

# Code of Ethics and Business Conduct for Suppliers

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This Supplier Code of Ethics and Conduct establishes the minimum requirements for all suppliers to conduct business and business relationships with Equadro.

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## 0 CODE OF ETHICS FOR EQUADRO SUPPLIERS

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Our mission is to generate effective solutions for our customers by applying the best technologies and finding innovative solutions that anticipate the future.

For us, fulfilling our mission also means doing so responsibly and virtuously, managing our internal processes with an awareness of who we are as a company and as a group of people, how we interact with partners, customers, institutions and suppliers.

With this Code of Ethics and Business Conduct, we define the standards we ask our suppliers to observe so that the relationship created with them is based on the same ethical principles and core values we believe in.

## 1 MANAGEMENT REQUIREMENTS AND RESPONSIBILITIES

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Equadro requires its suppliers to adopt a code of behaviors and rules and to monitor their compliance.

Equadro requires all of its suppliers to put in place and maintain adequate *compliance* procedures to enable effective compliance with this Supplier Code of Ethics and Business Conduct.

Procedures should include, at a minimum:

- Identification of an individual with the necessary hierarchical authority to be given responsibility for compliance management;
- Identification of key compliance risk areas;
- Determining compliance policies by implementing written instructions to relevant employees;
- Consistent compliance training programs;
- Procedures to monitor the effectiveness of the compliance system and to impose sanctions for violations;
- Application of penalties in cases of violation of compliance rules

Equadro requires the supplier that this Code of Ethics and Conduct for Suppliers be made available to all of its employees and contractors who relate themselves with Equadro.

Likewise, the supplier should require that its suppliers and partners adopt equivalent compliance standards.

## 2 HUMAN RIGHTS AND WORKING CONDITIONS

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Equadro calls on its suppliers to respect and protect human rights both in the workplace and in the business activities they carry on, and to ensure that working conditions comply with the law, applicable standards and conventions on an international scale (such as ILO, OECD Guidelines for Multinational Enterprises, UN Global Compact or Global Reporting Initiative).

More specifically, Equadro explicitly requires compliance with the following commitments:

- Not to become complicit in human rights violations within its sphere of influence;
- Respect employees' right to free union association and bargaining;
- Refrain from taking advantage of or participating in any form of exploitative forced labor;
- Refrain from taking advantage of or participating in any form of child labor exploitation;
- not practice any form of discrimination in hiring or employment practices on the basis of race, color, ethnicity, religion, nationality, sex, sexual orientation, age, physical ability, health condition, political or social opinion, union membership, or marital status;
- Ensure that all employees are paid a salary at least equal to the minimum wage established by the law or the applicable national collective bargaining employment agreement or other recognized agreement;
- Ensure compliance with working hours, vacations, leave periods required by law or applicable industry regulations;
- Ensure that workplaces are safe and appropriate risk mitigation measures have been put in place;
- Ensure that its employees participate in regular training on health and safety risk management.

### **3 ENVIRONMENTAL SUSTAINABILITY**

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Equadro suppliers must manage their activities and processes in compliance with applicable environmental obligations and criteria.

Equadro suppliers must be aware of the mandatory laws and regulations, and must be in compliance with any permits, licenses and authorizations that must be required in order to comply with them.

Equadro requires its suppliers not only to comply, but also to implement practices to minimize the environmental impact of their activities starting with identifying areas of focus and measuring environmental performance (resource consumption, waste generation, emissions, etc.) so that an improvement plan can then be initiated.

### **4 INTEGRITY IN CONDUCTING BUSINESS**

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Equadro requires its suppliers to conduct their business activities by complying with the legal obligations and ethical principles recalled in this document.

In particular, Equadro asks its suppliers:

- Compliance with the laws of each country with which it has business relations, especially knowing and complying with the laws on international trade and the obligations and prohibitions established by them;
- Not to implement or accept any form of corruption, coercion or undue influence. Specifically, not to implement or tolerate forms of payment or donation of items or utilities of value, in favor of business or institutional counterparts or other interested parties in order to obtain or retain undue advantages;

- Comply with competition and antitrust legislation by refraining from practices of fixing prices, sales conditions, dividing markets, customers or geographical areas;
- To refrain from adopting deceptive business or marketing practices and/or aimed at distorting in customer's economic behavior.

## **5 INTELLECTUAL PROPERTY AND PERSONAL DATA**

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Equadro requires its suppliers to respect and protect its own and its customers' and partners' confidential and proprietary information.

In particular, it requires from its suppliers:

- To refrain from disclosing or communicating to third parties confidential information of customers accessed in the course of business dealings with them. Also refrain from taking advantage of them through economic transactions implemented on the basis of this information;
- Enter into confidentiality agreements in situations where access to confidential information of its customers is unavoidable for the performance of services or supply of products to its customers;
- Implement the management of personal data of its customers' reference persons in compliance with the mandatory regulations.

## **6 SUPPLIER'S COMMITMENT**

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This Code of Ethics and Conduct for Suppliers is submitted at the stage of qualification of its suppliers by Equadro, and signing it is an indispensable condition for entering into a business relationship.

Equadro may also request confirmation of the commitments contained in this document when entering into new contracts.

Equadro requires the supplier to commit to a similar model toward its suppliers in order to extend to the supply chain compliance with a system of rules based on the values contained in this code.