



CODE OF CONDUCT FOR SUPPLIERS

Hitrac Engineering Group SpA (hereafter Hitrac), is committed to conducting business with honesty and integrity, complying with applicable laws, and ensuring that every employee and business partner is treated with respect. We expect our suppliers to do the same.

This Supplier Code of Conduct (Supplier Code) outlines the business rules and principles to be understood as Hitrac's rules of ethical behavior by specifying what Hitrac expects of its suppliers.

Hitrac is proud of its excellent reputation as a responsible and reliable business partner. Maintaining this reputation requires responsible management of our supply chain. For this reason, our suppliers are an integral part of our business strategy.

1 CORPORATE INTEGRITY

1.1 Compliance with laws

Our suppliers are required to comply with all applicable (local) laws and regulations in conducting their business activities.

1.2 Fair Competition

Our suppliers must compete fairly and comply with applicable competition laws and antitrust regulations. We expect our suppliers to:

- do not, to win a supply, resort to using unfair tactics, such as abusing their position within the market or creating cartels to exclude other companies from bidding, including through price-fixing practices;
- do not share with us financial information about our competitors or bids against them and not use, to obtain improper advantages, information obtained in the course of our business relations;
- report any anti-competitive behavior, even if only suspected.

1.3 Fraud Prevention

We expect our suppliers to carry out their activities in a trustworthy and honest manner. Our suppliers shall adopt internal control systems to detect, prevent, and respond to potential fraud and money laundering mechanisms. Any potential fraud potentially impacting Hitrac's business should be reported to us promptly.

1.4 Abstention from corrupt practices or bribes

We expect our suppliers to show zero tolerance for corrupt practices. Our suppliers shall refrain from giving, offering, or authorizing bribes or conducting any form of business practices contrary to ethical principles by avoiding making "facilitation payments." We also expect our suppliers to refrain from offering or accepting gifts and entertainment occasions that (a) are not reasonable and proportionate or (b) are offered to induce a person to perform improperly to secure a business advantage.

1.5 Avoiding Conflicts of Interest

In business dealings with our suppliers, we expect them to make decisions based only on objective criteria. All factors that could influence our suppliers' decisions due to private, corporate, or other conflicts of interest should be avoided from the outset. The same applies to their relatives and other related parties. If a supplier's employee is related to a Hitrac employee and this could represent a potential conflict of interest in a particular transaction or business relationship, our supplier shall disclose this to Hitrac or arrange for the Hitrac employee to do so.

2 RESPONSIBLE WORK ENVIRONMENT

2.1 Health and Safety.

Hitrac actively strives to ensure an accident-free, safe and healthy working environment for all its employees and expects its suppliers to do the same. Hitrac's suppliers shall enforce all applicable health and safety regulations and laws by constantly verifying and supervising compliance by both its personnel and its suppliers and subcontractors.

2.2 Prohibition of child labor or forced labor

We expect our suppliers to comply with applicable child labor laws and regulations and to strictly refrain from hiring minors. Our suppliers' employees shall not work against their will, be transported for exploitative purposes, be involved in slavery or servitude practices, or be deprived of their rights.

2.3 Working hours and payment of wages

Our suppliers shall comply with all applicable legal and regulatory requirements and commit to the principles of the International Labor Organization (ILO). Working hours, wages, and benefits shall be fair and follow laws and industry standards, including those related to minimum wages, overtime, and other legally mandated elements of compensation and benefits.

We expect our suppliers to respect individual rights inherent in freedom of opinion and association, including the right to collective bargaining.

2.5 Equal opportunity and non-discrimination

We expect our suppliers to ensure equal treatment opportunities for workers in the processes governing all stages of the employment relationship (hiring, training, promotions, reorganizations, etc).

Our suppliers shall not engage in or tolerate harassment of any kind based on race, color, religion, sex, sexual orientation, ethnic origin, age, disability, or any other type of hostile, disrespectful, offensive, and/or demeaning behavior.

Our suppliers are committed to promoting in the workplace a culture aimed at valuing diversity and inclusion, including through staff awareness-raising and training actions.

3 QUALITY AND EXCELLENCE IN IMPLEMENTATION

We expect our suppliers to operate in full compliance with applicable contractual requirements by constantly verifying and monitoring their compliance by both their staff and their suppliers; we also expect our suppliers to promote initiatives that contribute to the continuous improvement of production processes and quality performance.

4 ENVIRONMENT

Our suppliers will be expected to comply with all relevant environmental regulations and ensure that they hold all necessary permits.

Our suppliers shall be committed to the efficient use of raw materials, energy, and other natural resources while minimizing waste, emissions, and noise.

5 RELATIONSHIP WITH SUPPLIERS

We expect our suppliers to communicate the business standards outlined in this document to their subcontractors and sub-suppliers and to take these business standards into account when selecting subcontractors and sub-suppliers. We also expect our suppliers to encourage their subcontractors and sub-suppliers to comply with the minimum standards outlined in the Supplier Code regarding the protection of human rights, working conditions, abstention from corrupt practices and the giving of bribes, and sanctions in the performance of their contractual obligations.

6 INTELLECTUAL PROPERTY AND COMMUNICATION

We expect our suppliers to respect all intellectual property rights, including those of Hitrac. They shall also take appropriate measures to prevent the disclosure or any unauthorized use of Hitrac's confidential information made available to them. Our suppliers shall not issue any external communications about their business relationship with Hitrac including press releases about Hitrac without our prior written permission.

Our suppliers shall protect the personal data of Hitrac's employees and customers by using such data only for legitimate and authorized business purposes. Our suppliers shall disclose on what occasions and in what manner they collect, use or share personal data. All personal data shall be processed only under applicable data protection laws and regulations. In case of security breaches, our suppliers shall immediately notify Hitrac under applicable laws and regulations.

7 COMPLIANCE WITH THE CODE FOR SUPPLIERS.

Our suppliers shall enforce and monitor compliance with the principles outlined in the Supplier Code. Hitrac may conduct reasonable audits to verify our suppliers' compliance with the Supplier Code by giving adequate notice.

Failure to comply with the Supplier Code may result in measures that may lead to the termination of the relationship with the supplier.

8 REPORTING AND COMPLAINTS

Constant and constructive dialogue is the basis of the relationship between Hitrac and its suppliers. Any suspected or established violations of the contents of this document should be appropriately reported to Hitrac through:

- Completing the report/complaint form found at the following link: <https://forms.office.com/r/df99GN3aZM> or
- Sending an email to csr@hitrac-engineering.com

Hitrac handles the reports received following the provisions of the company's procedures in such a way as to avoid reporters any form of retaliation, discrimination, or penalization, also ensuring the anonymity of the reporter and the confidentiality of the facts reported by the reporter without prejudice to the legal obligations and the protection of Hitrac's rights.

9 POLICIES

The Supplier undertakes to observe, in addition to the applicable laws and regulations, the rules and provisions contained in the Hitrac documents listed below and available on the company's website at the following address: www.hitrac-engineering.com

- **Organizational Model 231**
- **Code of Ethics**
- **Quality, Environment, and Safety Policy**
- **SA8000 Policy**
- **Diversity & Inclusion Policy**

ACCEPTANCE OF THE CODE OF CONDUCT

We agree to comply with the business standards and principles outlined in this Supplier Code.

Business Name

Full Name

Job title/Company function

Date

Stamp and signature