

SUPPLIER CODE OF CONDUCT

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Introduction

This Supplier Code of Conduct sets out the principles and standards that Prima Electro S.p.A. requires of its supply partners.

Working with Prima Electro implies adherence to shared values of responsibility, integrity, and quality—fundamental elements to ensure operational continuity and reliability throughout the entire supply chain.

To ensure compliance, Prima Electro reserves the right to carry out assessments and audits of its suppliers and expects them to cooperate in a transparent manner. If this Supplier Code of Conduct is not complied with, corrective actions must be taken. Prima Electro will regularly monitor and verify progress and encourages ongoing dialogue between the parties.

However, should the Supplier Code of Conduct be seriously and repeatedly breached, future cooperation with Prima Electro may be jeopardized.

This Supplier Code of Conduct is based on the **United Nations Global Compact** (<https://unglobalcompact.org/>).

Ethical Business and Professional Responsibility

Legal Compliance

Prima Electro expects suppliers to operate in full compliance with applicable laws and regulations and in accordance with principles of professional integrity. Corrupt practices, unethical behaviour, or any action aimed at obtaining improper commercial advantages are prohibited. The principles of the Supplier Code of Conduct serve as mandatory guidelines where no specific local laws exist. We encourage our suppliers to work in accordance with recognized management systems to ensure full compliance with these requirements.

Suppliers undertake to protect the confidentiality of confidential information relating to Prima Electro's business partners and customers, as well as other information regarding Prima Electro's business operations.

Supply Chain Responsibility

The supplier is responsible for ensuring compliance also by its own subcontractors. It is essential that the entire supply chain complies with the principles set out by Prima Electro, by adopting verifiable, transparent, and traceable processes.

The supplier must therefore ensure oversight of its upstream partners, guaranteeing alignment with the standards of this Code.

Transparency

All suppliers commit to being fully open and transparent regarding any changes to:

- the product/service they provide to Prima Electro
- their facilities, including ownership and operating structure.

This is particularly critical if any change has the potential to affect our ability to meet customer needs and expectations, or if such change could harm our reputation and/or pose a risk to business operations.

Intellectual Property

Prima Electro suppliers must be aware that any information received from Prima Electro's customers and from Prima Electro itself, submitted in in any form or medium, and used to support the manufacture and/or procurement of their products, is the exclusive property of the customer. The supplier acknowledges and agrees that such information is strictly confidential and must not be reproduced, shared, or disclosed to third parties without the customer's written permission.

Worker Protection and Human Rights

Prima Electro requires its suppliers to fully respect fundamental human rights.

Suppliers must ensure safe and fair working conditions in compliance with applicable regulations, avoiding any form of discrimination, exploitation, child labour, or forced labour.

Respect for workers' dignity, equal treatment, and contractual compliance are essential. Suppliers must treat their employees with respect and must not tolerate any involvement in unprofessional conduct or complicity in harassment, for any reason or under any circumstances.

All forms of discrimination are prohibited, including discrimination based on race, age, religion, political opinion, nationality, ethnic origin, social origin, disability, sexual orientation, etc.

Workplace Health and Safety

Suppliers must adopt a systematic approach to protecting health and safety by identifying risks and implementing appropriate preventive measures.

Activities must be carried out in environments that comply with safety standards, with trained personnel provided with the necessary equipment.

It is the supplier's responsibility to ensure the maintenance of infrastructure and the implementation of suitable and effective emergency management procedures.

Quality and Technical Compliance

Suppliers must operate under appropriate quality management systems, ensuring controlled processes and products that comply with applicable technical standards.

The materials, components, and services supplied must ensure high levels of reliability and safety, consistent with Prima Electro's technological requirements.

Any significant changes in the supplier's organizational or production set-up must be promptly communicated in order to ensure continuity and transparency in the business relationship

Environment and Sustainability

Prima Electro promotes a sustainable industrial model and expects suppliers to adopt consistent practices. Compliance with environmental regulations and responsible management of waste, emissions, and hazardous substances are required.

Suppliers must commit to reducing environmental impacts, using resources efficiently, and supporting transparency of environmental data throughout the supply chain.

Organisational Model pursuant to Legislative Decree 231 and Code of Conduct

The Supplier acknowledges that Prima Electro, pursuant to Italian Legislative Decree No. 231 of 8 June 2001 (the "Decree"), has also adopted an Organisational Model under Decree 231 and a Code of Conduct (available for free consultation at the Company's registered office and downloadable free of charge from www.primaelectro.com).

The Supplier undertakes to refrain from any conduct that may constitute an offence under the Decree, regardless of whether the offence is committed or punishable, and to operate in compliance with the provisions and principles of the Decree itself.

The Supplier further undertakes to comply, within the scope of its responsibilities and as amended from time to time, with the provisions of the Code of Conduct, in relation to the fulfilment of its obligations under the Contract and throughout its dealings with the Company. In the event of a breach of the Organisational Model under Decree 231 and/or the Code of Conduct, the Company shall be entitled to terminate the Contract with immediate effect and to claim compensation from the Supplier for any damages suffered, within the quantified limits.

Acceptance of the Code

Acceptance of this Code is an essential requirement to establish and continue the supplier relationship with Prima Electro.

The supplier undertakes to disseminate its contents within its organization and to ensure compliance through appropriate internal management and control processes

Signature

Date

Company

The Company's Purchasing Department is available to provide support regarding the interpretation and implementation of this Supplier Code of Conduct.

For assistance requests, the Supplier is invited to contact their main point of contact at Prima Electro at the following address:

Prima Electro S.p.A.
Strada Carignano 48/2
10024 Moncalieri (TO)
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