



SUPPLIER CODE OF CONDUCT

Revisione 1

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1. INTRODUCTION

1.1. Purpose and Recipients

The impact we have on society extends beyond our operations, reaching throughout the value chain. We believe it is the responsibility of companies like ours to make the world a better and more sustainable place.

Datamatic considers sustainability a key factor for business performance, reputation, employee attraction, retention, and corporate citizenship. These values can be fully realized only when shared with all our partners and pursued in our daily activities.

Datamatic aims to make its suppliers (hereinafter referred to as "Suppliers" or "Recipients") fully aware of this shared goal, asking them to sign and accept this Supplier Code of Conduct ("Code") and to act in accordance with its provisions.

All Datamatic Suppliers must comply with the Code and ensure that their subcontractors (if any) and any other third party working on their behalf operate in full compliance with the Code.

This Code is based on Datamatic's Code of Ethics.

1.2. Our Commitment

At Datamatic, we believe that achieving business goals should never override legal or ethical standards. Therefore, all our counterparts can always expect from us:

- Maximum respect for people, nature, and the environment;
- Commitment to always act to the best of our knowledge;
- Moral integrity;
- Impartiality: At Datamatic, we recognize that success depends on the ability to build impartial and honest relationships with all our suppliers. In our daily activities, we commit to respecting the following values:
 - Ethics: We commit to meeting the needs of our Suppliers while respecting mutual expectations. We adopt a proactive approach to address potential critical situations and a reactive approach if critical areas are identified;
 - Working Conditions: We treat our Suppliers with fairness and professionalism. Datamatic recognizes and respects international principles regarding human rights and working conditions;
 - Transparency: We commit to facilitating the sharing of information with our Suppliers to ensure equal opportunities for all. We establish clear requirements for contract assignments and support direct communication to prevent, avoid, and manage any disputes or disagreements.

1.3. Our Expectations

The principles and provisions of the Code represent the guidelines we adhere to, and we ask all our Suppliers and their collaborators, subcontractors, and other parties working on their behalf to adhere to them when operating with us.

By accepting this Code, Suppliers commit to behaving in accordance with the values and principles outlined in this document. Suppliers are required to apply these principles and act in accordance with them in all their business relationships, continually improving their sustainability performance through appropriate conduct.

Datamatic expects Suppliers to promptly inform them if compliance with the provisions of this Code is not respected. Suppliers must ensure that all their workers directly or indirectly involved in activities related to goods or services supplied to Datamatic are aware of the Code, using any appropriate and effective means of communication.

2. ENVIRONMENT

2.1. Compliance with Environmental Standards

Datamatic is aware of the impact of its activities on socioeconomic development and the quality of life in the reference area. Therefore, we are committed to safeguarding the surrounding environment and contributing to sustainable development, expecting the same from our Suppliers. Recipients must adhere to current environmental regulations and requirements, including:

- Obtaining and maintaining environmental authorizations and approvals for regulated activities;
- Managing and disposing of hazardous materials;
- Emissions of pollutants affecting air, water, and soil;
- Protection of natural resources and wildlife;
- Prohibition or restriction in the use of specific substances;
- Recycling of materials and respect for environmental rights.

2.2. Environmental Impact and Hazardous Substances

We expect our Suppliers to implement adequate procedures for assessing environmental risks, conducting controls to mitigate the impact, and maintaining environmentally responsible business practices.

The use of hazardous substances by Suppliers must comply with legal requirements. Suppliers must prohibit the use of illegal or restricted substances in their products and processes, taking appropriate actions to identify and eliminate them.

2.3. Promotion of Eco-friendly Innovation

Datamatic promotes the development and application of new technologies and innovations that aim to reduce the environmental impact of products and processes. We encourage our Suppliers to invest in eco-friendly technologies and processes to contribute to sustainable development.

2.4. Control

Suppliers must adopt a systematic approach to manage and control the environmental aspects of their activities, complying with national and international standards such as ISO 14001. Datamatic may conduct audits to verify compliance with environmental requirements.



3. LABOR AND HUMAN RIGHTS

Datamatic adheres to the values expressed in the Universal Declaration of Human Rights and the key conventions of the International Labour Organization. Suppliers must always act in a manner that aligns with these conventions, protecting and promoting human rights in all their collaborations, considering counterparts as professionals, and, above all, as human beings.

We are committed to ensuring the respect of necessary conditions for the existence of a collaborative and non-hostile work environment, preventing discriminatory behaviors of any kind. We encourage anyone who suspects that their rights or the rights of another person are at risk, or anyone asked to conduct business in a way that could violate the fundamental human rights of another person, to speak up.

We also expect our Suppliers to reject any form of discrimination and ensure dignified working conditions.

3.1. Non-discrimination

We expect our Suppliers to promote diversity and equal opportunities, avoiding any form of discrimination based on race, color, sex, sexual orientation, gender identity, religion, national origin, disability, or any other protected status. Employment decisions, including hiring, promotion, compensation, benefits, termination, and retirement, must be based on merit.

3.2. Freedom of Association

Suppliers must respect the right of employees to associate freely, organize, and bargain collectively in accordance with applicable laws and regulations. They must not interfere with workers' rights to join, form, or not join trade unions or other worker organizations, and must not engage in any form of discrimination against employees for their lawful involvement in such activities.

3.3. Compensation and Benefits

We expect our Suppliers to provide wages and benefits that comply with applicable laws and regulations, including those relating to the minimum wage, overtime hours, and legally mandated benefits. Deductions from wages must be in accordance with applicable laws.

3.4. Working Hours

Suppliers must comply with applicable laws and industry standards regarding working hours. Workers must not be required to work excessive hours, and they must be provided with sufficient breaks and days off in accordance with the law.

3.5. Forced Labor

Datamatic strictly prohibits the use of forced, bonded, or indentured labor. Suppliers must not engage in any form of human trafficking or use of involuntary labor, and they must ensure that all work is voluntary.

3.6. Child Labor

Suppliers must not employ workers under the legal minimum working age as defined by applicable laws and regulations. In cases where the minimum age for employment is lower than the age for completing compulsory education, the higher age must be respected.

3.7. Privacy Protection

Suppliers must respect the privacy of their employees and handle personal information in accordance with applicable data protection laws and regulations.



4. HEALTH AND SAFETY

Suppliers must provide a safe and healthy working environment for their employees in accordance with applicable laws and regulations. This includes, but is not limited to, providing protective equipment, training, and procedures to prevent accidents and injuries.

To this end, it promotes responsible and safe behaviors and adopts all safety measures required by technological advancements to ensure a safe and healthy working and/or selling environment, fully compliant with the current legislation on prevention and protection outlined in Legislative Decree 81/2008.

We expect Suppliers to act in compliance with current national and international standards and regulations on safety and health in the workplace. Therefore, they should perform the following activities:

- Assessment of all health and safety risks.
- Planning of prevention by identifying technical conditions, as well as the influence of environmental factors and work organization.
- Elimination of risks, and where not possible, minimizing them to the extent possible based on knowledge acquired through technological progress.

- Consultations to reduce the health effects of monotonous and repetitive work.
- Substitution of what is dangerous with what is not or is less dangerous.
- Health checks for workers.
- Adequate information and training for workers, executives, supervisors, as well as worker safety representatives.
- Consultation with workers and their safety representatives.
- Emergency measures to be implemented in case of first aid, firefighting, evacuation of workers/clients, and serious and immediate danger.
- Use of warning and safety signs.
- Regular maintenance of environments, equipment, and systems, with particular attention to safety devices following manufacturers' indications.

5. ETICHS

5.1. Conflict of Interest

Suppliers must avoid situations that could create a conflict of interest with their relationship with Datamatic. Any actual or potential conflict of interest must be disclosed to Datamatic.

5.2. Confidentiality, Protection, and Privacy

Suppliers must respect and protect the confidentiality of Datamatic's proprietary information, trade secrets, and any other confidential information provided to them. They must also implement appropriate measures to protect personal data and privacy.

5.3. Private Corruption

Datamatic strictly prohibits bribery and corruption. Suppliers must not offer, promise, give, or accept any bribes, kickbacks, or other corrupt practices.

5.4. Economic Responsibility

Suppliers must conduct their business in an economically responsible manner, including the accurate and transparent recording of financial transactions, compliance with tax laws, and responsible use of resources.

5.5. Fair Business and Antitrust

Suppliers must compete fairly and comply with all applicable antitrust and competition laws. They must not engage in unfair business practices or anti-competitive behavior.

5.6. Export Controls

Datamatic is committed to fully comply with all laws and applicable sanctions regarding export control in the sectors where the Company operates. This includes EU regulations (EC) No. 428/2009, "US Export Administration Regulations – EAR," the International Traffic in Arms Regulations (ITAR), sanctions specified by the administrative regulations of the U.S. Department of the Treasury, Office of Foreign Assets Control (OFAC), as well as any other applicable law on export control.

Datamatic does not engage in relationships with entities listed by national and international Public Authorities in the fight against organized crime, terrorism, and money laundering.

Datamatic requires its Suppliers to implement customer and transaction screening procedures, including consulting the aforementioned Lists, and to immediately block commercial relationships if the entity in question appears on these Lists, preserving clear and accurate documentation of such transactions.

5.7. Relations with Politically Exposed Persons (PEP)

Datamatic commits to exercising reasonable due diligence on transactions and relationships involving PEP, aiming to prevent illicit or unethical activities. This due diligence includes investigations, monitoring, and periodic reviews.

Business partners are required to disclose the presence of PEP within their organization and any relationships with external PEP. The provided information will be treated with the utmost confidentiality and used exclusively for compliance assessment and risk management purposes; it will not be disclosed without the explicit consent of the partner unless required by applicable laws or regulations.

Intentional provision of false or incomplete information may result in the immediate termination of collaboration and the adoption of legal actions.

DATAMATIC imposes prohibitions and limitations on transactions or relationships with PEP posing a significant risk of corruption or conflict of interest and requires its Suppliers to apply the same policy through the implementation of specific procedures.



6.1. Monitoring and Reporting

Datamatic may conduct audits to verify compliance with this Code.

Suppliers must cooperate fully with Datamatic and its representatives during such audits.

Suppliers must also report any breaches of this Code to Datamatic promptly.

6.2. Control System

Suppliers must establish and maintain an effective control system to ensure compliance with the provisions of this Code. This includes internal policies, procedures, and training programs.

6.3. Measures

If a Supplier fails to comply with this Code, Datamatic may take appropriate measures, including termination of the business relationship.

Datamatic may also require the Supplier to implement corrective actions.



7. REFERENCES

- Code of Etichs: <https://www.datamatic.it/corporate/codice-etico.pdf>
- Universal Declaration of Human Rights: <http://www.un.org/en/documents/udhr/index.shtml>
- ILO International Labour Organization: <http://www.ilo.org/global/topics/lang--en/index.htm>
- The Ten Principles of the United Nations Global Compact: <https://www.unglobalcompact.org/>
- Rights of minors and business principles: <http://childrenandbusiness.org/>
- OCSE Guidelines: <http://mneguidelines.oecd.org/annualreportsontheguidelines.htm>
- Register of sanctioned nations: <https://www.trade.gov/data-visualization/csl-search>
- List of sanctioned companies: <https://sanctionssearch.ofac.treas.gov/>

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