

POL-941

CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

POLICY

IDENTIFICATION

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Procedure	POL-941 Code of Conduct for Suppliers and Business Partners	
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RESPONSIBILITIES

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SUMMARY OF CHANGES

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CONTENTS

1	INTRODUCTION	3
2	COMMITMENT FROM LUTECH BUSINESS PARTNERS	3
3	PRINCIPLES OF INTEGRITY	3
3.1	HUMAN RIGHTS	4
3.1.1	PROHIBITION AGAINST CHILD LABOR	4
3.1.2	PREVENTION OF FORCED, BONDED OR INVOLUNTARY LABOR	4
3.1.3	RESPECT FOR THE INDIVIDUAL RIGHTS OF EMPLOYEES	4
3.1.4	FREEDOM OF ASSOCIATION	4
3.1.5	PREVENTION OF HARASSMENT AND DISCRIMINATION, PROMOTION OF INCLUSION AND ACCESSIBILITY	4
3.2	HEALTH AND SAFETY OF INDIVIDUALS	5
3.3	BUSINESS INTEGRITY	5
3.3.1	ANTI-CORRUPTION AND EXTORTION	5
3.3.2	GIFTS, ENTERTAINMENT AND HOSPITALITY	5
3.3.3	CONFLICT OF INTEREST	6
3.3.4	FAIR COMPETITION	6
3.3.5	COMPLIANCE WITH SANCTIONS AND EXPORT CONTROL REGULATIONS	6
3.3.6	CONFLICT MINERALS	6
3.4	DATA PROTECTION AND PRIVACY	6
3.5	ENVIRONMENT	7
4	POTENTIAL VIOLATIONS - WHISTLEBLOWING SYSTEM	7

1 INTRODUCTION

The Lutech Group is committed to building a corporate culture of transparency and integrity based on ethical behavior, in accordance with relevant regulations, and demands that its suppliers and business partners do the same.

With this in mind and reflecting the natural correlation with the Group's Code of Ethics, - which recognizes the principles and defines the guidelines for the conduct of employees and those working on behalf of members of the Group in internal and external relations - the need has now arisen for a Code of Conduct to be drawn up, intended to guide the group's relations with suppliers and business partners.

As the Code of Conduct plays a key role in enabling the Lutech Group to provide services that meet its ethical and sustainable standards, suppliers and Business Partners are expected to commit to the principles set forth in this Code of Conduct and recognize that this commitment is an essential part of their contractual relationship.

Lutech's suppliers also acknowledge that this commitment will be taken into account in the assessment conducted by Lutech to monitor the risk of corporate social accountability connected with its supply chain. The principles applied are shared in the *POL-940 Policy for sustainable and responsible procurement* document distributed to all suppliers.

In this document, the term Business Partners (hereinafter referred to as "Business Partners") refers to any of the Lutech Group's working associates, including but not limited to: suppliers, subcontractors, resellers, distributors, sales associates, RTI companies (in which Lutech acts as agent), etc.

2 COMMITMENT FROM LUTECH BUSINESS PARTNERS

The Business Partners agree to abide by the principles set forth in this Code of Conduct and in the Organization, Management and Control Model adopted by the Group members pursuant to Italian Legislative Decree 231/01, to the extent applicable to them throughout the duration of the contract, including any renewals or extensions. In order to ensure compliance with these principles, the Business Partners therefore undertake to take appropriate and necessary internal measures.

The Business Partners acknowledge that the above commitment constitutes an essential part of the contract, so that any violations or conduct that deviates from the provisions of the Code of Conduct may, in accordance with applicable laws, result in the termination of the contractual relationship for just cause and breach of contract.

3 PRINCIPLES OF INTEGRITY

The following are the Principles that a Lutech Business Partner is committed to respect.

3.1 Human Rights

The Business Partner must uphold and respect - in its relations with all its stakeholders - the protection of human rights, as defined internationally; it must also take appropriate measures to ensure that it is not involved in human rights violations. It must respect the principles of the 1948 "Universal Declaration of Human Rights" and the "*International Labour Organization (ILO) Declaration*" on Fundamental Principles and Rights at Work. It must also reject any form of cruel, inhuman or degrading practices, such as corporal punishment, bullying, moral and sexual harassment, forced or threatened labor, and more generally, prevent violations of human rights or complicity in such violations.

3.1.1 Prohibition against child labor

The Business Partner shall not exploit child labor and shall not employ any child who is under the age of 15 or has not completed compulsory education.

3.1.2 Prevention of forced, bonded or involuntary labor

The Business Partner must ensure that it does not use forced, bonded or involuntary labor in its activities. Work is to be conducted on the basis of freely agreed conditions.

3.1.3 Respect for the individual rights of employees

The Business Partner shall guarantee acceptable working conditions and remunerate workers fairly by complying with all applicable laws and regulations on pay and working hours. It must not require its employees to work more than the maximum number of hours per week permitted by law, and must provide a fair and equitable wage, guaranteeing the minimum wage as stipulated in applicable collective labor agreements.

3.1.4 Freedom of association

The Business Partner must respect the right of workers to associate freely with, organize and join any organizations of their own choosing.

3.1.5 Prevention of harassment and discrimination, promotion of inclusion and accessibility

The Business Partner must prevent any form of harassment, including sexual harassment, and/or bullying at the workplace in order to bring itself into line with the anti-discrimination approach described in Lutech's Code of Ethics. The Business Partner shall not tolerate discrimination based on sex, race, religion, age, disability, gender identity, sexual orientation, or membership in categories protected by local law. Applicants and employees should be evaluated on their ability to do the job.

3.2 Health and safety of individuals

The Business Partner must ensure that personnel operate in safe and healthy working conditions and environments, in compliance with local laws and regulations. The Business Partner must conform to mandatory health and safety training standards. The Business Partner must have the necessary systems and structure in place to identify and mitigate health and safety risks and take the necessary precautions to prevent accidents and injuries.

3.3 Business integrity

The Business Partner must adhere to the highest standards of business integrity.

3.3.1 Anti-corruption and extortion

Lutech has implemented its Anti-Bribery Management System according to the international ISO 37001 standard as part of its tangible commitment to combating bribery and corruption and establishing a culture of integrity, transparency and compliance. The Business Partner therefore agrees to abide by "*PSQ-500 - Lutech Anti-Bribery Policy*" and, in this regard, will not engage in any form of bribery/corruption, extortion or influence peddling where, directly or indirectly, it would be found to:

- offer a person an undue advantage in order that the person act in an improper manner or refrain from acting in the exercise of his or her duties or exert an improper influence on the decision-making of a public official for the benefit of the subject offering the advantage;
- accept an undue advantage in exchange for acting in an improper manner or refraining from acting in the exercise of his or her duties;
- exert an improper influence on the decision-making of a public official for the benefit of the subject offering an advantage.

It should be pointed out that this prohibition applies:

- to both the person actively involved (who offers the undue advantage) and the person with a passive role (who accepts it), as both are punishable, regardless of whether or not the person acting passively solicited the advantage;
- in both the private and public sectors.

3.3.2 Gifts, entertainment and hospitality

The Business Partner shall not offer, accept, or solicit any gift, entertainment or hospitality for which there is reason to believe, also in the eyes of a reasonably informed third party, that this might exert an improper influence on decision-making or compromise the objectivity of actions taken in relation to business activities.

3.3.3 Conflict of interest

The Business Partner shall not tolerate inappropriate bias, conflict of interest, influence or abuse of power in relation to his or her professional judgment or responsibilities. The Business Partner must report such conflicts of interest immediately if they involve Lutech personnel.

3.3.4 Fair competition

The Business Partner must comply with all applicable antitrust and competition laws wherever they operate. It undertakes not to participate in any anti-competitive practices, collude with competitors with regard to pricing, auction disruption, market allocation, or exchange sensitive information. Where the Business Partner is in a dominant position, it must not abuse that role in order to eliminate competition or impose excessive or discriminatory business conditions.

3.3.5 Compliance with sanctions and export control regulations

The Business Partner must comply with all applicable laws and regulations regarding economic sanctions and export control. It must provide true, accurate, and regularly updated information regarding any export restrictions (e.g., dual-use or military classification) affecting products, software, or technology supplied to Lutech. Where required, appropriate state authorization must be obtained.

The Business Partner understands that, for all matters connected with the relationship with Lutech, it must not engage in any transaction with any country, person or entity with which or with whom business transactions are prohibited by regulations imposing economic sanctions applying in the United Nations, the European Union, Great Britain or the United States.

3.3.6 Conflict Minerals

The European Union's Conflict Minerals Regulation requires EU-based importers of tin, tantalum, tungsten and gold (also referred to as "3TG") to ensure their minerals are sourced responsibly and that their supply chains do not help to fund armed conflict or other illegal practices.

Although the global supply chain for these minerals is very complex and layered, and tracing the origin of these minerals poses significant obstacles, the Lutech Group requires its Business Partners to undertake not to source products consisting of minerals originating from countries potentially involved that use the revenues from these raw materials to finance wars and conflicts.

3.4 Data protection and privacy

The Business Partner must comply with all applicable data protection laws and regulations, as well as recommendations, guidelines and instructions provided by the relevant regulatory bodies, and take appropriate measures to protect the personal data and privacy of individuals, also when processing the data of Lutech employees.

3.5 Environment

In order to pursue its decarbonization and sustainability goals, Lutech asks its Business Partners to collaborate with the Lutech Group and contribute by participating in reducing the consumption of natural resources, designing more energy-efficient products, and reducing overall carbon emissions in line with key international and national recommendations.

The Business Partner, if when providing the services envisaged in the contract, produces or stores substances or objects defined as "waste", within the meaning and for the purposes envisaged in article 183(1)(a) of Italian Legislative Decree 152/06, shall provide for such articles to be managed correctly, at its own expense, taking all the measures prescribed by the environmental legislation in force at the time.

4 POTENTIAL VIOLATIONS - WHISTLEBLOWING SYSTEM

Pursuant to Article 4 of Italian Legislative Decree 24/2023 Lutech has activated an internal whistleblowing channel for each Group member, which guarantees - through the use of encryption tools - the confidentiality of the identity of the whistleblower, the person involved (reported) or the person otherwise mentioned in the report, as well as the content of the report and related documentation. Reports should preferably be made in writing or verbally using the computerized methods specified in this chapter. This is without prejudice to the whistleblower's right also to make verbal reports in the form of a face-to-face meeting that will be fixed within a reasonable time at the express request of the whistleblower.

The Company, therefore, collects, evaluates and analyzes, to the extent to which it is responsible, spontaneous reports that are transmitted by accessing the following dedicated platform, which guarantees the confidentiality of the whistleblower by means of encryption:

<https://lutech.integrityline.com/>

For any matter not expressly dealt with in this paragraph (definitions, purpose, responsibilities, phases of management of the report etc.), reference can be made to the provisions of the "*Whistleblowing Policy - Management of reports of unlawful actions pursuant to Italian Legislative Decree 24/2023*" available on the platform, as an integral part and operational development of this document.