

SUPPLIER CODE OF CONDUCT

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1.0 INTRODUCTION

In Claber's vision, being a responsible company means transforming its business model to achieve an ideal balance, with the objective of creating economic value and having a positive impact on the planet and on people's lives.

This Code of Conduct provides the foundation for our continuous collaboration with our suppliers on their ethical, social, and environmental performance.

Claber suppliers play a central role in the mission to develop more sustainable and responsible business practices. As such, we expect our suppliers to also run their operation in a responsible way and to manage adverse impacts on human rights, environment and anti-corruption within their business.

2.0 OUR EXPECTATION

Suppliers undertakes to respect in all areas the laws and regulations in force in all of the countries in which it operates and/or sells. When legislation is lower than the international standards outlined below, suppliers are still required to converge to the latest.

Moreover, we expect our suppliers to ask their respective suppliers to demonstrate responsible business conduct in relation to social, environmental, and economic sustainability too.

3.0 HUMAN RIGHTS INCLUDING LABOUR RIGHTS

Concerning Human Rights including Labour Rights, Suppliers shall:

- not use illegal child labour with reference to the national legislation applicable. The employment of young workers below the adult age shall only occur when young workers are above a country's legal age for employment.

In this case a specific induction training for workers is necessary;

- pay workers according to applicable wage laws, overtime hours and benefits. Working hours for employees shall not exceed the maximum set by national law;
- not use forced, involuntary or slave labour;
- not obstruct employee representation and commit to dialogue with employees and workers representatives in accordance with local laws;
- provide equal employment opportunities to all employees and applicants without discrimination.

The responsibility to respect human rights refers to internationally recognized human rights contained in the International Bill of Human Rights. All human rights should be the subject of periodic review.

3.1 HEALTH AND SAFETY

H&S is a top priority for all employees and is fundamental to strive and ensure a safe, good, and healthy working environment.

Suppliers shall:

- provide a secure and healthy working environment for all their workforce;
- develop and implement effective health and safety management systems;
- identify, label, and manage hazardous substances, chemicals, waste, and other materials posing danger to humans or the environment, to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

4.0 ENVIRONMENT AND SUSTAINABILITY

We expect our suppliers to support this responsibility by offering sustainable solutions, services, and products throughout the entire supply chain and to implement proper environmental management systems where applicable.

Suppliers shall not only comply with all environmental laws and regulations, but also implement measures contributing to the protection of the environment. Therefore, they should strive to minimize the adverse environmental impact of their products and services.

The Suppliers shall promote where applicable the development of technologies limiting CO2 emissions as well as energy saving and recycling solutions including logistic strategies with the same goal to minimize environmental impact.

Suppliers shall seek to reduce and optimise water consumption in their operations and throughout the lifecycle of their products.

5.0 ANTI-CORRUPTION / NO CORRUPTION & BRIBERY

Suppliers shall prevent and fight all forms of corruption, bribery, extortion and improper advantage, and comply with all applicable laws pertaining to these issues.

Suppliers should not, directly or indirectly, offer, promise, give, demand or accept any bribe or other undue advantage, to Claber employees, public officials or other private or public actors, with the intention to obtain or retain business or any other improper advantage.

Suppliers should develop and adopt adequate internal controls, ethics and compliance programmes or measures for preventing and detecting bribery. These may include promoting employee awareness of the company policies against bribery and, in compliance with the applicable national legislation, a system of financial and accounting procedures, reasonably designed to ensure the maintenance of fair, transparent and accurate books, records, and accounts.

6.0 CONTRACTUAL ARRANGEMENTS

We expect our suppliers to cooperate by answering questions, delivering data related to compliance and sustainability, carrying out self-assessments, and - if deemed necessary - to cooperate with Claber in addressing specific impacts.

If a supplier fails to comply with our expectations, described in this Code of Conduct, the suppliers must self-correct within a fixed period.

We are aware that improving ethical, social, and environmental performance requires resources and time. However, by failure to notify about severe impacts, failure to self-correct or failure to demonstrate willingness to address identified adverse impacts, Claber reserves the right to reduce or minimize to zero the business.

As an international company, Claber has voluntarily signed up to the international conventions and recommendations on corporate behavior, which form the working basis of this Code.

The most relevant conventions and recommendations that were taken into account in drawing up the Code are listed below:

- The Universal Declaration of Human Rights (UN).
- The United Nations' Global Compact (UN).
- Declarations of the International Labor Organization (ILO).
- The EU Taxonomy, the Rio Declaration on Environment and Development, including the climate as reflected in the Glasgow Agreement.
- "Agenda 21" for Sustainable Development (UN).

Suppliers shall respect the principles established in them in conducting their business.



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