CODE OF CONDUCT FOR SUPPLIERS

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Introduction

Tesmec Group (hereinafter also Tesmec, Group or Company) considers sustainability an asset of strategic importance and is constantly committed to promoting more sustainable development.

Tesmec put in place specific actions for the protection of the environment in which it operates, for the respect of human rights ensuring ethical behavior in the running of business and in the relationship with the stakeholders.

In this context, the Group promotes the sharing and the respect of the principles of sustainable action along the entire supply chain, as it believes in the synergy between doing business, respect for the environment and social responsibility.

Our commitments

Tesmec's primary goal is the sharing and dissemination of behaviours in support of sustainable development, encouraging a proper use of resources, respect for diversity and spreading the culture of integrity within its Group.

Tesmec Group's commitments in the field of sustainability are defined in the Sustainability Policy, approved by the Board of Directors of Tesmec S.p.A., applied to all Tesmec Group companies in compliance with the Code of Ethics, the 231 Organizational Model and all other company policies.

The Sustainability Policy contains the principles that guide the Group in contributing to the development of a responsible business from an economic, social and environmental point of view along the entire value chain, in order to create positive impacts and minimize negative ones, generating value both for the company and for all stakeholders. This document identifies the strategic guidelines and defines common medium-long term objectives to which all stakeholders, internal and external, can collaborate to achieve them:

- Environment, focus on Products: sizing and increasing the share of green & digital technological solutions. Addressing the product development towards an increasingly sustainable innovation with particular attention to the electrification of equipment for the minimization of the environmental impact, to the diagnostics & IoT for the increase of safety of infrastructures and to the optimization and digitalization of networks for an efficient use of energy resources

- Environment, focus on Processes: promoting the circular economy and integrating environmental aspects within business processes, to correctly manage the use of resources, promoting the reduction of direct and indirect environmental impacts, favoring sustainable procurement policies of products and services

- Social, focus on Human Resources and Stakeholders: enhancing the human capital and wellbeing of employees, ensuring a safe and inclusive work environment. Ensuring the development of skills and competences, through recruitment, training and professional growth based on equity and merit, fighting all forms of discrimination. Strengthening the relationship with the territory by supporting the local community through active participation in charitable and voluntary initiatives
- Governance, focus on Sustainability governance: designing effective governance on sustainability issues for the coordination, management and monitoring of actions planned to achieve the SDGs. Constantly committing to carrying out corporate activities in accordance with the highest ethical standards, operating in compliance with applicable laws and regulations on the subject

The sharing and compliance with these commitments extends to anyone working within Tesmec and business partners, starting with Suppliers and contractors and their subsidiaries, affiliates and subcontractors, involving all other entities that are part of the entire supply chain (hereinafter "Suppliers").

Our expectations

Tesmec is a Group that operates in compliance with its Codes of Conduct such as the Code of Ethics and the Organizational, Management and Control Model pursuant to Legislative Decree 231/01 which prescribe the principles, values and protocols of conduct, integral parts of the company.

Tesmec invests in the continuous innovation of products and processes, ensuring quality, safety and efficiency. A quality product is the result of collaboration and joint efforts between all players in the supply chain. Tesmec believes in the importance of developing synergies with those who not only guarantee reliability of performance, but who share the values and expectations of the Company also in terms of ethical, environmental and social standards.

The Group's approach to integrating sustainability into the business is concretely expressed in the relationship established with Suppliers right from the selection phase.

In the choice of its Suppliers, Tesmec selects reliable partners not only on the basis of quality standards and competitiveness, but also on adherence to ethical values and socio-environmental performance.

To this end, Tesmec requires the sharing and respect of the principles and values of sustainability identified in this Code of Conduct for Suppliers (hereinafter "Code") through its signature by the legal representative.

Working with partners who demonstrate commitment and conviction in undertaking a path of sustainable development allows the achievement of one of the most strategic business target: to have a responsible supply chain, built on stable and lasting relationships based on respect, transparency and integrity.

Legal framework

Suppliers are required to comply with the rules and standards in force in the countries in which they operate.

If the local regulations are less stringent than the principles contained in this Code, Suppliers undertake to adopt, within a reasonable period of time, the necessary measures to comply with these principles.

Social standards: LABOUR AND HUMAN RIGHTS

The Tesmec Group strongly believes that the defense and enhancement of human rights, especially in the workplace, is an indispensable prerogative to undertake any economic and commercial relationship.

This principle is based on the protection of employees, both by Tesmec and by its Suppliers. Employees must be treated with dignity and respect, ensuring that they are not subjected to harassment, cruel treatment, violence, intimidation, corporal punishment, physical or psychological coercion, verbal abuse, and discrimination in the workplace.

Health and safety in the workplace

Suppliers must provide all their employees with a safe, secure, and healthy working environment that meets or exceeds applicable occupational safety and health standards.
It is therefore suggested to establish a system for the management of the safety and health of workers in accordance with international standards on the subject (ISO 45001 or equivalent).

Suppliers are also required to adopt appropriate safety procedures and to implement all necessary measures to reduce the risk of accidents, injuries or exposure to harmful substances, minimizing the impact of dangerous situations through the implementation of emergency plans and response procedures.

Suppliers, sharing this Code, recognize the fundamental role that worker training assumes to identify and prevent critical issues in the field of health and safety in the workplace. It is important, therefore, that Suppliers guarantee continuous training and ensure that employees are duly informed and updated on these issues.

Forced labor and child labor

Suppliers undertake to protect the right to employment and voluntary provision and must not avail themselves of any form of forced labour. They must not tolerate the use of any disciplinary practice involving the use of physical violence and must oppose any form of exploitation of children.

In Tesmec, in fact, any type of child labor is not tolerated in the supply chain and in all the activities of the Suppliers, outside the cases contemplated by law (for example collaborations with educational institutions).

Diversity and equal opportunities

Suppliers shall not tolerate any form of harassment and/or discrimination in the field of gender, age, ethnicity, nationality, religion, physical or psychological disability, trade union membership, political affiliation or sexual orientation. Workers must be treated fairly, respectfully and with dignity, guaranteeing equal opportunities for all.

The terms and conditions of employment with the Supplier, including recruitment, training, working conditions, remuneration, allowances, promotions, discipline, dismissal or retirement, shall be based exclusively objectively on the qualifications, performance, skills and experience of each individual.

Payroll, benefits and working hours

Tesmec requires its Suppliers to comply with all current regulations regarding wages and working hours, including allowances, benefits, and overtime.

Suppliers are required to provide employees with fair remuneration and benefits, in full compliance with current legislation and contracts obtained through collective bargaining, together with the regular payment of all insurance, social security and social assistance contributions.

Freedom of association

Suppliers must fully recognize, respect, and guarantee the right to work and free association of their employees in all plants.

Suppliers must work constructively with their employees, or any organization that represents them, to promote their best interests. They must also try to create opportunities for dialogue with their employees. Suppliers must apply forms of collective bargaining where it is provided for by social rules and/or systems.

Environmental standards: PROTECTION AND RESPECT FOR THE ENVIRONMENT

Protecting the environment is the main challenge that a global company must overcome, to guarantee a sustainable future for our planet and for the new generations.

Tesmec works actively to reduce the environmental impact of its products, improving technologies aimed at reducing emissions and consumption. At the same time, every activity of the production plants is dedicated to waste reduction, recycling, energy saving and consumption optimization, creating a culture to be shared with all stakeholders. This commitment has resulted in the implementation and maintenance of an Environmental Management System at its production plants and offices with the certification of the international standard ISO 14001 for all companies based in Italy.

Tesmec requires that all its Suppliers share this approach, respecting principles and commitments in the field of environmental protection, with the aim of achieving a sustainable supply chain that minimizes environmental impact.

Environmental compliance

Tesmec activities are carried out in compliance with applicable environmental regulations. The same commitment is therefore required of the Suppliers.

Tesmec requires Suppliers to move towards an eco-sustainable approach within their company organization, also through certified environmental management systems, procedures for tracking and monitoring the environmental impacts of the activities carried out, policies to promote energy saving and the use of renewable energy sources.

Minimization of environmental impact

Tesmec encourages Suppliers to measure and reduce the impact of their activities on the climate and environment of the entire production chain, with the aim of minimizing the environmental footprint of all products.

The Group promotes all actions aimed at reducing polluting emissions and those of gases considered responsible for the "greenhouse effect", reducing the use of natural resources, recycling materials, and increasing energy efficiency.

The use of hazardous substances by Suppliers must be managed responsibly and in compliance with the requirements imposed by law. Suppliers must prohibit the use of substances subject to specific national and international bans as harmful to humans or the environment, putting in place appropriate measures for the management, storage, and transport of dangerous substances.

Suppliers must appropriately manage, in accordance with current regulations, the treatment and disposal of waste.

Suppliers must avoid the use of prohibited substances (e.g. CMR, Carcinogenic Mutagenic and Toxic to Reproduction) and adequately manage potentially hazardous substances (as defined in the applicable regulations).

Tesmec is committed to raising awareness among its employees on environmental responsibility issues through training activities: it is up to its Suppliers to activate initiatives in this field.

Product quality and safety

One of the key targets of Tesmec is to constantly improve the quality of its products and services in order to guarantee maximum customer satisfaction: Suppliers must ensure that the quality of all products and services complies with what is contractually defined.

Compliance with the most stringent product safety standards is guaranteed by Tesmec, which therefore requires all its Suppliers to define adequate control systems within their organization and supply chain.

The research for the highest standards of quality and product safety leads to the implementation and maintenance of a Quality Management System at the Group's Italian companies according to the international standard ISO 9001.

Tesmec expects all its Suppliers to operate in line with this approach, with the common goal of ensuring high levels of innovation while maximizing product quality.
In this sense, research and development is a strategic priority of the Tesmec Group, which has guaranteed over the years a positioning in the market segments with the highest added value and an international recognition as technological leader able to offer solutions in line with the highest quality and safety standards, with an increasing level of environmental friendliness.

Tesmec believes in the importance of creating a system and generating positive value for the entire supply chain. Technological development must be continuous and must take place in collaboration with the partners of the supply chain, creating a research network that therefore also involves Suppliers.

Ethical standards: ETHICS AND BUSINESS INTEGRITY

The Group operates responsibly, adhering to strict principles of ethics, loyalty, and professional fairness, in a framework of fair competition, acting with honesty, integrity, fairness and good faith, respecting the legitimate interests of shareholders, employees, customers, commercial and financial partners and local communities.

Tesmec Group adheres to and complies with the Corporate Governance Code for listed companies with the additions and adjustments resulting from the characteristics of the Group.

The Board of Directors of Tesmec S.p.A. has adopted the Organization, Management and Control Model pursuant to Legislative Decree 231/2001 aimed at ensuring conditions of fairness and transparency in the running of corporate activities, to protect the business and its image and that of Group companies, the expectations of its shareholders and the work of its employees.

Adherence to the principles of this Code of Conduct for Supplier is a fundamental requirement to undertake any business relationship with Tesmec.

Fight against corruption

Tesmec is actively engaged in the prevention and fight against corruption through controls that are an integral part of the Internal Control System. Legality, honesty, integrity, fairness and transparency are some of the general principles on which the Group Code of Ethics and the running of corporate activities are based. At Group level, the fight against corruption is a responsibility that falls on any person acting in the name or on behalf of Tesmec.

The approach to preventing and combating corruption is substantiated through the implementation and application of two main tools: the Organisational, Management and Control Model pursuant to Legislative Decree 231/01 (including the Group Code of Ethics) and the Group Anti-Corruption Policy. Several Italian companies are already certified in accordance with ISO 37001.

The Anti-Corruption Policy, adopted by the entire Group, provides a systematic framework for anticorruption, and prohibits company personnel and anyone acting in the name or on behalf of Group Companies and/or in the interest of the Group from offering, paying or accepting, directly or indirectly, money or other benefits, for the purpose of obtaining or securing an unfair advantage in the context of business activities.

Suppliers and their subcontractors are required not to practice or tolerate any kind of corruption and undertake not to offer or promise money, gifts or other benefits, with the aim, even implicit, of acquiring treatment in their favour or an improper advantage towards other potential Suppliers.

Suppliers must not offer to representatives of the Public Administration, directly or indirectly through third parties, money or any other type of service of any other nature for the purpose of obtaining an undue advantage. They also undertake not to pay any illicit contributions to candidates for public office, political parties or other political organizations.

Conflicts of interest

Any situation that may constitute or determine a conflict of interest must be promptly communicated to Tesmec according to the procedures indicated in the contractual phase so that its existence and seriousness is assessed, and the proper operating management mode is initiated.

Antitrust and anti-money laundering regulations

Suppliers must operate in line with the principles of fair competition and applicable antitrust laws and must also avoid agreements or actions such as collusive offers, price fixing and discrimination, or other unfair commercial practices, which unlawfully restrict market trade or free competition.

Suppliers are required to comply with applicable anti-money laundering legislation and may not be involved in or otherwise take part in any activity that could be interpreted as related to money laundering.

Regular bookkeeping

Suppliers must comply with legal requirements and industry standards under applicable laws and must maintain accurate books and records demonstrating compliance with such legal requirements and standards, to the extent permitted by law. The financial, accounting and management evidence of the Suppliers must be based on precise, exhaustive, verifiable information and in line with the organizational structure of the companies.

Confidentiality, protection, and confidentiality of data

Confidential information relating to knowledge or data owned by Tesmec must not be used, communicated or disclosed without specific authorization from Tesmec.

Suppliers are obliged to protect and appropriately use confidential and intellectual property information, know-how and trade secrets of the Group and to use them exclusively for the purposes authorized by the same.

Suppliers undertake to limit access to such information only to personnel who need to know it for reasons related to the supply itself. The confidentiality obligation will remain in force even after the termination of the relationship with the Group in compliance with applicable regulations.
The Suppliers also undertake to process in compliance with current legislation on privacy any additional personal data, only and exclusively to execute the obligations of the supply as well as for the fulfilment of the related legal obligations.

Finally, any form of manipulation of the financial market, instrumentalization, use for economic purposes, direct investment or through third parties, which has its source in confidential company information, i.e. not in the public domain, is prohibited.

Ethical sourcing

Suppliers must commit to achieving sustainable sourcing along the entire supply chain.

In accordance with the OECD Due Diligence Guidance for a Responsible Supply Chain of Minerals from Conflict or High-Risk Areas, Suppliers must ensure responsible sourcing of minerals (tin, tantalum, gold and tungsten) by ensuring that none of the products supplied to Tesmec contain minerals from conflict areas.
Their trade could involve the direct or indirect financing of armed groups, encourage corruption and money laundering, and induce the violation of human rights through the exploitation of forced labour.

International sanctions

The supplier represents and warrants that, as of the Effective Date and throughout the term of this Agreement:
(a) neither the Supplier, nor any entity controlling it, nor any of its directors, officers, shareholders, ultimate beneficial owners or Affiliates is a person or entity that is the target of, or designated under, any economic, financial or trade sanctions, restrictive measures, embargoes or similar restrictions administered or enforced by:
(i) the European Union;
(ii) the United Nations Security Council;
(iii) the United States, including the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) or any other competent U.S. authority (collectively, the "***Sanctions Laws***");
(b) the supplier is not owned or controlled, directly or indirectly, by any person or entity that is the target of Sanctions Laws;

(c) the Supplier shall exercise appropriate due diligence over its supply chain and shall ensure that the goods, materials, components, services, technology or software supplied to Tesmec are not directly or indirectly sourced from, manufactured by, supplied through, or otherwise connected with individuals, entities, vessels, organizations or jurisdictions subject to applicable sanctions, embargoes or trade restrictions.

The Supplier shall promptly notify Tesmec *no later than* two (2) Business Days of becoming aware of any circumstance that may affect the accuracy of the above representations or that could result in a breach of applicable sanctions or export control regulations.

Cybersecurity and information security best practices

Tesmec expects Suppliers to adopt appropriate cybersecurity and information security practices proportionate to the nature of the products or services provided, the information processed and the potential impact on Tesmec, its customers and the supply chain. These practices are intended as general expectations of responsible conduct and do not replace or modify any specific confidentiality, data protection, intellectual property, contractual or project-related obligations that may be defined in separate agreements, NDAs, purchase orders or technical specifications.
Suppliers should maintain adequate organizational and technical measures to protect the confidentiality, integrity and availability of information, systems and services used in the performance of activities for Tesmec. In particular, Suppliers are encouraged to:

- apply access control rules based on the need-to-know and least privilege principles, ensuring that accounts, credentials and authorizations are appropriately managed throughout their lifecycle;
- protect business devices, applications and networks through appropriate security measures, including secure configuration, malware protection, vulnerability management, patch management and backup practices;
- promote cybersecurity awareness among personnel involved in activities for Tesmec, including safe use of e-mail, secure handling of information, recognition of phishing attempts and responsible use of company tools;
- manage information and documentation received from or produced for Tesmec with appropriate classification, storage, sharing and retention practices, avoiding unauthorized disclosure or use;
- ensure that subcontractors or third parties involved in the supply chain apply comparable cybersecurity practices when they may access information, systems, products or services related to Tesmec;
- promptly inform Tesmec, through the available reporting channels, of any suspected or confirmed cybersecurity incident, vulnerability, unauthorized access, data breach or event that may affect Tesmec information, products, services or continuity of supply.

Where applicable to the supplied products or services, Suppliers should also consider secure-by-design and secure-by-default principles, appropriate traceability of changes, protection of software and firmware components, controlled management of vulnerabilities and availability of relevant technical evidence when reasonably required for qualification, compliance or customer assurance purposes.

Whistleblowing

Tesmec has adopted a whistleblowing system to the Supervisory Body, which represents a strong ethical safeguard put in place to maintain high attention on the conduct adopted by both employees and those who work with the Group.
Suppliers are required to promptly report any presumed or actual violations of the law, of the Code of Conduct for Suppliers, of the Organization, Management and Control Model pursuant to Legislative Decree 231/01 or of any contractual agreement with Tesmec. This includes violations committed by any employee, consultant, partner, agent or other representative acting on behalf of Supplier or Tesmec.

The Supplier undertakes not to carry out any retaliatory or discriminatory action towards personnel who have reported in good faith events deemed illegal or in conflict with corporate ethical principles.
Reports relating to suspected vulnerabilities, cybersecurity incidents or events that may affect Tesmec information, products, services or systems may also be submitted through the dedicated channels made available on the Tesmec website for vulnerability and cyber incident reporting.

Compliance with the code

This Code must be shared and signed by the Suppliers. Suppliers also undertake to share the principles contained therein with their employees, subsidiaries, collaborators and subcontractors, with a view to making a valuable contribution to its dissemination and concrete implementation.

Suppliers are responsible for monitoring compliance with this Code both internally and within the supply chain, appropriately informing Tesmec of any critical issues.

Communication and updating

This Code was approved by the Board of Directors of Tesmec S.p.A. on November 6, 2026.

The document is made available on the company intranet and on the Tesmec website for all stakeholders.

It will be subject to review and/or modification whenever an update with respect to substantial changes in the industrial or sustainability strategy of the Tesmec Group is necessary.

Any requests for clarification regarding the interpretation of the same can be sent to the e-mail address esg@tesmec.com.

By signing this form, the Supplier acknowledges that he has read and accepted all the principles, terms and conditions of the Code of Conduct for Suppliers regarding the products and/or services supplied to Tesmec Group.

COMMITMENT FORM

Company: _____

Address: _____

Name of signatory: _____

Role of signatory: _____

Signer's email address: _____

Date: _____

Legal Representative Signature: _____

Please return the "Commitment Form" signed by the legal representative to your reference Buyer.