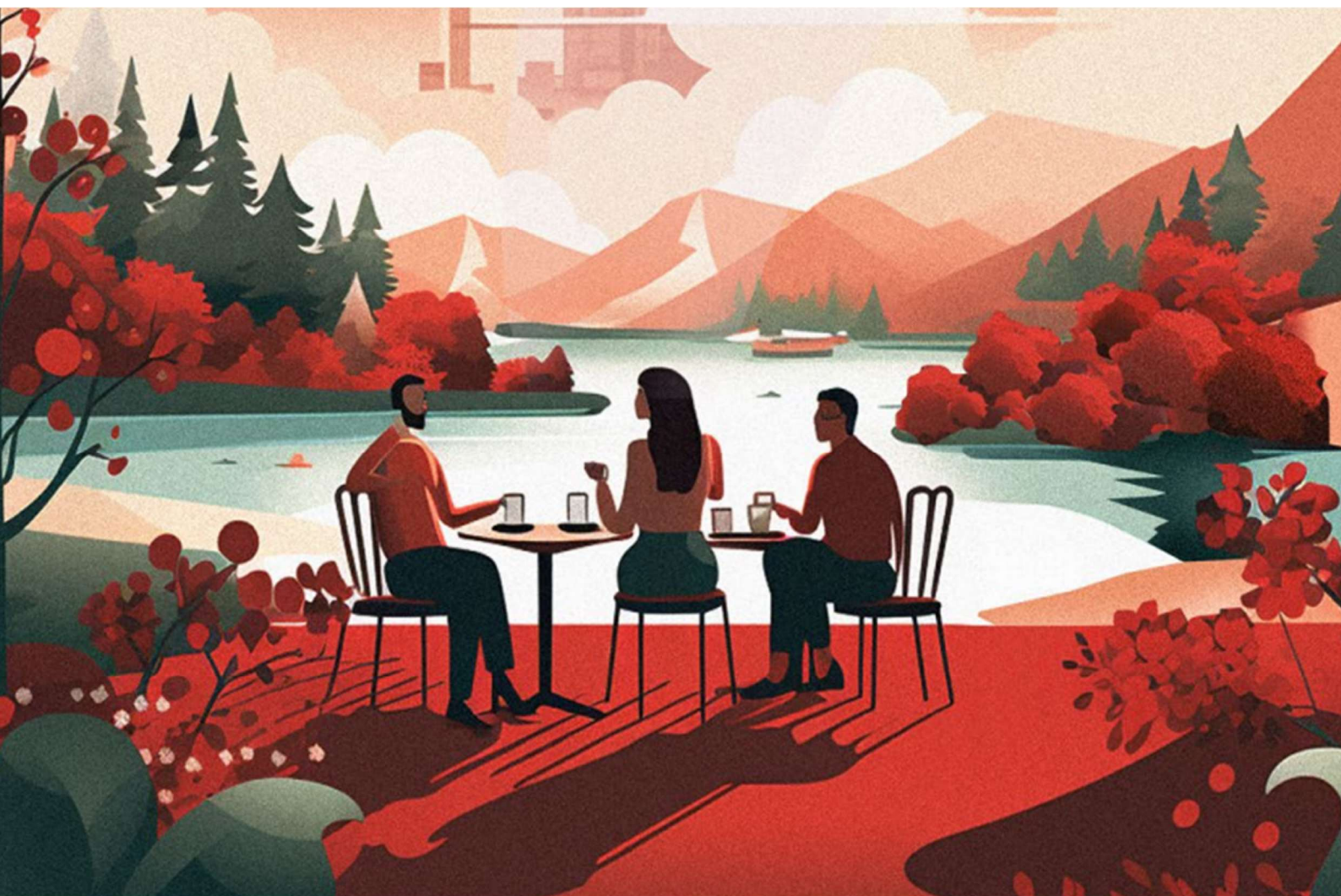




Cimballi Group S.p.A.

Supplier Code of Conduct

Adopted in April 2024





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INTRODUCTION

Cimbali Group S.p.A. (hereinafter “Cimbali”) is an Italian multinational company specialising in the design and production of professional espresso coffee machines and cafeteria equipment. Through the production and sale of products and services, Cimbali intends to enhance and protect human capital in a context that is increasingly oriented towards teamwork, integration and synergy.

Cimbali believes it is a fundamental duty to manage its business ethically and responsibly. Treating stakeholders with honesty and integrity reflects the values, principles and ethical behaviour of an industrial model capable of planning and supporting sustainable development throughout the supply chain. The same behavioural patterns on issues such as human rights, occupational health and safety and environmental protection are also transferred to and required in the supply chain and form the basis for the selection and evaluation of Suppliers.

Purpose and scope

Compliance with this Supplier Code of Conduct (hereinafter referred to as the “Code”) is required of all suppliers. In the context of Cimbali’s global relationships, the principles and rules of conduct contained in this document involve, by way of example, suppliers of materials and technologies, logistics companies and other service providers.

The Code, inspired by the values described in the Code of Ethics, presents Cimbali’s expectations in relation to product design, purchasing process, storage, production and other processes/services up to product distribution and after-sales service.

By signing this document, Cimbali intends to make its suppliers aware of the rules and principles of conduct to be followed. Cimbali expects its suppliers to ensure full compliance and maximum dissemination of content among their staff. Cimbali also encourages adoption by any third parties acting on behalf of Cimbali’s Suppliers.

This Code is divided into three sections:

- **Introduction**, where the purpose, scope, national and international references are given;
- **Rules and Behaviour**, outlining the principles to be observed in the following areas: “Labour and Human Rights”, “Environmental Responsibility” and “Business Ethics”;
- **Transparency**, detailing the control and monitoring mechanism, as well as the corrective actions in case of non-compliance.

Compliance with laws

The Code is based on United Nations Resolution 217 A (III), the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights (UNGPR), the ten principles of the United Nations Global Compact, the principles set out in the Charter of Rights of the European Union and the Italian Constitution.

A Supplier subscribing to this Code is required to comply with the regulations and standards in force in the country in which it operates. If local laws, regulations and standards impose stricter requirements than this Code, the Supplier is required to take the necessary measures to comply therewith.



RULES AND BEHAVIOUR

LABOUR AND HUMAN RIGHTS

Cimbali's business is founded on respect for universally established human rights. Cimbali expects its Suppliers to manage and reduce the potential risks and impacts of human rights violations, to avoid contributing to negative effects on human rights in the international context in which it operates. Cimbali's Suppliers are required to take appropriate and effective measures to eliminate and/or mitigate any intercepted risks and impacts.

Forced labour

Suppliers must not resort to labour of any kind performed involuntarily, including, but not limited to, forced labour, debt bondage or prison labour and other types of "modern slavery". Workers shall not be subject to any rules that may restrict their legitimate freedom, including human trafficking.

Similarly, workers are free to withdraw from their employment contract, in line with national legislation, without fear of retaliation or punishment. Likewise, Cimbali agrees to any re-educational work opportunities aimed at social reintegration, provided it is in line with the provisions of applicable local laws.

Child labour

Suppliers must not use child labour¹, any form of activity that harms the growth of children, compromises their health or prevents them from accessing compulsory education.

Suppliers who employ young workers are required to observe all legal obligations concerning the employment of this category. Therefore, they are required not to expose them to any physical risk, dangerous situation and/or night work.

Respect and non-discrimination

Suppliers must respect different cultural, ethical and religious backgrounds and the principles of equality, regardless of ethnicity, gender, age, origin, colour, disability, nationality, pregnancy status, sexual orientation, gender identity, religion or other protected characteristics or activities.

Suppliers must avoid any form of discrimination and ensure respectful and dignified treatment of their employees and workers, guaranteeing them equal opportunities.

Harassment at work

Suppliers must treat their employees with respect and dignity. Suppliers are therefore required to show zero tolerance of physical, sexual, verbal or other harassment, coercion, abuse or unlawful discrimination.

In this context, disciplinary policies and practices must be adopted and documented to prevent harassment at work. Suppliers are required to provide for disciplinary measures in accordance with the provisions of national laws and internationally recognised human rights principles and to communicate them in a transparent manner.

¹ For the purposes of this Code, a child is considered to be a person who (i) is under fifteen (15) years of age; (ii) is younger than the minimum age for completion of compulsory education in the country of production; or (iii) is younger than the minimum age for employment in that country, whichever is higher.



Freedom of association and collective bargaining

Suppliers must respect and recognise the right of their employees to join or not to join any association, establish workers' councils or other forms of worker representation.

Suppliers are therefore required to recognise the freedom of expression of all workers and to apply forms of collective bargaining where regulations and/or the social system provide for them.

Privacy

Suppliers must act in accordance with applicable laws on privacy and the processing of personal data, ensuring full respect for the rights and privacy protection of their employees.

Working hours

Working hours, both ordinary and overtime, must comply with legal requirements and applicable national collective labour agreements. Suppliers must require workers to work ordinary and overtime hours with advance notice, ensuring sufficient time for meals and breaks. Overtime work must be performed voluntarily and cannot be requested on a regular basis.

Suppliers are required to maintain an attendance register in terms of the start and end times of the working day and breaks so as to track the hours actually worked in a transparent and verifiable manner.

Remuneration and benefits

Suppliers must pay each employee at least the minimum wage and provide him or her with the minimum benefits required by applicable local laws. Suppliers are required to pay employees for all working hours performed, including overtime, and to pay workers on a regular basis under a regularly written contract. In the absence of applicable local laws, Suppliers must pay the minimum wages and benefits common in the local industry.

Health and safety

Suppliers must comply with all applicable health and safety and welfare laws, rules and regulations and provide employees with safe and healthy working conditions.

The Supplier undertakes to eliminate hazards to workers' health and safety where possible, and to assess residual risks, implementing solutions to reduce them to a minimum.

Suppliers promote responsible behaviour and ensure the conscious use of safety devices, especially when using chemicals and hazardous substances.

Suppliers must ensure the presence and updating of hazard management controls: workers must be prepared in emergency situations.

Suppliers are committed to promoting a safety culture. In addition to providing effective programmes to disseminate and inform employees on health and safety issues, Suppliers are encouraged to provide regular up-to-date training on these topics.

ENVIRONMENTAL RESPONSIBILITY

Being aware of its responsibility towards future generations, Cimballi is committed to making responsible use of natural resources and contributing to combating climate change. By acting on its environmental performance, Cimballi takes action to reduce environmental risks and minimise impacts throughout the value chain.



Energy efficiency

In view of the target to reduce CO₂ emissions and the impact generated in terms of carbon footprint along the value chain, Suppliers are required to be fully forthcoming and transparent with regard to the disclosure of emissions from their business processes and to commit to implementing effective measures to reduce direct and indirect CO₂ emissions in the medium to long term.

Suppliers must be aware of their current energy sources and strive to identify opportunities to reduce emissions of air pollutants and greenhouse gases. Suppliers and business partners are encouraged to adopt environmentally friendly alternatives.

In line with its decarbonisation commitments, Cimballi reserves the right to evaluate the way environmental issues are managed and to prioritise collaboration with Suppliers that use renewable energy sources and aim to reduce their GHG emissions with a science-based approach.

Water resources management

Suppliers must design products and processes that progressively reduce water consumption and avoid any form of water contamination.

Suppliers must regularly assess water consumption at their sites to detect potential risks associated with water scarcity, quality and quantity (e.g. flood and drought risks). In addition to proper water and wastewater management, Suppliers are encouraged to identify solutions and opportunities to reduce overall water consumption.

Minerals and conflict materials

Suppliers must take appropriate measures to avoid using in their products any raw materials that directly or indirectly finance armed groups violating human rights.

Suppliers must declare any materials regulated under the Conflict Minerals regulations, including cassiterite, columbite-tantalite (coltan), tin, tungsten, tantalum, gold and wolframite. For more information, see Regulation (EU) 2017/821 of the European Parliament and of the Council and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act².

Communications must be sent in writing to the following e-mail address: legale@gruppocimballi.com. Cimballi reserves the right to terminate and cancel orders or contracts for goods containing minerals from conflict zones.

For more information, please refer to the document on the management of Conflict Minerals.

Waste management

Suppliers must purchase, store, transport and handle hazardous and non-hazardous waste in line with all applicable legal requirements, protecting the health and safety of workers and the environment.

BUSINESS ETHICS

Cimballi expects its Suppliers to carry out their business in accordance with the highest ethical standards. The minimum requirement for each Supplier is to conduct its business in compliance with all applicable laws, rules and regulations on business ethics, including those on corruption and other prohibited conduct.

² We urge Suppliers to keep track of any updates to [EU Regulation 2017/821](#) and the [Dodd-Frank Act](#).



Anti-corruption and transparency

Suppliers must commit themselves against corruption in all its forms, including extortion and bribery.

Suppliers must refrain from attempting to influence employees of Cimballi by offering gifts (whether money, goods, services or other benefits) or inappropriate forms of entertainment in order to obtain favouritism. Any invitations or gifts to employees or related parties should be of reasonable economic value and reflect local business practices. Conversely, Suppliers must not demand inappropriate benefits from employees or related parties.

Suppliers must ensure full transparency in corporate governance by complying with all applicable national and international laws on accounting, taxation and transparency.

Fair competition

Suppliers respect fair competition practices, including compliance with all applicable antitrust and export control laws, regulations and sanctions, in particular those imposed by the European Union, the United Kingdom, Switzerland and the United States.

Conflict of interest

Suppliers must avoid any conflict of interest that may adversely affect business relations, and undertake to report any situation, even potential, of which they become aware.

A conflict of interest arises when an employee's personal interests influence his or her ability to fulfil his or her assigned responsibilities objectively. Attempts to obtain personal and/or family advantages or the pursuit of external commercial interests may damage Cimballi's reputation.

Suppliers undertake to ensure full transparency of relationships directly and/or indirectly involving employees of Cimballi.

Fighting money laundering

Suppliers must conduct their business in an honest and ethical manner and must not tolerate any corrupt or illegal business practices.

Suppliers are required to firmly oppose all forms of money laundering by tracing every economic and financial transaction carried out.

Suppliers must use permissible ways of selling their products and services, avoiding payments to third parties on behalf of the Supplier.

Protection of intellectual and industrial property and use of goods and technologies

Suppliers are required to preserve intellectual and industrial property rights and to ensure the correct use of any assets belonging to Cimballi.

Suppliers must take the necessary measures to prevent damage, theft or unauthorised use of such assets, including the risk of damage from cyber attacks, if applicable.

This provision applies to all types of assets, including tangible, intangible and financial assets, as well as intellectual property - such as patents, trade marks, copyrighted works and trade secrets. Suppliers must use Cimballi's technological resources conscientiously, respecting any applicable licences and avoiding any action that may damage Cimballi, expose it to third-party claims and/or proceedings by any governmental authority.



Social commitment and responsibility

Cimballi is committed to organising projects that promote corporate culture and sustainability. It considers it essential to support socially inclusive projects involving the local communities and expects its Suppliers to also commit themselves to promoting and disseminating these principles.

Suppliers are encouraged to give preference to the purchase of goods and services in local markets, adopting measures that enable the growth of local producers and promote the economic and social development of the local supply chain.



TRANSPARENCY

Cimbali ensures fairness, clarity and equal access to information to its Suppliers. Therefore, it expects Suppliers to accept and respect all the principles and requirements of this Code.

Claims and control system

Suppliers promote a culture that gives value to diversity and inclusion in the workplace, including through staff awareness-raising and training.

Suppliers must ensure that all operations relevant to the Code, including installations and analyses of records and registers, are verified by employees, legal representatives or authorised third parties of Cimbali.

Cimbali reserves the right to use the most appropriate control methods in respect of Suppliers, as well as the right to initiate an Audit before signing a supply contract and/or throughout the duration of the relationship.

Suppliers undertake to cooperate with Cimbali during Audits, facilitating and soliciting the collection and provision of the necessary documents during the inspection. Suppliers must keep the necessary documentation to prove compliance with this Code.

Suppliers undertake to communicate the requested information and data to Cimbali, unless this violates legal obligations. If necessary, the parties (Cimbali and the Supplier) shall sign a confidentiality agreement in order to protect confidential information.

Protection of Whistleblowers

Cimbali provides its stakeholders with a reporting system that allows them to report, with a guarantee of confidentiality, information on acts or omissions relating to the work environment that may affect its integrity³.

Suppliers undertake to protect anyone who reports unlawful acts, violations of the law or of this code from retaliatory or discriminatory acts, whether direct or indirect⁴.

Monitoring and corrective actions

Suppliers are required to inform Cimbali immediately of any non-compliance and planned corrective measures in this respect.

Consequences of Code of Conduct breach

Cimbali reserves the right to temporarily suspend and/or withdraw from the supply contract if, following audits, as provided for in the paragraph: "Claims and control system", any non-conformities are found, depending on their nature and seriousness.

It should also be noted that, following a grace period, Cimbali reserves the right at its discretion to immediately terminate any business relationship if suppliers refuse to provide adequate measures to eliminate and/or reduce any previously shared causes of non-compliance.

³ For more information, please refer to the web page [Whistleblowing](#).

⁴ For the purposes of this Code, the protection of whistleblowers refers to the European Directive 2019/1937 aimed at protecting persons who report any wrongdoing they become aware of as a result of their employment.



Cimbali reserves the right to take action for compensation of any losses, damages, expenses or other costs that may arise from any non-performance and/or inappropriate behaviour on the part of Suppliers.

Document changes

The Cimbali Code is not a static document and is subject to periodic review. It may be subject to changes required by new regulations, new international and national references and/or documents available to the company.

Suppliers are urged to comply with the latest version of the document.

The Code will be periodically reviewed by the Cimbali Legal Department.

The latest version of the Code dates from **April 2024** and is available on the **Cimbali Group S.p.A. website**.

References

The Code must be read in conjunction with the following documents that lay down the guiding principles and values of Cimbali:

- [Code of Ethics](#)
- [Organisation, management and control model pursuant to Italian Legislative Decree No. 231/2001](#)

Suppliers are required to submit any ethical or legal concerns and/or questions to Cimbali by contacting the Corporate Compliance department via the e-mail address legale@cimbaligroup.com.



COMMITMENT FORM

By signing the "Commitment Form" below, the Supplier acknowledges it has read and accepted all the principles, terms and conditions contained in this Code, as periodically amended, on the supply of goods and the performance of services to Cimballi Companies.

This version is available on Cimballi's website www.cimbaligroup.com

The "Commitment Form" must be signed by a Legal Representative of the Company.

COMMITMENT FORM	
Place and date	_____
Supplier's name	_____
Name and role of authorised signatory (in block letters):	_____
Signature of authorised signatory:	_____