

SUPPLIER CODE OF CONDUCT

INTRODUCTION

Aluphoenix S.r.l. aims to be a financially sound, innovative, and sustainable operator in its industry. Through its activities, products, and supply chain, the company is aware of the impact it may have on people and the environment.

This Supplier Code of Conduct defines the minimum requirements that Aluphoenix expects from its business partners, in line with internationally recognized principles and the company's values of **Environmental Responsibility, Stakeholder Growth, and Sustainable Value Creation**.

Suppliers are required to:

- comply with the principles set out in this Code;
- promote its implementation throughout their supply chain;
- adhere to sustainability due diligence processes in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Responsible Business Conduct.

Sustainability due diligence is a process aimed at identifying, preventing, mitigating, and accounting for the impacts of business activities on human rights and the environment.

This Code applies to all suppliers, contractors, consultants, agents, and business partners of Aluphoenix.

BUSINESS PRACTICES

Integrity and Anti-Corruption

The Supplier must operate with integrity and must not be involved, directly or indirectly, in any form of corruption, bribery, or other unlawful conduct.

It is prohibited to:

- offer, promise, or grant undue advantages to public officials or private individuals;
- accept benefits that may influence the impartiality of decision-making;
- make improper payments or offer facilitation payments.

Conflicts of Interest

The Supplier must avoid any actual or potential conflict of interest and must always act in a transparent manner.

Gifts and Hospitality

Any gifts or hospitality must be of modest value, occasional, and consistent with proper business practices. They are not permitted in the context of participation in public procurement procedures or negotiations.

Fair Competition

The Supplier must comply with applicable competition laws and must not engage in anti-competitive agreements or practices.

Anti-Money Laundering

The Supplier must adopt measures to prevent money laundering and the financing of terrorism.

Trade Sanctions

The Supplier must comply with applicable laws and regulations regarding trade sanctions and restrictions.

Data Protection

The Supplier is required to comply with applicable data protection and privacy laws.



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HUMAN RIGHTS

Human Rights

The Supplier must respect and promote human rights, preventing and mitigating any adverse impacts arising from its activities.

Child Labour

The employment of workers below the minimum legal working age is prohibited. Minors must not be employed in hazardous activities.

Forced Labour

Any form of forced, compulsory, or involuntary labour is prohibited. Workers must be free to leave their employment in accordance with contractual terms.

Freedom of Association

The Supplier must respect workers' rights to freedom of association and collective bargaining.

Working Hours

Working hours must comply with applicable laws and industry standards.

Remuneration

Wages must comply with legal requirements and ensure a decent standard of living.

Non-Discrimination

The Supplier must ensure equal opportunities and must not discriminate on the basis of personal characteristics or beliefs.

Dignified Treatment

Harassment, abuse, violence, or any form of degrading treatment is not permitted.

Local Communities

The Supplier must respect the rights of local communities and minimize any negative impacts of its activities.

Security and Human Rights

Where security services are used, the Supplier must operate in compliance with human rights principles.

Conflict Minerals

The Supplier must take measures to avoid the use of materials sourced from conflict-affected or high-risk areas, or from unsustainable sources.

Whistleblowing

The Supplier must provide channels for reporting unethical or illegal conduct, in accordance with EU Directive 2019/1937, transposed into Italian law by Legislative Decree 24/2023.

HEALTH AND SAFETY

The Supplier must ensure a safe and healthy working environment, in compliance with applicable legislation and international standards.

In particular, the Supplier must:

- identify and manage health and safety risks;
- provide adequate training;



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- ensure the use of appropriate personal protective equipment;
- allow workers to stop any unsafe activities.

Any accommodation provided must be safe, dignified, and comply with basic standards.

ENVIRONMENT AND CLIMATE

The Supplier must operate in compliance with applicable environmental regulations and adopt an approach aimed at preventing and reducing environmental impacts.

In particular, the Supplier must:

- manage significant environmental risks;
- reduce emissions, waste, discharges, and resource consumption;
- promote energy efficiency;
- ensure the safe management of chemicals and waste;
- protect biodiversity and ecosystems.

IMPLEMENTATION AND MONITORING

Aluphoenix reserves the right to:

- verify compliance with this Code through requests for information and documentation;
- carry out audits, including through third parties.

Failure to comply with the requirements may result in the implementation of corrective actions, up to and including termination of the business relationship.

The Supplier declares that it has received, read, and understood the Aluphoenix S.r.l. Supplier Code of Conduct and undertakes to fully comply with its principles and requirements.

The Supplier further undertakes to:

- ensure that these principles are also applied by its subcontractors and business partners;
- implement adequate due diligence processes to manage risks related to human rights, working conditions, environment, health and safety, and business ethics;
- promptly inform Aluphoenix of any significant breaches of the Code.

Riese Pio X, 2026-04-23

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