



Supplier Code of Conduct

INDEX

1. OBJECTIVE

2. REACH

3. DEVELOPMENT

1. PURPOSE

The Suppliers' Code of Conduct is based on the values contained in the Finmechanical Codes of Conduct. It is inspired by the UNITED Nations Universal Declaration of Human Rights, the ILO Tripartite Declaration of Principles on Multinational Enterprises and Social Policy and the OECD Guidelines for Multinational Enterprises.

2. SCOPE

This scope is defined only to Finmechanical within its organization and national and international extensions and in turn to its subcontractors, business partners and collaborators.

3. DEVELOPMENT

SUPPLIER SUSTAINABILITY POLICY

Finmechanical is a company that operates in accordance with its Codes of Conduct, such as the Code of Ethics, the Code of Basic Working Conditions, the Code of Conduct for Combating Corruption, the Non-Discrimination and Diversity Policy and the Control, Management and Organization Model, which establish the fundamental principles and values for the company.

Finmechanical aims to share and encourage behaviors in favor of sustainable development, promoting understanding and respect for diversity and building a true culture of integrity.

Finmechanical requires its suppliers, essential for the development of the Group, to adopt the same behaviors on issues such as human rights, health and safety at work, environmental protection and the fight against corruption, and to transfer this conduct to its supply chain.

The selection of Finmechanical suppliers is based not only on the quality and competitiveness of products and services, but also on environmentally friendly behavior and ethical values. These factors are a prerequisite for becoming a Finmechanical supplier and developing a lasting partnership.

REGULATORY FRAMEWORK

Suppliers must comply with the norms and standards in force in the countries in which they operate. If local regulations are less stringent than the principles contained in the Suppliers' Code of Conduct, suppliers undertake to take, within a reasonable time, the necessary measures to comply with the principles contained in the following Code.

Suppliers are required to comply with the following principles.

LABOUR AND HUMAN RIGHTS

1. Suppliers shall not employ child labour. They will never hire anyone under the age of 18, unless this is part of a government-authorized training, training or apprenticeship program that is clearly beneficial to the participant.
2. Suppliers may not use any form of forced labour. They will not tolerate physically abusive disciplinary practices. Suppliers oppose any kind of human trafficking.

- 3.** Suppliers shall recognise, respect and fully guarantee the right of their employees to work and associate freely in all their facilities. The supplier will work constructively with its employees, or with any organization representing such employees, with the aim of defending their interests. Suppliers will try to offer opportunities to employees to meet their needs. Suppliers will contract collectively when required by law or welfare systems.
- 4.** Suppliers shall not tolerate harassment or discrimination based on sex, race, colour, religion, belief, age, ethnic origin, nationality, marital/parental status, pregnancy, disability, sexual orientation or any other personal condition and shall recognise and promote the positive value of diversity.
- 5.** Suppliers shall provide and maintain a safe and healthy working environment that complies with or exceeds applicable occupational safety and health regulations.
- 6.** Suppliers shall comply with the applicable law governing working time.
- 7.** Suppliers guarantee remuneration and benefits in accordance with applicable law, in order to promote the material well-being of their employees as much as possible.
- 8.** Suppliers shall take into account the population and local communities among their main stakeholders in all projects they intend to carry out. Suppliers will openly share their plans with all recognized members of their stakeholders.

ETHICS

- 1.** In relation to the Finmechanical Anti-Corruption Code of Conduct, suppliers must act transparently and comprehensively in accordance with the anti-corruption laws applicable in all countries in which they carry out activities.

All forms of corruption, incitement to commit crimes, extortion and embezzlement are strictly prohibited.

Suppliers must not offer, promise, pay, claim, directly or indirectly, money (through bribes or subsidized payments) or other benefits to obtain an undue advantage, whether in cases where the undue advantage is offered directly or through an intermediary.

- 2.** Fair competition is a fundamental prerequisite for generating success through good performance and the creation of value for shareholders. Suppliers must operate in compliance with the competition, antitrust and commercial rules applicable in each country in which they operate. Agreements that prevent fair competition are strictly prohibited, such as, for example, commercial practices that may constitute a violation of antitrust laws.
- 3.** Suppliers shall report any actual or potential significant conflict of interest in the development of their business. There is a conflict of interest when personal interests or activities interfere or appear to interfere with the business relationship with Finmechanical.
- 4.** Suppliers should strongly oppose any form of money laundering and take measures to ensure the traceability of all economic and financial transactions. This makes it possible to identify the origin of the goods and/or money of each commercial transaction and to prevent their financial transactions from being used by third parties to launder money.

5. Suppliers must respect the intellectual property rights of third parties and protect the information and personal data of their customers.
6. The adoption of a code of conduct and the regular review of its implementation is strongly recommended.

ENVIRONMENTAL PROTECTION

To minimize the impact of Finmechanical's manufacturing activities and supply chain products on the environment, all Suppliers must:

1. do everything possible to optimize the use of natural resources, reduce emissions that pollute the environment and emissions of gases responsible for the "greenhouse effect".
2. design, use and/or suggest products and processes that take into account environmental impacts.
3. correctly manage, in compliance with applicable legislation, the treatment and disposal of waste.
4. avoid the use of prohibited substances (e.g., CMR, carcinogenic mutagens and toxic to reproduction) and properly manage potentially hazardous substances (as defined by applicable law).
5. adopt optimized logistics procedures that minimize the environmental impact.

FORMATION

Finmechanical encourages all suppliers to disseminate the aforementioned principles, including through the appropriate training of employees of its supplier base.

NOTIFICATION OF INFRINGEMENTS

Suppliers are required to notify Finmechanical of any violation by Finmechanical employees and/or their employees of the Code of Ethics, the Code of Conduct for Combating Corruption, the Organization's Management and Control Model and, in general, Finmechanical's Internal Control System through the following e-mail: info@finmechanical.com Finmechanical guarantees the confidentiality of the identity of the whistleblower in good faith and refuses to take or take any action that violates the Suppliers' Code of Conduct.

Suppliers also undertake to keep the documentation and/or information necessary to corroborate this relationship.

Finmechanical reserves the right to verify such documentation when it deems it necessary.

FOLLOW-UP AND CORRECTION ACTIONS

Finmechanical reserves the right to carry out audits by Finmechanical staff and/or third parties, in good time, on the issues addressed in this Code of Conduct.

In case of non-compliance, Finmechanical:

- require suppliers to prepare and implement a non-compliance remediation plan;

- carry out documentation audits and/or additional audits to determine the effective implementation of these corrective plans, upon notification.

In the event that the Supplier violates the Supplier's Code of Conduct or, in the event of non-compliance and that the planned improvement plans are not being drawn up and executed, Finmechanical reserves the right to suspend and/or terminate any business relationship in advance and with immediate effect, and to take appropriate measures to compensate for losses, damages, expenses or other costs incurred that are due to any violation and/or conduct by the Supplier.

SUPPLIER COMMITMENT

Finmechanical requires all Suppliers who receive the Supplier Code of Conduct to submit this "Commitment Form" signed by a legal representative.