

SUPPLIERS CODE OF CONDUCT

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INTRODUCTION

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TMB S.p.A. believes that the achievement of its results is also determined by its values that have influenced the way the Company operates, makes decisions and relates to the world.

Therefore, for TMB S.p.A. it is important that its suppliers adopt shared rules and values on topics such as human rights, health and safety in the workplace, environmental protection and fair competition.

In line with the provisions of its Code of Ethics, TMB S.p.A. adopts this Supplier Code of Conduct (hereinafter Code of Conduct) to ensure compliance with its ethical principles and for a sustainable business development.

Being compliant with this Code of Conduct is a necessary condition for a long-term collaboration between TMB S.p.A. and its Suppliers.

A handwritten signature in blue ink, appearing to read 'Luca Minguzzi'.

LAW COMPLIANCE

01

Suppliers are required to comply with applicable laws and regulations in the countries in which they operate, including labor law, human rights, workplace health and safety laws, laws related to environment, anti-corruption, safety and product quality.

If local regulations are less stringent than the rules contained in the Code of Conduct, the Suppliers undertake to adopt the necessary measures to adapt to the principles contained in this Code of Conduct, provided that the same does not violate mandatory laws and regulations applicable locally.

WORK AND **HUMAN RIGHTS**

02

TMB S.p.A. is committed to respect and promote human rights, workers' rights and creating a collaborative and inclusive environment every day, repudiating all forms of discrimination and supporting the personal and professional growth of each worker. TMB S.p.A. expects its Suppliers to be committed in the same way.

2.1 CHILD LABOUR

The minimum age for employment as required by law must be respected and child labour must not be exploited. Suppliers are also required to comply with the International Convention on the Rights of the Child and the regulations of the International Labour Organization (ILO).

2.2 FORCED LABOUR

No form of forced labour must be used or any disciplinary practice involving the use of physical violence must be tolerated, and any form of trafficking human beings must be opposed.

Workers must be in possession and have direct control of their personal identity documents, have freedom of movement and the right to terminate their employment relationship, while respecting the notice periods provided by laws, without fear of retaliation or punishment.

2.3 FREEDOM ASSOCIATION AND TRADE UNION

The right to work, freedom of association and freedom of association without retaliation of its employees in all establishments must be fully respected and guaranteed.

2.4 PROHIBITION OF HARASSMENT AND DISCRIMINATION

No form of harassment and/or discrimination based on gender, race, colour, religious belief, age, origin, sexual orientation or any other personal condition must be tolerated. Furthermore, we must refrain from engaging in any discriminatory practice regarding recruitment, distribution, access to training, remuneration or promotion. Gender equality of opportunity on the basis of professional qualifications must be ensured, including through specific policies.

2.5 WORKING HOURS AND ADEQUATE PAY

National and international labour standards and applicable collective agreements must be respected. Employees must be guaranteed to be able to enjoy local holidays provided for by law, paid annual leave, parental leave, sick leave, as well as any other leave required by law and applicable collective agreements. Under no circumstances shall weekly working hours be exceeded and the right to breaks shall be guaranteed in accordance with applicable laws and collective agreements.

Employees must be treated with respect and adequately remunerated in accordance with applicable legal regulations. Furthermore, the forms of employment provided for by law must be respected, avoiding the use of any irregular method, including the commitment of workers without a regular residence permit. Employees and collaborators must be guaranteed social security, welfare and insurance treatments in accordance with the applicable laws and regulatory provisions, as well as the collective agreements adopted.

HEALTH AND SAFETY

03

For TMB S.p.A. it is essential to offer its workers high quality workplaces by promoting and adopting prevention and health care measures.

For TMB S.p.A. it is important that Suppliers also create and promote healthy and safe work environments.

3.1 COMPLIANCE WITH LEGISLATION ON SAFETY AT WORK

The current legislation on health and safety at work must be respected, guaranteeing its employees and collaborators a safe, hygienic and healthy working environment, in consideration of the sector in which they operate and the risks associated with the activities carried out.

In addition, appropriate precautions must be taken to prevent accidents and damage to the health of their workers, minimizing the risks inherent to work as much as possible. For this reason, will be used prevention and emergency response tools, personal protective equipment, ensuring safety of equipment and electrical installations, limiting noise pollution, and providing adequate lighting, ventilation, hygiene, access to drinking water and guaranteeing cleanliness in the workplace.

In addition, workers should be offered dedicated trainings about health and safety at work.

ENVIRONMENTAL **PROTECTION**

04

TMB S.p.A. considers the environment a fundamental asset of the community that needs to be safeguarded. Therefore, TMB S.p.A. is committed to respect the environment throughout the entire production chain and expects suppliers to do the same. In particular, TMB S.p.A. requests that its Suppliers undertake to minimize the environmental impact of their activities, including the use of energy from renewable sources, the correct disposal of waste, the containment of greenhouse gas emissions, the mitigation of impacts on biodiversity and ecosystems.

4.1 COMPLIANCE WITH ENVIRONMENTAL LAWS AND AUTHORIZATIONS

Environmental laws and regulations must be respected. In addition, authorizations must be obtained and maintained for the conduct of the activity, the management and disposal of waste and hazardous materials, the emissions of contaminated agents that have an impact on the air.

4.2 NATURAL RESOURCES

We must strive to optimize the use of natural resources, adopting production processes that aim to reduce waste. Suppliers must take into account the environmental impact of their products and safeguard natural resources through their reasonable use. Where possible, Suppliers must evaluate the introduction of technological and process improvements.

4.3 ENVIRONMENTAL IMPACT AND WASTE MANAGEMENT

Suppliers must be committed to proper waste management and must comply with local regulations. TMB S.p.A. encourages Suppliers to adopt solutions aimed at responsible and sustainable waste management based on the principles of the circular economy.

We must commit to design and use products that take into account the impacts on the environment. In the development, manufacture and use of products, the aim must be to reduce waste, reuse and recycle, as well as to dispose of it properly.

4.4 EMISSIONS TO AIR

All laws and regulations relating to air quality must be complied with. In addition, where possible, quality and emission control systems must be established.

4.5 WATER MANAGEMENT

All laws and regulations relating to water and water conservation must be respected and actions must be taken where possible to reduce water use and make responsible the use of water.

All wastewater must be treated in accordance with the law and periodic plant checks must be carried out to ensure optimal performance.

4.6 ENERGY RESOURCES

It is important that everyone commits to improve energy performance and reduce greenhouse gas emissions. When procuring energy-using products, equipment and services, their energy efficiency must be taken into account. It is important to document electricity usage for each facility and implement policies to improve energy efficiency, as well as promote the use of renewable energy sources.

In addition, Suppliers must commit to report greenhouse gas emissions and implement projects and set targets for their reduction.

CONFLICT MINERALS

05

All Suppliers must declare to TMB S.p.A. the origin of the materials regulated by the legislation related to *Conflict Minerals*, such as Gold, Coltan, Cassiterite, Wolf Ramite and their derivatives such as Tantalum, Tin and Tungsten if contained in the products to be supplied.

Suppliers are required to carry out a thorough investigation of their supply chain in compliance with the OECD Guidelines.

INFORMATION **MANAGEMENT**

06

The technical know-how of TMB S.p.A. is the basis of its success. The protection of information and personal data are essential elements that have allowed the development of relationships of trust with our stakeholders. Therefore, TMB S.p.A. expects Suppliers to be attentive to these issues.

6.1 RESPECT FOR INTELLECTUAL PROPERTY

Specific procedures must be adopted to protect the company's know-how and the information received in carrying out the activities. Information that a party becomes aware of in the course of its business may not be disclosed.

Suppliers are required to comply with all intellectual property laws.

6.2 PRIVACY POLICY

The protection of personal data regulation EU Reg. 2016/679 must be respected and a policy for the protection of personal data must be adopted. Suppliers must protect the personal data of TMB S.p.A. employees and customers using such data for legitimate and authorized business purposes only. Suppliers shall clearly disclose when and how they collect, use or share any personal data.

6.3 IMPORT AND EXPORT

All applicable laws must be complied with in relation to the import and export of goods and products.

TMB S.p.A. expects its Suppliers not to violate domestic trade and international export controls.

6.4 COUNTERFEIT

Suppliers must guarantee the authenticity of the goods sent to TMB S.p.A.. Controls must be activated to prevent the delivery of counterfeit goods.

BUSINESS RELATIONS

07

TMB S.p.A. promotes and respects the principles of loyalty, fairness and transparency in the performance of its activities and in relations with its Suppliers and Customers.

Suppliers are in turn required to comply with these principles and to operate in compliance with applicable laws and commitments.

7.1 FIGHT AGAINST CORRUPTION

Any form of corruption, incitement to crime, extortion and embezzlement is strictly prohibited. In commercial relations, parties must operate with transparency and integrity respecting anti-corruption regulations. They must not offer, promise, pay, directly or indirectly solicit money or other benefits, including gifts or benefits that exceed normal courtesy practices, with the aim of obtaining an undue advantage.

7.2 CONFLICT OF INTEREST

There should be no conflict of interest, actual or potential. Suppliers must make their decisions exclusively on the basis of objective criteria without allowing themselves to be influenced by their interests and personal relationships.

7.3 FREE COMPETITION

Competition and antitrust rules must always be complied with. Anti-competitive agreements with competitors, suppliers, customers or third parties is prohibited, same as adopting practices that have a restrictive effect on competition.

7.4 MONEY-LAUNDERING

It is prohibited to engage in or maintain commercial or financial relationships in cases where there is reasonable doubt that the counterparties may engage in conduct constituting a money laundering offence. To this end, measures must be taken to ensure that each economic and financial transaction is traced, prohibiting any irregularity which, in accordance with normal diligence, gives rise to suspicion as to the origin of the money received.

TRAINING

08

TMB S.p.A. encourages Suppliers to disseminate the above principles to their employees and collaborators in order to ensure compliance with them.

REPORTING VIOLATIONS

cd. Whistleblowing

09

Following Legislative Decree 10 March 2023 n. 24 which implemented EU Directive 2019/1937 concerning "The protection of people who report violations of Union law" (so-called *whistleblowing discipline*), violations of the Code of Ethics and the Organizational Model can be reported via the following link:

<https://tmbspa.integrityline.com>

The procedures for reporting and verifying violations are based on criteria of confidentiality and the identity of the reporter in order to prevent retaliation of any kind against them and to guarantee effective and truthful verification of the facts.

To find out more about managing reports you can visit the FAQ section at:

<https://tmbspa.integrityline.com>

MONITORING AND AUDITING ACIVITIES

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TMB S.p.A. reserves the right to verify compliance with this Code by the Supplier. These checks may also be carried out through third-party audits or questionnaires.

In the event of non-compliance, Suppliers are required to endeavour to improve and/or correct any deficiencies/non-conformities.

Violation of this Code by the Supplier may result in termination of the contract.

COMMITMENT FORM



TMB S.p.A. requests that Suppliers who receive this Code of Conduct return the Commitment Form signed by the legal representative and send it to the following e-mail address:

legale@tmbspa.com

The form has been prepared for digital compilation.

SUPPLIERS POLICY

By signing this form, the Supplier declares that they have read and accepted all the principles and conditions included in the Supplier Policy.

COMPANY NAME:

VAT N°/DUNS:

ADDRESS:

NAME AND SURNAME OF THE SIGNATORY:

ROLE OF THE SIGNATORY:

E-MAIL ADDRESS OF THE SIGNATORY:

DATE:

SIGNATURE:



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