



CODE OF CONDUCT SUPPLIERS

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1 INTRODUCTION

Unicalce S.p.A. is constantly committed to carrying out its business activities in accordance with its values and with sustainability practices, building a corporate culture of transparency and integrity based on ethical behaviour, in compliance with the relevant legislation.

Our activities involve numerous Suppliers of various products, goods and services. Therefore, Unicalce S.p.A. expects and requests - in a logic of natural connection with the Company Code of Ethics - that its suppliers and partners also do the same, recognising that this commitment constitutes an essential part of the contractual relationship.

Unicalce suppliers also acknowledge that this commitment will be taken into account for the purposes of the assessment carried out by the Company to monitor the CSR risk related to its supply chain.

In this document, "Partner" refers to any business partner of Unicalce; by way of example, but not limited to: suppliers, subcontractors, resellers, distributors, carriers, business partners, etc.

2 COMMITMENT OF UNICALCE PARTNERS

The partners undertake to comply with the principles established in this Code of Conduct and in the Organisation, Management and Control Model pursuant to Legislative Decree 231/01 of the Company (freely available at: <https://www.unicalce.it/azienda/impegno/>) for the entire duration of the contract, including any renewals or extensions. In order to guarantee compliance with these principles, the partners therefore undertake to adopt the appropriate and necessary internal measures.

Partners acknowledge that the above commitment constitutes an essential part of the contract. Thus, any violations and conduct different from the provisions of this Code may lead, in compliance with the laws in force, up to the contractual termination of the relationship for just cause or breach of contract.

3 PRINCIPLES OF ETHICAL INTEGRITY

In particular, partners undertake to respect the following rules of conduct and ethical principles in the relationship with Unicalce S.p.A.

3.1. Human rights

Partners shall always support and respect - in relations with all their stakeholders - the protection of human rights, as defined at international level; they shall also take appropriate measures to ensure that any potential hypothesis of violation of human rights is avoided. They shall respect the principles of the "Universal Declaration of Human Rights" of 1948 and the "Declaration of the International Labour Organisation (ILO)" on fundamental principles and rights at work, rejecting any form of inhuman or degrading work practice, such as corporal punishment, bullying, moral and sexual harassment, forced or threatened work and, more generally, shall prevent any commission or complicity in human rights violations..

3.2. Respect for local communities

Closeness and interaction with local communities are one of our priorities, through a development model oriented towards dialogue and increasingly attentive to the needs of the territory. We ask our Partners to operate according to the same principles.

3.3. Prohibition of child labour

Partners shall not exploit child labour and shall not employ any child in violation of applicable labour laws or who has not completed the period of compulsory education.



3.4. *Respect for the individual rights of employees*

Partners shall guarantee decent working conditions and remunerate workers in a fair manner, complying with all applicable laws, regulations and contracts regarding remuneration and working hours. They shall not require their employees to work more than the maximum number of hours per week permitted by law.

3.5. *Respect of rights of association*

Partners shall respect the workers' right to associate, organise and join any associations.

3.6. *Prevention of harassment and discrimination, promotion of inclusion and accessibility – Gender equality*

Partners shall prevent any form of harassment, including sexual harassment, and/or bullying in the workplace to align with the anti-discrimination approach of Unicalce S.p.A. Partners shall not tolerate discrimination based on gender, race, religion, age, disability, gender identity, sexual orientation or on belonging to categories protected by local law. Candidates and employees shall be evaluated based on their ability to perform the job.

Partners promotes internally the adoption and concrete implementation of specific policies to combat harassment in the workplace and for gender equality in line with the strategy and objectives defined by the European Union.

3.7. *Conflict Minerals*

The European Union's Conflict Minerals Regulation requires EU-based importers of tin, tantalum, tungsten and gold (also referred to as "3TG") to ensure that their minerals are sourced responsibly and that their supply chains do not contribute to funding armed conflict or other illegal practices.

Although the global supply chain for these minerals is very complex and stratified and tracing the origin of these minerals poses major obstacles, the Company requires its suppliers to undertake not to procure products consisting of minerals from countries potentially involved that use the revenues of these raw materials to finance wars and conflicts.

4 ETHICS IN CONDUCTING BUSINESS

Partners shall respect the highest standards in the conduct of business.

4.1. *Prohibition of corruption and unlawful influences*

Unicalce S.p.A. requires a concrete commitment in the fight against corruption, establishing a culture of integrity, transparency and fight against conflicts of interest. Partners undertake to comply with the principles set out in the **Company's Anti-corruption policy for consultants, agents and suppliers** for the entire duration of the contract, including any renewals or extensions.

In order to ensure compliance with these principles, partners therefore undertake to adopt the appropriate and necessary internal measures to avoid any form of corruption, bribery or trafficking in illicit influences, where, directly or indirectly, they would find themselves:

- offering an undue advantage to persons, so that such persons improperly perform or refrain from performing an act relating to their functions or abuse of their influence, to obtain from a public authority a decision for the benefit of the offeror;
- accepting an undue advantage to improperly perform or refrain from performing an act within their functions;
- abusing their influence to obtain a decision of a public authority for the benefit of the offeror.

This prohibition applies:



- both towards the active person (who offers the undue advantage), and the passive person (who accepts it), as both are punishable, regardless of whether the passive person has solicited the advantage or not;
- in both the private and public sectors.

Finally, it shall be recalled that, in accordance with the company's Organisation, Management and Control Model and internal procedures, it is forbidden to provide gifts and/or gratuities to Unicalce employees and collaborators, unless they are of modest value, meaning a maximum amount of Euro 100.

4.2. *Conflict of interest*

Partners shall not tolerate conflicts of interest or illicit influences and shall immediately report any hypothesis of conflicts of interest, where they involve Unicalce personnel, as by way of example in the case of:

- exploitation of own functional position for the implementation of interests, contrasting with those of the Company (both personal and third parties);
- accepting money, or any advantage or benefit, from suppliers or from people and/or companies that intend to enter into business relationships with Unicalce S.p.A.;
- use of information acquired on the basis of the corporate position in such a way as to create a conflict between personal interests and corporate interests.

4.3. *Fair competition*

Partners shall comply with all anti-trust and competition laws applicable wherever they operate, undertaking to avoid any anti-competitive practices, hypotheses of collusion with competitors on prices, auction disturbances, market distributions or to exchange sensitive information. Partners, if in a dominant position, shall not abuse it to eliminate competition or to impose excessive or discriminatory business conditions.

4.4. *Compliance with export control sanctions and regulations*

Partners understand that, for all matters relating to their relationship with Unicalce, they must not engage in any transaction with any country, person or entity with which commercial transactions are prohibited by the economic sanctions regulations of the United Nations, the European Union, Great Britain and the United States.

4.5. *Data protection and privacy*

Partners shall comply with all applicable data protection laws and regulations, as well as recommendations, guidelines and guidance issued by relevant regulatory bodies, as well as take appropriate measures to protect the personal data and privacy of individuals, including when processing the data of Unicalce employees.

Partners shall protect sensitive, confidential and proprietary information, including personal data/information, against unauthorised access, destruction or use, as well as any modification and disclosure, by taking appropriate physical and electronic security measures, including the mitigation of emerging risks to information systems by installing computer security programmes and will promptly report any data breaches or security incidents to Unicalce.

5 HEALTH AND SAFETY OF PEOPLE

Partners shall ensure that their personnel operate in safe and healthy working conditions and environments, in compliance with the laws, local regulations and the **"Safety Policy"**, guaranteeing the most appropriate training for personnel in the field of occupational health and safety.



Partners shall have the organisational systems and structure necessary to identify and mitigate health and safety risks, as well as take all appropriate precautions to prevent any accidents and injuries, and in particular shall:

- provide and/or implement adequate organisational structures and procedures for effective management of health and safety risks and respect – where applicable due to the activities carried out on behalf of Unicalce S.p.A. – the procedures and/or safety operating instructions of the Occupational Safety Management System (OSMS) of Unicalce S.p.A. and of the plant and/or quarry object of the activities carried out;
- ensure that all employees are aware of the risks and adequately trained on the implementation of control measures, as well as on the reporting channels for any safety issues;
- ensure that Unicalce S.p.A. is always informed about the risks introduced in its organisation, as well as how to use and store its products safely.

6 ENVIRONMENT

Unicalce, in order to pursue its decarbonisation and sustainability objectives, asks its suppliers to collaborate with the Company and contribute by participating in the reduction of the consumption of natural resources, designing more energy efficient products and reducing overall carbon emissions, in line with the main international and national recommendations.

Partners shall ensure that their personnel operate in compliance with the laws, applicable environmental regulations and the “Environmental Policy” of Unicalce S.p.A. (freely available at: <https://www.unicalce.it/sostenibilita/>), ensuring adequate environmental training for personnel who carry out activities with an impact on the environment and natural resources.

Partners shall have the organisational systems and structure necessary to identify and mitigate risks to the environment, as well as take all appropriate precautions to prevent any accidents, or reduce the environmental impacts of its activities and, in particular, undertake to:

- provide and/or implement adequate organisational structures and procedures for effective management of environmental risks and respect – where applicable due to the activities carried out on behalf of Unicalce S.p.A. – the procedures and/or safety operating instructions of the Environmental Management System (EMS) of Unicalce S.p.A. and of the plant and/or quarry object of the activities carried out;
- carry out the measurement of the processes and the environmental aspects associated with them, through the identification of indicators, and assess related risks and opportunities;
- control and, when possible, reduce environmental impacts with the application of the best available technologies in the design and modification of production plants;
- manage their production facilities in such a way as to improve, as much as possible, environmental performance and prevent environmental pollution, also taking into account the needs and expectations of Interested Parties;
- optimise the use of natural resources, giving priority in particular to the use of renewable energy sources;
- raise awareness and qualify their suppliers and contractors belonging to the Unicalce supply chain, in relation to compliance with environmental standards.



7 REPORTS OF POTENTIAL VIOLATIONS – WHISTLEBLOWING SYSTEM

Pursuant to article 4 of Legislative Decree 24/2023, Unicalce S.p.A. has activated an internal reporting channel that guarantees, through the use of encryption tools, the confidentiality of the identity of the reporting person, of the person involved (reported) or of the person in any case mentioned in the report, as well as of the content of the report and of the relative documentation. Whistleblowing reports may be made in writing, or verbally, using the IT methods indicated in this chapter.

The Person responsible for the management of “whistleblowing” reports, therefore, collects, evaluates and analyses to the extent of its competence, the reports that are submitted through access to the following dedicated platform:

<https://unicalce.whistlelink.com/>

For any matters not expressly provided for in this paragraph (definitions, purpose, responsibilities, reporting management phases, etc.), please refer to the provisions of the applicable procedure “**DIR 07 management of reports of any unlawful acts pursuant to legislative decree 24/2023**” (freely available at: <https://www.unicalce.it/azienda/impegno/>), as an integral part and operational development of this document.

8 MONITORING AND CONTROL

Unicalce S.p.A. reserves the right to inquire about compliance with its Code of Conduct and to request verifications of the work and structures of Partners, at its own expense and with reasonable notice, with or without the support of third parties. If the results of such control or inspection lead us to believe that this Code of Conduct is not being respected, Unicalce S.p.A. may request corrective action or choose to terminate the relationship on the basis of the contractual terms.

9 MODIFICATION OF THE CODE OF CONDUCT

Any amendment and/or updating of this Code is the responsibility of the Company’s Board of Directors.



UNICALCE

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