



CODE OF CONDUCT FOR SUPPLIERS

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SUMMARY TABLE OF REVISIONS

Rev.	Date	Descriptions of the amendments
00	14.03.2025	First issue of the document

DRAFTING	QUALITY DPT – ALICE BARBERA
APPROVAL	COMPANY MANAGEMENT – FRANCESCO PAOLO DI SANTO



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1 INTRODUCTION

For BIBO ITALIA SPA, it is of paramount importance to ensure that its customers and end-users receive safe and quality products that comply with the applicable legal and technical parameters in the sector. Additionally, it is committed to promoting a supply chain that is attentive and respectful of current laws, workers, the environment, and the ecosystem. Therefore, in virtue of the desired supply chain as described above, BIBO ITALIA SPA is committed to establishing trusting relationships and building lasting and virtuous partnerships with its suppliers, promoting a fair, sustainable, and transparent supply chain (for all categories of supply). This Supplier Code of Conduct (hereinafter referred to as the "Code") aims to ensure that Suppliers:

- provide their workers with fair and safe working conditions.
- operate in respect of the environment.
- operate in compliance with the law, with integrity, transparency, and fairness.
- operate in accordance with applicable laws and regulations.

2. SCOPE OF APPLICATION

The macro categories of supply for BIBO ITALIA SPA are identified as:

- RAW MATERIAL
- PURCHASED FINISHED PRODUCT;
- PACKAGING;
- TRANSPORT;
- SERVICES PROVIDED WITHIN THE HEADQUARTERS (e.g., maintenance, cleaning, consulting, etc.)
- SERVICES PROVIDED OUTSIDE THE HEADQUARTERS (e.g., waste disposal).
For each of these categories, potential risks are identified as deviations from the protective conduct of areas, matrices, and stakeholders deemed sensitive. Therefore, BIBO ITALIA SPA has drafted, issued, disseminated, and shared the Code as a primary safeguard.

This Code applies to all suppliers of goods and/or services, including subcontractors, contractors, subcontractors, and business partners, hereinafter referred to as "Suppliers," who have a contractual relationship with BIBO ITALIA SPA. Suppliers are required to share the contents of this document with their collaborators and to promote virtuous behaviors within their supply chain that ensure compliance with this Code, both by their internal organizational structures and subcontractors/sub-subcontractors, facilitating compliance monitoring at all levels of the supply chain.

2 PRINCIPLES AND REFERENCE STANDARDS

The Code is inspired by the values contained in the COMPANY POLICY. Furthermore, it refers to industry regulations and standards issued by relevant international organizations, including:



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- the International Charter of Human Rights of the United Nations, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights;
- the United Nations Convention on the Rights of the Child;
- the United Nations Convention on the Elimination of All Forms of Discrimination Against Women;
- the UN Guiding Principles on Business and Human Rights;
- the “CEO Guide to Human Rights” of the World Business Council for Sustainable Development (WBCSD);
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) and the relevant applicable conventions;
- the Sustainable Development Goals (SDGs) of the United Nations;
- the 10 principles of the Global Compact;
- the Women’s Empowerment Principles (WEPs) for promoting gender equality;
- guidelines, including regulations and codes of conduct, issued by the European Union. It is specified that BIBO ITALIA SPA, in carrying out any verification activities (audits on suppliers when foreseen, motivated, and contracted) will refer to the main international standards.
It is understood that Suppliers are obliged to comply with all applicable national and international laws and regulations.

3 COMPLIANCE OF PRODUCTS AND SERVICES

The products and services offered by the Supplier must comply with national and international laws and regulations in terms of quality and safety and, where applicable, also meet the technical requirements and standards required by BIBO ITALIA SPA. The Supplier commits to providing precise and clear information, if requested, regarding the methods and resources used, production sites, and the characteristics of the products or services provided, refraining from any untrue statements.

4 HUMAN RIGHTS AND SOCIAL PRACTICES

4.1 LABOR RELATIONS

The Supplier commits to condemning any form of discrimination against workers based on social or ethnic origins, religion, gender, sexual orientation, age, or any other condition that may lead to discrimination or subjugation, as well as any form of harassment or inappropriate or disrespectful behavior in the workplace. The Supplier commits to ensuring that equal opportunities are guaranteed to all workers and that they are treated with fairness, dignity, and respect throughout all phases of the contractual relationship. The Supplier is required to employ only workers who meet the legal requirements for access to work, according to the laws of the



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country in which the work is performed. If the Supplier employs a foreign citizen as part of the workforce, it must ensure compliance with all regulations, guaranteeing an inclusive and non-discriminatory selection, hiring, and compensation process, as well as freedom of movement. The Supplier must handle personal data and confidential information regarding its workers in accordance with data protection laws and information confidentiality. The Supplier must comply with applicable regulations, collective labor agreements regarding wages, benefits, working hours, and social security contributions, ensuring that its workers receive dignified, fair, and regular wages. The obligations arising from the employment relationship must be formalized to the employee in the form of an employment contract compliant with applicable law. The Supplier must recognize the right of its workers to freedom of association, without prejudice or discrimination. The Supplier commits to condemning any form of discrimination against workers.

4.2 HEALTH AND SAFETY AT WORK

The Supplier must act in compliance with current health and safety regulations in the workplace (primarily Legislative Decree 81/08) and is committed to providing its workers with a healthy and safe working environment. The Supplier must assess health and safety risks in the workplace to prevent and manage them, identifying and using suitable prevention and protection devices. The Supplier must train and raise awareness among workers about adopting safe behaviors that respect health and safety regulations in the workplace. Contractors must also report to BIBO ITALIA SPA and investigate all relevant incidents related to health and safety in the workplace that occur within the headquarters of BIBO ITALIA SPA and its relevant areas (e.g., external areas, construction sites, etc.).

4.3 FORCED AND CHILD LABOR

The Supplier must not use any forms of forced or compulsory labor, performed under the obligation to repay a debt or slavery. It is also explicitly forbidden for the Supplier to seize or require workers to deposit their documents, sums of money, or guarantees to perform their work, or to implement practices that constitute an obstacle to the free termination of the employment relationship. The Supplier must act in full compliance with the regulations prescribed by the International Labour Organization and may not, in any way, directly or indirectly, hire workers below the minimum age for admission to work as defined by the applicable law in the state where the work activity is performed. If local laws allow the employment of young workers, the Supplier must protect them, avoiding dangerous situations and exhausting work that could compromise their health, safety, or moral integrity.

4.4 FIGHTING AND COMBATING THE PHENOMENON OF ILLEGAL LABOR

The Supplier must not employ personnel who perform their work against their will or who are not free to terminate the employment contract. The use of undeclared work and any form of illegal labor or exploitation that humiliates the dignity of the worker is strictly prohibited.

4.5 TRAINING

BIBO ITALIA SPA expects the Supplier to ensure the development of skills and competencies of all workers.



5 ENVIRONMENTAL PROTECTION

5.1 COMPLIANCE WITH ENVIRONMENTAL PROTECTION REGULATIONS

The Supplier must adhere to and respect current environmental regulations and is committed to implementing initiatives aimed at improving its environmental performance.

5.2 RESOURCE MANAGEMENT AND ENVIRONMENTAL IMPACT

BIBO ITALIA SPA expects the Supplier to carry out its activities using all resources (including forests and soil) responsibly using the best technologies that allow for the reduction of waste of natural resources and promote reuse, recycling, and recovery. Furthermore, the Supplier must provide tools for the prevention and reduction of any potential losses and accidental spills into the environment. Finally, BIBO ITALIA SPA expects the Supplier, when requested, to cooperate in calculating the environmental impact of the entire production chain in order to assess the possibility of improving its environmental performance and minimizing negative effects.

5.3 WATER RESOURCE MANAGEMENT

BIBO ITALIA SPA expects the Supplier to minimize the impact on water resources through the reduction of consumption, maintenance/improvement of aquifers, and promotion of water resource conservation.

5.4 WASTE MANAGEMENT

BIBO ITALIA SPA expects the Supplier to ensure responsible and sustainable waste management, reducing its ecological footprint and promoting, where possible, a circular economy, providing specific evidence upon request.

5.5 EMISSION MANAGEMENT AND ENERGY CONSUMPTION OPTIMIZATION

BIBO ITALIA SPA expects the Supplier to minimize its emissions, monitor, and reduce energy consumption.

5.6 BIODIVERSITY PROTECTION

BIBO ITALIA SPA expects the Supplier to protect areas of high conservation value and promote biodiversity concerning the products and services offered.

5.7 SUSTAINABLE PACKAGING

BIBO ITALIA SPA expects the Supplier to minimize the environmental impact of its packaging (if included in the supply) through, for example, eco-design activities and the choice of recycled, recyclable, or compostable materials.

5.8 CHEMICAL SUBSTANCE USE

The Supplier is committed directly and throughout the entire supply chain to the responsible use of chemical products that align with applicable regulations and respect people and the



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environment. If the supply involves the use of pesticides, fertilizers, or other products intended for the treatment of corporate green areas, the same expectations apply, along with those related to animal protection.

6 ETHICS AND BUSINESS PRACTICES

6.1 FAIR COMPETITION

The Supplier commits to conducting its activities in line with the principles of free competition and fairness and to refrain from any deceptive or illegal market practices and any anti-competitive behavior.

6.2 CORRUPTION, EXTORTION, EMBEZZLEMENT, AND MONEY LAUNDERING

BIBO ITALIA SPA does not tolerate any form of fraud, corruption, extortion, embezzlement, and money laundering. The Supplier must operate in full compliance with the law, with transparency, integrity, and fairness. The Supplier must therefore refrain from offering, promising, paying, requesting, receiving, or accepting directly or indirectly, money or other benefits, for the purpose of obtaining an unlawful advantage. The Supplier is required to adopt all appropriate measures to prevent its activities from being used for money laundering.

6.3 CONFLICT OF INTEREST

The Supplier commits to avoiding any situation that may lead to conflicts of interest and, before initiating any business and/or contractual relationship and during the business itself, to inform BIBO ITALIA SPA of the presence of a conflict of interest or any situation that may generate a conflict of interest.

6.4 PRIVACY, CONFIDENTIALITY, AND DATA SECURITY

The Supplier must process personal data and information acquired during the contractual relationship in compliance with data protection laws and information confidentiality, as well as the best practices applicable in the jurisdictions in which it operates. The Supplier uses the personal data collected only for legitimate, defined, and appropriate purposes for its activities. The Supplier guarantees that it can comply, where it processes personal data as a data processor, with all conditions required by law. The Supplier, in relation to its privacy role, guarantees its ability to comply with the criteria of reliability and adequacy of the technical and organizational security measures adopted so that the processing of personal data - its own and those of third parties - meets the requirements for personal data protection, ensures the protection of the rights of the data subject, and ensures an adequate level of security proportional to the risk and retention for a period consistent with the expressed need and the pursued purpose. The Supplier guarantees that it has appropriately trained authorized personnel for data processing, as well as having correctly identified privacy roles in accordance with applicable law during the execution of its activities and services. The Supplier is required to ensure, in compliance with applicable law and where it processes personal data on behalf of BIBO ITALIA SPA, to possess, when mandatory, a privacy management system. BIBO ITALIA



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SPA also expects the Supplier to implement organizational and technological measures to ensure high standards of cybersecurity to protect the confidentiality of shared information and data.

6.5 RESPONSIBLE SOURCING

BIBO ITALIA SPA encourages Suppliers to adopt commercial measures towards their respective suppliers, such as compliance with payment timelines and ensuring fair economic conditions. BIBO ITALIA SPA expects the Supplier to evaluate and manage the impact of its activities on communities and, where possible, promote procurement from local suppliers, fostering inclusive development by providing adequate economic conditions and aiming to promote positive and lasting collaborations with the communities in which it operates.

7 COMPLIANCE

7.1 REPORTING VIOLATIONS

The Supplier (including its collaborators), as well as the collaborators of BIBO ITALIA SPA, are required to report any violations of this Code. Reports of violations or suspected violations must be made through a specific "Whistleblowing" platform, accessible from the website at www.biboitalia.com. The Whistleblowing Officer will manage reports in accordance with the role, norms, and internal reference procedures, ensuring the confidentiality of the identity of the whistleblower, without prejudice to legal obligations.

7.2 AUDITS

BIBO ITALIA SPA may verify compliance with the principles set forth in the Code by its Suppliers. This verification may occur through requests for documentation and/or conducting on-site audits by qualified personnel directly appointed by BIBO ITALIA SPA.

7.3 RESOLUTION

If non-compliance is detected, including through the verification activities described in the previous paragraph, the Supplier may be requested to communicate planned corrective actions within an agreed timeframe and implement these actions, which will be subject to monitoring by BIBO ITALIA SPA. BIBO ITALIA SPA reserves the right to terminate any relationship and/or resolve any contractual agreement with the Supplier who refuses to implement corrective measures. Notwithstanding the above, in the case of a serious violation or non-compliance by the Supplier with the provisions listed in this Code, BIBO ITALIA SPA shall have the right to temporarily suspend the Supplier or, if deemed appropriate, terminate any contractual agreement with the non-compliant Supplier.



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8 UPDATES AND REVIEWS

This Code has been formally approved by the Management of BIBO ITALIA SPA on the date indicated on the first page BIBO ITALIA SPA commits to periodically reviewing and updating this document. The current version of the Code is available, including in English, on the official website at www.biboitalia.com.

