interest

Collaborators, consultants and sales agents must avoid situations of conflict of interest — especially personal or family situations that might affect their judgement when it comes to deciding what is in the best interest of SapiSelco srl and what is the most appropriate way to pursue it. Decisions and choices made on behalf of SapiSelco srl must be in the best interest of the company.

Suppliers must also identify, prevent and properly manage conflicts of interest by drafting and implementing appropriate administrative and organisational measures. This will effectively assist and support SapiSelco srl in assessing the risk of conflict.

Following its risk assessment, SapiSelco srl will determine whether to manage the conflict of interest by taking appropriate measures to mitigate the risk, or to request that the Supplier refrain from taking action.

### Disclosure of confidential information and obligation of confidentiality

The know-how developed by SapiSelco Srl is a vital resource that all Suppliers, collaborators, consultants and sales agents must protect.

This know-how and all other confidential information relating to knowledge or data owned by SapiSelco srl must not be used, communicated or disclosed without specific authorisation.

Suppliers undertake to limit access to such information exclusively to personnel who require it for reasons relating to the supply itself.

This obligation shall remain in force even after termination of the relationship with SapiSelco srl, in compliance with applicable regulations and/or contractual constraints.

All collaborators, consultants and sales agents are strictly required to comply with the laws on the abuse of confidential information (insider trading); more specifically, they must not use information obtained when performing their duties within SapiSelco srl or arising from business relations with SapiSelco srl (provided they are not in the public domain), to obtain a personal gain or to favour third parties, either during their employment or after termination thereof.

### Fair competition and antitrust

SapiSelco srl' Suppliers must undertake to respect the legal rules on fair commercial competition. This means putting the principle of fair competition into practice in all activities and avoiding behaviour that may restrict competition or create or strengthen a monopoly position.

### Intellectual property

SapiSelco srl's Suppliers must avoid any possible infringement of freedom of industry or commerce, as well as any form of unfair competition, fraud, counterfeiting or misappropriation of industrial property rights. They must also remind all those working on behalf of the company to comply with existing regulations.

SapiSelco srl safeguards its intellectual property rights, such as patents, trademarks and identifying marks, by complying with the relevant policies and procedures. At the same time, the Company takes action to respect the intellectual property rights of others, ensuring that licence agreements are not violated and that there is no unauthorised use of intellectual property rights (whether trademarks, identifying marks, designs, software, etc.), nor the placing on the market of products with trademarks or signs that may mislead purchasers into attributing them to another producer. The same behaviour is required of all Suppliers.

### Prevention of corruption and money laundering

No SapiSelco srl collaborator, family member, consultant, sales agent or Supplier shall request, solicit or accept (directly or indirectly) any payments for corrupt purposes, nor shall they induce or allow other parties to request or receive such payments, gifts or presents. Internationally accepted commercial items of modest value are acceptable.

Corruption and bribery, including bribery of public officials, in any form shall not be tolerated.

Suppliers must not facilitate or favour third parties, and their collaborators must not participate, either directly or indirectly, in activities involving money laundering, the financing of terrorism, or any other criminal activity.

### Embargoes, export controls, and economic sanctions

We expect Suppliers, no less than SapiSelco srl, to comply with all applicable international trade and export controls, as well as all applicable trade, economic, and financial sanctions and embargoes. SapiSelco srl and its Suppliers are also responsible for identifying and managing trade restrictions applicable to their activities, including those relating to sanctioned countries and entities.

### Financial responsibility and accurate records

Suppliers must comply with all applicable national and international laws relating to accounting, taxation, and transparency, and must not engage in any form of fraud, extortion, tax evasion, tax avoidance, money laundering, or other illegal activities.

Suppliers must issue accurate and complete invoices accompanied by the necessary documentation and refrain from any behaviour or omission that could compromise the correct and complete maintenance of SapiSelco srl's accounting records.

### Due diligence

To verify Suppliers' compliance with this document, SapiSelco srl reserves the right to carry out a due diligence process based on the OECD Due Diligence Guidance for Responsible Business Conduct. This may include conducting on-site third-party audits at Suppliers' facilities in the event of serious non-compliance with this document. All Suppliers must implement their own due diligence process to ensure that their supply chain complies with the standards and rules set out in this document.

### Responsible management of raw materials and minerals

Suppliers must source raw materials and minerals used in their products responsibly, developing a management system that promotes the traceability and transparency of the supply chain. This system must recognise the risks arising from the extraction and trade of minerals, such as human rights violations, conflict, child labour, illegal operations, and unsafe health and safety conditions.

Suppliers must comply with all applicable laws and regulations regarding their commercial products supplied to SapiSelco srl. They must adopt the best production practices and address potential environmental, health, and safety issues in accordance with the highest internationally recognised standards and regulations.

Suppliers must properly identify and communicate hazardous chemicals and mixtures to SapiSelco srl, ensuring they are handled, used, transported, stored, recycled, and disposed of safely in accordance with national and international regulations.



## HUMAN RIGHTS AND WORKING CONDITIONS

The following principles confirm the importance of respect for the individual, in accordance with national laws and the fundamental Conventions of the International Labour Organisation (ILO), ensure equality of treatment and exclude any form of discrimination based on gender, age, race, religion and nationality. All of the principles listed below, which have been adopted by SapiSelco srl, must also be subscribed to by Suppliers.

### Ethical recruitment and hiring

Suppliers must hire all personnel on a regular employment contract, in accordance with local regulations. No form of irregular employment is tolerated. Suppliers and SapiSelco srl must therefore undertake to implement precise supervision of work offered/performed also by external Suppliers.

Furthermore, employing workers without a valid residence permit is unacceptable. Social security, welfare, and insurance must be provided for all employees in accordance with applicable laws, regulations, and collective bargaining agreements.

Respect for the principles of equality and equal opportunities in selection and recruitment activities must be promoted. Candidates must have equal opportunities regardless of personal attributes such as ethnicity, gender, age, disability, or sexual orientation, and must be assessed on the basis of their skills and potential. Any form of favouritism and corruption for the purposes of recruitment and/or promotion must be avoided.

SapiSelco srl and its Suppliers must also provide training opportunities for their employees and guarantee a working environment that complies with current hygiene and safety regulations.

### Child labour and young workers

In accordance with International Labour Organisation (ILO) requirements, Suppliers must ensure that the minimum age for employment is observed. In compliance with ILO Conventions No. 138 and No. 182, and in accordance with national legislation, SapiSelco srl unequivocally condemns the use of child labour.

### Working hours and wages

SapiSelco srl and its Suppliers must treat their employees with respect and pay them fairly.

SapiSelco srl and Suppliers must ban all forms of labour exploitation, including through intermediary activities, and shall not subject workers to exploitative conditions or take advantage of their state of need. They undertake to comply with all applicable regulations concerning remuneration and working hours. In this regard, they shall:

- Pay wages that are proportionate to the quantity and quality of work, and in accordance with national or local collective bargaining provisions. This is a legal and moral obligation.
- Ensure compliance with working hours by regulating overtime, rest periods (including weekly ones), compulsory leave, and holidays.
- Ensure decent working conditions, excluding any surveillance methods that are not permitted by law, detrimental to the individual's personality, or not functional in meeting recognised needs.

### Equal opportunities and women's rights

Just as SapiSelco srl guarantees equal pay for men and women, offering all employees the same opportunities for professional growth, the same is required of Suppliers. In particular, they must be committed to protecting the rights of mothers and expectant mothers.

### Diversity, equality, and inclusion

SapiSelco srl requires its Suppliers, as it does itself, to commit to upholding the principles of inclusion and to protect and value diversity with reference to: race, nationality, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, trade union membership, political opinion, age, ethnic minority, membership of an indigenous population, or any other condition that could give rise to discrimination.

### Harassment and non-discrimination

SapiSelco srl considers harassment or undesired behaviours as absolutely unacceptable, such as those related to diversity, which have the purpose and effect of violating the dignity of the individual, both inside and outside the workplace. All Suppliers must subscribe to this principle of respect and equality.

### Modern slavery

SapiSelco srl and its Suppliers must not tolerate any form of forced or compulsory labour, modern slavery (i.e., work carried out under threat of intimidation, punishment, or violence by security forces, or threat of disadvantage), or human trafficking in the supply chain.

### Freedom of association and collective bargaining

All employees have the right to form and join trade unions, professional associations, and workers' representative bodies in accordance with national legislation. Discrimination of any kind that occurs on the basis of trade union activities has to be rejected.

### Local communities

Suppliers must operate in a manner that is respectful of local cultures, traditions, regulations, minorities, and indigenous peoples. Suppliers will actively cooperate with local communities to find solutions to disruptions and rapidly implement mitigation measures. At the same time, they will support the local economy by prioritising the employment of local personnel and Suppliers, thereby contributing significantly to the socio-economic development of the areas in which they operate, in line with SapiSelco srl's commitments.

### Private or public security forces

Just like SapiSelco, the Supplier shall not engage or use private or public security forces to protect the business project if the lack of training or control by the company may lead to human rights violations through their involvement.



## ENVIRONMENT

SapiSelco srl is committed to business ethics, not only in its relationships with people, but also in its duty to protect the environment in which we live and operate. The climate crisis and global warming are global challenges that require concrete and responsible action from every stakeholder.

SapiSelco srl has defined and implemented technical and organisational measures to prevent soil and groundwater contamination caused by production processes or the handling of chemicals, as well as to avoid pollution caused by wastewater and waste.

SapiSelco srl has effectively implemented an environmental management system since 2002, focusing its Environmental Policy (available at [www.sapiselco.com](http://www.sapiselco.com)) on compliance with environmental regulations and the prevention of pollution, optimising the use of resources, and the development of environmentally friendly products.

In turn, Suppliers are required to manage and improve their environmental performance by reducing the environmental impact of their products and services throughout their lifecycle, in accordance with the principle of prevention. As well as meeting legal requirements, they are responsible for preventing, reducing, and mitigating any form of environmental pollution (air, water, soil and groundwater, etc.), as well as preventing environmental incidents by quickly recovering and restoring them if they do occur.

The following should be the main objectives:

- Carbon neutrality: reducing emissions by adopting measures that promote decarbonisation throughout the entire value chain.
- Energy efficiency: optimising and reducing energy consumption by improving production processes and using the latest available technologies.
- Water quality, consumption, and management: reduce water consumption, effectively reuse and recycle it, and responsibly treat wastewater discharges in compliance with current regulations.
- Air quality: Suppliers must monitor emissions that contribute to air pollution, minimising and eliminating them where possible.
- Responsible management of chemicals: Suppliers must identify, minimise, or eliminate the use of restricted substances in production processes and finished products to ensure regulatory compliance.
- Circularity: Suppliers must promote closed-loop systems by supporting the use of sustainable and renewable natural resources and reducing unnecessary waste, particularly hazardous waste, while increasing reuse and recycling.
- Animal welfare: Suppliers must respect the 'five freedoms' formalised by the World Organisation for Animal Health (WOAH) in relation to animal welfare. No animal should be bred and killed solely for use in a product.
- Biodiversity, land use and deforestation: Suppliers must protect ecosystems, particularly key biodiversity areas affected by their activities, and avoid illegal deforestation in accordance with international regulations and IUCN recommendations.
- Soil quality: where appropriate, Suppliers shall monitor and control the impact on soil quality to prevent erosion, nutrient degradation, subsidence, and contamination.
- Noise pollution: where appropriate, Suppliers shall monitor and control industrial noise levels to prevent noise pollution.



## HEALTH & SAFETY

Although SapiSelco srl does not have a certified Safety Management System, the company has a prevention and protection service that ensures activities are carried out in full compliance with current regulations. The service applies the most advanced technologies to safeguard workers' health, where available. The company has also established the following Health and Safety Policy.

*SapiSelco srl believes that success on any market is dependent on the health and safety of its employees and visitors.*

*To this end, the company is committed to providing a safe and healthy working environment by:*

- *Complying with legal and other voluntary requirements*
- *Employing highly specialised staff such as the Safety, Prevention and Protection Officer (locally known as RSPP) and the Competent Physician, to **regularly and continuously assess risks** and **identify and analyse** potential **hazards** arising from work activities*
- *Eliminating risks, and minimising them where this is not possible, based on acquired know-how and technical progress*
- *Observing **ergonomic principles** when organising work, designing workplaces, **choosing equipment**, and defining **work and production methods**, particularly with a view to reducing the health effects of monotonous and repetitive work*
- *Limiting the use of **chemical, physical, and biological agents/substances** in the workplace and favouring non-hazardous substances*
- *Prioritising **collective** over individual **protective measures**, providing all appropriate personal protective equipment (PPE) and ensuring workers receive necessary training for its use and maintenance*
- ***Health monitoring** of workers according to a periodic and specific surveillance programme*
- *Providing adequate and continuous **information** and **training** for workers, and giving them clear instructions*
- *Promoting a commitment to worker and worker representative **consultation** and **participation** for the purpose of **continuous improvement***
- *Assigning roles, responsibilities, and authorities within the organisation*
- *Implementing emergency measures in the event of **first aid**, **firefighting**, **evacuating workers**, and serious and immediate danger, through scenario simulation identified in the risk assessment*
- *Using **warning and safety signs***
- ***Regularly maintaining** rooms, equipment, and plants, paying particular attention to machinery safety devices, in compliance with manufacturers' instructions and technical regulations*
- *Handling any **accidents and injuries** promptly and in accordance with current regulations by investigating and immediately eliminating or mitigating the cause*

*SapiSelco srl is committed to creating a safe and healthy working environment and to promoting a culture of safety and prevention, with the ultimate goal of achieving ZERO ACCIDENTS. All identified health and safety measures shall not incur any financial burden for workers.*

Suppliers must undertake to act in the same way as SapiSelco srl by protecting employees from workplace risks. They must take all necessary precautions, apply national and international health and safety standards and regulations, and observe the relevant contractual requirements. Suppliers must also manage contractors and the supply chain with the same responsible approach to health and safety management.



## PRIVACY, DATA PROTECTION AND SECURITY

When conducting its business activities, SapiSelco srl collects significant amounts of personal data and confidential information. The Company processes this data in accordance with all applicable laws in its jurisdiction and the best confidentiality and privacy practices.

SapiSelco srl is committed to providing training to its personnel on a regular basis with regard to such issues and has ensured that all personnel have access to the Safety Manual document, where all the rules and behaviours to be followed in order to comply with all legislative obligations are explained. The document also identifies the Data Controller and the Data Protection Officer (DPO), who carries out regular audits to ensure compliance with the established rules.

All parties involved (Suppliers, Customers, etc.) are provided with a data processing statement which describes how SapiSelco srl will process the personal data of the data subject.



## COMPLAINTS AND WHISTLEBLOWING

SapiSelco srl uses an electronic platform to collect, manage, analyse, and process reports of violations of the conduct rules set out in the Code. The platform is accessible via the dedicated website:

<https://sapiselcosrl.whistleblowingweb.it/#/>

The procedure ensures the highest degree of confidentiality and privacy when handling reports, and protects whistleblowers against possible retaliation by keeping their identity confidential unless specifically required by law.

Collaborators, agents, and Suppliers are required to report any potential violations of which they become aware in the manner set out in the procedure. In the case of clearly unfounded reports intended to gain advantages for the informant, consequent measures will be taken in compliance with applicable legislation.

The Supervisory Board is responsible for managing and verifying the validity of the circumstances represented in the report. The Board acts in accordance with the principles of impartiality and confidentiality, carrying out any activity deemed appropriate to resolve any conflicts or reported violations of rights.