

## Code of Conduct for Suppliers

### Introduction

Long-term cooperation, mutual commitment, sustainability and social responsibility are important principles for FuturaSun. Therefore, these principles are of particular importance in the procurement of raw materials, semi-finished and finished products and services. We also expect our suppliers to adhere to these principles.

This code applies to all FuturaSun suppliers worldwide. The requirements of this code extend to all employees of the supplier, regardless of their role or relationship with the supplier. This code therefore also applies to workers who are employed informally, on short-term contracts, or on a part-time basis.

To the extent that this is reasonable and possible, suppliers will actively encourage their sub-suppliers or subcontractors to comply with the guidelines of this Code. FuturaSun may explicitly require suppliers to also extend this code to selected sub-suppliers.

The observance of this code is a mandatory component of any type of business relationship between FuturaSun and its suppliers.

This code is based on guidelines and standards such as:

- the United Nations Universal Declaration of Human Rights
- the United Nations Convention on the Rights of the Child
- the ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- the principles of the United Nations Global Compact

### FuturaSun and Suppliers' Commitments

FuturaSun is committed to ethical business practices and we hold our suppliers to the same high standards. It is FuturaSun's policy to comply with all applicable laws and regulations of the countries and regions in which we operate and to conduct our business activities in an honest and ethical manner. FuturaSun's Code of Conduct declares that FuturaSun expects its suppliers to uphold the policies of FuturaSun concerning compliance with all applicable laws, respect for human rights, environmental conservation and the safety of products and services.

This Code is maintained and updated to reflect FuturaSun's standards and supplier operations.

FuturaSun hereby requires its suppliers to comply with this FuturaSun's "Code of Conduct for Suppliers".

Suppliers must ensure that this Code is enforced

through appropriate disciplinary measures. Suppliers are also obliged to make contractual arrangements to also ensure all their subcontractors comply with the standards and rules set out in this Code.

Suppliers have a duty to report all suspected or actual violations of the Code, or of any applicable laws and regulations. Suppliers must make all such disclosures to FuturaSun.

Any Supplier violating this Code, or any other FuturaSun policy or applicable laws, shall be subject to discipline, up to and including suspension or termination of a business relationship; FuturaSun may also institute a civil action in response to such violations to, among other things, enforce its legal and equitable rights, and to obtain restitution, contribution, and/or damages. The present Code of Conduct is subject to Italian law and the place of jurisdiction is Padua court in case of disputes.

FuturaSun may revise or supplement this Code at any time. FuturaSun will distribute promptly any such modification, and at that time Supplier will be required to sign a new acknowledgement to reaffirm your agreement to adhere to the latest version of the Code.

### 1. Labour practice and standards

**UN Global Compact Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights.

**UN Global Compact Principle 2:** Businesses should make sure that they are not complicit in human rights abuses.

### Working Hours

Studies of business practices clearly link worker strain to reduced productivity, increased personnel turnover and increased injury and illness. Working weeks are not to exceed the maximum set by local law. Workers shall be allowed at least one day off per seven-day week.

### Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay

rates greater than regular hourly rates. The basis on which workers are being paid is to be provided in a timely manner via pay stub or similar documentation.

## Humane Treatment

There is to be no harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers: nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

## Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) are to be controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tag out) and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate and well-maintained personal protective equipment. Workers shall not be disciplined for raising safety concerns.

## Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.

## Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to: a) encourage worker reporting; b) classify and record injury and illness cases; c) provide necessary medical treatment; d) investigate cases and implement corrective actions to eliminate their causes; and d) facilitate return of workers to work.

## Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, worker health is to be protected by appropriate personal protective equipment programs.

## Physically Demanding Work

Worker exposure to the hazard of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

## Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

## Sanitation, Food and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage facilities and eating facilities. Worker dormitories provided by the Suppliers or a labor agent are to be maintained clean and safe, and provide with appropriate emergency exits, hot water for bathing and showering, adequate heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

**UN Global Compact Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Open communication and direct engagement between workers and management are the most effective way to resolve workplace and compensation issues. The rights of workers to associate freely, join or not join labor unions, seek representation and join workers' councils as well as right of collective bargaining in accordance with local laws shall be respected. Workers shall be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment.

**UN Compact Principle 4:** the elimination of all forms of forced and compulsory labor.

Forced, bonded (including debt bondage) or indentured labor or involuntary prison labor: slavery or trafficking of persons shall not be used. This includes transporting, harboring, recruiting, transferring or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment. Excessive fees are unacceptable and all fees charged to workers must be disclosed.

**UN Compact Principle 5:** the effective abolition of child labor.

Child labor is not to be used in any stage of manufacturing. The term “child” refers to any person employed under the age of 15 (or 14 where the law of the country permits), or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace apprenticeship programs, which comply with all laws and regulations, is supported. Workers under the age of 18 shall not perform work that is likely to jeopardize the health or safety of young workers.

**UN Compact Principle 6:** the elimination of discrimination in respect of employment and occupation.

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory way.

## 2. Environment

**UN Global Compact Principle 7:** Businesses should support a precautionary approach to environmental challenges.

**UN Global Compact Principle 8:** Businesses should undertake initiatives to promote greater environmental responsibility.

**UN Global Compact Principle 9:** Businesses should encourage the development and diffusion of environmentally friendly technologies.

### Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

### Pollution Prevention and Resource Reduction

The use of resources and generation of waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

### Hazardous Substances

Chemicals and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

### Wastewater and Solid Waste

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). Wastewater generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal. In addition, measures should be implemented to reduce generation of wastewater. Suppliers shall conduct routine monitoring of the performance of its wastewater treatment systems.

### Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting

chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Suppliers shall conduct routine monitoring of the performance of its air emission control systems.

### Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal. Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001, the Eco Management and Audit System (EMAS) were used as references in preparing the Code and may be a useful source of additional information.

### 3. Ethical practices

**UN Global Compact Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

#### Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be transparently performed and accurately reflected on Suppliers' business books and records. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

#### No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

### Disclosure of Information

Information regarding business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

### Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights.

### Fair Business, Advertising and Competition

Standards of fair business, advertising and competition are to be upheld. Means to safeguard customer information should be available.

### Protection of Identity

Programs that ensure the confidentiality and protection of supplier and employee whistleblower are to be maintained.

### Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that all mineral including but not limited to: the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in any country but not limited to: the Democratic Republic of Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

### Privacy

Suppliers are committed to protecting the reasonable privacy expectations of personal information of everyone suppliers do business with, including suppliers, customers, consumers and employees. Suppliers shall comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

## Non-Retaliation

Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

**I acknowledge that I have read, understand, and agree with all the articles in this Code of Conduct described above.**

Date \_\_\_\_\_

Supplier's company details \_\_\_\_\_

Full Name \_\_\_\_\_

\_\_\_\_\_

Position \_\_\_\_\_

\_\_\_\_\_

Signature \_\_\_\_\_